

# Milliman Corporate Social Responsibility

Statement and Policies

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Milliman is among the world's largest providers of actuarial and related products and services. Founded in 1947, we are an independent firm with offices in major cities around the globe.

We strive to protect the health and financial well-being of people everywhere, through commitments to our work, our colleagues, and our world. Our commitment to corporate social responsibility (CSR) has been a quiet tradition since our inception. In 1986, Milliman approved the Milliman Code. This document lays out broad responsibilities that espouse the basic ethical standards by which Milliman employees abide. Throughout our history, employees globally have devoted time and money to the causes of their choice to enhance their communities and the world in which we live.

More recently, we formalized this tradition. Our goal is to broadly communicate Milliman's long-standing dedication to CSR to our clients, prospective clients, and communities.

We define corporate social responsibility as the integration of business operations and values to reflect the interests of all stakeholders in the company's policies and actions. At Milliman, we believe CSR is integral to our work, our colleagues, and our world. This document reflects our dedication to supporting ethical and positive actions and our prohibition of illegal actions.

## Global human rights

Milliman is committed to supporting and upholding the provision of basic human rights to all individuals globally. This commitment fits within Milliman's Mission statement that guides all our work and is seen throughout this document and Milliman's policies.

**“Our mission is to serve our clients to protect the health and financial well-being of people everywhere”**

## Commitment to our work

We serve a full spectrum of business, financial, government, union, education, and nonprofit organizations. In addition to our consulting actuaries, Milliman's body of professionals includes numerous other specialists, ranging from clinicians to economists.

### MicroInsurance

MicroInsurance is an innovative public/private policy strategy that makes insurance coverage affordable for low-income people. In developing countries and economies with limited resources, losses that result from health, financial, and natural disaster risks may produce devastating consequences for vulnerable populations.

Microinsurance features low-cost premiums along with low caps and coverage. It's available for many different types of risk, including health and life.

#### Milliman MicroAssist

Through Milliman MicroAssist, one of our volunteer programs, we match the expertise of Milliman's consultants with organizations that are working globally to bring financial security to vulnerable populations. The program primarily assists organizations that serve low-income workers, especially those in informal economies who are underserved by mainstream markets. Milliman MicroAssist's mission is to help develop economic solutions that protect these populations against health, lifecycle, financial, and natural disaster risks.

Milliman MicroAssist gives our consultants opportunities to use their specialized skills and experience in markets that have an urgent need. We believe this application of our consultants' skills significantly extends their reach and enhances Milliman's CSR efforts.

#### The MicroInsurance Centre at Milliman

The MicroInsurance Centre at Milliman is dedicated to generating access to valuable microinsurance products for the 3 billion low-income people around the world. We accomplish this by working with regulated insurers and appropriate delivery channels that efficiently provide simple, market-responsive microinsurance products. Our clients include commercial insurers, foundations, bi- and multi-lateral development agencies, regulators, and NGOs. These organizations work with us to ensure the best potential for success with their microinsurance activities. Our work with clients includes various aspects of microinsurance, from product development and training to research and advocacy. Our team has implemented microinsurance activities in more than 70 countries over the last two decades. For additional information, please visit [www.microinsurancecentre.org](http://www.microinsurancecentre.org).

## Industry innovation

Our groundbreaking work in employee benefits has led to significant innovation in retirement planning. As the leading provider of actuarial, analytical, and data management solutions in the U.S. healthcare industry, we have played a prominent role in healthcare reform over the past decade. We have been leaders in enterprise computing since the 1960s, and that leadership continues today with products that have transformed the actuarial industry.

While our name may not be a household word, our work has touched millions of individuals worldwide.

## Professional volunteerism

We encourage employees to give back to their varied professions in any way they can, including writing, speaking, researching, and serving on committees or holding positions of office in relevant professional organizations. The firm provides financial support to employees who serve on committees, hold office in professional organizations, or speak at public meetings.

Our consultants have served in leading roles, including as presidents of the American Academy of Actuaries, the Brazilian Institute of Actuaries, the Casualty Actuarial Society, the Institute of Actuaries, the Society of Actuaries of Ireland, and the Society of Actuaries. They have also volunteered as board members for the Institute of Actuaries of India, the Institute of Actuaries of Japan, the Dutch Actuarial Association, the Staple Inn Actuarial Society, The Actuarial Foundation, and the Actuarial Standards Board.

