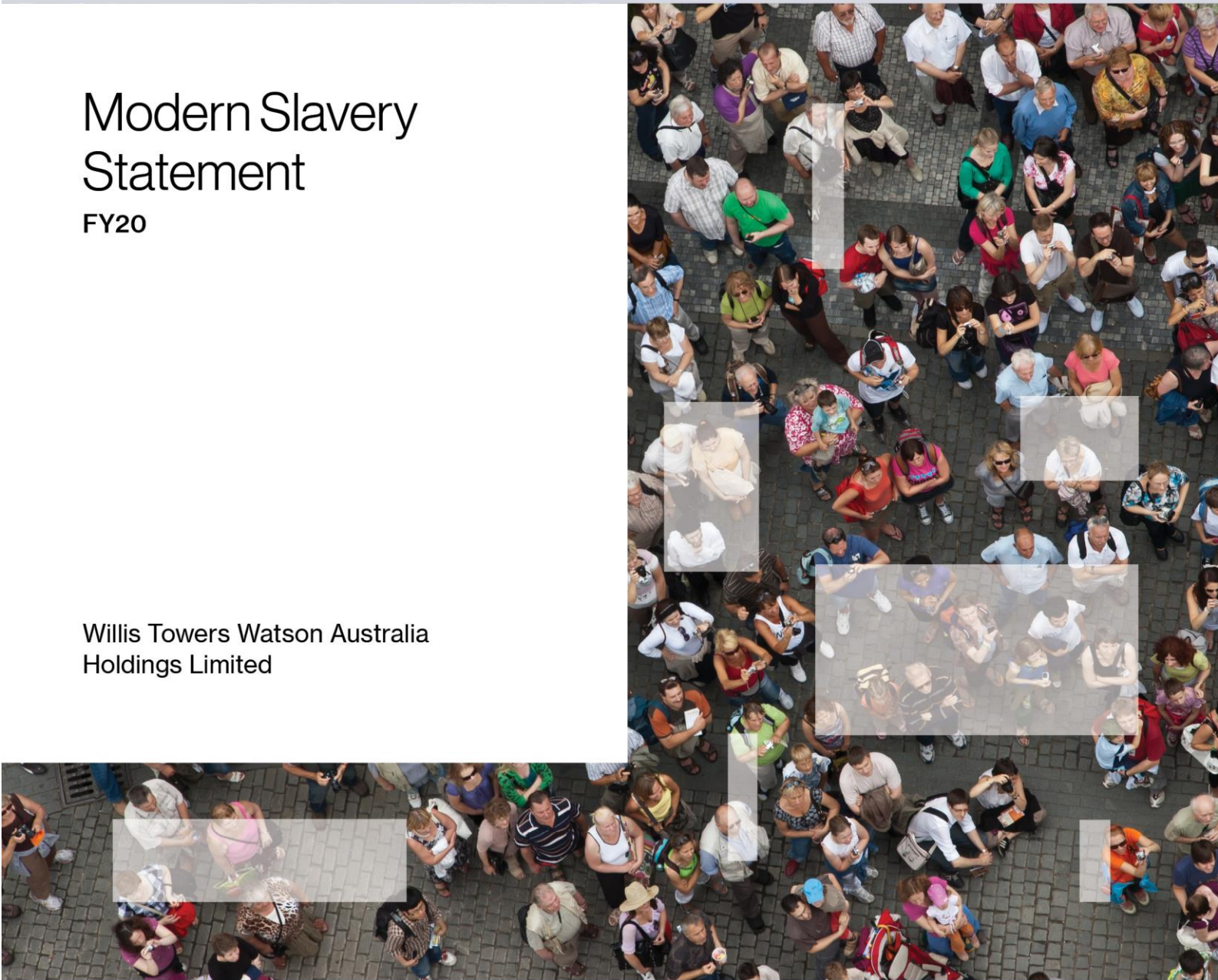


Modern Slavery Statement

FY20

Willis Towers Watson Australia
Holdings Limited





Message from the CEO Simon Weaver

Willis Towers Watson Australia's purpose is to create clarity and confidence today for a more sustainable tomorrow. We believe as a firm that with great power comes great responsibility – no more evident than in these times of great societal change and environmental and health pressures. Our values frame our approach and way of working and in managing environmental, social and governance risks. Willis Towers Watson prides itself on being a responsible, transparent and ethical business partner and employer.

