WTW Environmental, Social and Governance (ESG) Activities

Environmental Matters

Climate change and its growing impact on society represents a significant global challenge. As one of the world’s leading risk advisors and experts in assessing and mitigating climate risk, WTW is committed to supporting measures aimed at helping to tackle climate change.

As a global company serving 140 countries and markets, we recognize our environmental responsibilities and the need to minimize our impact on the environment. We have set a commitment to achieve net zero greenhouse gas emissions by 2050 and 50% reduction by 2030 using science-based indicators. We have also established an environmental baseline for the company in 2019 - which gave us a good sense of major drivers of our carbon footprint. We are currently updating that baseline to help us develop a more comprehensive action plan supporting our climate commitments. In addition to that work, we will be developing a complementary environmental management system, all of which will help us track and report our emissions and carbon footprint.

We help reduce our environmental impact and carbon emissions through improvements to energy efficiency in our operations, reducing our need for business travel through the use of virtual meeting technologies, promoting recycling and reducing the waste we send to landfill.

We engage over 44,000 colleagues globally through the promotion of Company-wide and local initiatives. Our colleagues are encouraged to adopt environmentally responsible habits, like paperless record-keeping and recycling, and to learn information about new sustainability initiatives through internal communications and promotional campaigns.

We partner with our clients and communities to help address their social and economic challenges. We accomplish this through a combination of our business services and corporate programs.

We are committed to improving our suppliers’ environmental impacts by increasing our demand for and use of goods that are developed in a sustainable way and contribute to a reduced carbon footprint, including Environmental, Social and Governance (‘ESG’) questions and evaluation criteria within our procurement processes, and having in place a form of supplier contract that stipulates, where the form is in place, that all operations must be conducted in full compliance with all applicable laws in connection with the contract.

We have been closely involved with various governments, intergovernmental organizations and civil societies on climate policy and research for some years and share the collective ambition of an orderly transition towards sustainable and resilient economies and communities. Amongst a variety of our collaborations and memberships, we are members of the insurance industry initiative ClimateWise, to support the Taskforce on Climate-Related Financial Disclosures (‘TCFD’), and are active members of the Coalition for Climate Resilient Investment.

Our policy is to comply with all applicable environmental laws and regulations where we operate.

Internally, we have an ESG Taskforce that provides central governance and focuses on aligning our ESG commitments with our Company’s strategic priorities. The Taskforce is sponsored by our General Counsel, Chief Financial Officer and Chief Administrative Officer, and comprises representatives from across the business segments and corporate functions.

Further detail regarding our approach to ESG, including our TCFD and SASB statements, is contained on our website at https://www.wtwco.com/en-US/About-Us/environmental-social-and-governance and is not part of or incorporated by reference into this document.
Social and Employee Matters and Respect for Human Rights

Social and Employee Matters

We are committed to demonstrating to our shareholders and communities that we are a responsible and ethical business partner and good corporate citizen by conducting our business based on our global Code of Conduct, Respect at Work and Anti-Harassment Policy, and our Company values, which emphasize managing our relationships, inside the Company and out, with fairness, decency and good citizenship. Our policy is that adherence is compulsory and enforced, with reported violations investigated promptly, and demonstration of values formally assessed during annual performance reviews and incorporated into a colleague’s overall performance rating. Colleagues may raise concerns anonymously or confidentially through our Code of Conduct Hotline, online or by phone. As discussed further below, mandatory training on our Code of Conduct is delivered to all colleagues annually and completion rates are monitored.

We partner with our clients and communities to help address their social and economic challenges. For example, we participate in the Insurance Development Forum, a public/private partnership led by the insurance industry and international organizations (such as the United Nations and the World Bank) that aims to optimize and extend the use of insurance and its related risk management capabilities to build greater resilience and protection for people, communities, businesses and public institutions that are vulnerable to disasters and their associated economic shocks.

Additionally, as a professional services company, we endeavor to enable our colleagues to reach their full potential by fostering a culture of mutual respect, an inclusive and diverse work environment, professional development opportunities, safe working conditions and fair hiring and labor standards. Each year, our leaders cascade I&D focused objectives throughout the organization, and we continue to look for ways to provide for an objective and fair process that mitigates human biases in our talent programs and processes. Highlights of our I&D activities include the following:

- **Globally** – Our I&D councils – with members from our businesses and functions – lead our I&D efforts around the world, with support from internal communication and HR colleagues, including our dedicated I&D team and our inclusion networks (employee resource groups). The councils help to align regional I&D objectives with Company priorities, including how we attract, hire, develop, promote and retain diverse talent and foster an inclusive environment.

