We protect client information 26 We do not trade on or disclose inside information 52 We comply with the special requirements of government clients 28 We safeguard company UggYhg UbX]bZcfa Uh]cb) (We compete ethically 30 We maintain accurate business We do not bribe 32 records and sound internal controls 56 KYdihW]Ybhg]bhYfYghg fgh We communicate honestly and We act with integrity" professionally with investors and the public 58 Leaders have additional responsibilities 12 KY_bck cifVig]bYggdUfhbYfg (\$ We work to prevent money laundering We build trust by UbX bUbWU Wala Yq ... (& UVM]b[fYgdcbg]V m We treat others with respect 16 We build strong relationships We make an impact We provide a safe and k]h\ ci f'gi dd`]Yfg'' ((healthy workplace 18 We engage appropriately in the KYaUbU[YWtb]WmgcZ political process 68 We respect privacy and protect]bhYfYghk]h\]bhY[f]hm dYfgcbU~UbX~Wtb XYbhJU~]bZcfa Uh]cb~ &\$ We play by the rules 70 We are transparent about potential dYfgcbU`Wtb]WtgcZ]bhYfYgh (, We use good judgment when giving or accepting gifts or entertainment K Y hfYUhW|Ybhg ZU|f`m 50 &(

Place copy here.

My manager recently notified me that something I was doing was in violation of the Code. I had no idea I was doing something wrong. Can I be held accountable even though I was unaware of the rule?

Yes, you can be held accountable. You are expected to read, understand and follow the principles in the Code and all Company policies. Whenever you encounter something in the Code or a policy that seems unclear or dif cult to carry out, you must seek guidance from a manager or Legal and Compliance or Human Resources. Our reputation for integrity is our most valuable asset. To protect that asset, it is essential that you follow the principles set out in the Code and the policies.

K Y'UfY']b'Vi g]bYgg'hc'Yl dUbX'k \Uhg' possible for our clients and each other.

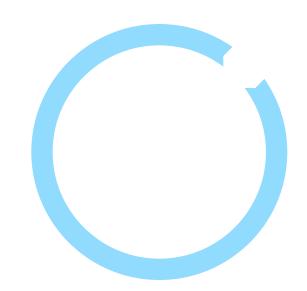
We embrace change and create enduring client value.

We strive to serve the greater good.

5hh\Y'WtfY'cZYUW\'cZh\YgY'Wta a]ha Ybhg']g'ci f'7cXY'cZ7cbXi WtiThe Greater Good. K Y'Yl dYWtiYj YfmWt'`YU[i Y'hc'UWtik]h\']bhY[f]mith 'fU]gY'nci f'\UbX'k \Yb'nci 'UfY' unsure of what to do and to speak up when you witness conduct that may not align with the values of The Greater Good.

We act with integrity.

9UW cbY cZi g a i ghhJ_Y]bX]j]Xi U`fYgdcbg]V]`]mifor acting with integrity at all times, even when h\]ga YUbga U_]b[X] W`hWc]Wg"H\]g]g h\Y bedrock principle of acting for *The Greater Good*.



- Ø Follow all laws and regulations that apply to your work.
- Take all required training to understand your responsibilities.
- Understand and adhere to the letter and spirit of this Code and Company policy.
- Speak up if you have a concern about any work-related behavior that may be a violation of the law, this Code or Company policy. Raise concerns with your managers at any level, or with Legal and Compliance or Human Resources, or http://doi.org/10.1007/10.
- 7ccdYfUhY]b]bhYfbU`UbX YI hYfbU`Ui X]rg'UbX]bj Ygh][Uh]cbg' by fully and truthfully providing information and by preserving all materials that might be relevant.

Is it legal, ethical and socially responsible?

Is it consistent with the spirit of the Code and Company policy?

Is it based on a thorough understanding of the risks involved?

Will it maintain trust with clients, shareholders, regulators and colleagues?

Would it maintain our good reputation if the behavior were to become known internally or publicly?

If the answer to any of these questions is no, stop and speak up.



Because we operate in many countries, laws will sometimes Wb] Whik]h\ YUW\ ch\Yfcf'k]h\ h\]g'7cXY'cf'7ca dUbmdc`] Wh' = Inci YbWti bhYf'gi W\ 'U'Wtb] WheWtbgi hk]h\ @Y[U`VYZcfY' deciding how to act.

