

# MODERN SLAVERY STATEMENT 2022



# A MESSAGE FROM OUR CEO, MARSH McLENNAN PACIFIC

At Marsh McLennan, everything we do is driven by our purpose to make a difference in the moments that matter.

One way we can do this is through our commitment to advancing good, and conducting business in a way that contributes to sustainable outcomes, by upholding a code of conduct that is ethical, responsible, and builds trust with our clients, communities, colleagues and other stakeholders including our suppliers.

We know from the recently updated Global Slavery Index<sup>[1]</sup> that an estimated 50 million people were living in modern slavery on any given day in 2021, an increase of 10 million people since 2016. In our third annual Modern Slavery Statement, we are pleased to provide an update on our efforts to help reduce and manage the risk of modern slavery across our operations and supply chains.

Through our Modern Slavery Program, we have focused on further integrating core modern slavery risk management into our processes and practices, while also enhancing how we address higher risk areas identified through our risk assessments.

Over the past year, our Modern Slavery Working Group has supported our colleagues and businesses in further embracing and activating our Modern Slavery Program. These key activities included:

- Continuing to educate our employees on the issue of modern slavery, with 86% of Pacific Region colleagues completing our Modern Slavery training module between 2020 and 2022.
- Progressing internal escalation procedures.
- Assessing the risks of modern slavery potentially arising from the provision of services by the Global Services Division (GSD) team located in India, to certain entities in the Pacific Region.

- Continuing, and enhancing some aspects of, our modern slavery due diligence processes and engagement across operations and high-risk supply chains, including investment activities where relevant.
- Updating and conducting portfolio holdings assessment for potential modern slavery risk within the Mercer Investment funds, and conducting an engagement survey of all appointed investment managers globally; this included a section dedicated to human rights and modern slavery.
- Conducting follow-up engagements with prioritised investment managers based on the results of portfolio risk assessment and manager surveys, to encourage ongoing improvement.
- Upholding transparency by publishing our sustainable investment report, which included findings from modern slavery portfolio monitoring and related manager surveys, and internal reporting on modern slavery activities.

Doing our part to end modern slavery is a continuation of the commitments Marsh McLennan makes within our code of conduct, The Greater Good, where we have one standard of conduct worldwide: to earn trust by doing the right thing for our colleagues, for our clients and for the betterment of the larger society around us.

We encourage you to read and refer to this Statement to understand how, in playing our part to end modern slavery, we have put these commitments into practice.

**David Bryant**

CEO, Marsh  
McLennan Pacific



<sup>[1]</sup> The Global Slavery Index, produced by human rights group Walk Free: <https://www.walkfree.org/global-slavery-index/>

# 1 REPORTING ENTITIES

This joint Modern Slavery Statement (“**Statement**”) is made by MMC Holdings (Australia) Pty Ltd, on behalf of the reporting entities (the “**Reporting Entities**”) outlined in **Appendix One**. This Statement outlines the actions taken to assess and address modern slavery risk in their businesses and supply chains, including investment activities, over the period 1 January 2022 to 31 December 2022 (the “**Reporting Period**”). References to “we” or “our” are to the Reporting Entities and their owned or controlled entities unless otherwise stated.

There are a number of sister and subsidiary companies (including Guy Carpenter and Oliver Wyman) that are owned and controlled by the Reporting Entities, but which are not themselves Reporting Entities. All of the Reporting Entities are Australian entities, but the Reporting Entities own and control entities in New Zealand, Fiji and Papua New Guinea. A reference to the “**Marsh McLennan Pacific Region**” in this Statement is a reference to Australia, New Zealand, Fiji and Papua New Guinea (PNG). Marsh McLennan Pacific Region provides services through a number of appropriately licensed entities.



# 2 OPERATIONS, STRUCTURE AND SUPPLY CHAINS

## 2.1 Operations

### 1) Our people and locations

The Marsh McLennan group of companies is the world’s leading professional services firm in the areas of risk, strategy and people. Globally, our around 85,000 colleagues advise clients in more than 130 countries, helping them navigate an increasingly dynamic and complex environment through four market-leading businesses.

The majority of our roles are performed by highly skilled, often tertiary-educated staff. Background checks are conducted for all new employees. The extent of the checks conducted can vary depending on local procedures and relevant roles. Types of checks may include a combination of: criminal checks, working rights, financial stability, education, previous employment and global sanctions.