- Additionally, our five global inclusion networks and recruitment teams partner with organizations such as the International Association of Black Actuaries, Organization of Latino Actuaries, Where Women Work and MyGwork to source diverse talent. We continually look to expand such partnerships with diversity-focused organizations to hire the best talent from the broadest, most diverse talent pools. Other strategic relationships include:
  - Since 2019, WTW has qualified for the Bloomberg Gender Equality Index, which recognizes organizations who are trailblazers in their commitment to transparency in workplace gender reporting.
  - In January 2021, WTW became one of the 44 founding members of the World Economic Forum’s Racial Justice in Business Initiative. The purpose of this initiative is to build more equitable and just workplaces for professionals with under-represented racial and ethnic identities.
  - WTW is a member of the Valuable 500, which works to ensure disability inclusion is on business leadership agendas across the globe.
WTW is proud to be a global festival partner of Dive In: The Festival for Diversity and Inclusion in Insurance. Supporting the festival since its inception in 2015, WTW colleagues worldwide collaborate with insurance industry peers and clients to lead local committees on the planning and launch of 100+ festival events each year, attracting thousands of participants worldwide (30,000+ across 30+ countries in 2021).

- Our commitment to I&D is universal and ongoing. We recognize observances around the world and in specific countries, such as Black History Month, International Women’s Day, World Autism Awareness Day, World Day for Cultural Diversity, LGBT+ Pride month, Dive In, World Mental Health Day, and International Day of Persons with Disabilities, and use these events to help us get to know one another better – and to become more aware of our similarities and our differences. We have also implemented unconscious bias and inclusion workshops in many of the countries in which we operate and have launched an online, interactive unconscious bias module available globally to leadership teams and colleagues.

- We launched a comprehensive set of actions to address and ameliorate gender imbalance in leadership levels, with an integrated, business-sponsored approach targeted at hiring, developing, retaining, and promoting senior women. Select recognition:

  - **In the U.S.**: We have been recognized by the Human Rights Campaign Foundation as a “Best Place to Work” for LGBT+ equality. In certain cities, we have also launched a pilot program that seeks to increase the representation of Black, African American and Latinx talent. Leadership teams and Multicultural Inclusion Network representatives will support a collection of focused efforts to attract, hire, develop, promote, and retain colleagues, in partnership with select external organizations.

  - **In the U.K.**: WTW is a member of Stonewall’s Diversity Champions Program, an employers’ forum for sexual orientation and gender identity equality.

We help strengthen our communities through charitable giving and volunteering by offering the following:

- **Matching** Gifts Program that matches our colleagues’ contributions to charitable organizations focused on healthcare, inclusion and diversity, post-secondary education, disaster relief and environmental/climate sustainability;

- Our Volunteer Day Program that provides our colleagues with paid opportunities to volunteer their time and talents to improve our communities; and

- A global charitable giving policy that benefits the Company by providing consistent new Company-wide governance and expenditure recording for all business and office charitable expenditures in this area.

We manage our internal Total Rewards activities using our Guiding Principles and internal governance processes to help ensure compliance and fair treatment. Our total rewards programs align to our commitment to colleague health and wellbeing, ensuring our people are protected in the event of accident or illness, have sufficient paid time off and can accumulate capital for personal needs and retirement. To ensure all colleagues have appropriate support and resources available for themselves and their families, Employee Assistance Programs are available throughout our organization.
Respect for Human Rights

While we believe the nature of our business as a professional services provider to predominantly corporate clients means that we are not directly exposed to a high risk of modern slavery and human trafficking, we are nonetheless aware that the possibility does exist within our global supply chains. We do not have a formal global human rights policy; however our approach to modern slavery reflects our overall approach to human rights. Seven of our U.K. subsidiaries (including Willis Limited and Towers Watson Limited) have produced Modern Slavery Act Transparency Statements, most recently for the financial year ending December 31, 2020. These U.K. entities work with other WTW entities to combat modern slavery and human trafficking in the business structure and have a cross-functional modern slavery working group that continues to coordinate a Company-wide approach. As part of WTW, these U.K. entities are committed to maintaining and improving practices to combat the human rights violations of slavery and human trafficking. The U.K. Modern Slavery Working Group has continued investigations into our supply chain to advance a standardized approach to assessing the risk of modern slavery and human trafficking.

We have expanded training to ensure a high level understanding of the risks of modern slavery and human trafficking amongst those of our colleagues helping to manage supplier arrangements; ensuring that relevant employees are aware of the risks and warning signs. We continue to standardize Company-wide modern slavery and human trafficking requirements for our large enterprise-wide supplier arrangements to provide for a coordinated approach.

Anti-Bribery and Anti-Corruption

The Company is subject to global anti-bribery and anti-corruption policies and procedures, which apply to all employees in entities owned and/or controlled by WTW, suppliers to WTW and third parties performing services on behalf of WTW (unless the suppliers or third parties have comparable anti-bribery and anti-corruption policies of their own).

WTW’s Anti-Bribery & Corruption Policy states that WTW is committed to conducting business with honesty, integrity and fairness and without the use of bribery and corrupt practices, and prohibits the offering, promising, giving, requesting, agreeing to receive or accepting of any bribes or other illegal or corrupt payments or inducements to or from any person at any time, anywhere in the world.