K Y'k]``]bYj]hUV`mZUWY`X] W``hg]hi Uh]cbg`]b`ci f`k cf_"I bXYf`h\Y`\YUX]b[`K UhW\Ci h: cfz`a cghcZh\Y`gYWf]cbg`cZh\]g`7cXY``]gh`hYa dhUh]cbgždfYggi fYg`cf`fYX` U[g" H\YgY`h\]b[g`hc` K UhW\Ci h`For" should alert you to the potential problems inherent in the choices you are facing and signal the need to speak up or seek [i]XUbW'": cf`Yl Ua d`YžK 5H7< Cl H: CF.

Temptations to compromise integrity for revenue.

Pr



Leaders have additional responsibilites.



Communicate the letter and spirit of this Code to those who report to you and to your other colleagues. Make sure that your teams understand Company policies and procedures.

Take an active role in assuring the quality of the work product of your teams and the fairness and honesty of their communications with clients, colleagues and other business partners.

Use adherence to this Code and Company policy as a factor when you evaluate and recommend compensation for your teams.

Communicate to your teams that your door is always open for h\Ya 'hc fYdcfh'U'a]gh'U_YžfU]gY 'U'WbWfb cf'X]gW gg'U'X] W 'h' Vi g]bYgg'W\c]W"'5hh\Y gUa Y 'h]a Yža U_Y ']h\WUf'h\Q L

₩ fi hë U

"A ma UbU[Yf'fYWbhmbch] YX'a Y'h\Uhigca Yh\]b[' I was doing was in violation of the Code. I had no idea I was doing something wrong. Can I be held accountable even though I was unaware of the rule?

Yes, you can be held accountable. You are YI dYWWX ht fYUXZi bXYfghUbX 'UbX 'Zc``ck h\Y' principles in the Code and all Company policies. Whenever you encounter something in the Code cf'U'dc')Whih UhgYYa gi bWYUf'cf'X] W hht WUffm out, you must seek guidance from a manager or @Y[U'UbX'7ca d']UbW'cf'<i a Ub'FYgci fWfg"Ci f' reputation for integrity is our most valuable asset. To channeples in the vaostte Code and all Code aes.

Q:

I'm a manager. If I observe misconduct in an area not within my responsibility, should I raise a concern?

"Mrg" 5```7ca dUbmWt``YU[i Yg'a i ghgdYU_i d']Zh\Ym have a concern about any work-related behavior that may be a violation of the law, the Code or Company dc`]Wh'5```Wt``YU[i Ygz]bWl X]b['a UbU[Yfgza UmfU]gY' concerns with their managers at any level with Legal and Compliance or Human Resources or through h\Y'9h\]Wg/ '7ca d`]UbW' @bY"

My manager says that we should always bring our concerns directly to her and has suggested she will "make problems" for anyone who reports "over her \YUX" '=g'h\Uh'C?3

No. She is in violation of Company policy if she is trying to prevent you from using other reporting channels. While it is often best to raise an issue with not if a UbU[Yf' fghznot a Umgca Yh]a Yg'VY' bUV'Y' to do so, or believe doing so is inappropriate. You are free to communicate the concern to another manager, Legal and Compliance or Human FYgci fWgzcf'Vmi g]b['ci f'9h\]Wg/'7ca d']UbW' Line. If your manager disciplines you, assigns you i bd'YUgUbhk cf_'cf'ch\Yfk]gY'hfYUhg'not 'X] YfYbhm because you chose to report through another channel, then she may be in violation of our anti-retaliation policy and you should report that behavior.

We treat others with respect.

Treat others respectfully and professionally, always.

Promote diversity and inclusion in hiring and other employment decisions.

Report comments, jokes, behavior or communications that a UmVY c Ybg]j Y"

8 c bchX]gWf]a]bUhY 'U[U]bghcf `\ UfUgg 'U 'Wc ``YU[i Y 'cb 'h\ Y 'VUg]g' of gender or gender identity, race, color, religion, national cf][]bžU[YžX]gUV]`]mža]`]hUfmgYfj]Wfža Uf]hU`ghUhi gžgYI i U` orientation, genetic predisposition or any other characteristic protected by law or Company policy.

Comments, jokes or materials, including emails, that others a][\h bX c Ybg]] Y"

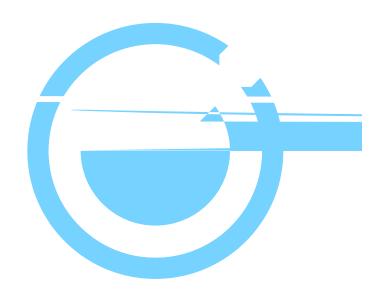
8]j Yfg]hmUhA Ufg\ A WeYbbUb

We provide a safe and healthy workplace.

Unsafe practices or work conditions, such as using handheld

We respect privacy and protect personal

information.



Understand and adhere to the law and Company policy on the use, protection and retention of information about colleagues.

