



Statement pursuant to the Transparency Act

Willis Towers Watson AS

June 19, 2025

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1 Introduction

This statement has been prepared by Willis Towers Watson AS ("WTW") in accordance with the "Act on Companies' Transparency and Work with Fundamental Human Rights and Decent Working Conditions" of 18 June 2022 no. 99 (the "**Transparency Act**"), § 5.

2 General description of the enterprise's organisation, area of operation, policies and procedures related to human rights

2.1 The organisation of the business

WTW is one of Norway's largest insurance brokerage firms with approximately 140 employees, with its head office in Oslo, and local offices in Larvik, Stavanger and Bergen.

WTW is a company of the Willis Towers Watson Group with offices in 140 countries and more than 48,000 employees. WTW is 100% owned, through subsidiaries, by Willis Towers Watson plc. Dublin, Ireland, and listed on the NASDAQ (ticker: WTW).

2.2 Operating Range

WTW is an insurance and reinsurance broker. WTW is also an advisor related to corporate risks and optimization of employee benefits, as well as employee development. WTW's customers are businesses in all industries, including the public sector.

2.3 Human Rights Policies and Procedures

As an advisor and insurance broker, WTW's supply chain is limited, mainly to office service providers. Insurance providers are not a direct part of our supply chain, but WTW advises its customers on which insurance policies and which insurance providers they should choose as part of their supply chain. WTW therefore strives to ensure that the recommended insurers comply with applicable human rights regulations, other related legislation and other relevant industry ethical standards, in addition to ensuring that they have sufficient financial solvency to handle any insurance settlements.

The principles we follow in our business, including laws and regulations related to human rights, gender balance, diversity and the working environment, are set out in our [Code of Conduct](#). WTW also follows extensive procedures and rules for who we work with and how this should be done. All our policies, procedures and internal rules are implemented in our business and all our employees complete annual training to ensure that awareness of this is maintained. There are also well-established whistleblowing routines in place in the company.

The responsibility for compliance with the Transparency Act lies with the board.

The day-to-day responsibility for the work on the Transparency Act and the due diligence assessments have been placed with the general manager, and in this connection, the CFO,

line managers, Compliance, HR, Facilities and other administrative positions have key roles in this work.

3 How do we work with these due diligence assessments when it comes to risks and measures in our own business?

3.1 Work environment

Our employees are our most important resource. A good working environment is therefore of crucial importance.

Our HSE routines and controls are comprehensive and under continuous follow-up locally and at group level, and are documented annually.

3.2 Equality and diversity

We work continuously to ensure equality, equality and diversity, so that all our employees feel that they thrive and belong when they work at WTW. This applies regardless of background, religion, orientation, life situation and other circumstances.

Every year, we prepare a gender equality and diversity report: [Inclusion and Diversity Report](#), which describes how these conditions are worked on in WTW and which focus areas have been selected for further work.

3.3 Customers and human rights

When establishing new and renewing existing customer relationships, our customers are assessed, among other things, against our know-your-client (KYC) procedures.

We work continuously with a focus on compliance with human rights, both locally and at group level.

If violations of human rights or decent working conditions are detected, we will initiate further investigations, and appropriate action will be taken. This can ultimately lead to customer relationships being denied or terminated.

4 How do we work with these due diligence assessments when it comes to risks and measures in the supply chain?

4.1 Vendors

Our business, as a provider of professional services to corporate clients, involves a low risk of slavery and human trafficking. Higher risks may exist in the supply chain, and it is therefore important that all employees are aware of, among other things, the prohibition against human trafficking and unethical working conditions, and that the company will take the necessary measures against any employee, agent or subcontractor if these prohibitions are violated.

We work actively to have a responsible value chain as we are aware that by entering into agreements with other companies, you also open up for increased sustainability risk. Therefore, we conduct due diligence assessments of new suppliers to avoid violations of fundamental human rights, decent working conditions and/or recognised principles and

framework for climate/environment. We regularly request confirmation from our largest suppliers that they comply with this framework.

We have a very limited number of external suppliers, most of them related to the rental and operation of offices, some ICT and actuarial services. These are primarily located in Norway.

We also have internal service providers within the WTW Group, mainly in Europe, who are all bound by the same rules, policies and procedures as we in Norway.

4.2 Insurance and pension providers

An essential part of our work as insurance brokers is to find suppliers of insurance programs and pension solutions for our customers.

All insurance and pension providers are subject to extensive regulation and have their own routines in relation to human rights, decent working conditions and climate and the environment.

In addition, insurers are assessed and followed up by our Market Security department, mainly for financial reasons, but other criteria are also used in the assessments.

4.3 Risk assessment of our suppliers

We find that the risks related to safe and decent working conditions and human rights violations at our suppliers are low.

In the years ahead, we will continue to focus on periodic inspections of our largest suppliers and continuously assess the need for inspections in relation to new and smaller suppliers.

With regard to insurance and pension providers, we base ourselves on their own statements pursuant to the Transparency Act.

5 **Summary and concluding remarks**

5.1 Period

This statement relates to the period from 1 July 2024 to 19 June 2025.

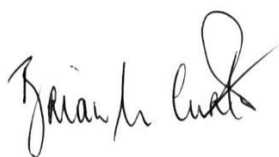
5.2 Continuous process

It is emphasized that even though this report relates to a specified period, due diligence and work related to human rights and working conditions are an essential part of the company's continuous efforts in this context.

5.3 Do you have any questions?

Our compliance officer will be helpful in responding. Get in touch via our website <https://www.wtwco.com/nn-no/contact-us>

This report was signed by the Board of Directors of Willis Towers Watson AS June 19th 2025.



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