

Modern Slavery Reporting Statement



Contents

Joint Chief Executive Officer Statement.....	3
Introduction.....	4
1. Our Organisations	5
2. Our Philosophy.....	6
3. Operations & Supply Chains	7
4. Modern Slavery Risk Categories	7
5. Risk Management, Due Diligence, Remediation	10
6. Actions Since Last Report	13
7. Building Capability	13
8. Consultation	14
9. Mandatory Criteria.....	15
10. Statement Endorsement and Approval.....	16

Joint Chief Executive Officer Statement

A message from Alex Lumby CEO of Arthur J. Gallagher & Co (Aus) Limited (AJG Australia) and Pete Nicholson, CEO of Gallagher Bassett Services Pty Ltd (Gallagher Bassett Australia) and, together 'Gallagher Australia, we, our or us'.

Together we recognise 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 endeavour will ultimately end the practice of Modern Slavery.

We aim to conduct our business activities with integrity and continue to implement and endeavour to identify and investigate potential risks of modern slavery in our operations and supply chain.

Client excellence is a fundamental value at Gallagher Australia. We strive to provide outstanding service to all our clients and our goal is to not knowingly partner with business partners, clients, vendors, or suppliers who engage in any form of Modern Slavery or human trafficking.

We aim to maintain a strong Modern Slavery risk management program in place that identifies, assesses, mitigates, and monitors the processes in place to support this intention.

"The Gallagher Way" is a document which was crafted in 1984 by then Chairman Robert E. Gallagher of Arthur J. Gallagher & Co. and remains true today. It encapsulates our shared values with integrity, leading our roadmap for the future. We strive to adhere to the highest standards of ethical leadership. Our Global Standards of Business Conduct further remind us to follow a consistent approach in our work across the global enterprise.



Alex Lumby, CEO
AJG Australia



Pete Nicholson, CEO
Gallagher Bassett Australia

Introduction

Modern Slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. It 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.

Australia's Modern Slavery Act 2018 (Cth.) (Act) established the national reporting obligations for Australian businesses and aims 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 is the first combined Modern Slavery Statement for Gallagher Bassett Australia and AJG Australia made in fulfilment of the requirements under the Act. It outlines our combined and continued efforts to identify, assess, minimise, and monitor the risk of Modern Slavery instances in our operations and supply chains for the period 1 January 2025 to 31 December 2025.

1. Our Organisations

Arthur J. Gallagher & Co (Aus) Limited

Arthur J. Gallagher & Co (Aus) Limited (ABN 34 005 543 920) is a limited by shares proprietary company registered in Australia with a registered office located at Level 16, 100 Arthur Street, North Sydney, New South Wales. Through a network of more than 30 regional and metropolitan branches across Australia, AJG Australia maintains approximately 1,060 Australian staff.

Gallagher Bassett Services Pty Ltd

Gallagher Bassett Services Pty Ltd (ABN 68 009 778 018) is a limited by shares proprietary company registered in Australia with a registered office located at Level 15, 144 Edward Street, Brisbane, Queensland.

As at the end of 2025 Gallagher Bassett Services Pty Ltd employed approximately 2,150 employees across Australia. In addition to the registered office located in Brisbane, offices are also located in Darwin, Sydney, Melbourne, Adelaide, and Perth.

Parent Company

The ultimate parent company of both entities is Arthur J. Gallagher & Co., a publicly listed company in the United States of America, headquartered in Illinois (Gallagher). Founded by Arthur J. Gallagher in Chicago in 1927, Gallagher has grown to be one of the leading insurance brokerage, risk management and employee benefits consulting companies in the world. With significant reach internationally, our organisation employs over 71,000 people and our global network provides services in more than 130 countries.

