



GALLAGHER BASSETT

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Modern Slavery Statement

March 2021

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1. Our Organisation - Gallagher Bassett Services Pty Ltd

Gallagher Bassett Services Pty Ltd ('GB'), is identified as a reporting entity under the Modern Slavery Act 2018 (Cth) ('Act').

GB recognises that slavery is a violation of fundamental human rights is committed to doing business with integrity by ensuring that we implement systems and controls to ensure that the risks of modern slavery practices in our business and supply chains are identified, assessed and addressed.

This is the first annual reporting statement reported by GB, and will include actions already undertaken in addition to actions yet to be completed.

2. Our Structure, Operations & Supply Chains

About Us

GB is a Third-Party Claims Administrator managing claims on behalf of insurers, brokers, government bodies and self-insured organisations. Our services are primarily claims management and risk consulting. GB forms part of the Arthur J Gallagher Group and has a long tradition of professionalism and integrity underpinned by the Gallagher Bassett Global Standards of Business Conduct.

Structure

Gallagher Bassett Services Pty Ltd (ACN 009 778 018) is a limited by shares proprietary company registered in Australia. GB's registered office is located at Level 15, 144 Edward Street, Brisbane, Queensland. The total number of employees is approximately 1200 in Australia. In addition to the registered office located in Brisbane, offices are also located in Darwin, Sydney, Melbourne, Adelaide and Perth. Offices in New Zealand are located in Auckland, Christchurch and Dunedin.

The relevant reporting entity within Australia is Gallagher Bassett Services Pty Ltd.

The ultimate parent company is Arthur J Gallagher & Co, a listed company in the USA.

Operations

Due to the nature of our operations as a professional services organisation, modern slavery risk within the direct day-to-day GB operations is low with regard to child labour, forced labour, and other modern slavery practices. GB has a robust recruiting and onboarding program that is aligned with Fair Work Legislation, and includes a right to work check.

New staff complete a series of training modules as part of their onboarding, with ongoing annual training required. Such training modules relate to equal employment opportunities, ethics and integrity. Staff are also required to read, understand and comply with GB's Global Standards of Business Conduct which includes the importance of doing the right thing for clients, business partners and for the Company. Gallagher Bassett's Global Standards of Business Conduct also outlines the company's 'zero tolerance for the use of child labour, slave labour, forced or indentured labour or human trafficking practices.' GB will not knowingly do business with business partners, vendors or suppliers who engage in these practices.

Where we source

GB's supply chains include service providers for procurement of products and services in relation to day-to-day claims management operations of the organisation such as solicitors, investigators, loss adjusters, assessors, forensic accountants, recovery agents, interpreters, repairers, as well as office equipment, IT infrastructure, travel, and the lease of office space.

The majority of goods and services we procure are from suppliers and contractors based in Australia. Our major categories of procurement include:

- Human resources;
- IT and technology;
- Marketing;
- Professional services;
- Hospitality;
- Property and operations;
- Maintenance and repairs; and
- Travel.

GB's overseas supply chain includes IDM Operational Support and the Global Service Centre (managed out of AJG – US) for offshore IT and Administration related services. In addition, Larsen and Toubro are used as part of the quality assurance function. These teams are all based in India.

3. Risks of Modern Slavery Practices

Gallagher Bassett is aware of the risks of modern slavery practices that have the potential to **cause, contribute** or be **directly linked** to modern slavery through GB's operations or supply chains.

Risks that may **contribute** to modern slavery practices include acts or omissions that may facilitate or incentivise modern slavery.

Risks where Gallagher Bassett may be **directly linked** to modern slavery practices means the risks that our operations, products or services may be connected to modern slavery through the activities of another organisation or individual that Gallagher Bassett, or any of its subsidiaries has a contract or relationship. Gallagher Bassett will ensure any possible supplier practices adherence to the Modern Slavery Act through the risk assessment and due diligence framework.

Modern Slavery Risk Categories

The identified modern slavery risk categories, as informed by the Australian Government guidance, include:

- **Sector & Industry risk:** specific sectors and industries may have high modern slavery risks because of their characteristics, products and processes.

