



# Policy: Whistleblowing and Non-Retaliation (U.S.)

LAST REVISED: APRIL 1, 2022

---

Travelers is committed to compliance with the laws, rules and regulations which govern its business operations and to maintaining a productive and respectful workplace that is free from retaliation. This policy applies to all employees, temporary employees, customers, vendors, contractors and guests whenever or wherever work-related functions take place. Our position on whistleblowing and retaliation is consistent with our efforts to prevent harassment and discrimination, promote diversity, and comply with federal, state and local law.

In addition to complaints of discrimination and/or harassment, we encourage employees to report good faith concerns about any conduct they believe to be unlawful, fraudulent or unethical, whether that conduct is occurring within the company or otherwise involves one of our customers, vendors, contractors, guests or any other party having a business relationship with our company. Examples of fraudulent activity that should be immediately reported include, but are not limited to:

- Intentional manipulation of company procurement procedures for personal gain;
- Bribery;
- Theft or embezzlement of company resources;
- Creation of false financial statements in formal reports or otherwise;
- Creation of false contracts;
- Misuse of company resources for personal benefit;
- Expense fraud;
- Association with third parties in a manner that creates a conflict of interest;
- Disclosure, destruction or theft of company confidential and proprietary information;
- Presentation or creation of false claims for government payment;
- Creation of a false record or statement in support of a fraudulent claim for government payment; and
- Other violations of the company Code of Business Conduct and Ethics.

## Retaliation Prohibited

Travelers will not tolerate harassment, retaliation or reprisals of any kind against any employee who has, in good faith, protested or raised a complaint with respect to a policy or practice of our company or any of its employees. In particular, we prohibit any form of unlawful discrimination or retaliation or taking any adverse action against any employee for engaging in the following conduct:

- The employee, in good faith, reports conduct they reasonably believe is a violation of federal, state or local law, including, without limitation, employment discrimination and/or harassment (see the [Harassment-Free Workplace policy](#)) or a violation of federal securities or anti-fraud laws.
- The employee opposes a practice the employee reasonably believes to be in violation of federal, state or local law (including, without limitation, employment discrimination and/or harassment or a violation of federal securities or anti-fraud laws) or because of the employee's participation in an investigation, proceeding or hearing related to a potential violation of federal, state or local law.
  - For purposes of this policy, examples of an employee opposing a practice include, but are not limited to: (i) complaining or protesting about alleged discrimination or harassment and/or other employment conditions to a manager or Human Resources generalist; (ii) threatening to file a complaint with a government agency; (iii) complaining on behalf of another employee; or (iv) having a complaint made on the employee's behalf by a representative.

Opposition expressed in a manner that disrupts the workplace, or that constitutes an unlawful activity, or threatens employees or managers is not protected.



- The employee engages in any form of participation in conjunction with the reporting or investigation of a good faith concern.
  - For purposes of this policy, participation includes, but is not limited to: (i) filing an administrative charge of discrimination or otherwise reporting possible violations of law to any government entity; (ii) testifying, assisting or participating in any manner in an investigation, proceeding, hearing or litigation under federal, state or local employment law or federal securities or anti-fraud laws, including making disclosures that are protected under the whistleblower provisions of federal, state or local law.

Travelers also prohibits retaliation against someone closely related to the employee exercising such rights as outlined above.

Any employee who unlawfully discriminates or retaliates against another employee as a result of their protected actions as described in this policy may be subject to disciplinary action, up to and including termination of employment.

### **Responsibilities**

All employees and managers are responsible for complying with this policy by maintaining and supporting a work environment that is free from retaliation. Toward that end, any employee who believes that they have become aware of an incident of retaliation, whether by witnessing the incident, being told of it or experiencing it personally, must follow the guidelines set forth below.

### **Guidelines for Submitting Complaints**

Employees have our support when reporting good faith complaints, concerns or information regarding potentially unethical, fraudulent or illegal conduct or misconduct, including any incidents of retaliation. Employees should submit these reports using the procedure set forth below.

The employee must report the situation immediately by: (i) notifying their direct manager, another member of management, including senior management, their Human Resources generalist; or (ii) calling Employee Relations at 860.277.7246 or via the Ethics Helpline at 866.782.1441. In reporting situations via the Ethics Helpline, the reporter will be given the opportunity to submit the report anonymously. Similarly, managers who witness or receive information that suggests a violation of this policy (e.g., receiving inquiries or complaints or otherwise witnessing misconduct) must immediately report the matter to their Human Resources generalist or Employee Relations at 860.277.7246.

When submitting a complaint, employees should provide as much detailed information as possible, including the background and history of the concern, names, dates and places where possible, and the reasons why the situation is reason for concern. This is particularly important where an employee submits a complaint on an anonymous basis, as the company will be unable to contact the reporting employee with requests for additional information or clarification.

Please understand as well that our company does not prohibit employees from electing to report concerns, making lawful disclosures or communicating with any governmental authority about conduct that the employee believes violates laws or regulations.

Travelers is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances and taking appropriate remedial and concluding steps, as warranted. All action taken by our company in response to a concern will depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Please understand that an investigation into concerns raised is not an indication that the concerns have either been confirmed or rejected. Our company complies with all laws in conducting investigations, and we expect that employees will cooperate with and provide truthful information to facilitate an effective investigation.



On occasion, individuals may desire a degree of confidentiality regarding an issue they wish to raise. Travelers will balance this desire for confidentiality with our responsibilities to our customers, employees and shareholders as well as its legal and regulatory obligations. How confidentiality is addressed in any individual case will be based on this balance, but Travelers cannot always ensure complete confidentiality. Information may be disclosed to those at Travelers who have a need to know the information, such as people who may investigate or resolve the concern or those who have relevant information regarding those concerns. As a result, complete confidentiality cannot be guaranteed with respect to an individual's use of any of the communication channels available at Travelers.

All conversations, calls and reports made in good faith under this policy will be taken seriously. However, employees who file reports or provide evidence that they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by this policy and may be subject to disciplinary action, up to and including termination of employment.

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.