Learn about the types of information given heightened

I b]bh/bh]cbU`Yl dcgi fY`cZWb XYbh]U`Wt``YU[i Y`]bZcfa Uh]cb`]b` public settings, such as during phone calls or while working on your laptop.

 $\underline{<\text{UbX`]b['\pm7cfa$$$Uh]cb'5ddfcdf]UhY`mDc`]VM}n$

While on a business trip, a colleague repeatedly asked me out for drinks and commented several times on my appearance in a way that disturbed a Y"'-g'fh\g'Ub']ggi Yzg]bW'k Y'k YfYb h]b'fh\Y'c W' when it happened?

This type of conduct is not tolerated in any work-related situation, including business trips. You should report the problem to Human Resources or a a UbU[Yf"5'gcž]Zmci 'ZYY`'Wta ZcfHJV`Y'Xc]b['gcžmci 'Wti 'X'HY``'nci f'Wt``YU[i Y'nci 'bX'\]g'cf'\Yf'UWh]cbg' inappropriate and unwelcome.

"C bY cZa mWck cf_Yfg'gYbXg'Ya U]`g'WcbtJ]b]b[gYl 'c_Yg'UbX'Wca a Ybhg't\Uha U_Y'Z b'cZWfftJ]b' nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

You should speak up immediately to a manager or to Human Resources, as sending such jokes may

We treat clients fairly.

Treat each client fairly and honestly.

8cWa Ybhh\Y'hYfa g'cZ'W]YbhfY`Uh]cbg\]dg'UbX'Yb[U[Ya Ybhg' according to your business procedures.

8 Yj Y`cd 'UbX 'XY`]j Yf 'dfcXi Wg 'UbX 'gYfj]Wg 'Uw\cklash fX]b['hc 'mci f' business procedures, including appropriate reviews to ensure high quality.

Promptly raise any concern about a potential error, omission, missed deadline or defect in quality with a manager or Legal.

Report actual or potential legal claims, lawsuits and errors and comissions to Legal by using your "Report to Counsel" form.

Dfca dhmfU]gY 'UbmdchYbh]U` Wcb]WhcZ]bhYfYghVYhk YYb 'W]Ybhgž or between a client and the Company, with a manager or with Legal and Compliance.

Comply with all licensing and other legal requirements that apply to your work.

Never follow a client's request to do something unethical or unlawful. If you are uncertain of the right course, consult a manager or Legal and Compliance.

5bmfYei YghVmUb Ya d`cnYY`cZU`W]YbhZcf`Ub`UffUb[Ya Ybh'h\Uh` dYfgcbU``mVYbY hg'h\Y`Ya d`cnYY`fUh\Yf'h\Ub`h\Y`W]Ybh']hgY`Z'

5bmW]Ybhg'fYei Ygh'Zcf'Ub'UffUb[Ya Ybh'h\Uh']g'bch'WYUf'm'Y[U''' or that could harm the Company's reputation.

Pressures from colleagues or managers to cut corners on quality or delivery standards.

Temptations to tell clients what you think they want to hear rather than the truth. If a situation is unclear, present a fair and accurate picture to the client as a basis for decision.

5bmfYei YghVmU'W]Ybhcf'h\]fX'dUfhmhc'g\UfY'ci f'fYj Ybi Yg'' if doing so would violate local licensing or other laws or regulations.

Comments or behavior from clients that may be considered c Ybg]j Y'cf'X]gfYgdYWZ `'hc'ch\Yfg"

FYgc`j |b['7cb]W/g'cZ=bh/YfYgh'Dc`]W/n

;]j |b['UbX'FYW']j |b[.;]Z/ngž9bh/YfhU]ba Ybh'UbX
Contributions Policy

We protect client information.



Understand and adhere to the law, Company policy and client agreements on the use, protection and retention of information from or about clients.

Learn about the types of information given heightened protection by the law and Company policy, such as personal <code>]bZcfa Uhjcb fjbWi X]b['GcWjU' GYW fjlmbi a VYfgžVUb_'UWVci bh' bi a VYfg*UbX \YU'h\ XUhUHŽUbX dfchYWh\ Ya 'h\ fci [\ appropriate means such as encryption or other types of access restrictions.</code>

Use and disclose client information only for legitimate business purposes in accordance with the client contract and the 7ca dUbmg < UbX`]b['=bZcfa Uh]cb'5ddfcdf]UhY`mdc`]Wh

Immediately consult Legal and Compliance if a law enforcement or regulatory authority or any other person outside the Company requests client information or documents.

Cb`mg\UfY`W]Ybh']bZcfa Uh]cb'k]h\]b'h\Y'7ca dUbm]Zmci '\UjY' made sure it is permissible and will be appropriately protected.