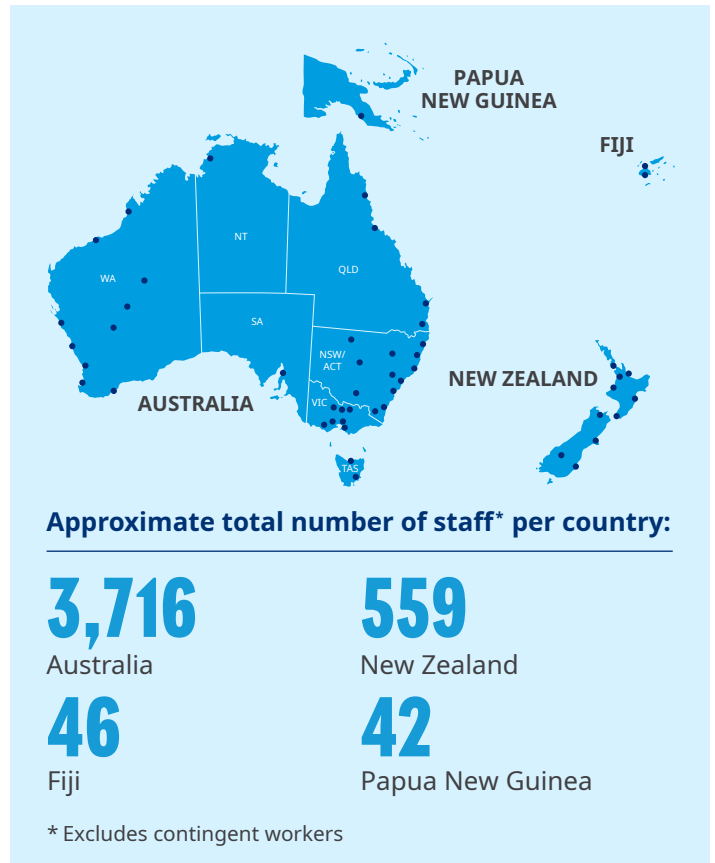
All our staff are remunerated in line with relevant awards and requirements, most well above minimum wage. The majority of our staff are employed on full- or part-time contracts. We pride ourselves on being a flexible employer and approximately 11% of our staff are on part-time contracts. We make use of fixed-term contracts and freelance contractors to help meet client needs in key business projects, and approximately 16% of our staff are contract workers. We also use third-party recruitment and labour agencies to support our staffing arrangements. Given the highly specialised nature of much of our work, especially in our consulting businesses, most of these workers are skilled professional specialists. We do not use labour hire companies for manual labour nor low-skilled work.

### 2) Shared corporate functions

Our businesses and colleagues are supported by various global and local corporate functions and shared services including People and Culture/Human Resources, Training and Talent Development, IT/Operations, Legal, Compliance and Public Affairs, Global Sourcing and Procurement (GSP), Company Secretariat, Marketing/Communications, Audit and Finance.

Many of these corporate functions are provided by local staff, directly employed within the Pacific Region’s businesses, supporting their own entity and group entities but with access to the global network. The internal Legal, Compliance and Public Affairs teams for Marsh and Mercer teams are examples of this, as are the local members of the GSP team.

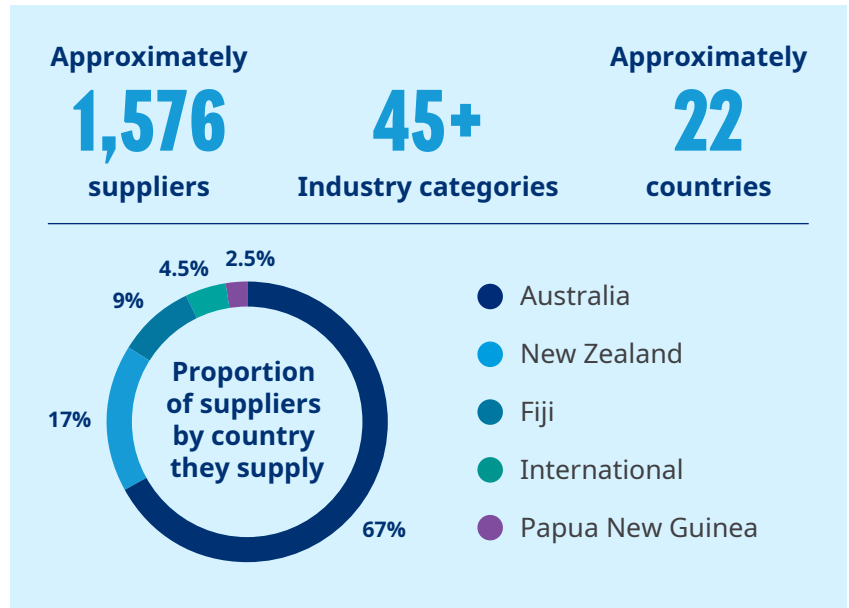
In some cases these shared services are provided by global group companies that are not owned nor controlled by the Reporting Entities. These services and entities do not fall neatly into either ‘operations’ nor ‘supply chain’, but we describe these services throughout the report in relation to our ‘operations’ because they are part of the global Marsh McLennan group and fall within group policies and procedures, not within the policies and procedures of our vendors through the GSP team and systems.



## 2.2 Supply chains

GSP is the shared service business unit that supports all our businesses globally. As such, centralised sourcing and procurement policies, processes and systems apply to the Reporting Entities as covered in this Statement. This includes supplier onboarding and contracting, monitoring and payment, and supplier database management.

Approximately 1,576 suppliers were used by the Australia, New Zealand, Fiji and Papua New Guinea businesses during the Reporting Period, from across more than 45 supplier sub-categories. Approximately 67% of these suppliers supplied the Australian businesses, approximately 17% supplied New Zealand, 9% supplied Papua New Guinea and 2.5% supplied Fiji. Our supplier database indicates these suppliers are based in around 22 countries, although 95% were domestic to the Marsh McLennan entity they were supplying (Australia, New Zealand, Fiji or Papua New Guinea) and 57% of the remaining international based vendors were in the US or UK.



The considerable majority of spend on suppliers is domestic and concentrated in professional, legal and financial services, property and facilities, and corporate equipment and communications technology.

Separate from the above, we also engage with a small number of global Marsh McLennan group suppliers for our Pacific Region operations. These suppliers provide services to most Marsh McLennan companies globally. The supplier relationships and monitoring are largely managed by parent companies in the US.

## 2.3 Structure

The Marsh McLennan group of companies has four core businesses: Marsh, Guy Carpenter, Mercer, Oliver Wyman. A summary of each business is provided below.

### Risk and insurance services

**Marsh**

Marsh advises individual and commercial clients of all sizes on insurance broking and innovative risk management solutions.

#### 1. Marsh (Pacific Region)

Marsh is a world leader in delivering risk and insurance services and solutions to clients. Our colleagues provide risk management, risk consulting, insurance broking, alternative risk financing and insurance program management services. Marsh has experts in many facets of risk and across industries, helping clients to anticipate, quantify and more fully understand the range of risks they face.

We work with clients of all sizes to define, design and deliver innovative solutions to better quantify and manage risk. We offer risk management, risk consulting, insurance broking, alternative risk financing, mutual risk broking and insurance program management services to businesses, government entities, organisations and individuals in the Pacific Region. These services are provided by the Marsh Reporting Entities and their sister companies and wholly owned subsidiaries including under core Marsh brands and sub-brands.



## Reinsurance and capital strategies



### Guy Carpenter

Guy Carpenter develops advanced risk, reinsurance and capital strategies that help clients grow profitability and pursue emerging opportunities.

#### 2. Guy Carpenter services (Australia and New Zealand)

Guy Carpenter is a leading global risk and reinsurance specialist, delivering a powerful combination of broking expertise, capital solutions, trusted strategic advisory services and industry-leading analytics to help clients adapt to emerging opportunities and achieve profitable growth. Guy Carpenter provides expert advice on **managing risk**, by helping clients identify, mitigate and transfer an evolving range of risks to optimise return on risk-adjusted capital; **capital solutions**, by helping clients determine the best strategy and portfolio mix from traditional reinsurance vehicles to the full range of capital market solutions;<sup>[2]</sup> and **business growth**, by providing wide-ranging strategic solutions to help clients discover and develop new markets, products and distribution channels that achieve long-term growth.

## Consulting and investment



### Mercer

Mercer believes in building brighter futures by redefining the world of work, reshaping retirement and investment outcomes, as well as unlocking real health and wellbeing.

#### 3. Mercer (Australia and New Zealand)

Mercer delivers solutions and consulting across superannuation, investments, health and workforce services.

Our **superannuation trustee services** (Mercer Australia only) and the **Mercer Super Trust (MST)** work with employer clients and retail brands to bring a comprehensive suite of personal superannuation services and financial advice to their workforce and members.

Mercer Australia also provides customised administration, technology and total benefits outsourcing solutions to employer clients and superannuation funds, including industry funds, master trusts and employer-sponsored superannuation funds.

As one of the **largest asset consultants** in the world, Mercer provides investment consulting and research services, implemented consulting and is a multi-manager of structured investment solutions. Mercer has a strong history of partnering with institutional asset owners, endowments and foundations, financial advisers and family offices to help them achieve their investment goals.

Mercer's **workforce consulting** and products include HR transformation, workforce strategy and design, talent and leadership services, rewards and employee experience, M&A advisory, salary and benefit benchmarking, and aged care and living guidance and assistance.

## Consulting



### OliverWyman

Oliver Wyman Group serves as a critical strategic, economic and brand adviser or to private sector and government clients.

#### 4. Oliver Wyman (Australia), Lippincott (Australia) and NERA Economic Consulting (Australia and New Zealand)

Oliver Wyman is a global leader in management consulting. We combine deep industry knowledge with specialised expertise in strategy, operations, risk management, actuarial and organisational transformation to help clients optimise their businesses, improve their operations and risk profile, and accelerate their organisational performance to seize opportunities. Close partnerships at every level in client organisations enable us to bring fresh perspectives and creative thinking to tough problems, helping to create significant and lasting change.




Lippincott is a global creative consultancy. A pioneer since 1943, Lippincott has shaped some of the world's most iconic brands and experiences. To help our clients grow, Lippincott focuses on six primary areas: brand, innovation, design, experience, marketing and activation.

NERA Economic Consulting provides economic analysis and advice to public and private entities to achieve practical solutions to highly complex business and legal issues arising from competition, regulation, public policy, strategy, finance and litigation.

<sup>[2]</sup> Activities involving mergers and acquisitions (M&A) and corporate finance solutions are conducted by GC Securities, a division of MMC Securities LLC, member FINRA/NFA/SIPC. MMC Securities LLC is not part of the Marsh McLennan Pacific Region.

## 2.4 Modern slavery risk in our operations and supply chains

An overview of the modern slavery risks in our operations (including investment activities) and supply chains is set out below. It remains materially the same as 2021 because there has been no material change in our operations and supply chain (including investment activities).

