

MODERN SLAVERY STATEMENT

2023

A MESSAGE FROM OUR CEO, MARSH McLENNAN PACIFIC

Dear Colleagues and Clients,

At Marsh McLennan we build the confidence to thrive through the power of perspective.

In the spirit of our Code of Conduct, *The Greater Good*, we are guided by doing the right thing – it's how we build trust and how we uphold our responsibility to the communities we serve.

Marsh McLennan has a Pacific Region Modern Slavery Policy and its goal is clear: We seek to avoid modern slavery in any part of our business, or in the business of our suppliers, and are taking steps to identify and address modern slavery risks that may exist.

In continuing to operate with this goal in mind, we are pleased to share our fourth Modern Slavery Statement.

This statement builds on our earlier statements and provides an update on the actions we are taking to identify and address modern slavery risks.

We continue to strive for the highest standards of responsible conduct in our own activities and encourage the same from our partners and suppliers.

As our Modern Slavery Program has progressed into its fourth year, we have sought to further integrate modern slavery risk management into our processes and practices, whilst also continuing our focus on the highest risk areas we have identified.

During the year, our Modern Slavery Working Group worked to support our colleagues and businesses in implementing and improving our Modern Slavery Program, including notably:

- Approximately 95% of new Pacific Region colleagues completed a modern slavery e-module as part of the on-boarding process during the Reporting Period.
- Continuing our modern slavery due diligence processes and engagement across operations and high-risk supply chains.
- Continuing activities seeking to assess and address modern slavery risk in our investments.

As our President and Global CEO John Doyle has stated: "Our workplace and the work we do in the world is built on trust. As individuals and as an enterprise, we earn trust by doing the right thing for our clients, colleagues and communities". This is the guiding principle by which to operate our businesses.

Doing our part to reduce and end modern slavery is a continuation of that commitment. I encourage you to read and refer to this statement to understand how we have sought to put these commitments into practice.



David Bryant

CEO, Marsh McLennan Pacific

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 where relevant, over the period 1 January 2023 to 31 December 2023 (the "**Reportable 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 related to or 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 licenced entities.



2 OPERATIONS, STRUCTURE AND SUPPLY CHAINS

2.1 Operations

a) Our people and locations

The Marsh McLennan group of companies is a leading professional services firm in the areas of risk, strategy and people. Globally, 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.

In the Pacific Region, the majority of our roles are performed by skilled 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.

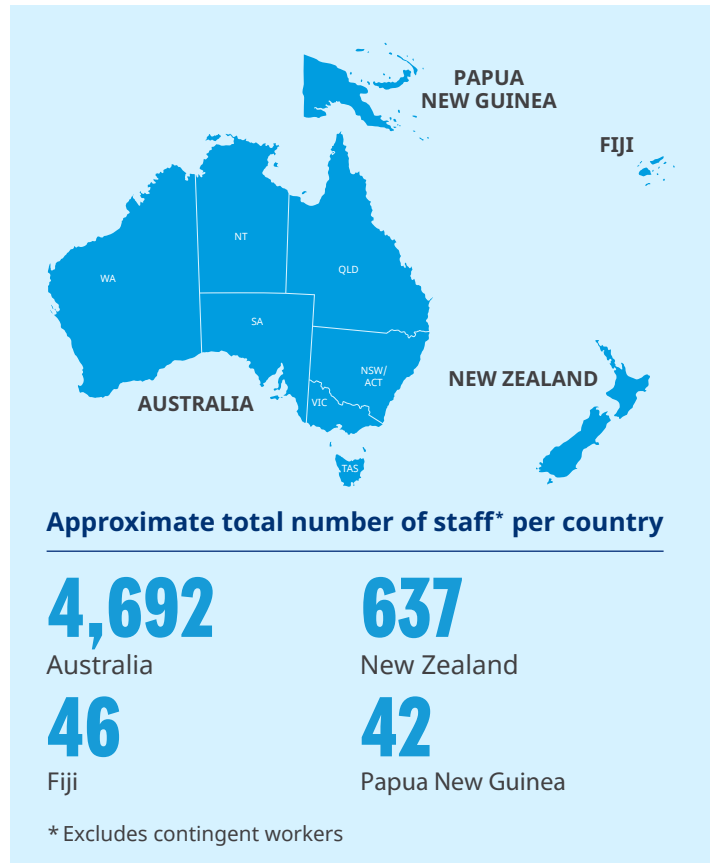
All our staff are remunerated in line with relevant awards and requirements, most well above minimum wage. The majority of our staff are employed on full or part-time contracts. We pride ourselves on being a flexible employer and approximately 10% of our staff are on part-time contracts. We make use of fixed-term contracts and third-party recruitment and labour agencies to support our staffing arrangements to help meet client needs in key business projects. Approximately 15% of our staff are employed on these arrangements. Given the highly specialised nature of much of our work, especially in our consulting business, most of these workers are skilled professional specialists. We do not use labour hire companies for manual labour or low skilled work.