Bribery and corruption risks include those through third parties and gifts, entertainment and hospitality. The Company mitigates these risks through global procedures which apply to all employees in entities owned and/or controlled by WTW. The Company’s Anti-Bribery & Corruption - Gifts, Entertainment & Hospitality Procedures require approval of gifts, entertainment and hospitality (whether given or received by WTW) that meet bribery risk criteria explained in the procedures. In general, the Anti-Bribery & Corruption - Third Party Approval Procedures require due diligence be conducted on, and approval be obtained for, all third parties performing specified services on behalf of WTW. For all but the very lowest risk third parties, the approval procedures must be refreshed and repeated annually. Very low risk third parties require re-approval under the procedures every two years.

The policies, procedures and supporting forms and information are available on the Company’s intranet site and are translated into 26 languages to support their global application and understanding.

Online training is delivered annually in these languages on a risk-based approach to WTW employees regarding Anti-Bribery & Corruption, Gifts, Entertainment & Hospitality, and Third Party Bribery Risk, including a comprehension test on the module content.

All WTW employees are also required to comply with the Code of Conduct, which among other things sets out the Company’s expectations regarding anti-bribery and anti-corruption matters. All employees are required annually to complete Code of Conduct training (provided in multiple languages) and to complete a comprehension test on the module content and certify their understanding and compliance with the Code of Conduct.
Legal disclaimer

Forward-Looking Statements

We have included in this document ‘forward-looking statements’ within the meaning of Section 27A of the Securities Act of 1933, and Section 21E of the Securities Exchange Act of 1934, which are intended to be covered by the safe harbors created by those laws. These forward-looking statements include information about possible or assumed future results of our operations. All statements, other than statements of historical facts, that address activities, events or developments that we expect or anticipate may occur in the future, including such things as our outlook, metrics and targets, the impact of the global pandemic on our business, future capital expenditures, ongoing working capital efforts, future share repurchases, financial results (including our revenue, costs or margins), the impact of changes to tax laws on our financial results, existing and evolving business strategies and acquisitions and dispositions, including the sale of Willis Re to Arthur J. Gallagher & Co. (‘Gallagher’), demand for our services and competitive strengths, goals, the benefits of new initiatives, growth of our business and operations, our ability to successfully manage ongoing leadership, organizational and technology changes, including investments in improving systems and processes, our ability to implement and realize anticipated benefits of any cost-savings initiatives including the multi-year operational Transformation program, and plans and references to future successes, including our future financial and operating results, plans, objectives, expectations and intentions are forward-looking statements. Also, when we use words such as ‘may,’ ‘will,’ ‘would,’ ‘anticipate,’ ‘believe,’ ‘estimate,’ ‘expect,’ ‘intend,’ ‘plan,’ ‘continues,’ ‘seek,’ ‘target,’ ‘focus,’ ‘probably,’ or similar expressions, we are making forward-looking statements. Such statements are based upon the current beliefs and expectations of the Company’s management and are subject to significant risks and uncertainties. Actual results may differ from those set forth in the forward-looking statements. All forward-looking disclosure is speculative by its nature.

A number of risks and uncertainties that could cause actual results to differ materially from the results reflected in these forward-looking statements are identified under Risk Factors in Item 1A of our Annual Report on Form 10-K and in our subsequent filings. Copies are available online at www.sec.gov or www.wtwco.com. The risk factors described in our filings are not the only risks and uncertainties that we face. Additional risks and uncertainties that are presently unknown to us could also impair our business operations, financial condition or results.

Although we believe that the assumptions underlying our forward-looking statements are reasonable, any of these assumptions, and therefore also the forward-looking statements based on these assumptions, could themselves prove to be inaccurate. Given the significant uncertainties inherent in the forward-looking statements, our inclusion of this information is not a representation or guarantee by us that our objectives and plans will be achieved.

Our forward-looking statements speak only as of the date made and we will not update these forward-looking statements unless the securities laws require us to do so. In light of these risks, uncertainties and assumptions, the forward-looking events discussed in this document may not occur, and we caution you against unduly relying on these forward-looking statements.

Policy Statements

Each of the following statements is a statement of general policy. It is possible that specific circumstances in our global operations may differ from those described in our policy statements.

Willis Towers Watson public limited company and its subsidiaries ("WTW") is a leading global advisory, broking and solutions company that provides data-driven, insight-led solutions in the areas of people, risk and capital. Leveraging the global view and local expertise of our colleagues serving more than 140 countries and markets, we help organizations sharpen strategies, enhance resilience, motivate workforces and maximize performance. Our purpose is to transform tomorrows - this extends to our own sustainability position and impact. Our clients, colleagues and other stakeholders expect us to conduct business with
integrity, in an environmentally and socially responsible manner and with the highest ethical standards. Providing disclosures, like this report, is just one way we plan to help create additional clarity for our stakeholders on our sustainability position and impact.