We support the intent behind the Australian Modern Slavery Act reporting requirement to leverage the collective power of Australian businesses to have a demonstrable impact on protecting and promoting human rights. We are committed to assessing and addressing all risks of modern slavery, including child labour and human trafficking, in our operations, investments and value chain.

A handwritten signature in black ink, which appears to be 'S. Weaver', written in a cursive style.

About Us:

Willis Towers Watson (NASDAQ: WLTW) is a leading global advisory, broking and solutions company that helps clients around the world turn risk into a path for growth. With roots dating to 1828, Willis Towers Watson has 45,000 employees serving more than 140 countries and markets.

Willis Towers Watson design and deliver solutions that manage risk, optimize benefits, cultivate talent and expand the power of capital to protect and strengthen institutions and individuals. Our unique perspective allows us to see the critical intersections between talent, assets and ideas – the dynamic formula that drives business performance. Powered by market analytics and behavioral insight, our integrated teams reveal hidden value within the critical intersections of our clients' organisations. We design and deliver solutions that manage risk, optimise benefits, cultivate talent and expand the power of capital to protect and strengthen institutions and individuals.

Our purpose and values:

Our purpose is why our company exists. We create clarity and confidence today for a more sustainable tomorrow. A strong client focus, an emphasis on teamwork, unwavering integrity, mutual respect and a constant striving for excellence are at the core of Willis Towers Watson's rich history.

Client focus:

We are driven to help our clients succeed. In every interaction and with every solution, we act in our clients' best interests – striving to understand their needs, respecting their perspectives and exceeding their expectations.

Teamwork:

When you get one of us, you get all of us. We bring innovative solutions and world-class advice to our clients by working across boundaries of business, geography and function. We help each other succeed and create more value by working together.

Integrity:

Our clients invest more than their time and money with us; they also invest their trust. We seek to earn that trust every day through professionalism, doing what is right and telling the truth. We are accountable to the organizations and people with which we interact – including clients, shareholders, regulators and each other for our actions and results.

Respect:

We listen to and learn from each other. We support and celebrate differences, foster an inclusive culture and operate with openness, honesty and benefit of the doubt. We manage our relationships, inside the company and out, with fairness, decency and good citizenship.

Excellence:

We strive to lead and sustain excellence. Most importantly, this means an unwavering commitment to professional development and personal growth for our people. Our colleagues take responsibility to develop their expertise, competencies and professional stature, while the company invests in the tools and opportunities that allow for continual development. In business, we place an unrelenting focus on innovation, quality and risk management.

Our Business:

Reporting Entities:

In compliance with the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**), this Modern Slavery Statement is a statement made on behalf of the Willis Towers Watson Australia Holdings Limited (**Reporting Entity** under the Modern Slavery Act) along with its owned and controlled entities based in Australia:

- Willis Towers Watson Australia Holdings Limited (ABN 98 112 435 079) (**WTW Australia Holdings**)
- Willis Australia Limited (ABN 90 000 321 237)
- Willis Employee Benefits Pty Limited (ABN 68 059 019 911)
- Richard Oliver Underwriting Managers Pty. Ltd. (ABN 66 006 649 341)
- CKA Risk Solutions Pty Limited (ABN 33 109 033 123)
- Willis Reinsurance Australia Limited (ABN 22 000 235 914)
- Willis Australia Group Services Pty Limited (ABN 64 006 256 908)
- Towers Watson Australia Pty Ltd (ABN 45 002 415 349)
- Towers Watson Superannuation Pty Ltd (ABN 56 098 527 256)
- Wycomp Pty. Limited (ABN 33 002 101 377)
- Risk Capital Advisors Pty. Ltd. (ABN 79 149 774 498)
- Cortex Global Risk Pty Limited (ACN 615 618 561)
- Cortex Global Risk Australia Pty Limited (ACN 622 900 047)
- Risk Capital Advisors Australia Pty Limited (ABN 79 148 182 389)
- Trinity Processing Services (Australia) Pty Ltd (ABN 72 124 164 530)