b) 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 & 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 & Public Affairs teams for Marsh and Mercer 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 or controlled by the Reporting Entities. These services and entities do not fall neatly into either ‘operations’ or ‘supply chain’, but we describe these services throughout the report in relation to our ‘operations’ as 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.



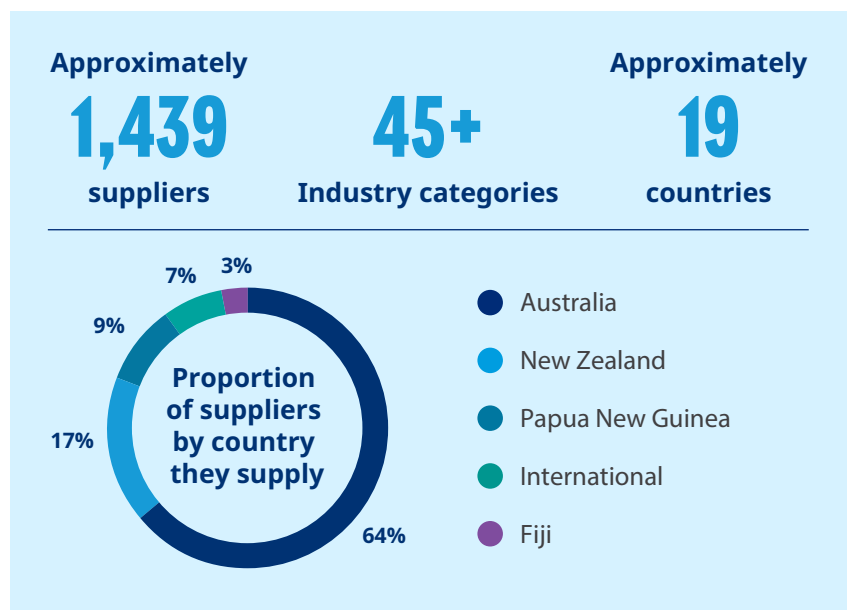
2.2 Supply chains

Global Sourcing and Procurement (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 on-boarding and contracting, monitoring and payment, and supplier database management.

We transacted with 1,439 suppliers across the Pacific Region during the Reporting Period, from across more than 45 supplier sub-categories. Of the 1,439 suppliers, 64% were Australian based suppliers, approximately 17% were New Zealand based suppliers, 9% were Papua New Guinea based suppliers and 3% were Fiji based suppliers; with the remaining 7% from the rest of the world. Our supplier database indicates these suppliers are based in around 19 countries, although 93% were domestic to the Marsh McLennan entity they were supplying (Australia, New Zealand, Fiji or Papua New Guinea), 71% of the rest of the world vendors were in the United States or United Kingdom.

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

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 United States.



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



1. Marsh (Pacific Region)

Marsh is a leader in delivering risk and insurance services and solutions. In the Pacific Region, 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.

Marsh works with clients of all sizes to define, design and deliver innovative solutions to better quantify and manage risk. Offering 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



2. Guy Carpenter (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. Wide-ranging strategic solutions to help clients discover and develop new markets, products and distribution channels that achieve long-term growth.

Consulting and investment



3. Mercer (Australia and New Zealand)

Mercer believes in building brighter futures by redefining the world of work, reshaping retirement and investment outcomes, and unlocking real health and wellbeing. Across the Pacific Region, Mercer draws on local and global expertise and insights to understand the unique needs and uncover opportunities to create positive change for clients across superannuation, investments, health and workforce consulting.

Mercer Superannuation (Australia) Limited provides members with a comprehensive suite of personal superannuation services.

Mercer's related activities and services include administration; technology and benefits outsourcing solutions; investment services; multi-manager investments; investment consulting and research services; workforce consulting and products.

