

# Modern Slavery Policy

## Marsh McLennan Pacific Region

October 2021

This Policy operates in Australia, New Zealand, Fiji and Papua New Guinea and covers all of the entities owned and controlled by MMC Holdings (Australia) Pty Ltd in these countries, including the following businesses: Marsh, Mercer, Guy Carpenter and Oliver Wyman (“Marsh McLennan Pacific”). It complements Marsh McLennan’s code of conduct, The Greater Good, which sets out the standards we expect of our colleagues and business partners.

### What is Modern Slavery?

Modern slavery can occur in various forms, including the following types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

### Our Modern Slavery Policy

We respect fundamental human rights and are committed to conducting our activities fairly, honestly and with integrity, in accordance with the applicable laws. We do not tolerate modern slavery in any part of our business, including our investments, or in the business of our suppliers, and are taking active steps to identify and address modern slavery risks that may exist.

This policy supports our key values in The Greater Good, including building trust with our clients and suppliers, and our commitment to competing ethically.

### Our modern slavery program

Marsh McLennan Pacific’s Modern Slavery Program is led by a cross-functional group with members from Legal, Risk, Compliance, Procurement, Operations, Investment and Consulting teams across our businesses.

The Modern Slavery Group reports into Senior Management, Risk Committees and Boards as appropriate.

The Marsh McLennan Pacific’s modern slavery program includes policy development and enhancement, training, supplier and investments-related risk assessment and engagement and industry engagement.

### How do we identify modern slavery risks?

Risk assessment is a key part of our modern slavery program. The following principles underpin our approach to assessing and addressing risk:

- Identifying risk through due diligence based on relevant risk profiles and operating environments (spanning operations, supply chain and investment activities);
- Implementing measures that are fit for purpose and adequate for addressing risk in particular organisational contexts;
- Balanced measures taking into account the capacity of Marsh McLennan Pacific and its suppliers to implement actions; and
- Reviewing existing processes to ensure specific actions are incorporated into those processes moving forward.

### Colleague expectations

All colleagues working for Marsh McLennan Pacific are responsible for the prevention, detection and reporting of modern slavery in any part of our business, supply chains or investments. In line with our values and obligations as part of The Greater Good, colleagues must:

- Exercise good professional and ethical judgment when performing their duties;
- Avoid engaging in any activity which might lead to a breach of this Policy;

**About Marsh McLennan:** Marsh & McLennan Companies Inc. (NYSE: MMC) is the world’s leading professional services firm in the areas of risk, strategy and people. The Company’s 76,000 colleagues advise clients in over 130 countries.

With annual revenue of \$17 billion, Marsh McLennan helps clients navigate an increasingly dynamic and complex environment through four market-leading businesses. Marsh advises individual and commercial clients of all sizes on insurance broking and innovative risk management solutions. Guy Carpenter develops advanced risk, reinsurance and capital strategies that help clients grow profitably and pursue emerging opportunities. Mercer delivers advice and solutions to help organizations reshape work, retirement, investment and health outcomes for a changing workforce. Oliver Wyman serves as a critical strategic, economic and brand advisor to private sector and governmental clients.

## Modern Slavery Policy

### Marsh McLennan Pacific Region

- Treat any concern about modern slavery with respect and appropriate levels of sensitivity;
- Raise any concerns of modern slavery through the channels below.

#### **How can you raise modern slavery concerns?**

For colleagues working at Marsh McLennan in the Pacific, if you believe or suspect that modern slavery may be occurring, you must notify your manager as soon as possible, or report the matter to Risk and Compliance at [ethicscomplianceline.com](https://ethicscomplianceline.com) or via reverse charge call:

Australia: 1-800-98-8007

New Zealand: 0800-58-3303

Fiji & Papua New Guinea: 1-704-540-2299.

If you are unsure whether a particular activity, the treatment of workers, or their working conditions may constitute modern slavery, you should not hesitate to raise the matter so that it can be investigated.

We encourage openness. We will not tolerate retaliation against any colleague who raises a concern in good faith as a result of reporting their suspicion that modern slavery may be taking place in our business or supply chains.

Members of the public or people not employed by Marsh McLennan in the Pacific should also contact us to raise any concern or suspicion of modern slavery in any part of our business or supply chain through our Ethics and Compliance Line: [ethicscomplianceline.com](https://ethicscomplianceline.com) or on the phone numbers listed above.

#### **How do we enforce the Policy?**

If an issue is identified in the business of our suppliers, we will work with them to prepare a corrective action plan and resolve the matter as soon as practicable.

Any incidents or allegations and any subsequent remediation are managed on a case-by-case basis.

We reserve the right to terminate our commercial relationships with any business partner if they are found to be involved in modern slavery.

Any colleague who breaches their obligations under this Policy, including by engaging in retaliation against any person who raises concerns about modern slavery risk, will face investigation and possible disciplinary action, which could include termination of employment.

#### **How do we raise awareness of this Policy?**

A copy of this Policy is available on various websites and on our internal intranet for colleagues.

General awareness training is being provided to colleagues.

Those colleagues closely involved in recruitment and procurement are trained in this Policy.

Our approach to modern slavery will also be communicated to all of our suppliers and reinforced as appropriate thereafter.

#### **Who is responsible for the Policy?**

The Marsh and Mercer Company Secretaries and Chief Legal Counsel for the Pacific region sponsor the modern slavery group and are involved in reporting activity to Senior Management as relevant.

Responsibility for this Policy rests ultimately with the Board of Directors of MMC Holdings (Australia) Pty Ltd. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.