



Gallagher Bassett Services Pty Ltd
Modern Slavery Reporting
Statement 2023 (for 2022 Calendar
Year

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Chief Executive Officer's Statement

Gallagher Bassett Services Pty Ltd 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 endeavour will ultimately end the practice of Modern Slavery.



Pete Nicholson

We are committed to conducting our business activities with integrity.

We are committed to ensuring that we implement and enforce systems and controls to ensure identification and investigation of any potential risks in our operations and supply chains.

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.

We will not knowingly do business with business partners, vendors or suppliers who engage in any forms of forced labour or human trafficking and will ensure that we have risk identification, assessment, mitigation and monitoring processes in place to support this intention.

1. Understanding and Obligation

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 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 Modern Slavery Act 2018 (Cth) ("Act") 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 Bassett Services Pty Limited's efforts to identify, assess, minimise and monitor Modern Slavery risks in our operations and supply chains.

2. Our Organisation – Gallagher Bassett Services Pty Ltd

Gallagher Bassett Services Pty Ltd (ACN 009 778 018) (“Gallagher Bassett”) 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 is approximately 1400 in Australia. In addition to the registered office located in Brisbane, offices are also located in Darwin, Sydney, Melbourne, Adelaide and Perth.

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.

Gallagher Bassett is a Third-Party Claims Administrator managing claims on behalf of insurers, brokers, government bodies and self-insured organisations. Our services are primarily insurance claims management and risk consulting.

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 any of our supply chains.

Gallagher Bassett is 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 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 with whom we conduct business.

An endorsement of Gallagher Bassett’s behavioural approach has been consistently recognised by the Ethisphere Institute. Gallagher received recognition as one of the World’s Most Ethical Companies for 2023 by the Ethisphere Institute – our 13th time being recognised. We are pleased to be part of the Gallagher Group and continue to conduct ourselves in a way that actively demonstrates our high standards of integrity, professionalism and the strength of the Group’s culture and core values.

Policy

Gallagher Bassett has created and published a Modern Slavery Policy, owned by the Head of Risk, Compliance and Ethics, sponsored by the Chief General Counsel and approved by the Chief Executive Officer.

The Policy 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

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.

Supply Chains

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

The majority of our suppliers are based in Australia and Gallagher Bassett maintains a register of current suppliers. Gallagher Bassett's overseas supply chain include the Gallagher Global Service Centre, which is based in India and forms part of, and is a division within, the Gallagher group.

Our major categories of procurement include:

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

4. Risks of Modern Slavery Practices

Risk 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 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 Bassett, or any of its subsidiaries has a contract or relationship.

Gallagher Bassett continues to be aware that Covid-19 may have increased the risk of Modern Slavery and risk assessments will take consideration of this.

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.

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

- Ongoing oversight of the program by the Ethics Committee, and quarterly reporting to the Compliance and Audit Committee.
- Risk assessments are conducted in line with our Enterprise Risk Management Framework.
- We have a supplier and service providers framework which includes a register of engaged providers. Although most of our suppliers are located in Australia and are rated as low risk, Gallagher Bassett 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 Whistle-blower channels are 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 National Ethics Officer, or through the whistleblowing channels and ethics notification process. Our parent company also operates an international Ethics and Compliance Hotline.
- All new corporate acquisitions are subject to an additional due diligence review for Modern Slavery risks.
- We conduct annual training for all Gallagher Bassett 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. We also conduct specific Modern Slavery training for all employees.

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 instigate 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 made to the Ethics Committee and, through that Committee, to the CAC.

Incidents are 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

During the period since submission of our Statement in March 2022, the following has been undertaken:

- Review and revision of the Ethics Committee Charter to place emphasis on the Committee's role in managing Modern Slavery risk;
- Review and revision of the Modern Slavery Policy to ensure alignment of content with our legislative obligations;
- Obtaining Compliance and Audit Committee authorisation for the setting of parameters for supplier due diligence;
- Appointment of Givvable in April 2023. Givvable is an automated supplier sustainability and Environmental Social and Governance diligence platform using the latest technologies to identify, track and map supplier credentials to frameworks and reporting standards.

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, 48% of the suppliers registered on the Givvable platform have credentials, with 17 of these suppliers having issued Modern Slavery Reporting Statements in 2022.
- Of the 52% of suppliers that are non-credentialed, the Givvable platform will prompt the suppliers to complete a learning module.
- 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.
- All new suppliers will be invited to register on the Givvable platform at supplier onboarding.

7. Building Capability and Measuring Effectiveness

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;
- Promoting effective oversight by the Ethics Committee and CAC.

8. Consultation – entities owned by Gallagher Bassett

This Statement was created in consultation with the entities listed below which are wholly controlled subsidiaries of Gallagher Bassett Services Pty Limited:

- Corporate Services Network Pty Ltd
- Gallagher Bassett Services Workers Compensation Vic Pty Limited
- Aurenda Pty Ltd
- