



Gallagher Bassett Services Pty Ltd
Modern Slavery Reporting Statement
2024

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Chief Executive Officer's Statement

Gallagher Bassett Services Pty Ltd (**Gallagher Bassett**) 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 are committed to conducting our business activities with integrity, by ensuring that we continue to implement and enforce systems and controls that ensure the identification and investigation of any potential risks in our operations and supply chain.

Pete Nicholson, CEO



The review of the Modern Slavery Act noted that Australia is at 'the early phase of a long journey' in combating Modern Slavery. Gallagher Bassett is committed to continuous improvement and performing an honest appraisal of where our actions are having an impact. We believe that the concentrated and coordinated efforts of those committed to this endeavour will ultimately end the practice of Modern Slavery.

We will not knowingly do business with business partners, clients, vendors, or suppliers who engage in any forms of forced labour or human trafficking and will ensure that we continue to have a strong modern slavery risk management program in place that will identify, assess, mitigate, and monitor the processes in place to support this intention.

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.

1. Understanding and Obligation

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 subtler, 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 latest (2021) Global Estimates of Modern Slavery¹ found that almost 50 million people are living in Modern Slavery worldwide. This sobering figure reminds us why a concerted and coordinated response to these crimes from governments, businesses, and civil society is critical.

Australia's *Modern Slavery Act 2018* (Cth.) (**Act**) established the national reporting obligations for Australian businesses 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 our fourth Modern Slavery Statement made in fulfilment of our requirements under the Act. It will outline our continued efforts to identify, assess, minimise, and monitor Modern Slavery risks in our operations and supply chains for the period 1 January 2023 to 31 December 2023.

¹ Global Estimates is the result of a collaborative effort between the International Labour Organization (ILO) and Walk Free, in partnership with the International Organization for Migration (IOM).

2. Our Organisation – Gallagher Bassett Services Pty Ltd

Gallagher Bassett Services Pty Ltd (ACN 009 778 018) is a limited by shares proprietary company registered in Australia. Gallagher Bassett's registered office is located at Level 15, 144 Edward Street, Brisbane, Queensland. The total number of employees of Gallagher Bassett is approximately 2000 across Australia. In addition to the registered office located in Brisbane, offices are also located in Darwin, Sydney, Melbourne, Adelaide, and Perth. The ultimate parent company is Arthur J Gallagher & Co., a listed company in the USA, with Gallagher Bassett having a number of wholly owned subsidiaries in Australia.

The relevant reporting entity within Australia is Gallagher Bassett Services Pty Ltd. This includes the group of companies associated with or subsidiary to Gallagher Bassett, which includes Gallagher Bassett NZ Limited, Corporate Services Network Pty Ltd, Gallagher Bassett Services Workers Compensation Vic Pty Ltd, Aureka Pty Ltd and Aureka Training Services Pty Ltd. In December 2023, Gallagher Bassett acquired My Plan Manager Group Pty Ltd, which is a new subsidiary since our last Modern Slavery Statement.

Philosophy

Gallagher Bassett 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 our supply chain.

We are also committed to adhering 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 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.

Gallagher Bassett complies 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 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 our high standards of integrity, professionalism and the strength of this group's culture and core values.

Policy

Gallagher Bassett maintains and annually reviews its Modern Slavery Policy, owned by the Head of Legal, Compliance & Ethics, sponsored by the Chief General Counsel and approved by the Chief Executive Officer and the Compliance & Audit Committee (**CAC**).

The Policy applies to all Gallagher Bassett staff, and clearly espouses our 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.

3. Operations & Supply Chains

Operations

Gallagher Bassett is a claims and risk management provider that manages claims on behalf of insurers, brokers, government bodies and self-insured organisations across Australia. Our services are primarily insurance claims management and risk consulting. Gallagher Bassett has an Australian Financial Services Licence through the Australian Securities and Investments Commission, which is required for a portion of the TPA services we deliver to some of our general insurance clients.

As a professional services organisation, modern slavery risk is low within our operations.

Gallagher Bassett complies with all laws relating to the recruitment and employment of staff and the engagement of consultants, including the conduct of 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.

Gallagher'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'. Gallagher Bassett will not knowingly do business with business partners, vendors or suppliers who engage in these practices.

In December 2023, Gallagher Bassett acquired My Plan Manager Group (**MPMG**), a provider of plan management services under the National Disability Insurance Scheme. Extensive due diligence was performed prior to the acquisition and there is Risk Audit & Compliance oversight, working within the broader Integration Team, to ensure that MPMG manages its Modern Slavery risk consistent with our approach. Gallagher Bassett's Modern Slavery Policy applies to all its subsidiaries, which includes MPMG, who will also be incorporated into our supplier governance framework in managing Modern Slavery risks, and who will be consulted in the preparation of future Modern Slavery statements.