 <b>Operations</b>	 <b>Supply chain</b>	 <b>Investment activities<sup>[3]</sup> (Mercer Entities only)</b>
<p>As professional services providers, we do not work in industries where modern slavery is prevalent in our operations. Our operations mostly involve highly skilled work conducted by educated professionals. For these reasons, and the workplace policies and procedures we employ, the risk of modern slavery in our operations is low.</p> <p>However we identified some operational areas with an elevated risk profile:</p> <ul style="list-style-type: none"> <li>• Some of our Reporting Entities operate in higher risk countries</li> <li>• A small number of our employees perform higher risk roles</li> <li>• Some of our group shared services operate in higher risk countries.</li> </ul>	<p>A large number of our suppliers are based in Australia and operate predominately in lower risk industries (such as professional services). In this context, the risk that we have caused or contributed to modern slavery in our direct suppliers is low.</p> <p>However, we identified some areas of our supply chain with an elevated risk profile:</p> <ul style="list-style-type: none"> <li>• Direct suppliers in higher risk countries (eg India, Malaysia and Philippines)</li> <li>• Australian suppliers with supply chains in higher risk countries</li> <li>• Local suppliers operating in higher risk industries (eg facilities management, information and communication technologies, and food, beverage and hospitality)</li> <li>• Domestic suppliers to our Fiji and PNG businesses.</li> </ul> <p>Despite the low risk of having caused or contributed to modern slavery in our direct supply chain, we may be linked to modern slavery risks via our suppliers operating with an elevated risk profile as described above.</p>	<p>The investment activities of some Reporting Entities are our most likely exposure to modern slavery. This is not due to direct investment operations or among direct investment service providers, where risk is thought to be low, but due to risk within underlying holdings of the Mercer Funds<sup>[4]</sup> investment portfolios. Investment management is outsourced to external investment managers.</p> <p>The Mercer Funds are highly diversified across most major asset classes, industries and countries, therefore modern slavery risk will vary across Mercer Funds, with those investing offshore and in high risk countries and asset classes likely to be more exposed.</p> <p>Examples include:</p> <ul style="list-style-type: none"> <li>• Higher risk asset classes, including emerging market debt, global credit and global property</li> <li>• Higher risk appointed external investment managers, based on risk assessment of holdings and responses to our surveys.</li> </ul> <p>Note: Investment activities only apply to some of our Reporting Entities within the Mercer businesses.</p>

### Inherent country risk – PNG & Fiji operations

We recognise that the risks of modern slavery are higher in Papua New Guinea where The Global Slavery Index 2023<sup>[5]</sup> estimates that 93,000 people live in modern slavery, an increase of approximately 12,000 people since the previous Global Slavery Index published in 2018. The 2020 report by human rights group Walk Free, Murky Waters: A Qualitative Assessment of Modern Slavery in the Pacific Region<sup>[6]</sup> also highlights the prevalence of modern slavery in Fiji. Having regard to the heightened risks in the Pacific, we will continue to evaluate our operations and supply chain to seek to manage modern slavery risks.

<sup>[3]</sup> Our Investment Approach to Modern Slavery (available here: <https://www.multimanager.mercer.com.au/funds/sustainable-investment.html>) contains more information on our investment-specific activity.

<sup>[4]</sup> The Mercer Funds refers to the investment funds where Mercer Investments (Australia) Limited is the Responsible Entity or Trustee, and the MST investment options under Mercer Superannuation (Australia) Limited ("MSAL").

<sup>[5]</sup> Source: <https://www.globallslaveryindex.org/>

<sup>[6]</sup> Source: <https://cdn.minderoo.org/content/uploads/2020/03/04091414/Walk-Free-Foundation-Pacific-Report-03-2020.pdf>

# 3 ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

## 3.1 Highlights of the 2022 Marsh McLennan Pacific Modern Slavery Program

In the 2022 Reporting Period, Marsh McLennan in the Pacific Region built on and consolidated our Modern Slavery Program by taking a number of important actions to assess and address Modern Slavery Risks. These included:



Continuing to train employees: since 2020, approximately 86% of our Pacific Region colleagues have completed a Modern Slavery training e-module.



Progressing internal escalation and reporting procedures for supply chain and investment-related risks.



Carrying out a due diligence questionnaire of the Global Services Division (GSD) (located in India) to assess the risks of modern slavery arising from the provision of services by GSD to certain entities in the Pacific Region.



Continuing, and enhancing some aspects of, our modern slavery due diligence processes and engagement across operations and high-risk supply chains, including investment activities where relevant.



Publishing Mercer's sustainable investment report, which included findings from modern slavery issues monitoring and related manager survey findings, and internal reporting on modern slavery activities to Investment Management team and relevant boards.



Updating and conducting portfolio holdings assessment for potential modern slavery risk within the Mercer Funds.



Conducting an annual engagement survey of all appointed investment managers globally, which included a section dedicated to human rights and modern slavery.



Conducting follow-up engagement with prioritised investment managers, based on the results of portfolio risk assessment and manager surveys, to encourage ongoing improvement.



Joining the Investors Against Slavery and Trafficking Asia-Pacific (IAST APAC), an investor-led, multi-stakeholder project, established in 2020, to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains (Mercer Investments (Australia) Limited ("MIAL" only).

The above builds on our existing Modern Slavery Program as explained in our 2021 Modern Slavery Statement. An overview of the foundations of the Program, including highlights from our prior work from 2020 and 2021, is also included in **Appendix Two** of this Statement.



## 3.2 Operations

### a) Engagement with shared services operating in India

Marsh McLennan operates a Global Shared Services and Operations Division (GSD) out of India. The GSD provides a range of services to Marsh McLennan globally.

During the Reporting Period, a sub-committee of our Modern Slavery Working Group engaged with senior staff in the GSD who are responsible for the provision of services to the Australian and New Zealand Mercer businesses. Those discussions included an outline of the Marsh McLennan Pacific obligations under the Modern Slavery Act and our obligations to assess and mitigate the risks of modern slavery within our operations.

Following these initial discussions the GSD was provided with a due diligence questionnaire specifically designed to assess the likely areas of modern slavery risks arising from GSD operations in India. The responses provided by the GSD have been considered and we identified a number of practices in place to address the potential risks of modern slavery in the GSD's operations. The sub-committee has identified areas for follow-up and potential enhancement, for example, by providing training to GSD colleagues.

