

MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR FINANCIAL YEAR ENDING 31 DECEMBER 2018

MODERN SLAVERY ACT 2015

The Modern Slavery Act 2015 (the "Act") came into force in March 2015 and has helped clearly define and codify offences relating to modern slavery and human trafficking.

This statement is made on behalf of Towers Watson Software Limited and provides information about our business and supply chain and the steps we have taken to investigate and mitigate the risk of modern slavery and human trafficking both within our business and our supply chain.

We have explained our approach with specific regard to the six areas identified in section 54(5) of the Act and in light of the relevant official guidance.

OUR ORGANISATION

Towers Watson Software Limited is based in the UK and is part of the global Willis Towers Watson group of companies. Towers Watson Software Limited focuses on the sale of computer software and technology solutions to clients as part of this larger group, and coordinates with other Willis Towers Watson group companies in order to combat modern slavery and human trafficking.

SUPPLY CHAIN OVERVIEW

As part of the Willis Towers Watson group of companies, we have continued to take steps to identify and manage those areas in our supply chain where we believe modern slavery and human trafficking are a possibility. Our goal is to identify and minimise the risk wherever possible and to continually monitor and improve in our efforts.

We believe that the nature of our business, as a provider of software and technology solutions predominantly to corporate clients, means that we are not directly exposed to a high risk of modern slavery and human trafficking. We are nonetheless keenly aware that the possibility does exist within our global supply chains, particularly 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 other Willis Towers Watson group companies and our intra-group shared services suppliers and endeavour to establish adequate procedures to tackle the risk of modern slavery and human trafficking in their supply chains and ensure their policies reflect appropriate standards for their business.

The Willis Towers Watson group of companies have taken a coordinated approach to tackling the risk of modern slavery in our business structure, and our cross-function modern slavery working group continues to coordinate a group-wide approach to the matter.

POLICIES AND GUIDANCE

The Willis Towers Watson group of companies observe a number of policies and guidance in order to ensure we conduct our business responsibly and in compliance with all applicable laws and regulations. The Willis Towers Watson group of companies expect and require our colleagues to act with the highest possible standards of ethical conduct and integrity. The policies and guidance can be accessed by our employees through the group intranet site and include the following:

- Code of Conduct Reporting and Whistleblowing Guidance;

- Anti-Bribery and Corruption; and
- Anti-Money Laundering & Counter-Terrorist Financing.

The Willis Towers Watson group of companies has also commenced the development of a dedicated Procurement Intranet site. The site will consist of one central homepage with multiple sub-pages feeding directly from the homepage. One such sub-page will be dedicated to modern slavery and will contain more information on our policies and guidance to combat modern slavery. The intranet site will also include our modern slavery questionnaires to be sent to suppliers and prospective suppliers as part of a tender or contract renewal process, as well as template modern slavery clauses to be included in purchasing agreements.

ASSESSMENT AND MONITORING OF RISK IN OUR SUPPLY CHAIN

The Willis Towers Watson group of companies has certain intra-group shared service suppliers located in countries considered to be of higher risk in the context of modern slavery and human trafficking. In addition to this, we have a number of smaller external suppliers located across the globe.

The Willis Towers Watson group of companies has reviewed its tender processes and have formulated modern slavery enquiries to include, 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 particular, this year the Willis Towers Watson group of companies continued to monitor the procurement processes undertaken by our intra-group shared services providers to combat the risk of modern slavery and human trafficking in their own supply chains.

DUE DILIGENCE AND ON-BOARDING IN RELATION TO OUR SUPPLY CHAIN

We have continued our investigations into our supply chain to ensure a standardised approach to assessing the risk of modern slavery and human trafficking. Although we are satisfied there is minimal risk, to ensure a coordinated approach going forward, we continue to standardise modern slavery and human trafficking requirements for our suppliers. To encourage compliance in our supply chain with our values, we endeavour to include appropriate provisions dealing with the risk of modern slavery where possible.

These enquiries, alongside our existing due diligence processes, help us to appropriately assess the modern slavery and human trafficking risk of a potential supplier as part of our general consideration of their tender.

OUR EFFECTIVENESS AND PERFORMANCE

The Willis Towers Watson group of companies has an established enterprise risk management framework which ensures the risks faced by group companies 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.

Over the course of 2019 we intend to add modern slavery and human trafficking measurements as part of our procurement risk assessment process for our material supplier engagements.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, we are aware of the importance of training for key departments so that relevant employees are aware of the nature of the risks, what warning signs they should look for and what steps they should take in response as part of a responsible business.

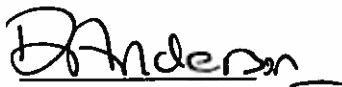
Training in relation to the Act, modern slavery risks and their practical implications for the procurement process has been provided to relevant personnel in key group departments in both 2016 and 2017.

We continue to work with our online training partner to finalise appropriate training on modern slavery and ethical purchasing with a view to rolling this out across the Willis Towers Watson group of companies in order to improve the level of understanding of the issues throughout the business. We intend to launch this training during 2019.

FUTURE DEVELOPMENTS

We will review and develop our processes and guidance, training and supplier approach towards the detection and prevention of modern slavery and human trafficking as our business evolves.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018, and has been approved by the Board of Directors of Towers Watson Software Limited and is signed below by one of the company's Directors.



Name: Duncan Anderson

TOWERS WATSON SOFTWARE LIMITED

Date: 20/6/19