# Business practices

## Quality

Milliman is committed to providing superior services and work products. We employ a strong ethic of peer review in all our projects. This process requires a secondary review of the work performed, reports prepared, and overall project management. Selected reviewers are familiar with the project but have not performed significant work on the specific project. This allows for impartial review and the opportunity to provide additional insight. The review is structured to identify any outstanding issues that were not addressed, ensure that information is presented in a logical and complete manner, and confirm that the overall quality of the work meets Milliman's high standards. This process adds an additional level of security for our clients.

## Governance

Milliman is owned by approximately 400 current employees. This means that all employees are active in our business and intensely concerned about Milliman's future. The board of directors, which consists of senior leaders from diverse practice areas, leads the firm. Milliman believes in transparency in its governance. Prior to any meeting, each owner is provided with meeting materials and a chance to offer their opinions on voting items to their board contact. Formal meeting minutes and informal notes from each meeting are posted to our intranet site.

Milliman operations are governed by a series of policies that ensure that work is high quality and provided in an ethical manner.

In addition, a series of specialized committees oversee various business areas, including a Quality Assurance Committee, a Corporate Social Responsibility Committee, and a Global Compliance Committee.

## Anti-corruption and anti-bribery

Milliman's Anti-Bribery Policy prohibits all types of bribery or the appearance of bribery to public officials and private entities. Our employees are educated on this policy through our outreach and training program. We monitor activities on a global basis through a series of financial audits by internal and external auditors. Milliman's Audit Committee oversees the audit process and the Global Compliance Committee oversees compliance with the policy.

## Conflicts of interest

Milliman is committed to a conflict-free environment. As a privately held company, we retain our independence.

Conflicts are managed through a series of procedures, starting with a conflict check prior to entering into any client work and continuing with conflict reporting and management throughout the project. Milliman's policy requires any employee who becomes aware of a conflict or potential conflict to report it in a timely manner. Conflicts will be analyzed and addressed either through conflict mitigation or disclosure.

## Fraud and anti-corruption

We're committed to legal and ethical behavior throughout the organization as stated in The Milliman Code. Internally, this is maintained through a series of policies, including our Anti-Bribery Policy and our Whistleblower and Non-Retaliation Policy. Milliman also acts to prevent fraud from outside the company. Our Milliman Information Security Policy and various policies relating to the protection of data require all employees to take steps to ensure that threats from outside the company are detected and prevented where possible.

## Money laundering

As a service provider, Milliman is unlikely to be involved with money laundering; however, it is our policy to prohibit money laundering in all areas. We do our best to detect and prevent any work or support provided to any individual or entity engaged in money laundering.

All U.S. employees submit to a background check, which includes screening against the Office of the Inspector General exclusion lists prior to starting employment and each month thereafter. Prior to providing services to any potential client, an entity undergoes a thorough background check. For global entities, this includes a screening through WorldCheck. On a continuous basis, all employees maintain close contact with their clients. If employees notice any suspicious behavior, they're required to report it through the Whistleblower and Non-Retaliation Policy.

On a global basis, several business units are legally required to implement anti-money laundering programs. These robust programs are tailored for the types of services provided and the clients who receive the services. Each program is reviewed on a periodic basis, and any suspicious activity must be reported. Employees who are subject to these anti-money laundering programs are trained to identify and detect money laundering.

## Anti-competitive practices

Milliman's U.S. Antitrust Compliance Policy prohibits conduct that reduces competition or involves competition by unfair means. All employees are expected to conduct business in compliance with laws, regulations, and our policy. Any activity of an anti-competitive nature in violation of this policy may subject an employee to disciplinary measures up to and including termination of employment. We do not collude with competitors to set prices nor do we attempt to obtain information on competitors' prices. Employees who perform work for or participate in professional associations pay particular attention to ensure their actions do not conflict with this policy.

## Data security

Milliman takes its responsibility to protect electronic data seriously. Milliman has a comprehensive information security policy based on the ISO 27001 risk management framework. Milliman has implemented layered controls and safeguards, including administrative policies and procedures and automated systems. These controls are employed in a defense-in-depth arrangement to secure electronic information stored on our systems.