(collectively, the **Reporting Entities**)

This statement is made with respect to the financial year ending 31 December 2020 (**Reporting Period**).

Our Structure, Operations and Supply Chain:

Structure:

WTW Australia Holdings ultimately holds 100% ownership in each of the other above-listed entities. The Board of Directors of each Reporting Entity has reviewed and approved this statement.

WTW Australia Holdings and its subsidiaries form the Australian operations of a global group of companies, Willis Towers Watson.

Our Operations:

There was a total of 546 staff employed by the Reporting Entities during the Reporting Period.

	Willis Towers Watson Australia group of companies
Total employees	546
Full time employees	473
Part time employees	73
Casual employees	0
Contractors	17

We do not employ children in any of our entities and do not use forced labour in any form.

In Australia, our colleagues work cohesively to deliver client experiences in three principal areas: Corporate Risk & Broking, Human Capital & Benefits and Investment Risk & Reinsurance. We are represented in major capital cities throughout the country, with offices in Adelaide, Brisbane, Melbourne, Perth and Sydney.

We have strong local industry expertise in Affinity, Construction, Education, Financial Institutions, Government, Healthcare, Natural Resources and SuperFunds, providing our clients and prospects with market-leading products, services and solutions focusing on value, quality and innovation.

Corporate Risk and Broking:

Our clients rely on us to help them unlock potential through effective risk management and to craft strategies to quantify, mitigate and transfer risk, taking advantage of our specialist industry experience and unparalleled market know-how. The result is a new way of embracing risk that drives superior results.

Human Capital and Benefits:

High-performing institutions cultivate and grow talent, carefully balancing costs and rewards. From employee benefits to executive compensation, we take a rounded perspective based on leading-edge thinking, data, analytics and software, unearthing new ways to motivate people, foster well-being and implement solutions that work.

Investment, Risk and Reinsurance:

Our sophisticated approach to risk helps clients free up capital. We work in close concert with investors, reinsurers and insurers to manage the equation between risk and return. Blending advanced analytics with deep institutional knowledge, we reveal new opportunities to maximise performance. As we operate in the highly regulated financial services industry, our employees are required to conduct themselves to high standards specific to their respective professional industries including, but not limited to, the Insurance Brokers Code of Practice and the Financial Adviser Standards and Ethics Authority.

Our Investment Practice:

Our investment business operates within Towers Watson Australia Pty Ltd. Apart from pure investment consulting to institutional clients, the investment team also selects:

- investment opportunities for a handful of **discretionary management clients**. These opportunities would typically be in a series of unlisted trusts or limited partnerships;
- underlying equity managers (sub-IMs) for the **Australian GEFF**, our in-house Australian-domiciled fund. These sub-IMs then, in turn, make investment decisions at the underlying asset level. The sub-investment managers we engage are all large, reputable international investment houses of portfolios of wholesale clients.

Our Supply Chain:

Our supply chain predominantly consists of goods and services acquired to facilitate our employees in the seamless delivery of our professional services to our clients. The sourcing and purchasing of the majority of goods and services is supported across the company by our global procurement team. The key categories we procure in order of spend are:

- **Property** (including office space, facilities management (including cleaning, catering, security, office renovation, car parking)
- **Consulting** (professional services, including audit)
- **Telecommunication**
- **Insurance**
- **Travel**
- **Technology**

In FY20 our total procurement spend with external vendors was approx \$20.75 million AUD.