### b) All-colleague training

As described in our prior Modern Slavery Statements, Marsh McLennan rolled out an e-learning training module on modern slavery to all colleagues in the Pacific, commencing in 2020 and updated in 2021. We are pleased to report that approximately 86% of colleagues in the Pacific had completed the training by the end of 2022.

The training module describes and explores examples of modern slavery, explains what Marsh McLennan in the Pacific Region is doing to assess and address modern slavery risk in our operations and supply chains (including investments), educates colleagues on our Modern Slavery Policy and outlines what colleagues can do if they have concerns or suspect modern slavery. It includes a short quiz to confirm the knowledge of our colleagues.

As noted in our summary of operational risks in Section 3 above, a small number of our employees perform higher-risk roles. The training module and the Policy referred to above are designed to help address the risk of modern slavery in such higher risk roles, by educating staff on indicators of modern slavery, on their related rights, and on our committed stance against all forms of slavery, and also providing details of the ethics hotline where they can raise concerns.

### c) Internal escalation procedures

A sub-committee of the Working Group continued documenting and implementing our approach to engagement with suppliers beyond the supply chain due diligence questionnaire. This included enhancing the process for further engagement with some of the high-risk suppliers who did not respond to our questionnaire or whose questionnaire responses required further consideration.

Processes were also improved within Investments for internal reporting of appointed investment managers requiring follow-up engagement, and included processes to implement and track this engagement.



## 3.3 Supply chains

In the Reporting Period, we sought to further refine and improve the Modern Slavery Risk Assessment and Supplier Engagement Program. We also continued and expanded our engagement with certain high-risk suppliers and identified opportunities for ongoing improvement of our initial approach (outlined in **Appendix Two**).

The following are key modern slavery activities related to our supply chains conducted over the course of the Reporting Period:

### a) Supplier assessment

- Completed a risk assessment of all new suppliers to Marsh McLennan in the region.
- Issued modern slavery questionnaires to all new Australian and New Zealand suppliers providing goods or services in industries with a higher inherent risk, as well as to equivalent Fiji and PNG suppliers where email addresses were available.
- Reviewed and scored the responses to the questionnaires to identify those suppliers whose responses were in line with our expectations and those whose were not.
- Issued follow-up notifications to those suppliers who did not satisfactorily engage with us on modern slavery or meet our scoring threshold.
- Followed up the suppliers where there were concerns based on the responses provided.

### b) Contractual terms and onboarding

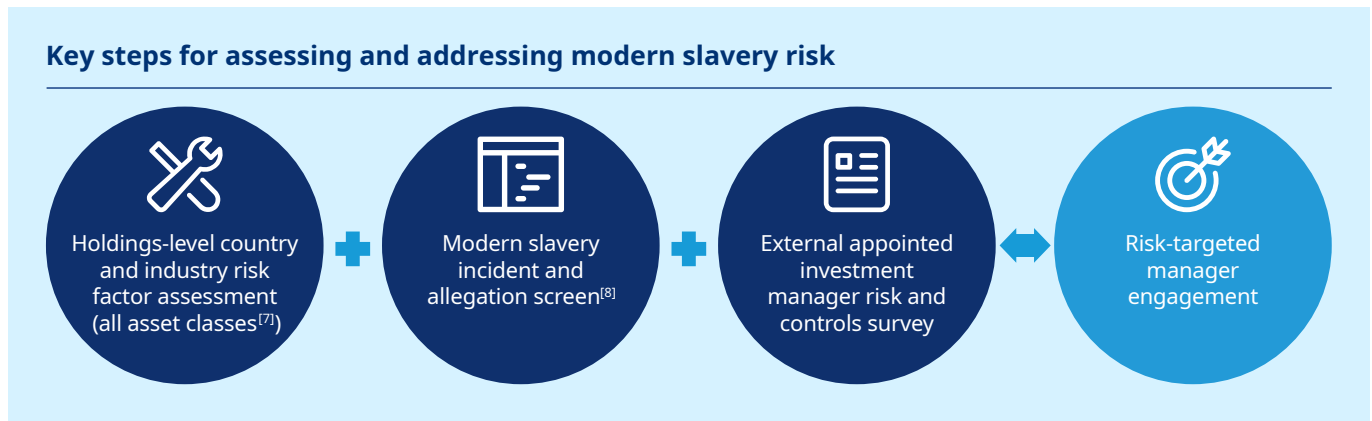
Members of the Modern Slavery Working Group's sub-committees worked in conjunction with global GSP on the following initiatives:

- Developing modern slavery questions and attestations to be incorporated into a proposed new global supplier portal which is scheduled to launch in 2023.
- Developing a modern slavery contractual provision to be included in standard global purchase order terms and conditions (to be rolled out in 2023).
- The use of standardised request for proposal (RFP) templates which include environment, social and governance (ESG) related questions including modern slavery risk assessment questions.



## 3.4 Investments (Mercer and Mercer Funds)

This section relates to two specific Mercer Entities: Mercer Investments (Australia) Limited (“MIAL”) and Mercer Superannuation (Australia) Limited (“MSAL”). References to ‘Mercer’ or ‘our’ in this section relate only to MIAL and MSAL.



