



Modern slavery statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Jelf Insurance Brokers Ltd t/a Marsh Commercial, its subsidiaries and associate companies slavery and human trafficking statement in respect of the financial year ending 31 December 2018.

Group Structure

The Company is part of the Marsh & McLennan Companies, Inc. ("MMC") group which is a global professional services firm offering clients advice and solutions in risk, strategy and people. The MMC group has approximately 65,000 employees worldwide and approximately 9,600 employees in the United Kingdom.

Our Business

MMC's main operating companies are Marsh and Marsh Commercial (insurance broking and risk management), Guy Carpenter, (reinsurance and intermediary advisory services), Mercer, (talent, health, retirement and investment consulting) and Oliver Wyman (management, economic and brand strategy consulting).

Our Supply Chain

The Company uses a central procurement process operated by MMC which trades with in excess of 60,000 suppliers across over 82 different countries. As professional services providers, the Company does not operate in an industry where modern slavery is prevalent but nevertheless is committed to taking steps to uncover any potential risks within its supply chain.

Our Policies

Marsh has various policies in place which aim to minimise the risk of modern slavery or human trafficking, and encourage reporting of any related concerns, including:

- **A robust procurement policy,**

In addition to the rigorous supplier assessment processes, the Company implemented an [additional questionnaire](#) focused on modern slavery activities/signals. The questionnaire is deployed on a risk basis, according to the nature of services provided. The Board reviews the level of responses received.

Suppliers are required to report what steps they are taking regarding identifying the risk of modern slavery within their particular supply chain which will allow the Company to better assess the potential risks of modern slavery in its own supply chain.

The Company includes a specific requirement for compliance with modern slavery legislation in its standard terms and conditions and contracting agreements.

- **Vendor management program**

and policy defining managing Vendor Risk, including:

- How to identify vendor risk
- How to mitigate vendor risk

- How to monitor vendor risk
- Who to contact for assistance

- **The Greater Good,** Marsh & McLennan Companies' [Code of Conduct](#), is a significant part of Marsh's culture and makes clear that Marsh conducts business consistent with the highest ethical and professional standards and will not tolerate behavior that deviates from those standards. Colleagues are expected to act with integrity, honesty, courage and promote mutual respect.

- **Whistleblowing policy** Respect and a culture of openness in the workplace is a key aspect of the MMC Code of Conduct. Marsh encourages colleagues and other business partners to report any concerns, including any concerns relating to modern slavery or human trafficking.

The Company's whistle-blowing procedure, utilises an Ethics & Compliance Line (a service administered by third party) which makes reporting easy and confidential.

Training

The Company's [Modern Slavery Policy](#) has been rolled out to all staff, and incorporated into induction training. It includes information on who staff should contact should they have any concerns.

There is additional training for those staff most likely to interact with supply chains with a potentially higher risk of encountering modern slavery.

Company staff are encouraged to report any concerns or suspicions regarding the presence of modern slavery within the supply chain.

Going forward

Marsh recognises that tackling modern slavery requires a continuing year-on-year commitment and will continue to undertake due diligence in our supply chain and review and improve procedures to help identify and prevent the risks of modern slavery or human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of the Company on 8 May 2019.

J V Barker
Chairman

Jelf Insurance Brokers Ltd t/a Marsh Commercial

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