



Modern Slavery Statement

Arthur J. Gallagher & Co (AUS)
Limited 2021



Gallagher

Insurance | Risk Management | Consulting



Our aim in 2021 is to build trust with our clients, and in the broader insurance and risk management industry. We earn that trust by upholding the values of integrity and fair dealing.

1. Our Organisation – Arthur J. Gallagher & Co (Aus) Limited

This Modern Slavery Statement is made on behalf of Arthur J. Gallagher & Co (Aus) Limited (Gallagher Broking Australia) (the reporting entity) in response to the Australian Modern Slavery Act 2018 (Cth).

Message from our CEO Sarah Lyons

Gallagher Broking Australia recognises that slavery is a violation of a fundamental human right. We believe that Modern Slavery is an affront to the common humanity of all people and this global issue is a concern for every person and every business. Enslaving one human being imperils the liberty of every person. We believe that the concentrated efforts of those committed to this endeavor will ultimately end the practice of Modern Slavery.

Across our business, we are committed to identifying and investigating any potential risks in our operations and supply chains to ensure that human rights violations are not occurring.

The Gallagher Way encapsulates our shared values with integrity leading our roadmap for the future. We strive to adhere to the highest standards of ethical leadership. Gallagher's Global Standards of Business Conduct further remind us to follow a consistent approach in our work across the global enterprise.

Client excellence is a fundamental value at Gallagher. We strive to provide outstanding service to all our clients and we will not knowingly do business with business partners, vendors or suppliers who engage in any forms of forced labour or human trafficking

The Gallagher Way emphasises respect, inclusiveness and team work. We continually endeavor to promote a diverse workforce, and equal employment opportunities at every level within our company. We develop expertise and innovation using depth of experience as a source of confidence.

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A handwritten signature in black ink, which appears to read 'Sarah Lyons'. The signature is fluid and cursive.

Sarah Lyons

*Chief Executive -
Australia*



Background

Modern Slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern Slavery refers to a range of serious forms of exploitation including forced labour, debt bondage, human trafficking, and slavery.

Instances may involve clear physical indications, such as physical confinement, or may be more subtle, such as threats and deception. Modern Slavery can happen in any industry and any country. Both adults and children can be victims of Modern Slavery. Women and children are often especially vulnerable.

The Modern Slavery Act 2018 established Australian business' national reporting obligations to reduce the risk that goods and services are the result of Modern Slavery.

Under the Act, certain entities must publish Annual Modern Slavery Statements describing their actions to assess and address Modern Slavery risks in their operations and the operations of their suppliers. This Statement will outline Gallagher Broking Australia's efforts to combat Modern Slavery risks in our operations and supply chains.

Our Policy

Gallagher Broking Australia has zero tolerance to any form of slavery and human trafficking, and is committed to enforcing effective systems and controls to ensure neither is taking place in any part of our business or in any of our supply chains.

Gallagher Broking Australia is also committed to adhering to the highest standards of professional and ethical behavior, and acting with integrity and transparency in all our business relationships. We expect all those connected to our supplier network, or involved in procurement for the company or in any other part of the business, to comply with the Gallagher Global Standards of Business Conduct, which is available to view by accessing www.ajg.com/about-us/global-standards.

We comply with all laws, regulations and rules relevant to our business, and take our corporate and social responsibilities very seriously. We expect the same high standards from those we conduct business with.

An endorsement of Gallagher's behavioral approach has been consistently recognized by the Ethisphere Institute. We are pleased to be part of the Gallagher Group and continue to conduct ourselves in a way that actively demonstrates our high standards or integrity, professionalism and the strength of the Group's culture and core values.

2. Gallagher Broking Australia Structure, Operations & Supply Chains

Structure

Our registered office is located at Level 12, 80 Pacific Highway, North Sydney, New South Wales. The total number of employees is approximately 1000 in Australia.

The parent company is Arthur J. Gallagher & Co (AJG&Co). AJG&Co is headquartered in Illinois, USA and it is a separate legal entity distinct from its subsidiaries that operate across the globe.

Operations

Gallagher Broking Australia provides insurance brokerage and risk management services to a wide variety of commercial, industrial, institutional and governmental organisations. This includes planning, designing, and administering a wide array of insurance and risk management programmes. Our broking and risk management services help our clients reduce their risk costs and manage their risks effectively.

As a professional services organisation, modern slavery risk is low within our operations. Gallagher Broking Australia also has robust recruiting and onboarding programme that is aligned with Fair Work Legislation, including a right to work check.

New and current staff complete annual mandatory training modules relating to equal opportunity, ethics, anti-corruption and integrity. Our Global Standards of Business Conduct module includes training on our zero tolerance approach to Modern Slavery.

Supply Chains

Our supply chains are limited as we do not produce, manufacture or retail goods. Gallagher employs external service providers contracted for the maintenance and support of our offices, including cleaning, repairers, IT, solicitors, travel, and the lease of office space. The majority of our suppliers are based in Australia and Gallagher maintains a register of current suppliers.

Gallagher's overseas supply chain includes the Gallagher Global Service Centre, which is based in India and forms part of, and is a division within, the Gallagher group of companies.





