

D	Disclosure and Transparency	Source Document/ Location of Information	Yes / No	Point	REMARKS
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D.1 Transparent ownership structure

D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	<p>Annual Report</p> <p>Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html</p> <p>Investor Information ACE Limited Annual Report 2012 (pdf file) Item No. 8 Significant Shareholders, page S-12 http://www.acegroup.com/Investor-Information/Investor-Information.html</p>	Y	1	
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?	<p>Annual Report</p> <p>Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html</p> <p>Investor Information ACE Limited Annual Report 2012 (pdf file) Item No. 8 Significant Shareholders, page S-12 http://www.acegroup.com/Investor-Information/Investor-Information.html</p>	Y	1	
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?	<p>Annual Report</p> <p>Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html</p> <p>Investor Information ACE Limited Annual Report 2012 (pdf file) Item No. 7 Common Share Ownership of the Board of Directors and Group Executives, page S-11 http://www.acegroup.com/Investor-Information/Investor-Information.html</p>	Y	1	

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D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?	Annual Report Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information ACE Limited Annual Report 2012 (pdf file) Item No. 7 Common Share Ownership of the Board of Directors and Group Executives, page S-12 http://www.acegroup.com/Investor-Information/Investor-Information.html	Y	1	
D.1.5	Does the company disclose details of the subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?	Annual Report Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information ACE Limited Annual Report 2012 (pdf file) Business Segment Overview, Products & Distribution Around the World, pages 13-17 http://www.acegroup.com/Investor-Information/Investor-Information.html	Y	1	
D.2 Quality of Annual Report					
	Does the company's annual report disclose the following items:				
D.2.1	Key risks	Annual Report Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information ACE Limited Annual Report 2012 (pdf file) Enterprise Risk Management ITEM 1A. Risk Factors (pages 19-31)	Y	1	

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D.2.2	Corporate objectives	Annual Report Source: 2012 Annual Report; Letter to the Shareholders of Evan G. Greenberg, Chairman & CEO "To My Fellow ACE Shareholders" pages 3-11 http://www.acegroup.com/Investor-Information/Investor-Information.html	Y	1	
D.2.3	Financial performance indicators	Annual Report Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information <ul style="list-style-type: none"> • ACE Limited Annual Report 2012 (pdf file) <ul style="list-style-type: none"> o Financial Summary (page 2) o Financial Highlights for the Year Ended December 31, 2012 (page 41) 	Y	1	
D.2.4	Non-financial performance indicators	Annual Report 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information <ul style="list-style-type: none"> • ACE Limited Annual Report 2012 (pdf file) <ul style="list-style-type: none"> o Message of Chairman to ACE Shareholders (pages 3-11) Business Segment Overview (pages 13-17) 	Y	1	
D.2.5	Dividend policy	Annual Report Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information	Y	1	
D.2.6	Details of whistle-blowing policy	Company Website Source: http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=irol-govhighlights Corporate Governance Highlights <ul style="list-style-type: none"> • Governance Documents: <ul style="list-style-type: none"> Integrity First – ACE Code of Conduct 	Y	1	

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D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners	<p>Annual Report</p> <p>Source: 2012 Annual Report</p> <p>http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information</p> <ul style="list-style-type: none"> • ACE Limited Annual Report 2012 (pdf file) o ACE Limited Board of Directors (page 18) – Other directorships of listed companies <p>2013 ACE Proxy Statement, page 10</p>	Y	1	
D.2.8	Training and/or continuing education programme attended by each director/commissioner		N	0	
D.2.9	Number of board of directors/commissioners meetings held during the year	<p>Annual Report</p> <p>2012 Annual Report</p> <p>http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information</p> <ul style="list-style-type: none"> • ACE Limited Annual Report 2012 (pdf file) Risk assessment and management (pages S-12 – S-13) 	Y	1	
D.2.10	Attendance details of each director/commissioner in respect of meetings held	<p>Annual Report</p> <p>Source: 2013 ACE Proxy Statement, page 44 "The Board of Directors" (at least 75% by each director)</p> <p>http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy</p>	Y	1	
D.2.11	Details of remuneration of the CEO and each member of the board of directors/commissioners	<p>Annual Report</p> <p>Source: 2012 Annual Report</p> <p>http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information</p> <ul style="list-style-type: none"> • ACE Limited Annual Report 2012 (pdf file) Remuneration of the Board of Directors and the Group Executives (pages S-8 – S-12) 	Y	1	

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	Corporate Governance Confirmation Statement				
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	Annual Report Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information <ul style="list-style-type: none"> • ACE Limited Annual Report 2012 (pdf file) o Directors, Executive Officers and Corporate Governance (page 108) o CEO and CFO Certifications (page 20) 	Y	1	

D.3. Disclosure of related party transactions (RPT)

D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	Annual Report Source: 2013 ACE Proxy Statement, pages 50-51 "What is our RPTs Approval Policy and What Procedures Do We Use to Implement It?" http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	Annual Report Source: 2013 ACE Proxy Statement, pages 51-53 "What is our RPTs Approval Policy and What Procedures Do We Use to Implement It?" http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
D.3.3	Does the company disclose the nature and value for each material/significant RPT?	Annual Report Source: 2013 ACE Proxy Statement, pages 51-53 "What is our RPTs Approval Policy and What Procedures Do We Use to Implement It?" http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	