Mercer’s sustainable investment approach has included consideration of human rights issues for many years, including modern slavery and related issues. In the Reporting Period, activities related to modern slavery were incorporated into Mercer’s sustainable investment program, notably through portfolio assessment, manager engagement and collaborative engagements, as detailed below:

### a) Policy, process and disclosure

- Maintaining relevant sustainable investment policies, which covered how ESG risks and opportunities, including human rights and modern slavery, are managed.
- Public sustainable investment reporting, which included findings from modern slavery issues monitoring and related manager survey findings.
- Reporting on modern slavery activities internally to investment management team and MIAL and MSAL boards as part of regular, ongoing ESG monitoring and annual board reporting.
- Continuing to disclose Mercer’s Investment Approach to Modern Slavery<sup>[9]</sup>, as an online document, to share our approach.

### b) Assessing risk

- Updating and conducting portfolio holdings assessment for potential modern slavery risk for the Mercer Funds, identifying the highest risks within underlying holdings and investment strategies.
- Conducting an annual engagement survey of all appointed investment managers globally, which included a section dedicated to human rights and modern slavery.

- Commencing further updates to the investment risk assessment, including exploring ways to broaden the risk assessment to look at human rights risks beyond modern slavery and to incorporate additional third-party data.

### c) Addressing risk

- Conducting follow-up engagement with prioritised investment managers, based on the results of portfolio risk assessment and manager surveys, to encourage ongoing improvement.
- MIAL joining the Investors Against Slavery and Trafficking Asia-Pacific (IAST APAC), an investor-led, multi-stakeholder project established in 2020 to engage with companies in the Asia-Pacific region to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains. MIAL is participating in both the policy and advocacy-focused work stream, and the collaborative investor company engagement work stream.
- Continued participation in a collaborative Human Rights Industry Working Group led by Responsible Investment Association of Australia (RIAA). This group promotes good practice among investors in relation to understanding and managing human rights issues in investments, including modern slavery.

<sup>[7]</sup> Subject to data availability, noting that fixed income has the lowest data availability, and cash is taken to be an overall low-risk asset class so individual holdings are not assessed.

<sup>[8]</sup> This covers listed equities only and uses data from a third-party provider (ISS ESG).

<sup>[9]</sup> Our Investment Approach to Modern Slavery document contains more information on our investment-specific activity, and is available on our sustainable investment webpage: <https://www.multimanager.mercer.com.au/funds/sustainable-investment.html>

# 4 ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN

Over the years, we have sought to assess the effectiveness of our actions by tracking against a set of goals each year and reporting on our progress in our annual Modern Slavery Statements.

In the table below, the column labelled '2022 goals' describes what we set out to achieve during the Reporting Period and the '2022 progress' column describes the actions undertaken during the year. We have also set out what we endeavour to achieve during 2023 with a view to reporting on our progress in our next Modern Slavery Statement.

 <b>2022 Goals</b>	 <b>2022 Progress</b>
<p>Maintain regular meetings of the Marsh McLennan Pacific Region Working Group (including sub-committees) and ensure consultation continues.</p>	<p>The Working Group and sub-committees met regularly and engaged in consultation with appropriate stakeholders.</p>
<p>Continue Working Group activities and drive continuous improvement efforts to increase awareness of our Modern Slavery Policy.</p>	<p>The Working Group sought to improve how Marsh McLennan in the Pacific Region assesses and addresses risks.</p>
<p>Track and seek to improve completion rates of the e-learning training module.</p>	<p>Approximately 86% of colleagues in the Pacific had completed training between 2020 and 2022.</p>
<p>Continue to risk assess new suppliers and send questionnaires to new higher risk suppliers. Continue to review and score questionnaire responses and follow up those suppliers not meeting our expectations. Continue to evolve our approach to supplier engagement.</p>	<p>Ongoing supplier engagement.</p>
<p>Investigate improvements in our onboarding and contracting terms with suppliers across the region to better address modern slavery risk.</p>	<p>Ongoing engagement with Legal and Global Sourcing and Procurement (GSP) teams to identify opportunities to enhance modern slavery considerations in processes and documents.</p>
<p>Further investigate of our group shared services operating in high-risk countries.</p>	<p>Discussions have been held with senior Global Shared Services and Operations Division (GSD) staff in India, and due diligence indicated some controls are in place to reduce the risk of modern slavery in their operations.</p>
<p>Continue to conduct risk-targeted engagement with external appointed investment managers.</p>	<p>Engagement with investment managers on modern slavery was conducted through the survey and targeted follow-ups, as outlined above. The survey provides us with a mechanism to assess the effectiveness of external investment manager activities.</p>



## 2023 Goals

Maintain regular meetings of the Marsh McLennan Pacific Region Working Group (including sub-committees) and ensure consultation continues.

Launch the global supplier portal which includes modern slavery questions and attestation (planned for 2023).

Include a modern slavery contractual provision in standard global purchase order terms and conditions.

Monitor regulatory change arising from the Federal Government's review of the *Modern Slavery Act 2018*.

Continue to engage with GSD on areas for follow-up and potential enhancement.

Continue to produce public sustainable investment reporting, including modern slavery content, and update the Investment Approach to Modern Slavery public disclosure document, if applicable.

Continue to undertake portfolio risk assessment for modern slavery.

Continue to survey external investment managers on modern slavery, and follow up with prioritised managers.



# 5 PROCESS OF CONSULTATION AND APPROVAL

The Reporting Entities consulted on modern slavery matters through the actions of the Marsh McLennan Pacific Region Modern Slavery Working Group as outlined in this Statement.

