

Policy: Non-Solicitation and Non-Distribution (U.S.)

REVISION DATE: APRIL 17, 2015

The company maintains this Non-Solicitation and Non-Distribution policy because solicitation and distribution in the workplace can interfere with normal operations, impair efficiency and create distractions or uncomfortable pressure for customers and/or employees.

Non-Employees

On company property, including that under company ownership, administration, control, company-owned parking lots, and leased parking lots where the company has an exclusive right of use, non-employees are prohibited from:

- Soliciting funds or signatures
- Conducting membership drives
- Distributing literature or gifts
- Offering to sell merchandise or services (except by representatives of suppliers properly approved by the company)
- Engaging in any other solicitation, distribution – or similar activities – or any other activities not expressly authorized by management

Vendors, agents, clients, customers and guests must conform their behavior to generally applicable rules regarding conduct when on company property.

Employees

During working time (of either the employee soliciting or the individual being solicited), employees cannot “solicit” other employees or individuals working for Travelers, such as temporary employees, contractors or other non-permanent employees (collectively “co-workers”). “Soliciting” includes things like asking employees or co-workers to join organizations or pools, to buy memberships or subscriptions, or to make pledges or gifts to charities. “Working time” is the time employees or co-workers are expected to be working and does not include rest, meal, other authorized breaks (whether paid or unpaid), or any other time when an employee or co-worker is not expected to be engaged in work activities. This policy also applies to solicitation by electronic means. Company communication systems, including, but not limited to, computer, voicemail and email, should not be used for solicitations which are not authorized by this policy.

In addition, employees must refrain from distributing literature during working time or in work areas at any time. “Work areas” include any location where work is typically conducted, including conference rooms, copy rooms, etc. Restrooms and break rooms are considered non-work areas.

The company may authorize a limited number of fund drives during work time or in work areas sponsored by employees on behalf of approved charitable organizations whose missions are aligned with the company’s business initiatives. These events must be approved by local site management in the field and home office, in addition to Community Relations and Employee Relations. If the event involves any type of raffle, gambling or other games of chance, it also must be approved by the Chief Compliance Officer given the state and federal regulation of such activities.

Bulletin Boards

The company maintains bulletin boards to communicate company information and to post legally required notices. Only persons designated by the Executive Vice President of Human Resources may place or remove material.

On company bulletin boards, walls, windows, doors, equipment or other property, employees may not post:



- Notices
- Items or services for sale
- Photographs
- Other printed or written materials

Violations of this policy may result in disciplinary action, up to and including termination of employment.

Contact the Employee Services Unit (ESU) via [AskESU](#) or 800.441.4378 with questions about this policy.