: c``ck 'ci f'< UbX`]b['=bZcfa Uh]cb '5ddfcdf]UhY`mdc`]Whhc 'dfchYWi' client information, Company information and equipment

We comply with the special requirements of government clients.

	Understand and adhere to Company policies and guidance in this area, including :ji_]b[_'UbX'FYW']j_]b['; _]Zrgž9bhYfhU]ba Ybh and Contributions and Working with Third Party Providers, Governments and Vendors.
	Businesses such as transportation providers, energy Wta dUb]Ygž bUbVJU`]bghJh h]cbgžhY`YVta a i b]VVh]cbg'dfcj]XYfg'
BYHYfa]bY`]b`Yj YfmWUgY`k \Yh\Yf`h\Y`W]Ybhmci `UfY`k cf_]b[`k]h\` s owned or controlled by a government.	
Follow all laws, regulations, contractual provisions and other rules applicable to the business relationship between the Company and each government client you work with.	
Understand the rules about gifts, entertainment, travel and odging of each government client you work with, as they may X] Yf Zfca 'ch\Yf W]Ybhg"	
Clearly communicate any special requirements of government clients to all colleagues, agents, subcontractors and other business partners involved in the work.	

We compete ethically.

CVhU]b]b['Wta dYh]h]j Y`mgYbg]h]j Y`]bZcfa Uh]cb'Zfca 'U'Wta dYh]hcf''

Coordinating employee compensation with a competitor.

Sharing the Company's competitively sensitive information with a competitor.

Sharing competitively sensitive information of clients or third

Collusion—when companies secretly communicate or agree on how they will compete. This may include agreements or YI W. Ub[Yg'cZ]bZcfa Uh]cb'cb'df]W[b[žhYfa gžk U[Yg'cf' allocations of clients or market segments.

Bid-rigging—when competitors manipulate bidding to undermine fair competition. This may include comparing bids, agreeing not to bid or knowingly submitting noncompetitive bids.

- Hm]b[k \Yb'U'Wa dUbmk]h\'g][b] WUbha Uf_Yhdck Yf'ZcfWfg' customers to buy products or services they do not want in order to receive those that they do want.
- Bc 'DcUW. '5[fYYa Ybhg k\Yb 'Wa dYh]hcfg 'U[fYY 'bch'hc' pursue each other's employees.

Also refrain from:

8]gW gg]b['cf'U[fYY]b['k]h\ 'Wa dYh]hcfg'cb']bUddfcdf]UhY'' matters, including fee and commission levels, strategic plans and how we win business.

We do not bribe.

a dfcdYf]b i YbW a UmHU_Y a UbmZcfa g" Cash, gifts, meals, travel, entertainment, loans, charitable contributions, political contributions cfc YfgcZYa d`cma Ybha UmU``VY i gYX]bUddfcdf]UhY`m]b UhYa dhg hc]b i YbW Vi g]bYgg decisions or government action. Regardless of the form, we do not bribe or use any other means hc]a dfcdYf`m]b i YbW h\Y XYV\\g]cbgcZW]Ybhgz potential clients or government employees. We Xc bchc Yf cfdfcj]XY Vf]VYg X]fYWfmcfh\fci [\alpha a third party. We do not bribe even where it might be a generally accepted practice, when competitors do so or for any other reason.

- 8c bch[]j Y cf c Yf Ubmh\]b[cZj Ui Y hc U W]YbhzdfcgdYW]j Y client or government employee unless it is legal, reasonable UbX ZfYY cZUbm]bhYbhcf i bXYfghUbX]b[h\Uh]hk]``]b i YbWY U business decision or government action.
- Follow our rigorous due diligence processes when engaging agents who represent us or third parties who introduce clients to us, and oversee their activity for the duration of any agreement.
- Raise a concern if you know or suspect that a colleague, third party or other agent of the Company may be attempting to la dfcdYf'm]b i YbW' U'XYWJg]cb cZU'WJYbhzdchYbhJU'WJYbhcf' government employee.

