

2023 Code of Conduct

On May 17, 2023, the Board of Directors of Willis Towers Watson plc (“WTW”) approved amendments to the Code of Conduct (“the Code”). The Code applies to all WTW colleagues, including employees, directors and officers. The amendments were made as a result of the annual evaluation of the Code and provided clarification in relation to topics previously addressed in the Code and other WTW policy and corporate governance documents. The amendments include:

- updates to address developments in applicable laws and regulations;
- the improvement of focus on core company values such as inclusion and diversity;
- the addition of wording consistent with WTW policy and procedure in relation to health and safety, human rights and conflicts of interest; and
- technical, administrative and non-substantive amendments to the Code.

The amendments do not result in any waiver of any provision of the Code or company policy.