

## MODERN SLAVERY STATEMENT

### Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Mercer Limited and its subsidiaries (Darwin Technologies Limited, Darwin Technologies Holdings Limited and JLT Benefit Solutions Limited) (together “Mercer”) slavery and human trafficking statement in respect of the financial year ending 31 December 2020.

### Group Structure

Mercer is part of the Marsh & McLennan Companies, Inc. (“Marsh McLennan”) group which is a global professional services firm offering clients’ advice and solutions in risk, strategy and people. Marsh McLennan group has approximately 75,000 employees worldwide and approximately 13,380 employees in the United Kingdom.

### Our Business

Mercer, which is one of Marsh McLennan’s main operating companies, specialises in the provision of health, wealth and career solutions for its clients, including the provision of software solutions. Marsh McLennan’s other main operating companies are Marsh and Marsh Commercial (insurance broking and risk management), Guy Carpenter, (reinsurance and capital strategies), and Oliver Wyman (strategy, economic and brand consulting).

### Our Supply Chain

Mercer uses a central procurement process operated by Marsh McLennan which trades with in excess of 60,000 suppliers across over 82 different countries.

As a professional services and software solutions provider, Mercer does not operate in an industry where modern slavery is prevalent but nevertheless is committed to taking steps to uncover any potential risks within its supply chain.

### Our Policies

Mercer has various policies in place which aim to minimise the risk of modern slavery or human trafficking, and encourage reporting of any related concerns, including:-

- **A Robust Procurement Policy**, In addition to the rigorous supplier assessment processes, including assessment of supplier modern slavery statements, Mercer has implemented an additional questionnaire focused on modern slavery activities/signals. The questionnaire is deployed on a risk basis, according to the nature of services provided. Suppliers are required to report what steps they are taking regarding identifying the risk of modern slavery within their particular supply chain which will allow Mercer to better assess the potential risks of modern slavery in its own supply chain.

Mercer includes a specific requirement for compliance with modern slavery legislation in its standard terms and conditions and contracting agreements.

- **Vendor Management Program and Policy** defining managing Vendor Risk, including:-
  - How to identify vendor risk
  - How to mitigate vendor risk
  - How to monitor vendor risk
  - Who to contact for assistance
- **The Greater Good**, Marsh McLennan's Code of Conduct, is a significant part of Mercer's culture and makes clear that Mercer conducts business consistent with the highest ethical and professional standards and will not tolerate behaviour that deviates from those standards. Colleagues are expected to act with integrity, honesty, courage and promote mutual respect.
- **Speak Up Policy** Respect and a culture of openness in the workplace is a key aspect of the Marsh McLennan's Code of Conduct. Mercer encourages colleagues and other business partners to report any concerns, including any concerns relating to modern slavery or human trafficking.

Mercer's speaking up procedure, utilises an Ethics & Compliance Line (a service administered by third party) which makes reporting easy and confidential.

## Training

Mercer's Modern Slavery Policy has been rolled out to all colleagues, and incorporated into induction training. It includes information on who colleagues should contact should they have any concerns.

There is additional training for those colleagues most likely to interact with supply chains with a potentially higher risk of encountering modern slavery.

Colleagues are encouraged to report any concerns or suspicions regarding the presence of modern slavery within the supply chain.

## Going Forward

Mercer recognises that tackling modern slavery requires a continuing year-on-year commitment and will continue to undertake due diligence in our supply chain and review and improve procedures to help identify and prevent the risks of modern slavery or human trafficking.

This statement is made pursuant to section 54(1) of the *Modern Slavery Act 2015* and has been approved by the Board of Mercer Limited on 23 June 2021.



A Gupta  
Chairman  
Mercer Limited