Reporting entities

For the purposes of this joint Modern Slavery Reporting Statement, the relevant reporting entities are:

1. Gallagher Bassett Australia, including the group of companies associated with or subsidiary to Gallagher Bassett Australia: Corporate Services Network Pty Ltd, Gallagher Bassett Services Workers Compensation Vic Pty Ltd and My Plan Manager Group Pty Ltd (and its subsidiaries); and
2. Arthur J. Gallagher & Co (Aus) Limited and the wholly controlled subsidiaries, including: Milne Alexander Pty Ltd; MA Underwriting Pty Ltd; I-Protect Underwriting Pty Limited; iSure Pty Ltd; Mutual Brokers Pty Limited and A.C.N. 003 030 180 (formerly OAMPS Gault Armstrong Pty Ltd).

2. Our Philosophy

We have zero tolerance to any form of slavery and human trafficking and we are focused on enforcing effective systems and controls to work toward ensuring neither is taking place in any part of our operations or supply chains.

We also aim to adhere to the highest standards of professional and ethical behaviour 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 Gallagher Bassett Australia and AJG Australia or in any other part of the business, to comply with our Global Standards of Business Conduct, which is available to view by accessing www.ajg.com/about-us/global-standards. We promote compliance with laws, regulations, and rules applicable to our business, and we take our corporate and social responsibilities very seriously. We expect the same high standards from those with whom we conduct business, including our clients and suppliers.

We are pleased to be part of the Gallagher group of companies and continue to conduct ourselves in a way that actively demonstrates high standards of integrity, professionalism and the strength of Gallagher's culture and core values.

Globally, Gallagher is a member of the UN Global Compact. The UN Global Compact provides a universal language for corporate responsibility and provides a framework to guide all businesses regardless of their size, complexity or location. Through participation in the UN Global Compact, companies around the world are helping alleviate extreme poverty and address labour issues.

Policy

Each business maintains and annually reviews its own Modern Slavery governance documentation which is approved by the relevant governance committee for each organisation.

Governance documentation applies to all employees within each business area and clearly espouses our joint abhorrence of Modern Slavery, identifies the Modern Slavery risks faced by the organisation, specifies how these risks are addressed, outlines our governance structure, and assigns roles and responsibilities to people and functions within our organisation to manage our risk.

We are deeply focused on upholding human rights across all aspects of our business. Operating within Australia's highly regulated financial services sector, we benefit from strong labour protections and safe working environment standards. The office-based nature of our work, combined with a highly skilled and educated workforce, means that the risk of forced labour, child labour, or other forms of modern slavery is inherently low in our operations and the jurisdictions in which we operate.

We promote compliance with all relevant employment laws and regulations, endeavouring to ensure that our recruitment and engagement processes include right-to-work checks, background screening, and the inclusion of modern slavery clauses in consultant contracts. Employees, both new and current, complete annual mandatory training on equal opportunity, ethics, anti-corruption, and integrity—reinforcing our zero-tolerance approach to modern slavery and our broader commitment to human rights. We consider that our employees are fairly remunerated in line with all applicable awards and requirements, and most are employed on a full-time or part-time basis. Where third-party recruitment or labour agencies are used, these roles are filled by highly skilled professionals, and we do not engage labour hire companies for manual or low-skilled positions.

3. Operations & Supply Chains

As we do not produce, manufacture, or retail goods, we employ external services providers across our supply chain.

This can include categories of procurement such as:

- Human resources;
- Information, communications and technology;
- Marketing, advertising and printing services;
- Financial and professional services;
- Hospitality;
- Property and operations;
- Office support including cleaning, maintenance and repairs, leasing;
- Investigations or legal advice; and
- Corporate travel.

Although most of our suppliers are located within Australia and are considered low risk, we engage the services of the Gallagher Global Centre of Excellence (GCoE) to provide outsourced administrative services on an ongoing basis. The GCoE is located in India, which is considered higher risk in terms of Modern Slavery risk, however, the GCoE is a wholly-owned subsidiary of Gallagher and, as part of our group, we consider the risk low.

We recognise our responsibility to proactively identify and manage risks related to Modern Slavery within our operations and supply chains. We acknowledge that, as a global business, there is potential to inadvertently cause, contribute to, or be associated with instances of Modern Slavery through business activities or relationships. We consider that addressing these risks is not only a matter of regulatory compliance, but also integral to upholding broader human rights standards and protecting each company's reputation and long-term value for shareholders.