- **Product & Services risk:** certain products and services may have high modern slavery risks because of the way that they are produced, provided and/or used.
- **Entity risks:** some entities may have particular modern slavery risks, for example where there are poor governance structures, a record of treating workers poorly, or a track record of human rights violations.
- **Impact of Covid-19:** GB is aware that Covid-19 may have increased the risk of modern slavery and a risk assessment will be undertaken to identify any risks within GB.

4. Action Plan

GB will conduct ongoing risk assessments and continue to develop and implement strategies to identify, mitigate and address the risks of modern slavery, as consistent with the Australian Government’s guidance, in our supply chain and operations. Modern slavery risk assessments will coincide with existing regular risk assessment processes. This will include the update of risk registers in GB’s risk management system, remediation if required, and ongoing monitoring and reporting processes.

GB will communicate with new suppliers prior to engagement to ensure consideration of modern slavery risks. GB will include in supplier contract terms, where relevant, requirements that suppliers comply with modern slavery legislation.

The following action plan outlines GB’s commitment to further enhance and develop our Modern Slavery Framework.

Action Plan

Action	Responsibility	Outcome
Implementation of Modern Slavery Policy – Completed March 2021	Compliance & Audit Committee	<p>Introduction and awareness of modern slavery risk within our organisation.</p> <p>Commitment by Senior Management and governing body to consider, review and monitor the risks of modern slavery within the business.</p>
Identify supply chains	Senior Management/Business Divisions	Identification of supply chains, including goods/services, nature of contact, duration of contract

Identify, assess and address risks of modern slavery within GB	Senior Management/Business Divisions	Update risk registers accordingly, risks, controls, remediation, monitoring and review.
Due Diligence Program – Suppliers	Senior Management/Commercial Management	Identification of any risks of modern slavery within supply chain – due diligence and remediation.
Ongoing Supplier Due Diligence	Senior Management/Commercial Management	Incorporate Modern Slavery checks into our supplier and annual reviews, and incorporate modern slavery checks into procurement and tender processes.
Remediation actions where necessary with regard to operations and suppliers	Senior Management/Commercial Management	Remediate any adverse findings
Alignment with relevant policies, procedures and charters.	Senior Management/Commercial Management	Update of policies as necessary within promapp. (Whistleblowers Policy, Occupational Health and Safety Framework, Anti-Harassment Policy)
Modern Slavery Reporting processes	Senior Management, Ethics Committee	Set up of reporting mechanism to allow staff to report potential modern slavery risks.
Regular Reporting to the Compliance & Audit Committee	Risk, Audit & Compliance (RAC)	Standing agenda item to ensure oversight by Compliance & Audit Committee
Adherence to Modern Slavery Act reporting requirements	Senior Management, Risk, Audit & Compliance (RAC)	Regulator reporting, annual review of Policy, or as legislation changes.
Training	People & Culture (Learning &	Awareness training for all staff relating to modern

	Development), Risk, Audit & Compliance (RAC)	slavery and human trafficking
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5. Effectiveness of actions taken to address risks

The Compliance & Audit Committee will have oversight of the modern slavery risks and steps taken to adhere to the requirements of the Modern Slavery Act. On completion of the required action items within this Reporting Statement, reporting will be presented to the Compliance & Audit Committee to assess the efficacy of the actions taken.

6. Consultation - entities owned by Gallagher Bassett

Gallagher Bassett Services Pty Ltd, being the parent company and the relevant reporting entity of the Group as mentioned in 'structure'. A robust and well-established governance framework underpins the Group. The Gallagher Bassett Services Pty Ltd Board of Directors has overall responsibility of the governance and risk management and has delegates oversight to the Compliance & Audit Committee to oversee governance and risk management. Executive Committee Members, General Managers and other Senior Management from all subsidiaries of the group attend the Compliance & Audit Committee Meeting.

7. Statement Endorsement and Approval

Gallagher Bassett commits to complete the necessary actions to identify, assess and address the risk of modern slavery within its operations and supply chain, and to raise awareness of modern slavery.

This statement has been **endorsed and approved** by the Gallagher Bassett Board of Directors.



Signed:

John McNamara

Chief Executive Officer / Representative Board Member

Date:

30 March 2021

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