Administrative controls include staff awareness and local involvement in security administration. Every employee signs Milliman's Employee Trade Secret and Client Information Agreement. Access to every Milliman office is monitored, and key network equipment is secured. Security incidents are promptly reported to management, including the chief legal officer and information security officer.

Electronic safeguards include preventive and detective controls. Milliman contracts with a major telecommunications provider to maintain and manage a secure wide-area virtual private network. This network is protected by a layered system of firewalls and intrusion detection and prevention systems monitored 24/7 for security incidents by a third-party managed security services provider. In addition, key telecommunication facilities are housed in vendor-secured facilities. The implementation of these controls is based on the requirements of the data being protected.

In addition, business continuity and disaster recovery are critical elements of Milliman's strategy to safeguard client information and ensure timely service delivery. Milliman business units have disaster recovery programs that are regularly tested. Milliman's wide area network has multiple points of redundancy to ensure prompt recovery of telecommunications services. This includes but is not limited to a fully meshed network, multiple firewalls configured for high availability, and 24/7 support from our providers. Each business unit develops its own disaster recovery plan, according to the Milliman template for disaster recovery and addresses the specific needs and threats to that business unit's location. Each business unit includes procedures in its plan for data backup and recovery, equipment recovery, and business restoration. Milliman's business units can operate independently in the event of a business outage of another unit.

## Gifts and entertainment

It is our policy that the receipt and provision of gifts and entertainment must comply with Milliman's Anti-Bribery Policy. All gifts or entertainment must be paid for through Milliman resources and are subject to additional finance review. All gifts and entertainment must be reasonable, taking into consideration the nature of the services provided and the location and culture where the office is located. Several of Milliman's practices have specific gift and entertainment policies that provide further guidance.

## Commitment to our colleagues

Our people are our most precious resource, and our goal is to create an environment that recognizes and meets our employees' personal and professional needs.

### Diversity and inclusion

The best ideas result from diversity in thought and open collaboration. Milliman's Diversity and Inclusion Community leverages experiences and differences to build and strengthen our corporate culture by valuing all employees. We recognize that every person is uniquely diverse in thought, experiences, geography, and culture. We recognize that inclusive cultures create innovative environments and are not only better places to work, but places that work better. As a global firm, we're in awe of the breadth of cultures, views, religions, languages, and experiences across our firm. We strive to preserve and cultivate these unique perspectives.

While we actively promote diversity in our current workforce, we also take a bottom-up approach to building a more diverse pool. Varied perspectives are necessary in building a successful business, a fact that hasn't always been a strength of the professions that comprise our global workforce. Our vision in creating the Milliman Opportunity Scholarship is to assist students from ethnic groups and races that are under-represented in the fields of actuarial science, data science, computer science, economics, programming, mathematics, statistics, data analytics, or finance. Our hope in creating the Milliman Opportunity Scholarship is to encourage and assist students whose ethnicity or race is under-represented and whose demonstrated academic excellence and passion for achievement holds much promise for our organization and the clients we serve. In the program's first year, we awarded 12 \$5,000 scholarships.

Milliman's Recruiting Committee participates in events and activities focused on increasing diversity. We recruit students and graduates at colleges and universities that are known for their racially diverse student population. We work closely with the International Association of Black Actuaries (IABA) and sponsor a scholarship to provide support and encouragement to students of color.

### Anti-discrimination/harassment

With the full support of our board of directors and executive staff, we're committed to protecting the rights of all applicants and employees. We recruit, train, promote, and consider qualified applications for employment in all positions without regard to age, ancestry, citizenship status, color, creed, familial status, genetic information, marital status, national origin, political ideology, race, sex, sexual orientation, gender identity, status as an individual with a disability, or veteran status, and we prohibit discrimination against any individual or any other characteristic protected by law.

Milliman's Unlawful Harassment Policy states that all employees are responsible for ensuring that our workplace is free from all forms of unlawful discrimination and harassment. All employees are required to avoid any action or conduct that could be viewed as harassment, including unwelcome sexual advances, offensive conversations or comments, requests for sexual acts or favors, or other verbal or physical conduct of a harassing nature. All employees must also avoid any action or conduct that could be viewed as violent or threatening behavior toward a coworker, coworker's family, supervisor, or visitor.