4. Modern Slavery Risk Categories

FY25 Risk Categories

Risks that may contribute to Modern Slavery practices include acts or omission that may facilitate or incentivise Modern Slavery. Risks where we may be directly linked to Modern Slavery practices include the risks that our operations, products or services may be connected to instances of Modern Slavery through the activities of another organisation or individual with whom we, or any of our subsidiaries has a contract or relationship. Our supply chains are limited as we do not produce, manufacture or retail goods.

We have not identified any specific instances of Modern Slavery in our supply chain or operations.

We have, however, identified the risk areas listed below where the perception of, or potential for risk factors of Modern Slavery exist:

Operations	Supply Chain
<p>Acquisitions</p> <p>Corporate acquisitions form a key part of our growth agenda. Appropriate due diligence is required to ensure we remain cognisant of the potential for instances of Modern Slavery through of the acquisition process, both prior to the acquisition and after a target is acquired.</p> <p>We consider that through the due diligence procedures associated with our acquisitions, the risk of Modern Slavery in this area is low.</p>	<p>E-waste</p> <p>We monitor that we do not cause or are not directly linked to instances of Modern Slavery through the disposal of electronic waste (e-waste). Disposal of e-waste is notoriously difficult to track; however, research and reporting has linked e-waste items from Australia to offshore waste facilities where the worst forms of child labour and hazardous work conditions may be prevalent. Entities in the professional services sector often contract third parties to dispose of e-waste items such as computer monitors and printers. Most of these third parties try to refurbish the e-waste; however, e-waste that cannot be refurbished is often sent to another recycler. As a result of these practices, we consider that the risk of Modern Slavery in this area is low.</p>
<p>Clients</p> <p>Our core business is the provision of insurance broking, claims management and risk management services to clients. If any of our clients were associated with Modern Slavery practices, we could inadvertently be linked to such practices by virtue of the provision of our services. There is also a risk of a relationship with individuals or entities that may be implicated in Modern Slavery practices in their operations or supply chain, particularly in cases where we may have limited visibility of an entity's model of business.</p> <p>We consider the risk of Modern Slavery in this area to be low as our clients are primarily Australian entities who are also subject to Australian Modern Slavery legislation.</p>	<p>Branded goods and ad-hoc purchases</p> <p>We will, from time to time, procure promotional or marketing goods — such as t-shirts, hats and pens — for use by individuals and teams and handed out at conferences and events. Such goods can be mass-produced at low cost, and where appropriate due diligence on the vendors is not completed there is a potential for poor labour practices that are not visible. This risk is heightened when such goods are sourced from countries identified as at high-risk of modern slavery and produced by workers from vulnerable backgrounds.</p> <p>We endeavour to ensure it does not cause instances of Modern Slavery through our sourcing procedures. We consider our risk of Modern Slavery in this area to be low as we aim to source goods ethically and, while orders are generally too low volume/frequency to warrant specific contracts with dedicated suppliers, we consider, amongst other factors, sustainability, treatment of workers and indigenous procurement when making purchasing decisions.</p>