In FY20, Willis Towers Watson also spent approximately \$3.52 million AUD with two offshore operational partners in Manila, The Philippines and Mumbai, India.

Assessment of Modern Slavery Risks:

Modern slavery is a global problem affecting every country of the world and requires a co-ordinated response from governments and companies alike. Our review and response to modern slavery takes guidance from the UN Guiding Principles on Business and Human Rights which sets the standard for countries and companies to prevent, address and remedy human rights abuses committed in business operations. We also acknowledge

target 8.7 under the UN Sustainable Development Goals (**SDGs**) which sets a global goal to take action to eradicate forced labour and end modern slavery.

Willis Towers Watson understands that modern slavery is an umbrella term that includes a range of serious exploitative practices and labour rights abuses, such as human trafficking, debt bondage, forced labour and the worst forms of child labour. While poor labour practices such as substandard working conditions or underpayment of workers do not meet the definition of modern slavery, we understand these forms of exploitation are high risk factors that may lead to modern slavery over time.

We know that modern slavery can also occur in any industry, at any point in the supply chain, but is often hidden deep down the supply chain and so can be difficult to detect. High risk industries identified by the Human Rights Working Group of the Responsible Investment Association of Australasia (RIAA) include agriculture and fishing, apparel, construction and building materials, electronics and electronics recycling and mining. We recognise that red flags that might identify modern slavery include complex and long supply chains with many intermediaries, supply chains with predominately migrant workers and oligopolistic industries with a small number of companies putting pricing pressures on their suppliers.

We believe that due to the nature of our business, as a provider of professional services predominantly to corporate clients, we are not directly exposed to a high risk of modern slavery and human trafficking within our direct operations.

However, we are nonetheless aware that the possibility does exist within our local and global supply chains, particularly in products made in high-risk regions using high risk raw materials (e.g. our IT hardware) as well as in low-skilled facilities management services within Australia (e.g. cleaners and security guards). We are also aware that potential risks may occur in the context of certain of our intra-group shared service suppliers located in countries considered to be of higher risk in the context of modern slavery and human trafficking.

In order to mitigate this risk we work alongside our intra-group shared services suppliers and establish procedures adequate to manage the risk of modern slavery and human trafficking in their supply chains and ensure their policies reflect appropriate standards for their business.

Actions to Address Modern Slavery Risks:

Policies:

The Reporting Entities observe a number of group and local policies and procedures in order to ensure we conduct our business responsibly and in compliance with all applicable laws

and regulations. Willis Towers Watson expect and require our colleagues to act with the highest possible standards of ethical conduct and integrity. The policies and procedures can be accessed by our colleagues through the internal intranet site and include the following:

- **Willis Towers Watson Code of Conduct** (applies to all employees, subsidiaries and affiliates – as well as all others working with Willis Towers Watson, such as contractors, temporary workers, third parties, agents and suppliers – must comply with the Code and related policies);
- **Willis Towers Watson Supplier Modern Slavery Risk Management Procedure;**
- **Willis Towers Watson Sustainable Investment Policy;**
- **Anti-Bribery and Corruption Policy and Procedures;**
- **Anti-Money Laundering and Counter-Terrorist Financing Policy and Procedures;** and the
- **Willis Towers Watson Australia Whistleblowing Policy.**

Supplier Due Diligence/Engagement:

The Willis Towers Watson group of companies have global supplier tender processes and have formulated modern slavery enquiries to be included, as appropriate, within tender packs sent to prospective suppliers at the initial engagement stage and also for on-boarded providers at the review/renewal stage. In this regard, the Reporting Entities are following the global corporate approach.

