Integrity is at the heart of what we do, and who we are as a company. Alongside our firm cultural commitment to excellence in risk management, our UK-based financial services companies are subject to regulation by the UK Financial Conduct Authority (FCA) and observe the strictest standards of business conduct and regulatory compliance.

JLT is committed to actively contributing towards the international efforts to eradicate all forms of financial crime. Limiting our exposure to financial crime is an integral part of JLT’s activities and helps us maintain our reputation. As a global company listed on the London Stock Exchange, JLT is subject to the UK Bribery Act (2010) which requires us to have adequate procedures to prevent bribery and corrupt action by those working for JLT or on its behalf. Anti-bribery and corruption is also a key feature of global regulatory regimes that JLT complies with.

Contractual obligations

Our various Employee Handbooks, defining the terms under which JLT offers contracts of employment in different jurisdictions, specify in detail the policies all colleagues must observe on risks. These include rules on unauthorised payments, gifts and hospitality, anti-competitive practices, bribery, conflicts of interest, tax compliance, licensing, exchange controls, invoicing, proper record-keeping, share dealing, fair and respectful treatment of colleagues – and set out clear processes for whistle-blowing.

Training

Our set goal is to train every employee from director to broker to support functions globally so not only can they recognise and prevent the use of JLT in the furtherance of bribery and corruption, but they can anticipate where to look. Training includes global e-learning modules in eight languages, and is supplemented by face to face training and briefings for higher risk jurisdictions.

Vigilance

All staff are reminded of their legal obligations in relation to reporting suspicious activity or transactions and JLT provide communication channels to enable employees to discuss and report any suspicion of bribery and corruption.

Investigation

JLT will investigate any instance of alleged bribery and corruption as well as assisting the police and other appropriate authorities in
any resultant investigation and prosecution.

**Financial Crime Team**

This JLT team supports the active reduction of bribery and corruption risk by managing and providing oversight of the company's bribery corruption policies, and providing tools, training and specialist expertise including investigation.

**Whistleblowing**

JLT has a global whistleblowing policy and 24 hour hotline provided by a specialist external firm. This provides an alternative channel for those colleagues who might find themselves unable to report wrongdoing or suspicions of wrongdoing through their normal line management channels. The hotline allows employees across the world to report issues or concerns online or via phone, in a range of languages and with complete confidentiality and without fear of dismissal or retaliation.

The whistleblowing policy is actively communicated annually, and managers are required to ensure that their teams understand the purpose of the policy, how concerns can be raised, and the protections afforded to employees. Any reports of incidents, events and concerns made under this policy are investigated and resolved confidentially. JLT's policy and system conforms with the differing regulatory requirements of all the countries in which we operate, and gives colleagues the option of anonymity or complete confidentiality wherever this is permitted by law. The Group's whistleblowing arrangements are monitored and reviewed by the Group Audit & Risk Committee.

See in addition a summary of our Anti Bribery & Corruption Policy.

**Third Party Risks**

Corrupt practices remain an unfortunate feature of local business practice in some countries where we operate, and certain means of doing business, such as via third parties, carry a higher risk to us as a company. At JLT the use of third parties is subject to strict controls, coordinated by a central team on behalf of our global operations. All third party relationships undergo extensive due diligence, and a robust, documented risk assessment. This ensures we have identified:

- who we are dealing with,
- what links they have to the clients they bring to us,
- whether they are connected to Politically Exposed Persons,
- whether they are government-owned,
- whether they are licensed and regulated,
- what publicly available adverse information might relate to them,
- whether they operate in higher risk countries or industries,
- how much we are asked to pay them, and
- what services they will provide to JLT

Once all risks have been identified the third party will be considered for formal approval. Third party approvals are given for a set period of time, after which the due diligence and risk assessment must be refreshed.

By controlling third party payments in this way, and ensuring transparency over all our dealings, we mitigate the risk of JLT being used for corrupt purposes.