Any employee who experiences such prohibited behavior is encouraged to bring this to the attention of a supervisor or a manager in their practice. Milliman's Grievance Procedure outlines both an informal and a formal process that employees may initiate. Should any employee witness such prohibited behavior, they are required to report the behavior through the various methods outlined in Milliman's Whistleblower and Non-Retaliation Policy. Any employee who, in good faith, reports a violation of law or of Milliman policy will be shielded from retaliation.

## Employee health and safety

Our employees are our greatest asset and their safety and well-being is a primary concern. Each office provides safe working conditions that are conducive to creating high quality work. Each office is required to develop a disaster plan that includes a focus on employee safety in case of emergencies.

Milliman's benefits package for employees includes a comprehensive and competitive suite of insurance and retirement-focused benefits. In addition, we provide a generous paid time off policy for vacation or illness.

## Career management

We believe we make our company stronger by encouraging employees to grow and build new skills. We advocate career development from short-term, project-driven goals to long-term, career-oriented goals. We believe we'll increase job satisfaction by cultivating the next generation of leaders early on. Our Professional Development Committee identifies and explores opportunities to help employees advance professionally and develop consulting skills that supplement their technical expertise.

- In 2016, Milliman launched its first formal mentorship program. The program matches senior leaders with junior employees for a nine-month guided program. The program is highly sought after, with hundreds of participants in each cycle. Past participants cite benefits as diverse as learning new skills to breaking down social barriers.
- In 2017, Milliman launched Milliman University, an online learning system. Milliman University helps employees develop career paths, identify key skill learning opportunities, and participate in online training. With hundreds of topics and subtopics, training includes inspirational leadership, managing a budget, and creating a vision statement.
- In 2018, Milliman launched the Milliman Leadership Academy, a comprehensive program that builds and enhances leadership skills in high achieving Milliman leaders. Its structure enables participants to learn and demonstrate proven foundational leadership principles. Participants will learn from leadership experts and other leaders in the firm to develop behaviors and skills that they'll immediately use to drive business results.

## Child labor/slavery

Slavery, human trafficking, and child labor are fundamental violations of a person's rights and freedoms. Milliman is totally opposed to such abuses in its direct operations, its indirect operations, and its supply chain as a whole. Milliman will not use or allow the use of forced or compulsory labor, slavery, servitude, human trafficking, or child labor in the course of its business. It's our policy that these practices are strictly prohibited in any Milliman office. We're confident in the steps we take to ensure that slavery, human trafficking, and child labor do not take place in any part of our business, but we remain alert for possible occurrences. We're committed to driving high standards across all supply chains. We maintain a zero-tolerance policy and any vendor found violating this policy will be terminated immediately.



## Commitment to our world

We are dedicated to giving back to the communities where we live and work and taking responsibility for our impact on the environment.

### Community outreach

Milliman's policy is to encourage good corporate citizenship. Throughout our history, consultants and staff have generously contributed their time and talents to improve the quality of life in our communities. As we've expanded globally, we have carried this tradition of corporate citizenship into new markets.

#### Philanthropy – Giving back to our communities

Many Milliman offices support organized volunteer activities for employees and their families to serve their communities. These initiatives encourage camaraderie and teamwork and offer leadership opportunities. Activities include adopt-a-family programs, charitable walks, hunger drives and food banks, Junior and Special Olympics, cleanup and restoration, school supply drives, and classroom and literacy tutoring. Given the mathematical aptitude and focus of our consultants, it is not surprising that many employees regularly volunteer in school classrooms.

In the United States, Milliman is a corporate sponsor and employees have served on the board of The Actuarial Foundation, a program dedicated to improving math education and math literacy, especially in poorer communities. Employees are also encouraged to donate to this cause, as we believe that education is a key foundation of a healthy society.

#### Scholarships

Besides the IABA and Opportunity scholarships, our commitment to education extends to ongoing support of the Wendell Milliman Scholarship Fund and the Stuart Robertson Memorial Scholarship. The former assists college-bound children of Milliman employees, while the latter works through the Actuarial Foundation to assist students majoring in actuarial science.