In FY20, Willis Towers Watson launched its Supplier Modern Slavery Risk Management Procedure, which provides Guidelines to the Reporting Entities to facilitate compliance with the requirements of the Modern Slavery Act. All Business Supplier Owners are required, with the assistance of the Compliance function, to undertake a risk assessment of the supply chain, determine risk control activities or develop actions plans to address material risks, and monitor any remediation process through to completion, and escalate any material risks.

During 2020, for purely local supplier engagements, the Reporting Entities completed a comprehensive due diligence exercise involving their existing critical (local) suppliers. The suppliers were sent a Modern Slavery Questionnaire with the aim to collect information about our suppliers' human rights policies and controls around modern slavery. No causes for concern were revealed in the course of conducting this due diligence exercise.

Governance/Accountability:

Governance of Willis Towers Watson's modern slavery response rests with a cross-functional Supplier Modern Slavery Risk Management (**SMSRM**) team which consists of:

- Chief Financial Officer, Australia and New Zealand
- Head of Legal, Asia-Pacific (Corporate Risk & Broking)
- Lead Counsel, HCB Australasia
- Facilities Services Director, Australasia & CEEMEA (Real Estate & Workplace Solutions); and
- Operations Leader (CRB), Australia

The SMSRM team's responsibilities and remit are to:

- be the central point of contact for all supplier modern slavery risk management queries within Willis Towers Watson Australia;
- drive the process of ensuring the completion of relevant risk activities or development of appropriate action plans to address identified control gaps and weaknesses and of monitoring remediation progress through completion;
- provide overall governance, guidance and oversight in relation to supplier modern slavery risks within Willis Towers Watson Australia and concerns raised as a result of assessments through the Questionnaire;
- report to senior management on supplier modern slavery risk concerns at relevant governance forums, if applicable;
- engage with the Willis Towers Watson global Supplier Risk Management (**SRM**) team, as appropriate; and
- to review the central register of supplier responses periodically.

The SMSRM team is authorised to make decisions in relation to the engagement, or termination of engagement, of a supplier having regard to the policy of Willis Towers Watson not to accept modern slavery risks within the supply chains of the Reporting Entities.

Investor Engagement:

Willis Towers Watson has a comprehensive global Sustainable Investment Policy, which documents the way in which our investment teams imbed the best of our sustainable investment research, risk management and idea generation. During 2020 Willis Towers Watson reported under the UK Stewardship Code, and the Principles of Responsible Investment (**PRI**) Annual Report. We align our sustainable investment approach with the various standards, initiatives and frameworks in the UK Stewardship Code and the PRI.

As trusted advisors to investors, we also believe that we have an important role to play in raising awareness of modern slavery with our clients.

During the Reporting Period, Willis Towers Watson produced a publicly available update on sustainable investment practices, focusing on social factors – the “S” in ESG for our client audiences. In this report, we advised clients who were asset owners to assess their material portfolio exposures to ESG risks and advised them to prepare their own modern slavery statements to provide transparency around the actions they are taking to assess and address modern slavery risks in their operations and supply chain.

We believe that investors who integrate ESG factors such as modern slavery into their investment process can improve portfolio resilience by identifying sustainability-related

risks and opportunities and then taking action through their portfolio holdings and stewardship activities.

In our engagement with investors, we encouraged asset owners to take the following practical actions:

- **Measure and monitor:** Assess portfolio exposure to ESG risks such as modern slavery. Identify exposures to high-risk countries and sectors in internally and externally managed portfolios
- **Engage:** Engage with companies on ESG issues such as modern slavery or indirectly through investment managers and collaborative groups.
- **Collaborate:** Participate in collaborative groups such as the Principles for Responsible Investment (PRI) that aim to address ESG issues such as modern slavery.
- **Beliefs, policies and process:** Conduct a beliefs exercise to examine and benchmark current sustainable investment beliefs. Review existing policies and incorporate ESG issues into investment policy documents. Integrate ESG issues into the entire investment process.