This Working Group provided periodic updates and reports to risk and compliance committees and senior management of both the Reporting Entities and the entities which they own and control.

Senior management of the Reporting Entities and of owned and controlled entities were provided with a copy of this Statement prior to publication.

This Statement has been approved by the principal governing body of MMC Holdings (Australia) Pty Ltd, on behalf of the Reporting Entities, and is signed by a Director of the company.



**Wayne Vergano**

Director, MMC Holdings (Australia) Pty Ltd



# APPENDIX ONE

## REPORTING ENTITIES – 2022

### Marsh McLennan Holding Companies (the “Marsh McLennan Pacific Holding Companies”)

MMC Holdings (Australia) Pty Ltd ABN 41 607 891 207	<i>These are holding companies with no direct operations or staff.</i>
Marsh Mercer Holdings (Australia) Pty Ltd ABN 86 097 026 812	

### Marsh Entities (“Marsh Reporting Entities”)

Marsh Pty Ltd ABN 86 004 651 512	<i>Insurance broking, risk consulting, asset valuation, workplace health, safety and rehabilitation and training solutions.</i>
JLT Risk Solutions Pty Ltd ABN 69 009 098 864	<i>Discretionary trust and mutual fund services.</i>

### Mercer Entities (“Mercer Reporting Entities”)

Mercer (Australia) Pty Ltd (“MAPL”) ABN 32 005 315 917	<i>The core Mercer Entity for Australia, providing centralised shared services to Mercer Entities in Australia and New Zealand.</i>
Mercer Outsourcing (Australia) Pty Limited (“MOAPL”) ABN 83 068 908 912	<i>Outsource service provider to third-party superannuation fund trustees as well as the Mercer Super Trust. These services are primarily fund administration.</i>
Mercer Investments (Australia) Ltd (“MIAL”) ABN 66 008 612 397	<i>Responsible Entity/Trustee of a range of managed investment schemes, provider of investment consulting and research services.</i>
Mercer DG (ex p) Trust ARSN 111 235 011 <sup>[10]</sup>	<i>These six entities are individual managed investment schemes, of which MIAL is the Responsible Entity/Trustee (as applicable).</i>
Mercer Passive Australian Shares Fund ARSN 160 295 009	
Mercer SmartPath Fund 1964 – 1968 ARSN 166 662 657	
Mercer SmartPath Fund 1969 – 1973 ARSN 166 662 737	
Mercer SmartPath Fund 1974 – 1978 ARSN 166 662 764	
Mercer Tailored #1 Trust ABN 71 799 340 037	
Mercer Superannuation (Australia) Limited (“MSAL”) ABN 79 004 717 533	<i>Trustee and issuer of regulated superannuation funds.</i>
Mercer Super Trust ABN 19 905 422 981	<i>This entity is a regulated superannuation fund where MSAL is the Registrable Superannuation Entity that is captured as a Reporting Entity in its own right.</i>

<sup>[10]</sup> This entity was not a Reporting Entity in the 2021 Reporting Period as it did not meet the revenue threshold but it did meet the threshold in the 2022 period. Conversely, ACN 005 279 890 Pty Ltd (ABN 24 005 279 890) and Mercer Portfolio Service Superannuation Plan (ABN 92 181 844 838) were Reporting Entities for 2021 but they are no longer reporting entities as they did not meet the revenue threshold for the 2022 Reporting Period.

# APPENDIX TWO

## THE FOUNDATIONS OF OUR MODERN SLAVERY PROGRAM

Marsh McLennan in the Pacific Region is dedicated to continuously improving our Modern Slavery Program as evidenced by our 2022 actions which are described in the main body of this Statement.

Our Modern Slavery Program was launched in late 2019, and has matured over the years since to build a foundation of policies, processes and systems to foster a culture of responsible and ethical business practice. This Appendix summarises those foundations and provides an overview of the actions we have taken over the years, as outlined in our 2020 and 2021 Modern Slavery Statements.

### Pacific Region Modern Slavery Policy

Marsh McLennan in the Pacific Region implemented a Modern Slavery Policy (the Policy) in 2021.

The Policy is available online at [Other Policies \(marsh.com\)](#).

The Policy supports our key values as laid out in The Greater Good, our company code of conduct, and states that we respect fundamental human rights and are committed to conducting our activities fairly, honestly and with integrity, in accordance with 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 to which we may be linked.

All colleagues working for Marsh McLennan in the Pacific Region are responsible for the prevention, detection and reporting of modern slavery in any part of our business, supply chains or investments.

We encourage openness and will not tolerate any 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.

The Policy outlines how colleagues and third parties can raise modern slavery concerns.

### Other existing policies, processes and systems

#### The Greater Good

At Marsh McLennan, our values define who we are and shape our aspirations for the future. We are committed to the fundamental principles of human dignity, equality and mutual respect.

The Greater Good (available at [integrity.mmc.com/the-greater-good](https://integrity.mmc.com/the-greater-good)), our global conduct framework, is aligned around three key pillars:

- **Win With Integrity.** We compete vigorously and fairly. Work that might harm the reputation of the firm is simply not worth it.
- **You Are Never Alone.** The only mistake you can make at our company is the mistake that you make alone. When in doubt, reach out. To your manager. To Compliance. To HR. To a colleague. We are all in this together.
- **Speak Up.** If something doesn't feel right, speak up. You are not doing a service to anyone by keeping quiet. You have a right to raise concerns and, indeed, an obligation to do so.

