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About the Ethics & Compliance Line

WHAT IS THE ETHICS & COMPLIANCE LINE?

The Ethics & Compliance Line is a comprehensive and confidential reporting tool supplied by specialist provider [NAVEX Global](#) to assist Marsh McLennan colleagues to work together in addressing allegations of fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

The Ethics & Compliance Line is an important part of our culture, and assists us in creating a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

WHY DO WE NEED THE ETHICS & COMPLIANCE LINE?

We believe that our colleagues are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.

Marsh McLennan's businesses are required by law in a number of countries to have an anonymous reporting vehicle to address allegations of accounting and auditing fraud directly to the audit committee.

An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

MAY I REPORT USING EITHER THE INTERNET OR THE TELEPHONE?

Yes. With the Ethics & Compliance Line, you have the ability to file a confidential report via either the telephone or the Internet.

WHAT TYPE OF SITUATIONS SHOULD I REPORT?

The Ethics & Compliance Line is designed for colleagues to report any potential violation of our Code of Conduct, *The Greater Good*, or other concern you may have.

In some countries, you can only report certain types of issues through a service like the Ethics & Compliance Line. The Ethics & Compliance Line website or telephone operator will advise you about any restrictions on what you can report, and suggest an alternative route where necessary.

IF I SEE A VIOLATION, SHOULDN'T I JUST REPORT IT TO MY MANAGER, SECURITY, OR HUMAN RESOURCES AND LET THEM DEAL WITH IT?

When you observe behavior that you believe violates our Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of your management team, or the Employee Relations, Human Resources, or Legal and Compliance departments. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we offer the Ethics & Compliance Line. We would rather you speak up than keep the information to yourself.

WHY SHOULD I REPORT WHAT I KNOW? WHAT'S IN IT FOR ME?

We all have the right to work in a positive environment. With that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together and speaking up, we can maintain a healthy and productive environment.

DOES MANAGEMENT REALLY WANT ME TO REPORT?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance. Remember, we are only as strong as our weakest link.

WHERE DO THESE REPORTS GO? WHO CAN ACCESS THEM?

Reports are entered directly on the Ethics & Compliance Line secure server. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has received training in keeping these reports in the utmost confidence.

WHAT HAPPENS WHEN I MAKE A REPORT?

The Ethics & Compliance Line will help you to provide all the relevant information, and will summarize the details in a report that is sent to trained individuals in Marsh McLennan's Corporate Compliance and Employee Relations teams. These recipients will assess your report and identify the most appropriate individual(s) to investigate, fairly and impartially.

WHAT HAPPENS AFTER I MAKE MY REPORT?

When submitting a report, you will be given a Report Key and asked to create a password – please keep these details in a safe place. If you lose your Report Key, you will not be able to access your Report in the future.

If you choose to provide an email address when making a report, you will receive an email confirming that the details have successfully been recorded by the Ethics & Compliance Line.

You may be asked to provide further information to assist with investigating your report. You will need your Report Key and password to update your report with further details.

Marsh McLennan will investigate all concerns raised. This may result in action being taken internally or externally. Or, the investigation may determine that no wrongdoing occurred.

In order to maintain full confidentiality around the process it is Marsh McLennan's policy not to share the outcome of investigations, unless required to do so.

WHAT HAPPENS IF I FORGET MY REPORT KEY OR PASSWORD?

It is important to keep your Report Key and password safe. If you forget either of them, you will no longer be able to access your report to add information or to see any follow-up questions. If you wish to provide further information you will need to submit a new report.

WHAT IF I HAVE TROUBLE GETTING THROUGH ON MY COUNTRY'S DEDICATED PHONE NUMBER?

If your country's dedicated number does not work, please use AT&T Direct service. Click [here](#) for instructions.

Please tell the Ethics & Compliance Line operator that you had difficulty using your country's dedicated number, so they can pass this information on to Marsh McLennan.

DO I HAVE TO MAKE MY REPORT IN ENGLISH?

The Ethics & Compliance Line can cater for a wide variety of languages. If you would like to speak in a language other than English, an interpreter can join the call to assist. Please be patient as this process may take several minutes.

Reporting Security & Confidentiality

IF I MAKE A REPORT FROM A COMPANY COMPUTER, WON'T THE SERVER LOG IDENTIFY ME AS THE REPORTER?

The Ethics & Compliance Line does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Ethics & Compliance Line is available. Our provider, NAVEX Global, is contractually committed not to pursue a reporter's identity.

MGTI will not share your computer activity from your work computer to the Ethics & Compliance Line with any Marsh McLennan colleagues. Yet if you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) to access the Ethics & Compliance Line secure website.

CAN I FILE A REPORT FROM HOME AND STILL REMAIN ANONYMOUS?

A report submitted from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Ethics & Compliance Line system strips away Internet addresses so that anonymity is totally maintained.

I AM CONCERNED THAT THE INFORMATION I PROVIDE TO THE ETHICS & COMPLIANCE LINE WILL ULTIMATELY REVEAL MY IDENTITY. HOW CAN YOU REASSURE ME THAT WILL NOT HAPPEN?

