MARSH

Modern Slavery Policy

Marsh Pacific Region

October 2026

This document provides a high-level description of how we operate in Australia, New Zealand, Fiji and Papua New Guinea, and covers all the entities owned and controlled by MMC Holdings (Australia) Pty Ltd, collectively 'Marsh Pacific' or 'we'. It complements our code of conduct, The Greater Good, which sets out the standards we expect of our colleagues and business partners. This policy should also be read in conjunction with the Marsh Modern Slavery Statement available on the Australian Commonwealth Attorney General's Office Modern Slavery Statements Register.

What is Modern Slavery?

Modern Slavery includes human trafficking, any form of servitude, slavery, forced labour, forced marriage, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Our Modern Slavery Policy

Marsh Pacific is committed to respecting human rights, including seeking to avoid any form of Modern Slavery within its operations or the operations of its suppliers, including our investments. Our suppliers are expected to maintain controls to ensure the risks associated with Modern Slavery are actively managed. In some markets we are required to publish a Modern Slavery Statement.

We also have various policies and procedures in place which help to minimise the risk of Modern Slavery and encourage reporting of any related concerns, including:

- **Procurement Procedures.** Our supplier assessment process includes assessment of a supplier's Modern Slavery activities/signals. Material suppliers are required to report what steps they are taking regarding identifying the risk of Modern Slavery within their supply chains, which allows us to better assess the potential risks of Modern Slavery in our own supply chain.
- **Vendor Management policy** defining management of Vendor Risk, including:
  - How to identify vendor risk;
  - How to mitigate vendor risk;
  - How to monitor vendor risk; and
  - Who to contact for assistance.
- **Third-Party Providers (TPP) Policy** – all Marsh Pacific's TPP relationships (i.e. with certain external parties involved in or related to our business or the (re) insurance chain, e.g. referrers and introducers) must be conducted in accordance with the Marsh, *Working with Third Party Providers, Government and Vendors Policy*.
- **The Greater Good**, Marsh's Code of Conduct, is a significant part of our culture and makes clear that we expect colleagues to conduct business with the highest ethical and professional standards and to act with care and integrity and promote mutual respect.
- **Speak up policy**, respect and a culture of openness in the workplace is a key aspect of our Code of Conduct. Marsh encourages colleagues and other business partners to report any concerns, including any concerns relating to Modern Slavery.

Modern Slavery program

Marsh Pacific's Modern Slavery program is supported by a cross-functional group with members from Legal, Risk, Compliance, Human Resources, Procurement, Operations, Investment and Consulting teams across our businesses.

The Marsh Modern Slavery program includes policy development and training, supplier and investments-related risk assessment and industry engagement.

How do we identify Modern Slavery risks?

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

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

Colleague Expectations

Modern Slavery Policy training is incorporated in the induction training for new Marsh Pacific colleagues.

All colleagues working for Marsh Pacific are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business, supply chains or investments. In line with our values and obligations as part of our Code of Conduct, colleagues must:

- **Know their responsibility:** All colleagues are responsible for preventing, detecting and reporting Modern Slavery risks in our operations, suppliers and investments;
- **Use sound judgement:** Exercise professional and ethical judgement in dealing with suppliers, clients, contractors and colleagues;
- **Win with Integrity:** Avoid engaging in any activity which might lead to a breach of this policy. We compete vigorously and fairly for business by providing superior products and services, not by engaging in improper practices.
- **Never act alone:** The only mistake you can make is the mistake that you make alone. When in doubt, reach out to your manager, Legal & Compliance, HR, a colleague or the Ethics & Compliance Line. We are all in this together;
- **Speak up:** Notify your manager as soon as possible or direct to Legal & Compliance, HR or the Ethics & Compliance Line;
- **Avoid independent investigations:** Do not confront suspected perpetrators or conduct your own investigations, escalate to your manager, Legal & Compliance, HR or the Ethics & Compliance Line;
- **Protect victims:** Treat concerns sensitively and protect the identity of victims and reporters; and
- **No retaliation:** Marsh prohibits retaliation against anyone reporting a Modern Slavery concern in good faith; potential violations will be investigated.

How can you raise Modern Slavery concerns?

If you believe or suspect that Modern Slavery may be occurring within Marsh's business operations or through our suppliers or partners, you must raise your concerns with your manager, Legal & Compliance or HR as soon as possible, or use the Ethics & Compliance Line to raise your concern or seek guidance.

EthicsComplianceLine.com

or via reverse charge telephone call:

Australia: 1800 953 650

New Zealand: 800 422 150

As there is no direct telephone number for colleagues in Fiji and Papua New Guinea, colleagues in those locations should use the Ethics & Compliance Line.

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

How do we raise awareness of this Policy?

- A copy of this Policy is available on various websites and on our internal intranet for colleagues.
- General awareness training is being provided to colleagues.
- Those colleagues closely involved in recruitment and procurement are trained in this Policy.
- Our approach to Modern Slavery is communicated to all our suppliers and reinforced as required.

Enforcement of Policy

If an issue is identified in the business of our suppliers or investments, we will work with them to understand their practices and where necessary, seek deeper engagement to address any concerns we have.

Any incident or allegation and any subsequent remediation are managed on a case-by-case basis.

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

External Parties – Self Service Guidance

Modern Slavery Statement

The Modern Slavery Act 2018 (Cth) sets standards for Modern Slavery disclosures in Australia. The Act requires entities with an annual consolidated revenue of $100 million or more to report annually on the risks of Modern Slavery in their operations and supply chains, and actions to address these risk.



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