Supply Chains

Our supply chains are limited as we do not produce, manufacture, or retail goods.

Apart from the Gallagher Global Centre of Excellence, which is based in India and forms part of, and is a division within, the Gallagher group, all our suppliers are based in Australia. Gallagher Bassett maintains a register of current suppliers.

Our major categories of procurement include:

- Human resources;

- Information Technology;
- Marketing;
- Professional services;
- Hospitality;
- Property and operations;
- Maintenance and repairs; and
- Travel.

4. Our Modern Slavery Risk Areas

Risks that may contribute to Modern Slavery practices include acts or omissions that may facilitate or incentivise Modern Slavery. The presence of Modern Slavery can also be linked to broader human rights impacts and challenges.

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.

Gallagher Bassett FY23 Risk Categories

Gallagher Bassett has not identified any specific instances of Modern Slavery.

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 Gallagher Bassett’s growth agenda. Appropriate due diligence is required to ensure Gallagher Bassett is adequately aware of modern slavery risks as part of the acquisition process, both prior to the acquisition and after a target is acquired.</p>	<p>E-waste</p> <p>The disposal of electronic waste (e-waste) is notoriously difficult to track; however, research and reporting has linked e-waste items from Australia to offshore waste facilities where child labour and hazardous work conditions are 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.</p>
<p>Clients</p> <p>Gallagher Bassett’s core business is the provision of claims management and risk consulting services to clients. If any of our clients were associated with modern slavery practices, we could inadvertently be linked to such practices by</p>	<p>Branded goods and ad-hoc purchases</p> <p>Gallagher Bassett will often procure promotional or marketing goods – such as t-shirts, hats, and pens – for use by individuals and teams. Such goods can be mass-produced at low cost, and where appropriate due diligence on the vendors</p>

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.

Offshore vendors

Gallagher Bassett has a service agreement in place with an offshore vendor (Global Centre of Excellence (**GCoE**)) in India that provides outsourced administrative services on an ongoing basis. We have identified that the country in which this offshore vendor operates is at a higher risk of potential modern slavery practices based on its geography; however, we note that the GCoE is a related body corporate.

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.

Facilities Management

Across Gallagher Bassett's Australian offices, various categories of services are procured 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.

Hospitality

Gallagher Bassett acknowledges the importance of assessing the potential risks associated with catering suppliers. While our catering needs primarily revolve around small events such as event lunches organised by our executive assistants and reception, we recognise that suppliers in this industry could pose risks related to modern slavery.

5. Risk Management, Due Diligence, Remediation

Risk Management

The nature of our business means that Gallagher Bassett 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 processes and procedures outline the steps we have taken to identify, mitigate and address the risk of Modern Slavery in our operations and supply chains:

Appointment of Givvable

Givvable was appointed in April 2023, which is an automated supplier sustainability and Environmental Social and Governance diligence platform that uses the latest technologies to identify, track and map supplier credentials to frameworks and reporting standards. All new suppliers are invited to register on the Givvable platform at supplier onboarding.

Credentials are certifications, accreditations, standards, ratings, scores, assessments, commitments, pledges, memberships, initiatives, or other actions and attributes that are independently or externally validated, issued, or administered and link or align to an Environmental, Social or Governance issue under a widely used reporting framework or standard. Where credentials are unavailable, Givvable will issue the supplier with a learning module on supply chain risks and labour practices for completion. Suppliers that complete learning modules are issued tags which are added to their profile and tracked on the Givvable platform. Tags are based on supplier responses and reflect their maturity and/or level of awareness on the topic.

The register of suppliers is maintained on the Givvable platform where the suppliers are tracked on a regular basis. To date, 44% of the suppliers registered on the Givvable platform have credentials, with 32 (62%) of these suppliers having issued Modern Slavery Reporting Statements in 2022. For suppliers that are non-credentialed, the Givvable platform will prompt said suppliers to complete a learning module. Gallagher Bassett also follows up with suppliers who are flagged as non-credentialed by the Givvable platform.

The Givvable platform refreshes information quarterly to ensure Gallagher Bassett has the most up-to-date information on suppliers. Any red flags will be brought to Gallagher Bassett's attention for remediation. These red flags or indicators could include for example, that the supplier no longer holds a credential such as an ISO accreditation indicating that perhaps the company has not recertified. To date, Gallagher Bassett has received no red flags.

