

## **MODERN SLAVERY POLICY**

### **1. APPLICATION AND BACKGROUND**

This policy applies to operating companies of Marsh & McLennan Companies, Inc. located in the United Kingdom (collectively the "Company") and their operations in the United Kingdom and to all persons who work for or on behalf of the Company in respect of such operations.

This policy reflects the Company's obligations under the Modern Slavery Act 2015 and the Company's commitment more generally to avoid any form of modern slavery or human trafficking within its operations or its supply chain. The Company has a longstanding commitment to conducting business in a responsible way and in accordance with its Code of Conduct, *'The Greater Good'*.

### **2. WHAT IS MODERN SLAVERY?**

Modern slavery includes:

1. Slavery – the behaviour on the part of the offender as if they owned the victim, depriving the victim of their freedom;
2. Forced or compulsory labour – work or service of a victim which involves coercion, either direct threats or violence or more subtle forms of compulsion. Work or service is extracted from the victim under the menace of any penalty and for which the victim has not offered themselves voluntarily; and
3. Human trafficking – arrangements for the travel of the victim with a view to them being exploited.

It is important to recognise that modern slavery is prevalent throughout the world and whilst less common, exists in the United Kingdom and other developed countries.

### **3. RESPONSE TO MODERN SLAVERY**

The Company will not tolerate any form of modern slavery within its own operations or within its supply chains.

You should notify your line manager or HR business partner as soon as possible if you have any concerns, issues or suspicions about modern slavery in any parts of the business or its supply chains.

The processes in relation to the Company's suppliers are set out below.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Company's business or its supply chains.

### **4. MODERN SLAVERY AND THE MMC SUPPLY CHAIN**

The Company deploys rigorous existing processes to assess and validate its vendors prior to making either a purchase from or a payment to a vendor. These checks are required of all vendors before the vendor can be added to the Company's systems to allow payment to the vendor.

In addition to these checks the Company deploys the following measures to ensure compliance to the Modern Slavery Act with our vendors:

- 1) To augment its sourcing and procurement process, the Company's standard purchase terms and conditions and other vendor agreements contain a specific requirement for its suppliers to comply with modern slavery legislation.

- 2) On an annual basis the MMC Global Sourcing and Procurement organisation issue a Modern Slavery Supplier questionnaire to selected suppliers. The selection of the suppliers is risk focused and, where selected, requires suppliers to report on what steps they are taking regarding the risk of modern slavery within their own supply chain which will allow the Company to better assess potential risks of modern slavery in its supply chain.

### **The Modern Slavery Supplier Questionnaire**

Suppliers targeted for receiving the questionnaire have been assessed annually on the basis of their exposure to potential risk with regards to compliance with the Modern Slavery Act (2015).

Criteria for this risk potential will include, as a minimum:

- a. Annual Spend with the vendor;
- b. Category(ies) of spend that the vendor provides to the Company; and
- c. Country of operation of business.

### **Non-Conforming Suppliers**

Global Sourcing and Procurement check responses in the first instance; if any are deemed not fully compliant they are referred initially to the MMC Global Vendor Risk Manager, who works with the business contact and local compliance organisation to evaluate risk, consider further requests for information and determine appropriate action. The HR business partner will be involved in any case where there is considered to be a significant risk of modern slavery involving a supplier.

### **Additional steps for suppliers**

In accordance with section 3, all Company staff interacting with a supplier should remain vigilant as to any potential indicators of modern slavery, including in any visits to suppliers, and report these as appropriate. Where suppliers are considered to be at a higher potential risk for modern slavery it may be appropriate for staff to raise this with the Head of the Vendor Risk Team

<https://colleagueconnect.mmc.com/en-us/services/Pages/VendorManagement.aspx>

or their line manager so that consideration can be given to whether any further specific steps for monitoring risks are appropriate.

#### **5. INFORMATION AND TRAINING**

This policy has been distributed and communicated to all UK Company staff and all staff are expected to read this policy closely.

In addition, the Company has arranged training for those staff most likely to interact with suppliers with a potentially higher risk of modern slavery.

#### **6. RESPONSIBILITY FOR THIS POLICY**

The HR department has primary responsibility for monitoring the implementation of this policy, dealing with any queries about it and assessing its effectiveness.

#### **7. WHEN MMC IS THE SUPPLIER OF SERVICES**

If you receive a supplier questionnaire related to modern slavery please contact, in the first instance, Global Sourcing & Procurement.

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