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D.4 Directors and commissioners dealings in shares of the company					
D.4.1	Does the company disclose trading in the company's shares by insiders?	Source: Investor Information; SEC - Section 16 Filings; All Forms 4s http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=irol-sec&control_selectgroup=3,4,5	Y	1	
D.5 External auditor and Auditor Report					
D.5.1	Are audit fees disclosed?	Annual Report Source: 2013 ACE Proxy Statement, Agenda Item No. 6 - Election of Auditors, page 23 http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
	Where the same audit firm is engaged for both audit and non-audit services,				
D.5.2	Are the non-audit fees disclosed?	Annual Report Source: 2013 ACE Proxy Statement, Agenda Item No. 6 - Election of Auditors, page 23 http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy	Y	1	
D.5.3	Does the non-audit fees exceed the audit fees?		N	1	

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D.6 Medium of communications					
	Does the company use the following modes of communication?				
D.6.1	Quarterly reporting	Announcement / Company website Source: Company website; Investor Information; SEC - Section 16 Filings; All Forms 10-Q and 10-K http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information: Upcoming Events	Y	1	
D.6.2	Company website	Company website Source: Company website http://www.acegroup.com/ www.aceinsurance.com.ph	Y	1	
D.6.3	Analyst's briefing	Annual Report / Announcement / Company website Source: Company website; Investor Information - Analyst Coverage http://investors.acegroup.com/phoenix.zhtml?c=100907&p=irol-analysts#STS=g76fymuo.1fbo Analysts Coverage	Y	1	
D.6.4	Media briefings /press conferences	Annual Report / Announcement / Company website Source: Company website http://www.acegroup.com/Media-Center/Media-Center.html Media Center	Y	1	

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D.7 Timely filing/release of annual/financial reports

D.7.1	Is the audited annual financial report released within 120 days from the financial year end?	Announcement	N	0	
D.7.2	Is the audited annual financial report released within 90 days from the financial year end?	Announcement	N	0	
D.7.3	Is the audited annual/financial report released within 60 days from the financial year end?	Announcement Source: Within 60 days Investor Information; SEC - Section 16 Filings; All Forms 10-K http://www.acegroup.com/Investor-Information/Investor-Information.html	Y	1	
D.7.4	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	Annual Report Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information • ACE Limited Annual Report 2012 (pdf file) SIGNATURES (page 117-118) MANAGEMENT'S RESPONSIBILITY FOR FINANCIAL STATEMENTS AND INTERNAL CONTROL OVER FINANCIAL REPORTING (page F-3)	Y	1	

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D.8 Company website					
	Does the company have a website disclosing up-to-date information on the following:				
D.8.1	Business operations	Company website Source: ACE News http://www.acegroup.com/	Y	1	
D.8.2	Financial statements/reports (current and prior years)	Company website Source: Investor Information Archives http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information <ul style="list-style-type: none"> • ACE Limited Annual Report 2012 (pdf file) • Latest Earnings • Financial Supplement http://investors.acegroup.com/phoenix.zhtml?c=100907&p=irol-reportsannual#STS=g76ftr6z.19zv Financial Reports	Y	1	
D.8.3	Materials provided in briefings to analysts and media	Company website Source: http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information <ul style="list-style-type: none"> • Latest Earnings • Press Release • Financial Supplement http://investors.acegroup.com/phoenix.zhtml?c=100907&p=irol-reportsannual#STS=g76ftr6z.19zv Financial Reports	Y	1	
D.8.4	Shareholding structure	Company website	N	0	

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D.8.5	Group corporate structure	Company website Source: http://www.acegroup.com/About-ACE/About-ACE.html About ACE • Business Structure	Y	1	
D.8.6	Downloadable annual report	Company website Source: 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information • ACE Limited Annual Report 2012 (pdf file)	Y	1	
D.8.7	Notice of AGM and/or EGM	Company website Source: http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information • Upcoming Events http://investors.acegroup.com/phoenix.zhtml?c=100907&p=irol-calendar#STS=g76g3l7n.wu5 Calendar of Events http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=proxy Annual Meeting Materials • Invitation	Y	1	

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D.8.8	Company's constitution (company's by-laws, memorandum and articles of association)	Company website Source: http://proxy.acegroup.com/phoenix.zhtml?c=100907&p=irol-govhighlights Corporate Governance Highlights • Governance Documents: • Articles of Association of ACE Limited • Organizational Regulations of ACE Limited	Y	1	
D.8.9	All of the above (D.8.1 to D.8.8) are available in English	Company website Source: http://www.acegroup.com/Investor-Information/Investor-Information.html	Y	1	

D.9 Investor relations

D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer responsible for investor relations?	Annual Report / Company website Source: http://www.acegroup.com/Contact-ACE/Contact-Investor-Relations.html Contact Investor Relation 2012 Annual Report http://www.acegroup.com/Investor-Information/Investor-Information.html Investor Information • ACE Limited Annual Report 2012 (pdf file) Shareholder Information • Address Investor Relations Inquiries to (page 20)	Y	1	
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