Consulting



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

Oliver Wyman is a global leader in management consulting. Combining 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 Oliver Wyman to bring fresh perspectives and creative thinking to tough problems, helping to create significant and lasting change.

Lippincott is a global creative consultancy at the intersection of brand, innovation and culture. An industry pioneer for more than 70 years, Lippincott partners with the world's leading companies to help them succeed on the edge of change.

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

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 remains materially the same as 2022 as there has been no material change in our operations and supply chain (including investment activities).

 Operations	 Supply chain	 Investment activities (Mercer Entities only)
<p>As professional services providers, we work in industries which we understand to have low operational modern slavery risk. 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 considered to be low overall.</p> <p>However, we identified some operational areas with an elevated risk profile:</p> <ul style="list-style-type: none"> • Some of our Reporting Entities operate in higher risk countries • A small number of our employees perform higher risk roles • Some of our group shared services operate in higher risk countries. 	<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 <i>caused or contributed</i> to modern slavery in our direct suppliers is considered to be low overall.</p> <p>However, we identified some areas of our supply chain with an elevated risk profile:</p> <ul style="list-style-type: none"> • Direct suppliers in higher risk countries (eg India, Malaysia and Philippines) • Australian suppliers with supply chains in higher risk countries • Local suppliers operating in higher risk industries (eg facilities management, information and communication technologies, and food, beverage and hospitality) • Domestic suppliers to our Fiji and PNG businesses. <p>We understand that we may be <i>linked</i> to modern slavery via our higher risk suppliers as described above.</p>	<p>The investment activities of some Reporting Entities are considered to be our most likely exposure to modern slavery risks. This is not due to direct investment operations or among direct investment service providers, where risk is low, but due to risk within underlying holdings of the Mercer Funds^[1]. Within the Mercer Funds, the selection of underlying holdings is outsourced to external investment managers.</p> <p>The Mercer Funds are diversified across asset classes, industries and countries, therefore modern slavery risk will vary across the Mercer Funds, with those investing in higher risk countries and asset classes likely to be more exposed.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Higher risk asset classes, including emerging markets equities and emerging markets debt • Higher risk appointed external investment managers, based on risk assessment of holdings and responses to our surveys. <p><i>Note: Investment activities only apply to some of our Reporting Entities within the Mercer businesses.</i></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^[2] estimates that 93,000 people live in modern slavery and is ranked 5th highest for the prevalence of modern slavery in Asia and the Pacific. Walk Free’s report ‘Murky Waters: A Qualitative Assessment of Modern Slavery in the Pacific Region’^[3] also highlights the prevalence of modern slavery in Fiji. Having regard to the heightened risks in the Pacific Region, we will continue to evaluate our operations and supply chain to seek to manage modern slavery risks.

^[1] The Mercer Funds refers to the investment funds for which Mercer Investments (Australia) Limited (‘MIAL’) is the Responsible Entity or Trustee, and the investment options made available within the Mercer Super Trust, which are managed by MIAL. We note that there were other Mercer Pacific Entities, not themselves Reporting Entities but owned and/or controlled by Reporting Entities, that invested in the Mercer Funds in the Reporting Period.

^[2] Source: <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

^[3] 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 2023 Modern Slavery Program

In the 2023 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:



Approximately 95% of new Pacific Region colleagues completed a Modern Slavery e-module as part of the on-boarding process during the Reporting Period.



Continued to risk assess suppliers and seek further engagement with those understood to be high risk. Took steps to incorporate modern slavery considerations into new supply chain systems and tools.



Continuing our modern slavery risk assessment processes and engagement across operations and high-risk supply chains, including investment activities where relevant.



In countries identified as higher risk, Fiji and PNG, our Pacific Region Modern Slavery policy continues to apply, and staff training on modern slavery remains in place (which includes details of how to raise modern slavery concerns).



Continuing activities seeking to assess and address modern slavery risks in our investments.



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



Mercer Investments (Australia) Ltd continued to participate in Investors Against Slavery and Trafficking Asia-Pacific (IAST APAC), an investor-led, multi-stakeholder project to promote effective action in finding, fixing and preventing modern slavery.

3.2 Operations

a) Engagement with shared services operating in higher risk countries, including India

Marsh McLennan operates a Global Shared Services and Operations Division (GSD) out of India. GSD provides a range of services to Marsh McLennan globally. As noted in the summary of operational risks in *Section 2.4*, shared services in higher risk countries are one of the elevated risk areas we have identified.