Operations	Supply Chain
<p>Offshore vendors</p> <p>We are cognisant that we could cause, contribute or be directly linked to instances of Modern Slavery through engaging with providers in high-risk countries; however, due to the service providers we engage and the types of services delivered, we consider our interactions are very low risk. We have service agreements in place with the GCoE that provides outsourced administrative services on an ongoing basis operating in India. We have identified that the country in which the GCoE operates is at a higher risk of an instance of Modern Slavery practices; however, we note that the GCoE is a related body corporate and subject to compliance with global Gallagher policies and standards. Other offshore suppliers are contracted through an Australian entity under an agreement that contains Modern Slavery contractual clauses.</p>	<p>Facilities Management</p> <p>Across our Australian offices, there is the potential to cause or contribute to instances of Modern Slavery through the procurement of various categories of services including cleaning, electrical, installation and maintenance services. Workers in the facilities management supply chain can be from populations with heightened vulnerability to Modern Slavery, including base-skilled workers and workers from migrant, low socio-economic, or culturally and linguistically diverse backgrounds.</p> <p>We consider this risk is low in our facilities as our contractors are engaged through our contractual process which includes requirements relating to the management of Modern Slavery risk.</p>
<p>Building and Fit-outs</p> <p>In 2025 we undertook the fit-out of new office spaces in Melbourne. Reputable suppliers and contractors were engaged to undertake the fit-outs; therefore, we consider the risk of Modern Slavery to be low.</p> <p>While there was potential for us to be directly linked to instances of Modern Slavery through the inclusion of workers from vulnerable populations in the building crew, or for materials for the fit-out to be sourced from high-risk locations or manufactured using vulnerable workers, our contracts with reputable third parties successfully mitigated any associated risks.</p>	<p>Hospitality</p> <p>We acknowledge that we could be directly linked to instances of Modern Slavery through the engagement of our catering suppliers. While our catering needs primarily revolve around small events such as event lunches organised by our executive assistants and receptionists, we recognise that suppliers in this industry could pose risks related to Modern Slavery.</p> <p>While we limit our engagement to local, and often smaller businesses, and consider the risk to be low, we will continue to review and uplift our practices in this area to reduce our exposure to risk, including through actions outlined in section 7 – Building Capability.</p>

5. Risk Management, Due Diligence, Remediation

The nature of our business means that we consider that we face a low risk of Modern Slavery in our operations and across our supply chains. We have a zero-tolerance stance both internally and with our suppliers and provide reporting avenues free of reprisal so that any potential risks may be identified and addressed.

The following sections describe the processes that outline the steps we have taken to identify, mitigate and address the risk of Modern Slavery in our operations and supply chains.

Appointment of EthixBase360

We use a modern slavery due diligence platform provided by a third-party vendor EthixBase 360. The platform facilitates an automated and independent due diligence mechanism for suppliers and provides an intuitive risk assessment of suppliers by applying a unique risk methodology which aggregates the list of suppliers using logic provided by Norton Rose Fulbright. The Questionnaire asks a series of questions to assist in the identification, management and reporting on Modern Slavery risks.

Once the supplier has completed the Questionnaire the system will automatically create an assessment of the supplier calculating values across five core risk areas (geographic, policy / systemic, industry, human rights and workforce vulnerability). These ratings are aggregated using pre-determined weightings to provide a single risk score which is used to assist us to manage our Modern Slavery risk exposure and fulfil our reporting obligations across multiple jurisdictions. Depending on the score, the supplier will be denoted as either Low (1-3); Moderate (4-7) or High (8-10) risk.