- Never record, or allow a colleague to record, a transaction in a way that disguises its true nature, such as booking the cost of YbhYfhU]b]b['U'W]Ybh'Ug'U' Wbgi 'h]b['ZYY 'cf'U' hfU]b]b['Yl dYbgY" '7UfYZ `mfYj]Yk 'h\Y'UWV fUWmcZh\Y'Yl dYbgY fYdcfhg'mci 'Uddfcj Y"'
- A Requests for payments to a country or a party unrelated to a transaction, or for payments in cash.
- ⚠ Third parties or agents who are deemed valuable for their personal ties rather than for their services, or who request compensation out of proportion to the value of their services.
- A Requests to engage third parties or agents without a written contract, or without completing the documentation required by the Company's due diligence process.
- ⚠ Requests from colleagues not to record agreements or payments.
- riangle 7`]Ybh'fYei]fYaYbhg'hc'Yb[U[Y'gdYV|YWh\]fX'dUfh]Yg"
- Client requests for favors, such as job interviews or internships for family members.
- △ 9bh/fh/]ba Ybhcfa Yu`g h\uhWti `X VY gYYb Ug``Uj]g\ cf]bUddfcdf]uh/"
- The appearance of impropriety, especially when dealing with government employees.
- 回 ;]j]b['UbX FYW']j]b[.;]Zngž9bhYfhU]ba Ybh'UbX 7cbhf]Vi h]cbg Dc`]Wh
- Working with Third Party Providers, Governments and Vendors Policy

We put clients'

We are often called upon to help clients choose between business partners. Some of our most important services involve helping our clients gY`YVMffYLJbgi fUbW a Uf_Yhg UbX Jbj Ygha Ybh gYfj JW dfcj JXYfg Zcf dYbg]cb UbX VYbY hd`Ub assets. Within the bounds of applicable law, regulation and Company policy, we always put ci f WJYbhg JbhYfYghg fghk \Yb \Y`d]b[h\Ya choose business partners of any kind.

Help clients choose business partners based on the quality of their products and services and the competitiveness of their prices and other terms and conditions.

< Y`d 'W]Ybhg 'W\ccgY 'Vi g]bYgg'dUfhbYfg'k \c'UfY'k Y```ei U'] YX`UbX` bUb\JU`mfYgdcbg]V`Y`UbX`Uj c]X`Vi g]bYgg'dUfhbYfg'k \c'have engaged in unlawful or unethical conduct, or who could damage client reputations.</p>

8]gWcgY homei fa UbU[Yf'UbmUWi U'cf'dchYbh]U'Wb]Wi of interest, or any personal relationship with a prospective business partner if you are involved in choosing the business partner.

5j c]X 'Ubm[]ZhžYbhYfhU]ba Ybh'cf 'ZUj cf'Zfca 'U'Vi g]bYgg' partner or potential business partner which might create the UddYUfUbW 'cZdYfgcbU' VYbY hhc 'mci 'Zfca 'h\Y'W\c]W' cZ' business partner.

5bmfY`Uh]cbg\]d VYhk YYb h\Y`7ca dUbmUbX`U`Vi g]bYgg`dUfhbYfž or between a colleague and a business partner, that could be dYfWY]j YX`Ug`U`Wb]WhcZ]bhYfYgh"=ZUbmgi W\ fY`Uh]cbg\]d`` YI]ghgžX]gW gg`]hk]h\ U`a UbU[Yf`cf`@Y[U``UbX`7ca d`]UbW""

FYgc`j]b['7cb]WtgcZ=btYfYghDc`]Wth

Business procedures for compensation disclosure

time to a client. It's a minor error, given the scope of the project, and it will make us look bad if I point it out. Can I just adjust future billings accordingly?

Mti 'g\ci 'X'bch]Zmh\Y:]bUbW' 8YdUfha Ybh' and the client and agree how to correct the error. This is the right thing to do, complies with Company policies and may in fact build trust because of our honesty.

I've discovered that I made an error in billing my

ked past a coworker sk this merning. She a meeting in the conf ce roo the highly Ybhju' jb Zcfa Uhjcb' UVc bY'cZ\Yf WjYbhg'k Ug'cc b'\Yf XYg_"'H\]g']gb hit fghhja Y'g\Yg'XcbY' ha hat should I do?

You dalk to your manage bout https://www.sauchen.com/

CbY'cZa mW]Ybhg']g'Ug_]b['a Y'hc' [c'k Umci hg]XY' the scope of our engagement agreement. They're a very important client, and I want to keep them happy. What should I do?

G][b] WJbhW.Ub[Yg]bh\Y`gWbdY`cZkcf_`g\ci`X` VY`XcWa YbhYX`UbX`UddfcjYX`Vmh\Y`W]Ybh'`CZ course, if the requests are for something illegal or inappropriate, you must not help, even if it "keeps them happy."

I'm on a tight deadline preparing a report for a client. The report includes some information we Wt``YWMYX"'=j Y`fYj]Yk YX`a cghcZ]hzUbX`]hgYYa g` bY"'7Ub`=^t gh'Uggi a Y`h\Y`fYghcZ]h]g'C? 'gc`=\Uj Y`U` chance of meeting the deadline?