Governance

Our Modern Slavery Program is overseen by the Ethics Committee. Quarterly reporting, based on data provided by the Givvable platform is provided to the CAC. Any red flags would also be reported into these forums.

Whistleblowing

Our Whistleblower channels are available to all employees and suppliers. Gallagher Bassett's 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 National Ethics Officer, or through the whistleblowing channels and ethics notification process. Our parent company also operates an international Ethics and Compliance Hotline, which is accessible by all staff.

Acquisitions

All new corporate acquisitions are subject to an additional due diligence review for Modern Slavery risks as part of the pre-acquisition process. Once acquired, the Integration Team, with oversight and support from the Risk, Audit & Compliance team, assesses the Modern Slavery risk of the target and aligns its practices with the Gallagher Bassett approach to Modern Slavery.

Training

Gallagher Bassett conducts annual training for all 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. Annually, all staff complete a training module on Modern Slavery.

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, Audit and Compliance team 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.

Monitoring

Quarterly reporting is provided to the Ethics Committee and, through that Committee, to the CAC, which is made up of Gallagher Bassett directors, members of the Executive in Australia and New Zealand, and senior leaders across the organisation including in People & Culture, Risk, Legal, and Finance, as well as from our parent company.

Incidents related to Modern Slavery are to be registered in our incident management system, Promapp, and the investigation, assessment, remediation, and closure of such matters are overseen by the Chief General Counsel, where applicable.

6. Actions Since Last Report

Since the submission of our Modern Slavery Reporting Statement in June 2023, the following actions additional to our business-as-usual Modern Slavery Program have been undertaken:

- Appointment of a Compliance Manager, who is accountable for the maintenance and delivery of the Modern Slavery Compliance Program;
- Review and revision of the Modern Slavery Policy to ensure alignment of content with our legislative obligations; and
- Development of a Modern Slavery Supplier Code of Conduct, which is provided to all new suppliers, and must be acknowledged as having been read as part of our Supplier Questionnaire when onboarding new suppliers.

7. Building Capability

Building Capability

Gallagher Bassett has developed organisation-wide experience and capability in the detection, assessment and minimisation of Modern Slavery risk and has communicated its equivalent expectations to our suppliers.

This has been achieved by:

- implementing and maintaining due diligence and supply chain assurance measures;
- building awareness within the company about Modern Slavery risks and our commitment to addressing them, including providing education to staff and suppliers; and
- promoting effective oversight by the Ethics Committee and CAC.

We acknowledge that we continue to mature in our approach to managing Modern Slavery Risk. Our focus for FY24 will be to:

Implement Key Performance Indicators

In order to measure the effectiveness of our modern slavery controls and risk management, the following key performance indicators (**KPI**) and metrics will be introduced:

1. **Percentage of Completion of Modern Slavery Training:** This KPI measures the percentage of employees who have completed the modern slavery training. It indicates the level of awareness and understanding of Modern Slavery within Gallagher Bassett.
2. **Supplier Modern Slavery Data:** This metric provides insights into the extent to which our suppliers are actively addressing Modern Slavery risks, by utilising data provided by our outsourced supplier due diligence provider.
3. **Modern Slavery Grievances Received:** This metric measures the number of grievances or complaints related to Modern Slavery that Gallagher Bassett has received. It reflects the effectiveness of our reporting mechanisms and the level of awareness among employees and stakeholders.

Centralise Procurement

As part of our ongoing efforts to enhance our approach to Modern Slavery, we have made the decision to centralise our procurement function. This strategic move will enable us to have better visibility and control over our supply chain, ensuring that Modern Slavery risks are effectively identified and mitigated. By centralising procurement, we can streamline processes, implement consistent due diligence measures, and strengthen our engagement with suppliers to ensure compliance with Modern Slavery standards.

This initiative reflects our commitment to combatting Modern Slavery and underscores our dedication to responsible and ethical sourcing practices. We believe that centralising procurement

will further enhance our ability to proactively address Modern Slavery risks and contribute to a more sustainable and socially responsible supply chain.

8. Consultation – entities owned by Gallagher Bassett

During the reporting period, Gallagher Bassett consulted with the entities listed below, which are wholly controlled subsidiaries of Gallagher Bassett Services Pty Ltd:

- Corporate Services Network Pty Ltd;
- Gallagher Bassett Services Workers Compensation Vic Pty Limited;
- Aureka Pty Ltd;
- Aureka Training Services Pty Ltd; and
- My Plan Manager Group Pty Ltd.

9. Statement Endorsement and Approval

This statement was approved by the Board of Directors of Gallagher Bassett Services Pty Limited on 28 June 2024.

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



Signed: _____
Peter Cameron Nicholson

Date: 28 June 2024