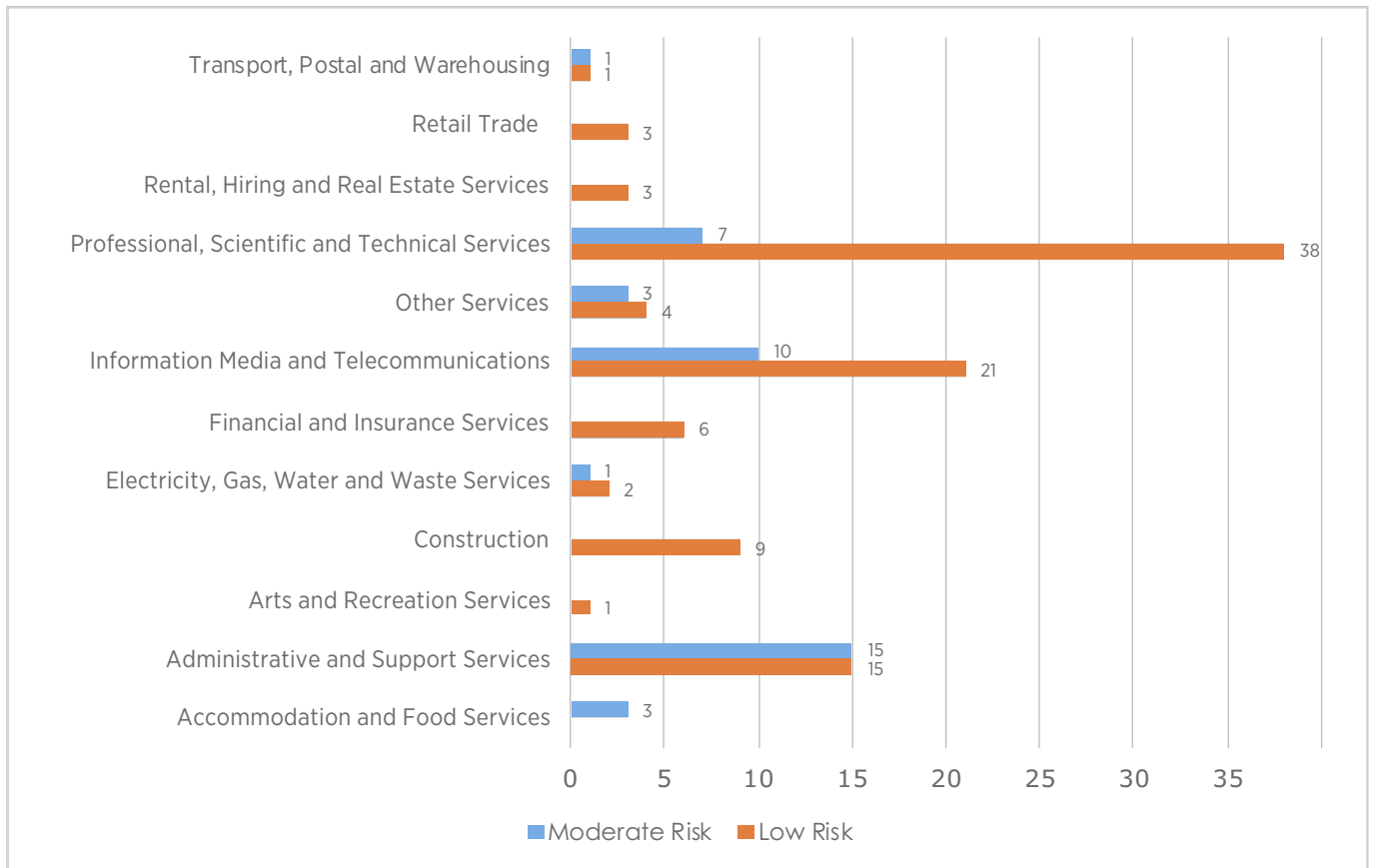
During 2025, AJG Australia uploaded their suppliers into the system. The system now contains suppliers who provided either or both of Gallagher Bassett Australia and AJG Australia with either goods or services valuing at least \$30,000 over the previous financial year.

The Questionnaire was sent to the suppliers across both entities. Where no response to the Questionnaire was received, the relevant Compliance team conducted a manual review of the supplier using publicly available information to determine a modern slavery risk rating. No suppliers were rated High overall using either rating methodology.

Based on the risk rating provided by EthixBase360 or via our internal assessment the following methodology was applied:

- **Low:** No further action is taken and the supplier is subject to normal requirements under the Procurement Framework
- **Moderate:** The relevant business will review the factors that have contributed to the moderate risk rating and consider any further required actions required
- **High:** The relevant business will work with the supplier to understand why the rating is High and to provide education on modern slavery so the supplier can determine and action appropriately and the rating can be reduced

The graph below demonstrates the spread of our suppliers by overarching supplier category and risk ratings obtained through either supplier response or manual review.



Supplier categorisation and risk rating

EthixBase360 also provides us with ongoing monitoring and risk alerts for each of the suppliers via a series of dashboards and reporting, which is updated continually. These alerts will indicate where a supplier has flagged in the due diligence process for potential indicators related to human rights. Each of these alerts is reviewed by the relevant Compliance team to determine the extent of any potential impact on the relevant business.