Your reputation and ours are tied to everything we deliver to clients. When you inform them that the information you're providing is accurate, you must be certain that it is. Failing to do so could lead to harm for both you and the Company.

I'm in a meeting with government clients, which is running longer than planned, and they've missed h\Y]f'][\h\VUW_'\ca Y"'H\YfY'UfY'bc'a cfY'][\hg' for a number of hours. Can I buy them dinner since k YfY'gh]\"k cf_]b[']b'h\Y'7ca dUbmg'c Wg3

When dealing with government clients, you must become familiar with all special rules relating to our service for those clients. This includes any special I sent a visa application to an embassy. It has been there for a long time and I now need to travel to that country. I have been told that the embassy a UmYI dYX]hY a mUdd`]\Wh\cb`]\Z=dUmcbY`cZ]\rg' employees a modest amount. Can I go ahead with such payment?

No. The payment is to an individual, not to the embassy. This is a "facilitating" payment, which is not acceptable under the Code and illegal in almost all of the countries in which we operate. However, if h\YfY`]g`Ub`YI dYX]h]b['ZYY`h\Uh`]g`UʻghUbXUfX`k Umh\Y` embassy operates, and the fee goes to the embassy, not to an individual employee, it might be acceptable to pay—check with Legal and Compliance.

I have a client in another country whose insurance manager is about to come to my city for three days of business meetings with me and the insurance companies who underwrite the client's coverages. The manager has asked me to arrange for our Company to organize and pay for a day of sightseeing for him during his trip. Is this something I should discuss with Legal and Compliance?

Yes. Striking the right balance between business meetings and entertainment often requires a careful understanding of the anticorruption laws applicable to our Company. Legal and Compliance can assist you in understanding what the limits are so you can plan a client visit that will both enhance the client relationship and comply with the law.



9bhYf'U``fYei]fYX']bZcfa Uh]cb']bhc'h\Y'gnghYa g'dfcj]XYX'Vm your business for onboarding and managing clients, suppliers and third parties before you begin work on a new matter or engage a new business partner. These systems screen business partners and protect the Company from violating trade sanctions laws.

8c bchYb[U[Y]b ZJW]hUh]cb ZcfYl Ua d`Yž\Y`d]b['gca YcbY' else do an act you are not permitted to do yourself. If you are not legally allowed to perform an action yourself, you are also prohibited from helping someone else perform the action.

GYY_'UXj]W'' Zfca '@Y[U`'UbX'7ca d`]UbW''k \Yb'nci 'bX'Ubm' Wb]WiVYlk YYb'h\Y'gUbWfjcbg``Uk g'cZX] YfYbh'Wei blf]Yg''

Third parties acting on behalf of sanctioned countries, companies or persons.

5bma cbYmcf'ch\Yf'UggYhg']b'ci f'7ca dUbmg'dcggYgg]cb'



A client or pr

We build strong relationships with our suppliers.

5bmfY`Uh]cbg\]d`cf`XYU`]b[g`VYhkYYb`mci`UbX`U`gidd`]Yf`h\Uh`` Wti`X`VY`dYfWf]jYX`Ug`U`Wtb]WhcZ`]bhYfYgh' Df

We manage

interest with integrity.



Situations where a revenue opportunity for the Company is not in the best interests of a client.

Situations where one client is in litigation with another client.

GYfj]Wg'h\UhWti `X']bj c`j Y'cbY'Vi g]bYgg']bj Ygh][Uh]b[žc Yf]b[an opinion on or questioning the work of a sister company.

FYgc;]b[7cb]W/gcZ=bh/Yf/ghDc;]W/m

We are transparent about potential

of interest.