Gallagher Australia is a Fairtrade Supporting Workplace.

3. Risks of Modern Slavery Practices

Risks that may contribute to Modern Slavery practices include acts or omission that may facilitate or incentivise Modern Slavery.

Risks where Gallagher Broking Australia may be directly linked to Modern Slavery practices includes the risks that our operations, products or services may be connected to Modern Slavery through the activities of another organisation or individual with whom Gallagher, or any of its subsidiaries has a contract or relationship. We will monitor supplier adherence to the Modern Slavery Act through ongoing risk assessment and due diligence.

Gallagher Broking Australia is aware that Covid-19 may have increased the risk of Modern Slavery and risk assessments will take consideration of this.

4. Risk Management, Due Diligence, Remediation

Risk Management

The nature of our business means that Gallagher Broking Australia is considered to face a low risk of Modern Slavery. Our aim is to emphasise our zero tolerance stance both internally and with our suppliers, and to provide assessment and reporting avenues free of reprisal such that any potential risks may be identified and addressed.

The following are steps we are taking to identify, mitigate and address the risk of Modern Slavery in our operations and supply chains:

- Annual review of all aspects of our Modern Slavery programme carried out by the Gallagher Broking Australia Legal, Risk and Compliance team. Risk assessment will be a combination of research and risk-based questionnaires.
- Suppliers and service providers will be listed on a register. If the supplier issues their own Modern Slavery Statement, a copy will be kept on file. Suppliers who do not issue a Statement will be issued with a Modern Slavery Risk Questionnaire which will assess Modern Slavery risks for suppliers and offer support and corrective action plans to address the risk should an instance be identified. Suppliers will be required to confirm that their operations do not contradict the principles set out in this Statement and





that they comply with all laws and regulations that apply to their business. Although most of our suppliers are located in Australia and are rated as low risk, Gallagher Broking Australia engages the services of a related entity located in India, which is rated as a higher risk geography. However, as this entity forms part of the global Gallagher group, the risk is lowered for this partner.

- Our Whistleblower channels will be available to all employees and suppliers. Our Whistleblowing Policy ensures all employees can easily raise concerns about how colleagues are being treated, or regarding practices within our business or supply chain without fear of reprisal. All employees are encouraged to report violations to their manager, the Legal, Risk and Compliance team, or through the whistleblowing channels. Our parent company also operates an international Ethics and Compliance Hotline.
- All new acquisitions will be subject to an additional due diligence review for Modern Slavery risks.
- Our HR team will be issued a copy of this Statement and will report any risks identified across the business to the Legal, Risk and Compliance team.
- We conduct annual training for all Gallagher employees based on the principles set out in the Global Standards of Business Conduct, which includes training on our zero tolerance approach to Modern Slavery.
- Reference to compliance with our Modern Slavery Statement will be included on our website, and across relevant contracts and agreements.

Due Diligence

Due diligence will be carried out on an ongoing basis for our register of suppliers and for new acquisitions. All suppliers who do not publish their own Modern Slavery Statement will be issued with a Modern Slavery Risk Questionnaire confirming that they comply with the spirit and principles of the Act, and assessing the risks of Modern Slavery in their operations.

Remediation

Senior management will be informed of any identified instances of Modern Slavery occurring within our operations or within our supply chains. The Legal, Risk and Compliance team will instigate corrective action plans if any risk factors or instances of Modern Slavery are identified in our operations or suppliers. Remediation will be available as required.

Gallagher Initiatives

In addition to our regulatory requirements, Gallagher will continue to participate in company and community initiatives to combat Modern Slavery in our global and local community.

- Gallagher Australia is a Fairtrade Supporting Workplace.
- Australian Red Cross flyers describing the signs of Modern Slavery and how to report it will be available in our offices.
- All employees are eligible for an annual charitable day (including offering support to disadvantaged people in our community).

5. Effectiveness

Effectiveness

The effectiveness of our programme will be monitored and assessed by the Legal, Risk and Compliance team. The compliance team will complete an annual review of performance indicators including reports of instances of Modern Slavery or human trafficking instances identified by employees, the public, law enforcement, or our suppliers.

Future Commitment

An annual review will lead to updates to our Modern Slavery programme as required. In conjunction with the Group approach, we will continue to review any further steps which may be taken to ensure our obligations are met under the Act. Modern Slavery risks in their operations and the operations of their suppliers. This Statement will outline Gallagher Broking Australia's efforts to combat Modern Slavery risks in our operations and supply chains.



6. Consultation – Entities owned by Gallagher

This Statement was created in consultation with and covers the entities listed below which are wholly controlled subsidiaries of Gallagher Broking Australia and are the main operating entities in Australia (“Gallagher”, “we”, “us”, or “our”).

Milne Alexander Pty Ltd
MA Underwriting Pty Ltd
I-Protect Underwriting Pty Limited
isure Pty Ltd
Secure Enterprises Pty Ltd

7. Statement Endorsement and Approval

This Statement was approved by the board of Gallagher Broking Australia on 13 May 2021 by the Chairman of the Board. This Statement in its entirety has been signed by the Chief Executive Officer of Gallagher (page 1) and the Chairman (page 6).

Peter Searson

Chairman

13 May 2021



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