The Greater Good provides guidance on topics including anti-corruption, data handling, conflicts of interest, trade sanctions, anti-money laundering, counter-terrorism financing and environmental and social responsibility. It specifically identifies the need to watch out for violations of human rights when engaging suppliers. It applies to our directors, officers and other colleagues and requires the company's agents, subcontractors and suppliers to comply with relevant aspects of our compliance policies.

The policy is available in 13 languages and everyone at Marsh McLennan is required to complete compulsory training on this policy.



### Global statements on Human Rights and Modern Slavery

Marsh McLennan has a global Human Rights Statement (available publicly at [mmc.com/about/esg](https://mmc.com/about/esg)) which applies to Marsh McLennan in the Pacific Region.

It prescribes that we support and abide by recognised international human rights principles. The Human Rights Statement applies to all Marsh McLennan colleagues worldwide, candidates for hire and contingent workers. It applies to all events, locations and situations where our business is conducted. It includes a prohibition of child labour and forced labour and support of fair pay, hours and benefits. It provides a process for raising grievances and reporting human rights concerns, which is accessible by anyone, via our third-party operated Ethics and Reporting Portal.

### Remediation

To enable staff and suppliers to make disclosures of violations of The Greater Good or other misconduct or breaches of laws and regulations, including modern slavery, an MMC Ethics and Compliance Line is available to employees and third parties. For more information on the types of disclosure that can be made through the MMC Ethics and Compliance Line, please refer to The Greater Good, or [compliance.mmc.com](https://compliance.mmc.com), or [ethicscomplianceline.com](https://ethicscomplianceline.com)

### Investing responsibly (Mercer and the Mercer Funds)

The policies and processes covered in this section relate to two specific Mercer Entities, Mercer Investments (Australia) Limited (MIAL) and Mercer Superannuation (Australia) Limited (MSAL). References to 'Mercer' in this section relate only to MIAL and MSAL.

The MIAL and MSAL Sustainable Investment Policies were updated during 2020 to include specific reference to modern slavery, setting out a clear commitment and expectation to our appointed investment managers that modern slavery is an important ESG factor to be considered in investment decision-making. Within our client investment advice and solutions offerings, Mercer has consistently sought to be a responsible and sustainable investor. Mercer's consulting pedigree in this area goes back to 2004 and as a founding signatory to the world's leading proponent of responsible investment, the Principles for Responsible Investment (PRI), in 2006. Mercer's policy outlines globally held beliefs in the importance and materiality of ESG factors and active ownership for investors, and the implementation principles adopted for Mercer's investment solutions in Australia. It affirms Mercer's commitment to managing ESG risks within the investment approach across the Mercer Funds, and sets expectations for appointed investment managers to do the same.



## Our approach to due diligence

Our approach to risk assessment, as part of our due diligence efforts, are designed having regard to the UN Guiding Principles on Business and Human Rights, drawing on risk factors including country, industry, product, service and raw material, thematic, and entity risk. We developed risk assessment methodologies and tools for our operations, supply chains and investment activities. These due diligence activities informed our understanding of risks in our operations and supply chain, including investment activities.

**Operations:** Business-specific operational risk assessments are conducted, with a focus on country and industry modern slavery risk factors, including risk indicators associated with the type of work being undertaken, the demographics and make-up of the workforce, and the existing controls in place to manage modern slavery.

**Supply chain:** Our local Modern Slavery Working Group works in close consultation with local and global representatives of our GSP team to develop and apply a risk assessment approach drawing on the risk factors outlined above. When assessing Tier 1 suppliers, the industry risk we assign includes common beyond Tier 1 supply chain risk in that industry, including raw material, product and service risk factors, where possible.

**Investments:** Our Modern Slavery Working Group works closely with our sustainable investment and investment solutions team to develop and apply a modern slavery risk assessment across the investment portfolio (the Mercer Funds), drawing on the risk factors outlined above and investments and ESG data from third-party providers. The risk assessment includes top-down risk (applied to asset classes) and bottom-up risk (assessing underlying holdings). The output identified risk hotspots in the Mercer Funds portfolio, targeting the highest risk asset classes, investment managers and underlying assets/investments.

## Supplier engagement

Following risk assessment our high-risk suppliers are engaged via an online supplier due diligence questionnaire. This is designed to help us gather further information from suppliers directly to better understand the extent of their risk exposure, the extent of their existing risk controls, and build their awareness of the issue of modern slavery and the ways in which we expect suppliers to address it.

## Investments manager engagement (and other investment-related engagement)

Modern slavery was added to MIAL's ongoing annual investment manager ESG survey in 2019. This survey is sent to all Mercer Funds-appointed external managers annually and typically obtains a 80-90% response rate. The modern slavery questions are designed to help us better understand the extent to which all of our investment managers are aware of modern slavery and how they are assessing and addressing risk specifically within the Mercer Funds investment portfolio, as opposed to within their own organisations.

We review and score responses from those investment managers identified as high risk in our portfolio risk assessment and engage with managers to flag their high-risk status and to encourage improved practices and responses in future surveys. We also set up dedicated meetings with a small number of investment managers to discuss their approaches to modern slavery risk.

# APPENDIX THREE

## REPORTING CRITERIA

Reporting criteria	Section
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	Sections 1 and 2 Appendix 1
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Section 3
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Section 4
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Section 5
6. Describe the process of consultation with any entities the reporting entity owns or controls	Section 6
7. Any other relevant information	Appendix 2 and 3