To assist in addressing this risk, during the Reporting Period, we determined it was appropriate to roll out modern slavery training to senior management in the India business, expected to commence in 2024.

b) All-colleague training

As identified in the prior Reporting Period, Marsh McLennan rolled out a modern slavery e-learning module to all colleagues in the Pacific Region, commencing in 2020. Approximately 95% of new Pacific Region colleagues completed the e-module as part of the on-boarding process during the Reporting Period.

As noted in our summary of operational risks in *Section 2.4*, a small number of our employees perform higher risk roles and/or work in higher risk countries. 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 stance against all forms of slavery, and also providing the Marsh McLennan Ethics and Compliance hotline for concerns to be raised.



3.3 Supply chains

As outlined in our prior Modern Slavery Statement, processes are in place seeking to identify higher risk suppliers and to gather further information to inform actions to address these risks. In the Reporting Period, we sought to further refine and improve the modern slavery risk assessment and supplier engagement program.

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 109 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.
- Reviewed and scored the responses to the questionnaires to identify those suppliers who may be higher risk and require further attention.

b) Contractual terms and on-boarding

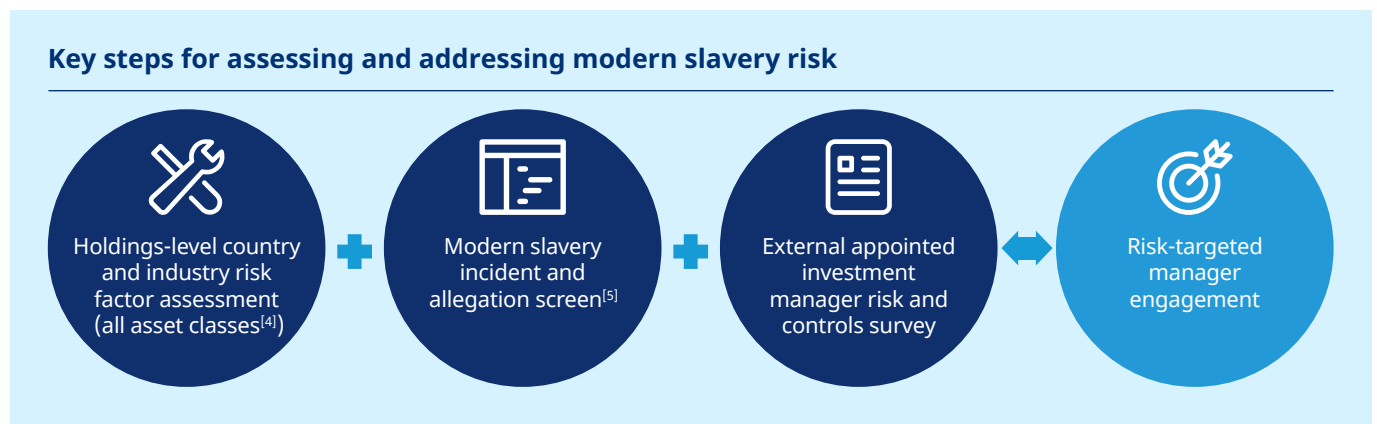
- Modern slavery questions and attestations were incorporated into a new global supplier portal (APEX) which is scheduled to launch across the Pacific Region in 2024.
- Modern slavery contractual clauses are included in all standard global purchase order terms and conditions.
- The use of standardised request for proposal (RFP) templates, including ESG related questions which cover modern slavery risk assessment.



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. MSAL relies on MIAL as the manager, Responsible Entity or Trustee of the relevant Mercer Funds to assess and address modern slavery risks in respect of its investment activities.

During the Reporting Period, Mercer acquired Advance Asset Management Limited (AAML) and took on its investment funds. In 2024, it is expected that AAML investment funds will become part of MIAL’s modern slavery activities as outlined below. During the Reporting Period, the modern slavery activities in this section did not apply to the AAML investment funds, as a staged approach was applied to the transition of these assets.



Mercer’s sustainable investment approach has included consideration for modern slavery as an important human rights issue for many years. In the Reporting Period, activities related to modern slavery continued to be incorporated into Mercer’s sustainable investment program, notably through portfolio assessment, manager engagement and industry collaborative initiatives, as detailed below.



^[4] 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.