Collaboration on Due Diligence:

In order to mitigate the risk of modern slavery in our facilities management, Willis Towers Watson reached out to our property management in Australia to review their controls in place around the protection of the most vulnerable workers in our Australian supply chain – our cleaners. We recognise the work of the Cleaning Accountability Framework (**CAF**) as one of the few genuine worker-driven due diligence schemes – and support this tangible measure businesses, in collaboration with building owners, can take to prevent modern slavery.

In FY20, Willis Towers Watson were able to confirm that the current certifications are in place with our offices across Australia.

1. **Sydney:** current CAF certification between AMP Services and Dimeo, building/tenancy cleaner.
2. **Melbourne:** current CAF certification for ISS Facility Services, building/tenancy cleaner.

In FY21, we will continue to liaise with our building managers in Brisbane, Perth and Adelaide in relation to their certifications.

Remediation/Grievance Mechanisms:

The Willis Towers Watson Australia Whistleblowing Policy governs the grievance mechanism which incidents of modern slavery can be reported by employees or suppliers.

In the event that due diligence conducted on a particular supplier reveals the presence of a modern slavery risk (for instance if a supplier questionnaire confirms that there are concerns, reported incidents or investigations of modern slavery), a business supplier owner must: (a) request details of a corrective action plan (or similar) from the supplier; (b) report to the SMSRM team in relation to the plan; and (c) engage with the SMSRM team for further monitoring of the plan implementation by the supplier and jointly determine if any on-site assessment or evaluation is to be undertaken.

Training:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our operations and our supply chains, we are aware of the importance of training for key stakeholders so that relevant colleagues across all business functions are aware of the nature of the risks, the warning signs they should look for; and the steps they should take in response to relevant indicators.

While initial information/awareness sessions have been provided to the relevant stakeholders during the Reporting Period, we endeavour to finalise a formal training structure on modern slavery and ethical purchasing commencing in FY21.

Assessing the Effectiveness of Our Actions:

The Reporting Entities have established a fit-for-purpose supplier modern slavery risk management framework to ensure the risks faced are effectively identified, assessed and managed. Our response to managing the risk of modern slavery and human trafficking within our supply chain aligns to the overall enterprise risk management framework.

We will continue to monitor for modern slavery and human trafficking as part of our procurement risk assessment process for our material supplier engagements and will review and enhance this process through regular review.

Future Action:

Willis Towers Watson are committed to building on our work to date to further embed our policies and processes around human rights across the Reporting Entities – and to continue to strengthen our management of modern slavery risks.

During FY21, we will focus on:

- Continuing our risk assessment of suppliers and strengthening our supplier engagement around modern slavery;

- Reviewing our policies, standards and procedures to embed human rights and modern slavery due diligence more comprehensively;
- Building capacity of our staff on human rights, modern slavery and ethical purchasing through dedicated training;
- Identifying ways to raise awareness of our grievance mechanisms with potentially affected stakeholders; and
- Engaging and collaborating with relevant external stakeholders (including human rights experts) to share good practice and to provide input into our FY21 Modern Slavery Statement.

Consultation:

This statement is made pursuant to the Modern Slavery Act and constitutes the Reporting Entities' "Modern Slavery Statement" for the year ending 31 December 2020, and has been reviewed and approved by the Board of Willis Towers Watson Australia Holdings Limited on behalf of the Reporting Entities.



Board Chair
Willis Towers Watson Australia
Holdings Limited

Date: 30 June 2021

About Willis Towers Watson

Willis Towers Watson (NASDAQ: WLTW) is a leading global advisory, broking and solutions company that helps clients around the world turn risk into a path for growth. With roots dating to 1828, Willis Towers Watson has 45,000 employees serving more than 140 countries and markets. We design and deliver solutions that manage risk, optimise benefits, cultivate talent, and expand the power of capital to protect and strengthen institutions and individuals. Our unique perspective allows us to see the critical intersections between talent, assets — the dynamic formula that drives business performance. Together, we unlock potential.

Learn more at willistowerswatson.com.