#### Matching gift programs

Many Milliman offices throughout the world participate in matching gift programs that match employees' contributions to registered nonprofit organizations.

## Environmental responsibility

As a service provider, Milliman doesn't have the same carbon footprint as a manufacturing company. Even so, we encourage sustainable processes, primarily in the areas of recycling and energy conservation. Examples throughout the firm include sustainability initiatives that range from reminders to turn off computers at night to the use of energy-efficient lighting.

Milliman recycles paper, aluminum, and plastic in coordination with programs in the local marketplace. Most often, recycling bins for glass, plastic, and aluminum are placed in common areas, while we locate paper recycling bins at each workstation or office and adjacent to copy machines and printers. It is our policy that we consider environmental impacts when making decisions about process design or vendor selection. Where possible, we choose the process with the least environmental impact. We also support sustainable procurement initiatives.

To encourage environmentally friendly commuting options, many offices provide subsidies for using public transportation. For example, the Seattle office provides each employee the opportunity to purchase a transportation pass at a dramatically reduced rate. This pass covers the full fare for regional buses, trains, water taxis, and light rail.

Several of our offices are located in Leadership in Energy and Environmental Design (LEED) Certified buildings.

## General program outline

Milliman's global social responsibility officer oversees the CSR program as a whole, with substantial assistance from the chief compliance officer.

The CSR Committee manages the structure, functioning, and reporting of the program. The chairman of the board, chief executive officer, chief operating officer, and chief compliance officer sit on the committee. The global social responsibility officer is the chairperson of the committee.

The Global Compliance Committee is responsible for ensuring that all laws, rules, regulations, and Milliman policies are followed on a global basis. Our compliance program is designed with the key elements as outlined by the Department of Justice and the U.S. Sentencing Guidelines. These elements include policy oversight, training, monitoring, and reporting. The initial steps of the program are through a global risk assessment that identifies the regulatory risks associated with Milliman's services.

The Global Compliance Committee reviews this risk assessment on an annual basis. Each year, this risk assessment identifies focus areas. The Global Compliance Committee ensures compliance with all Milliman's policies, including those identified in this statement. Potential violations are reported to the Global Compliance Committee and investigated based on the nature of the potential violation. The chief compliance officer is the chairperson of this committee. The committee reports to the board annually on its activities and potential violations of law or policy. If needed, the chief compliance officer has direct access to all executives, officers, and/or directors and can immediately report potential issues.

## Training

Our goal is to ensure that each employee is aware of his or her obligations. Training on the Corporate Social Responsibility Program and the Global Compliance program is available on Milliman University. This includes training in specific topic areas, such as anti-discrimination and anti-bribery.

## Signed acknowledgement by each employee

Each new employee is required to acknowledge certain Milliman policies upon hire. Each new employee receives training in specific areas and access to all corporate policies.

## Auditing of standards

Milliman policies are reviewed and affirmed on an annual basis. Changes or additions to policies are made on an as-needed basis. The Global Compliance department monitors policies for effectiveness and compliance. Focus areas are determined through the risk assessment completed by the Global Compliance Committee. The compliance department audits these annual focus areas and reports findings to the Global Compliance Committee.

## Handling of policy violations

Potential violations may be reported in a number of ways as outlined in the Whistleblower and Anti-Retaliation Policy. Once a violation is reported, a senior employee performs an investigation. If a violation of law or policy is confirmed, action will be based on the nature and severity of the violation. Disciplinary action may include termination of employment and/or reporting to law enforcement agencies if the violation is severe.

## Annual report to board

The Corporate Social Responsibility Committee reports annually to the board on areas that include the effectiveness of the program and on global employee participation.

The Global Compliance Committee reports annually to the board on the committee's and the compliance group's activities. This report includes information on the risk assessment, policy review, training, monitoring activity, and potential violations. If a severe issue arises, the chief compliance officer may report to the board at any time.



Milliman is among the world's largest providers of actuarial and related products and services. The firm has consulting practices in life insurance and financial services, property & casualty insurance, healthcare, and employee benefits. Founded in 1947, Milliman is an independent firm with offices in major cities around the globe.

[milliman.com](http://milliman.com)

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