^[5] This covers listed equities only and uses data from a third-party provider (ISS ESG).

a) Policy, process and disclosure

- Maintaining relevant sustainable investment policies, which covered how environmental, social and governance (ESG) risks and opportunities, including human rights and modern slavery, are managed.
- Sustainable investment (SI) reporting to clients, which included findings from modern slavery issues monitoring and related manager survey findings.
- Internal SI reporting on modern slavery activities to the Investment Management team and relevant Boards as part of regular, ongoing SI monitoring and annual board reporting.

b) Assessing risk

- Portfolio holdings assessment for potential modern slavery risk for the Mercer Funds, identifying the highest risk underlying holdings and investment strategies, based primarily on country and industry risk data^[6].
- Conducting an annual engagement survey of all appointed investment managers globally, which included a section covering human rights including modern slavery.
- Conducted a review of the investment risk assessment approach, adjusting inputs and research to also provide a broader human rights risk lens.

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.
- Continued participation in Investors Against Slavery and Trafficking Asia-Pacific (IAST APAC), an investor-led, multi-stakeholder project seeking to promote effective action in finding, fixing and preventing modern slavery in operations and supply chains.
- Continued participation in a collaborative Human Rights Industry Working Group led by Responsible Investment Association of Australia (RIAA). This group seeks to promote good practice among investors in relation to understanding and managing human rights issues in investments, including modern slavery.



^[6] It is noted that this risk assessment approach has limitations, including reliance on 'inherent risk' data at the country and industry level, assumptions and limitations carried over from the external primary research used, and the reality that modern slavery is known to be under-reported. Nonetheless, the approach is designed to reach an appropriate understanding of the exposure to modern slavery risk.

4 ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN

The Reporting Entities will seek to achieve, where practicable, year on year improvement in our approach to assessing and addressing modern slavery risks in our operations and supply chains, including investment activities. We assessed the effectiveness of our overall approach by tracking the progress of our 2023 goals during the Reporting Period. The table below shows progress updates against some of the goals that were set for 2023.

 2023 goals	 2023 progress
Launch the global supplier portal (APEX) which includes modern slavery questions and attestations.	The APEX supplier portal was rolled out in 2023 in North America and Canada and is scheduled to be rolled out in the Pacific Region in 2024.
Include a modern slavery contractual provision in standard global purchase order terms and conditions.	Modern slavery contractual clauses were included in standard global purchase order terms and conditions in 2023.
Monitor regulatory change arising from the Federal Government’s review of the <i>Modern Slavery Act 2018</i> .	There were no changes to the regulatory environment over the Reporting Period.
Continue to engage with the Global Shared Services and Operations Division in India.	During the Reporting Period, we determined it would be appropriate to roll out Modern Slavery training to senior management in the India business, which is expected to commence in 2024.



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.

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 – 2023^[7]

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 Ltd (“MOAPL”) ABN 83 068 908 912	<i>Outsource service provider to third-party superannuation funds trustees as well as the Mercer Super Trust. These services are primarily fund administration.</i>
Mercer Investments (Australia) Limited (“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 Passive Australian Shares Fund ARSN 160 295 009	<i>Registered and unregistered funds of which MIAL is the Responsible Entity/Trustee.</i>
AP #1 Trust ARSN 111 236 778	
Mercer DG (ex p) Trust ARSN 111 235 011	
Advance Asset Management Limited ABN 98 002 538 329	<i>Responsible Entity/Trustee of a range of managed investment schemes.</i>
Mercer Indexed Australian Shares Fund ARSN 086 512 834	<i>Registered and unregistered funds of which AAML is the Responsible Entity/Trustee.</i>
Mercer Indexed International Shares Fund ARSN 086 513 564	
Mercer Multi-manager Accumulator Fund ARSN 126 248 548	
1970’s Lifestage Fund – A ARSN 165 860 113	
1980’s Lifestage Fund – A ARSN 165 860 079	
WSSP Australian Equities Trust (Unregistered)	
Mercer Consulting (Australia) Pty Ltd ABN 55 153 168 140	<i>Provider of investment consulting, operational due diligence and custody consulting services.</i>
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>

^[7] Reporting Entities may change compared to prior Reporting Period if an entity meets, or does not continue to meet, the revenue threshold.

APPENDIX TWO

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 2 and 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 3
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Section 4
6. Describe the process of consultation with any entities the reporting entity owns or controls.	Section 5
7. Any other relevant information.	Appendix 2



Marsh GuyCarpenter Mercer OliverWyman