Policies and procedures

Business Conduct: Every member of our team is responsible for their conduct, and we collectively uphold a global dedication to ethical conduct. We also aim to ensure compliance with equal employment opportunity laws, as well as other relevant civil rights, human rights and labour laws.

This expectation extends to all employees, officers and directors, who are required to acknowledge and understand our Code of Conduct. We strive to comply with legal and regulatory requirements in all areas of our business and integrate the principles outlined in our Code of Conduct into all our activities.

Governance and Remediation

AJG Australia: Senior management will be informed of any identified instances of Modern Slavery occurring within our operations or within our supply chains. The 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. Any red flags would also be reported into these forums

Gallagher Bassett Australia: The Gallagher Bassett Modern Slavery program is overseen by its Ethics Committee and monitored by its Compliance and Audit Committee (CAC). Quarterly reporting, based on data provided by the EthixBase360 platform is provided to the Ethics Committee and the CAC for their review and consideration. Any red flags or suppliers that have been flagged as High risk through the Questionnaire would also be reported at these forums. Senior management will be informed of any identified instances of Modern Slavery occurring within our operations or within our supply chains. The Legal, Ethics, and Compliance teams will recommend corrective action plans if any risk factors or instances of Modern Slavery are identified in our operations or suppliers. Remediation will be undertaken as required.

Whistleblowing: Our Whistleblower reporting channels are available to all employees, suppliers and those as described under the Whistleblower legislation as eligible disclosers. Each entity's Whistleblowing Policy provides a mechanism for all employees to easily and confidentially 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 Global Chief Ethics Officer, to eligible recipients within the business (who receive annual training on how to receive disclosures) or through the whistleblowing channels and ethics notification process. Our parent company also operates an international Ethics and Compliance Helpline, which is accessible by all employees.

Training: Employees complete annual training based on the principles set out in our Global Standards of Business Conduct, which includes training on our zero-tolerance approach to Modern Slavery.

New and current employees complete annual mandatory training modules relating to equal opportunity, ethics, anti-corruption and integrity. Our employees also complete a dedicated Modern Slavery module annually with completion rates monitored by the Organisational Development team.

Monitoring

The effectiveness of the Modern Slavery program is monitored and assessed by the relevant Committee within each entity and each entity's Risk and Compliance team.

Each Risk and Compliance team will complete an annual review of performance indicators including reports of instances of Modern Slavery or human trafficking identified by employees, the public, law enforcement or suppliers for their entity.

Incidents related to Modern Slavery will be registered in the entity's incident management system, and the investigation, assessment, remediation and closure of such matters will be overseen by the Risk and Compliance team.

An annual review will lead to updates to our Modern Slavery program as required. In conjunction with Gallagher's approach at the global level, we will continue to review any further steps which may be taken to ensure our obligations are met under the Act.

Other initiatives

In addition to our regulatory requirements, we participate in company and community initiatives to combat Modern Slavery in our global and local community including offering support to disadvantaged people in our community. Employees are eligible for an annual charitable day.

6. Actions Since Last Report

Since the submission of each entity's Modern Slavery Reporting Statement in 2025, the following actions additional to our business-as-usual Modern Slavery Program have been undertaken:

- Review and update of the Gallagher Bassett Australia Modern Slavery Policy and the Modern Slavery Framework to align with our legislative obligations;
- Centralisation of the Gallagher Bassett Australia Procurement function including the implementation of the Procurement Framework;
- AJG Australia uploaded its suppliers to EthixBase360 and issued the first Modern Slavery Questionnaire;
- Implementation of the AJG Australia Supplier Code of Conduct to all new suppliers; and
- Creation of a Modern Slavery framework document by AJG Australia.

7. Building Capability

Building Capability

We have developed organisation-wide experience and capability in the detection, assessment and minimisation of Modern Slavery risk and have communicated our equivalent expectations to our existing suppliers. New suppliers will have these requirements included in their onboarding processes, including where relevant as contractual terms.

