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## For External Use:

# Trade Sanctions and Anti-Money Laundering

Marsh McLennan is a global professional services firm offering clients advice and solutions in the areas of risk, strategy and people through four operating companies: Marsh, an insurance broker, intermediary and risk advisor; Guy Carpenter, a risk and reinsurance specialist; Mercer, a provider of human resources and related financial advice and services; and Oliver Wyman Group, a management, economic and brand consultancy. Marsh McLennan and its four businesses (collectively, the “Company”) have over 70,000 employees in more than 130 countries.

The Company, including the business, is committed to compliance with applicable economic sanctions, anti-terrorist financing laws, export controls and anti-boycott laws, as well as anti-money laundering and anti-corruption laws in the conduct of our business. The Company’s Code of Conduct, *The Greater Good*, and the Company’s Understanding Trade Sanctions and Anti-Money Laundering, Working with Third Party Providers, Government and Vendors and Giving and Receiving: Gifts, Entertainment and Contributions policies require compliance with these laws, and apply to all employees of the Company. All of the Company’s employees are required to certify that they have read, understand and will comply with *The Greater Good*.

The Company has implemented systems and controls, including sanctions screening, client and third party on-boarding procedures, transactional protocols, training and monitoring designed to achieve compliance with applicable sanctions laws and export controls, anticorruption laws, as well as *The Greater Good* and the Company’s Understanding Trade Sanctions and Anti-Money Laundering Policy. A copy of *The Greater Good* may be accessed by clicking here <https://www.mmc.com/about/esg.html>. As part of our trade sanctions and anti-money laundering compliance programs, we have in place a screening program using screening software to screen clients, prospects and various counterparties and transactions on a risk basis including against sanctions watch lists of the United Nations, Canada, United States, the European Union, United Kingdom and approximately 20 other governments. We also perform control and ownership screening to assist with identification of any company owned by one or more sanctions targets.

We have established an Anti-Money Laundering Compliance Program (“AML Program”), which incorporates, to the extent required by applicable laws and regulations, a Customer Identification Program designed to comply with the USA PATRIOT Act or other applicable laws and regulations relating to the prevention of money laundering and terrorist financing. The AML Program provides for the following where required by applicable laws and regulations:

- Policies, procedures, and a system of internal controls designed to ensure ongoing compliance with applicable AML laws and regulations;
- The designation of AML Compliance Officers, responsible for coordinating and monitoring day-to-day compliance with the AML Program for their businesses;
- Risk-based measures for monitoring transaction activity of customer’s accounts;
- Procedures for independent testing for compliance with the Global AML Program and applicable laws;
- Anti-money laundering training for appropriate personnel; and
- Identification of higher risk customers, including Politically Exposed Persons and the performance of enhanced due diligence.