The Ethics & Compliance Line system is designed to protect your anonymity. However, if you wish to remain anonymous, you need to ensure that the body of the report, or an uploaded attachment, does not accidentally reveal your identity. For example, avoid details of your location of work ("From my cube next to Jan Smith...") or other specific information ("In my 33 years...").

IS THE TOLL-FREE TELEPHONE HOTLINE CONFIDENTIAL AND ANONYMOUS TOO?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report. An interviewer will enter your responses into the Ethics & Compliance Line website. These reports have the same security and confidentiality measures applied as an Internet-based report. Calls to the Ethics & Compliance Line telephone service are not recorded.

WHAT IF I WANT TO BE IDENTIFIED WITH MY REPORT?

There is a section in the report for identifying yourself, if you wish to do so.

IS THERE ANY REASON I SHOULD IDENTIFY MYSELF WHEN MAKING A REPORT?

It can be very helpful if you identify yourself when making a report: this gives us the best chance of bringing the investigation to a definitive outcome by allowing us to clarify details and ask further questions. All reports are treated in the strictest confidence, and details will only be disclosed to those with a genuine need to know in order to investigate.

If you would still prefer not to disclose your identity, the Ethics & Compliance Line provides a means for you to provide additional information and answer questions anonymously by relaying messages between you and Marsh McLennan's investigators. Please check in on your report regularly for any follow-up questions.

CAN I TRUST THE ETHICS & COMPLIANCE LINE WITH MY PERSONAL DATA?

NAVEX Global is the world's largest specialist provider of ethics and compliance hotline services, and is trusted by companies, government agencies, police forces, retailers and charities across the world to supply secure and confidential reporting facilities. NAVEX Global was carefully chosen as Marsh McLennan's partner to provide the expert support needed to protect our culture of integrity, and allow all colleagues to speak up and make a difference in the moments that matter.

Data will be processed in line with all relevant privacy and data protection laws for your location, including the EU General Data Protection Regulation (GDPR) and the California Consumer Privacy Act.

Tips & Best Practices

I AM AWARE OF INDIVIDUALS INVOLVED WITH UNETHICAL CONDUCT, BUT IT DOESN'T AFFECT ME. WHY SHOULD I BOTHER REPORTING IT?

Marsh McLennan chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all colleagues, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. We are only as strong as our weakest link.

So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues to report potential issues. Remember that you're never alone.

I AM NOT SURE IF WHAT I HAVE OBSERVED OR HEARD IS A VIOLATION OF COMPANY POLICY, OR INVOLVES UNETHICAL CONDUCT, BUT IT JUST DOES NOT LOOK RIGHT TO ME. WHAT SHOULD I DO?

File a report. The Ethics & Compliance Line can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

WHAT IF MY SUSPICIONS PROVE TO BE UNFOUNDED?

All reports are fully investigated. We will not penalize any individuals if an investigation identifies no further evidence of wrongdoing; nor would there be any negative consequences for the reporter in such cases if the issue was raised from a genuinely held belief or concern.

It is rare that one individual possesses all the facts and evidence around an instance of wrongdoing. If you feel that something is not right, speak up and let us look into it properly. We would rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you were unsure. It is important that Marsh McLennan colleagues can speak up about issues that cause them concern.

WHAT IF MY BOSS OR OTHER MANAGERS ARE INVOLVED IN A VIOLATION? WON'T THEY GET THE REPORT AND START A COVER-UP?

The Ethics & Compliance Line system and corresponding report distribution process are designed so that implicated parties are not notified or granted access to reports in which they have been named.

WHAT IF I REMEMBER SOMETHING IMPORTANT ABOUT THE INCIDENT AFTER I FILE THE REPORT? OR WHAT IF THE COMPANY HAS FURTHER QUESTIONS FOR ME CONCERNING MY REPORT?

When you file a report at the Ethics & Compliance Line website or through the Ethics & Compliance Line call center, you receive a unique Report Key and are asked to create a password. With the Report Key and password, you can return to the Ethics & Compliance Line either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions.

ARE THESE FOLLOW-UPS ON REPORTS AS SECURE AS THE FIRST ONE?

All Ethics & Compliance Line correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of confidentiality and, if applicable, anonymity.

CAN I STILL FILE A REPORT IF I DON'T HAVE ACCESS TO THE INTERNET?

If you don't have access to the Internet, or are uncomfortable using a computer, you can call the Ethics & Compliance Line toll-free, 24 hours a day, 365 days a year.

CAN I BE PENALIZED FOR REPORTING A GENUINE CONCERN?

No. As affirmed in *The Greater Good*, Marsh McLennan will not tolerate retaliation against any colleague who raises a concern in good faith about a violation of the law, the Code of Conduct or Company policy.

WHAT IF SOMEONE DELIBERATELY MAKES A FALSE REPORT?

A colleague who knowingly makes a false allegation is in violation of the Code of Conduct and is subject to disciplinary action in accordance with local laws and internal procedure.