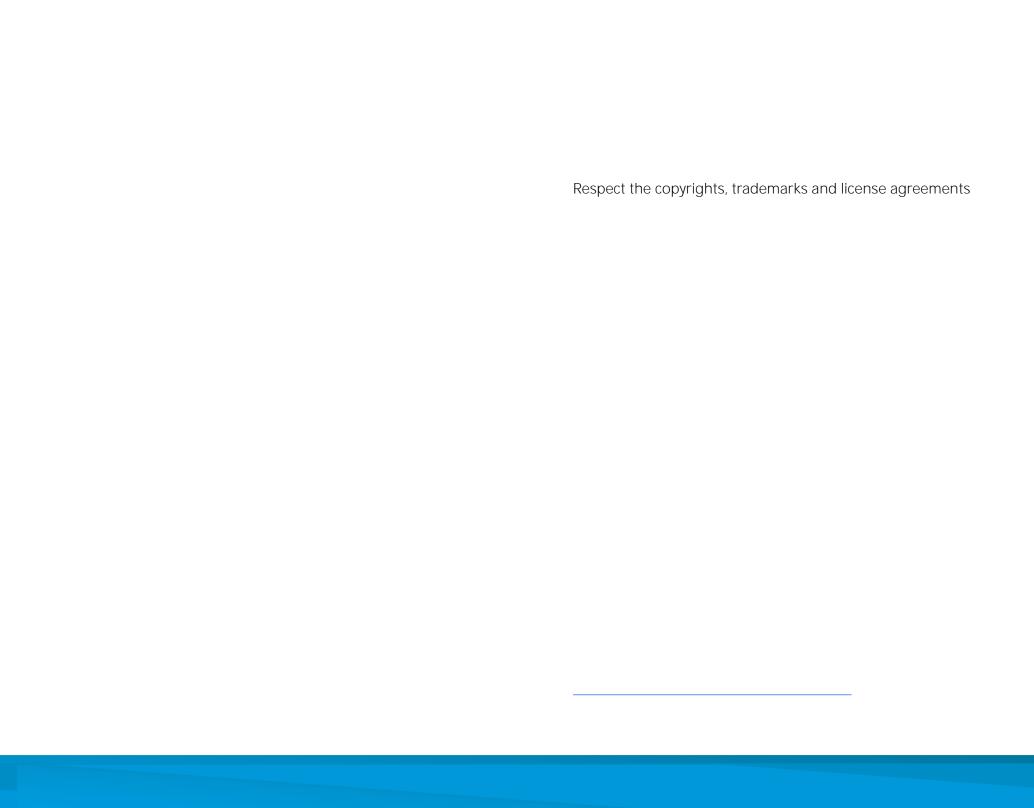
We use good judgement when giving or accepting gifts or entertainment.



We do not trade on or disclose inside information.



We safeguard Company technology and information.



We maintain accurate business records and sound internal controls.

7fYUhYUWWcibh]b[UbXVig]bYggfYWcfXgh\UhUWWf

Retain, protect and dispose of records according to our < UbX`]b['=bZcfa Uh]cb '5ddfcdf]UhY`mDc`]Vm Records subject to legal-hold notices, document-preservation requests or regulatory requirements may be subject to additional protections.

Understand and comply with legal-hold notices and other document-preservation requests.

9gh]a UhYgʻcfʻUggi a dh]cbgʻh\Uh'UfYʻfYdcfhYXʻUgʻZUWgʻʻ=Zmci ··· include estimates or assumptions in business records, ensure that such estimates or assumptions are properly supported by appropriate documentation.

91 U[[YfUh]cbžXYfc[Uhcfm`Ub[i U[Y`UbX`ch\Yf`Yl dfYgg]cbg`h\Uh` Wti`X`VY`hU Yb`ci hcZWtbhYl h'

Communications related to your work on social media or other sites. These may be considered business records and subject to the 7ca_dUbmg <a href="UbX"]b['=bZcfa_Uh]cb'5ddfcdf]UhY`miDc']Wh and other requirements.

8cWa Ybhgʻgi VYVMhcʻUʻ`Y[Uʻ`\c`Xʻcfʻg]a]`UfʻdfYgYfj Uhjcbʻ requirement. These records—whether in paper or electronic form—should not be destroyed, discarded, altered or hidden.

< UbX`]b['=bZcfa Uh]cb'5ddfcdf]UhY`mDc`]Wh</p>
Social Media Guidelines

We communicate honestly and professionally with investors and the public.



"A mik]ZY fi bg'U'hfU]b]b['Wtbgi 'h]b[' fa "'7Ub' she submit a proposal to become a vendor of Marsh McLennan?

5 'gi dd`]Yf']bj]hYX'a Y'hc'U'W\Uf]hUV'Y'[c`Z hci fbUa Ybh'UbX'a m7ca d`]UbW'C Wf'Uddfcj YX' a mUrhYbXUbW'''5h'h\Y'hci fbUa Ybhz'=k cb'U'gYhcZ Wi Vg'j U'i YX'Uh' &z\$\$\$]b'U'Xccfldf]nY'fU Y'''=g']hC?'' to accept them?

B chbYWggUf] nt 5 df]nY fYW] j YX]b U W bhYghcf UfU Y]g'U[] zh 5 & \$\$\$\$ [] zh]g`]_Y`mYI hfUj U[Ubh and accepting it would almost certainly violate our _____ j_]b[_'UbX FYW] j_b[_:___]zhgz 9bhYfhU]ba YbhUbX Contributions Policy.

