

## **MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR FINANCIAL YEAR ENDING 31 DECEMBER 2017**

### **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 provides information about our business and how we have taken steps to investigate and mitigate the risk of modern slavery and human trafficking within our supply chain.

### **OUR APPROACH**

Willis Group Limited is based in the UK as part of the Willis Towers Watson group of companies. Willis Group Limited acts as a holding company as part of the larger Willis Towers Watson group. Willis Group Limited coordinates with Willis Towers Watson group companies to combat modern slavery and human trafficking.

Whilst we believe that the nature of our business as a provider of professional services to predominantly 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.

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

We 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.

### **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 have introduced training for key departments so that relevant employees are aware of the nature of the risks and what warning signs they should look for. During 2017 we again brought in a leading London law firm to provide this training to key personnel in our Procurement, Compliance, Vendor Management, Secretariat, Risk and Legal teams. The training focused on some practical case studies highlighting how modern slavery occurs, the offences under the Act, the reporting obligations for certain entities and general guidance on combating the risk of modern slavery and human trafficking.

We are working with our online training partner with the aim of rolling out appropriate training on modern slavery and ethical purchasing more widely across our whole organisation, in order to improve the level of understanding of the issues throughout the business.

### **DUE DILIGENCE, ON-BOARDING AND MONITORING IN RELATION TO OUR SUPPLY CHAIN**

The group 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 multitude of smaller external suppliers located across the globe.

We have continued 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.

To accompany these investigations, we have reviewed our tender processes, and have formulated modern slavery enquiries to include within tender packs, as appropriate, sent to prospective suppliers. In particular, this year we have developed 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.

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

### **PROCESSES AND GUIDANCE**


We are reviewing the need to develop a Procurement Intranet site where more information on our processes and guidance to combat modern slavery within our supply chain would be more widely shared. This intranet site would include the modern slavery enquiries we send out to suppliers and prospective suppliers as part of a tender or contract renewal process.

We also have in place existing Code of Conduct Reporting and Whistleblower Guidance that colleagues may follow if they wish to raise concerns relating to modern slavery.

### **FUTURE DEVELOPMENTS**

We intend to review and develop our processes and guidance, training and supplier approach towards the 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 2017, and has been sent to the Board for approval, as reflected by the Director's signature below.



Name: S. Alcock

**WILLIS GROUP LIMITED**

Date: 26 June 2018