This is achieved by:

- Implementing and maintaining due diligence and supply chain assurance measures;
- Building awareness within our organisations about Modern Slavery risks and our focus on addressing them, including providing education to employees and suppliers, where appropriate;
- Promoting effective oversight by the relevant governance committees (Ethics Committee and CAC for Gallagher Bassett Australia and Risk and Compliance Committee and Risk, Audit and Compliance Committee for AJG Australia);
- Gallagher Bassett Australia has transitioned the responsibility for EthixBase 360 from the Risk and Compliance team to the Procurement team for the effective management of suppliers in accordance with the Procurement Framework; and
- Requiring suppliers to complete the Questionnaire provided through EthixBase360.

8. Consultation

During the reporting period:

1. AJG Australia consulted with the entities below which are the wholly controlled subsidiaries of AJG Australia and are the main operating entities in Australia:
 - Milne Alexander Pty Ltd;
 - MA Underwriting Pty Ltd;
 - I-Protect Underwriting Pty Limited;
 - iSure Pty Ltd;
 - Mutual Brokers Pty. Limited (acquired 30 April 2021); and
 - A.C.N. 003 030 180 Pty Ltd (formerly OAMPS Gault Armstrong Pty Ltd).
2. Gallagher Bassett Australia consulted with the entities listed below, which are wholly controlled subsidiaries of Gallagher Bassett Australia:
 - Corporate Services Network Pty Ltd;
 - Gallagher Bassett Services Workers Compensation Vic Pty Limited; and
 - My Plan Manager Group Pty Ltd (and its subsidiaries).

9. Mandatory Criteria

Entities are required to address the mandatory criteria in each Modern Slavery Statement. The table below indicates where each of the mandatory criteria can be found within this Statement.

Mandatory Criteria		Found in Section
1	Identify the reporting entity	1. Our Organisation – Gallagher Bassett Australia and AJG Australia
2	Describe the structure, operations and supply chains of the reporting entity	3. Operations & Supply Chains
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls	4. Our Modern Slavery Risk Categories
4	Describe the actions taken by the reporting entity and any that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	5. Risk Management, Due Diligence, Remediation
5	Describe how the reporting entity assesses the effectiveness of such actions	5. Risk Management, Due Diligence, Remediation
6	Describe the process of consultation with: (i) Any entities that the reporting entity owns or controls; and In the case of a reporting entity covered by a statement under section 14 – the entity giving the statement	8. Consultation – entities owned by Gallagher Bassett Australia and AJG Australia
7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	6. Actions since Last Report 7. Building capability

10. Statement Endorsement and Approval

This statement was approved by the Board of Directors of Arthur J. Gallagher & Co (Aus) Limited on 22 March 2026 and the Board of Directors of Gallagher Bassett Services Pty Limited on 24 March 2026.

This statement has been signed by the Chief Executive Officer – Australia and Asia of Arthur J. Gallagher & Co (Aus) Limited.



Signed: _____

Alex Lumby

Date: 19 March 2026

This statement has been signed by the Chief Executive Officer of Gallagher Bassett Services Pty Limited.

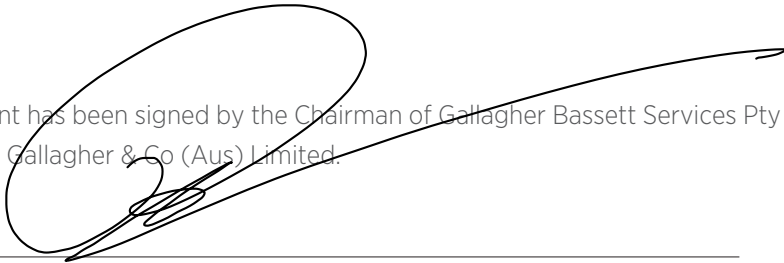


Signed: _____

Peter Nicholson

Date: 25 March 2026

This statement has been signed by the Chairman of Gallagher Bassett Services Pty Limited and Arthur J. Gallagher & Co (Aus) Limited.



Signed: _____

Peter Searson

Date: 24 March 2026