I've developed a close relationship with one of my W]Ybhg"5h'\c']XUmh]a Yž=X'`]_Y'hc'gYbX'\]a 'U'[]ZhVUg_Yh']bWi X]b['U'Z/k VcHiYg'cZ[ccX'k]bY"=q'h\]g'C?3

Maybe. First, check your client's Code of Conduct. Many of our clients prohibit employees from receiving gifts of value. If it passes the client's test, review our ;_jj_b[_'UbX'FYW']j_b[_.';_]ZrgZ9bhYfhU]ba_Ybh' and Contributions Policy as well as your business policy. Generally, any gift you give must be: less than your business's policy threshold; not cash or cash-equivalent; legal; reasonable under the circumstances; free of any intention to improperly jb i YbW'Vi g]bYgg'XYWJg]cbg'UbX'i b']_Y'mhc WYUhY' h\Y'UddYUfUbW'cZ]b i YbW'"

We make an impact.

We engage appropriately in the political process.

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McLennan may engage in political activities.
5hU`h]a Ygžh\YgY UWh]j]h]Yg k]`Wta d`mk]h\`cW\`and national laws. In the US, the Company has U'dc`]h]W\`UWh]cb Wta a]hhYY fA Ufg\ A WeYbbUb D57tzk \]W\ a Uma U_Y Wtbhf]Vi h]cbg hc I G federal candidates, campaigns, political parties or political committees.



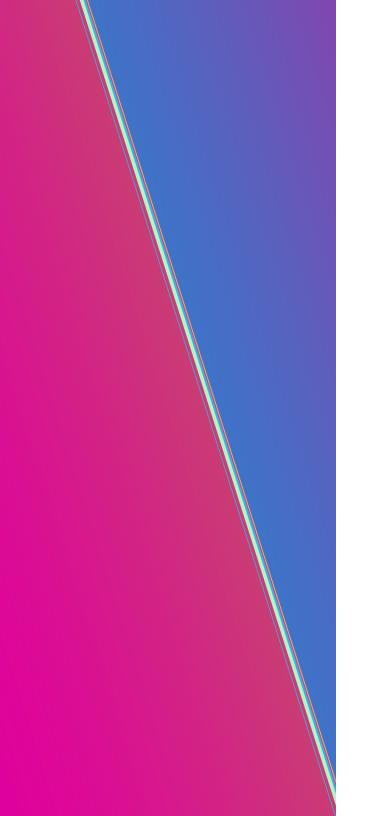
- FYWY]j Y'Uddfcj U``Zfca 'h\Y'79C'cZmci f'Vi g]bYggž]b' Wbgi `hUh]cb'k]h\'Di V`]W5 U]fgžVYZcfY'Yb[U[]b[']b'dc`]h]WU`` activities on behalf of the Company.
- 8c bcha U_Y 'Ubmdc`]h]\W\` \Wtbhf]\Vi h]cbg'cb \VY\\U`ZcZ' the Company.
- 5j c]X 'Ubmgi [[Ygh]cb'h\ Uhmci f'dYfgcbU'j]Yk g'UbX'UVhjj]h]Yg' are those of the Company.
- 8c'bchi gY'7ca dUbmfYgci fWfg'cf'ZUWj']h]Yg'hc'gi ddcfh'mci f' personal political activities.

- ! ≠bhYfUMncbg'k]h\ [cjYfbaYbhc W]U`g`cf'fY[i`Uhcfg'h\Uh'Wti`X`` VY`gYYb`Ug`cVVn]b["5bm`cVVn]b['UMnj]h]Yg'aigh`VY`X]gW ggYX`` in advance with Government Relations.
- [] j]b['UbX FYW']j]b[.;]Zrgž 9bhYfhU]ba Ybh'UbX Contributions Policy
- Global Fundraising Guidelines
- Social Impact at Marsh McLennan
- Working with Third Party Providers, Governments and Vendors Policy

We play by the rules.

We are a publicly traded US corporation [cj YfbYX VmUb]bXYdYbXYbh6cUfX cZ8]fYWcfg" We are committed to best practices in corporate governance. We have approval policies and procedures in place to protect the Company, our colleagues, our clients and our shareholders. It is each colleague's responsibility to know our procedures and adhere to them.

- ?bck 'h\Y'Uddfcj U`'dfcWfXi fYg'Zcf'mci f'Vi g]bYgg'UbX'A Ufg\'McLennan and obtain all required approvals in a timely way.
 - Consult with Legal and Compliance whenever you are unsure about the correct procedure.
- 8YWJg]cb!a U_]b['h\Uh'df]cf]h]nYg'g\cfhhYfa 'fYgi `hg'cj Yf' good governance.
- A Ufg\ A WeybbUb 5ddfcj U DfcWXi fYg
 Marsh McLennan Corporate Governance Guidelines



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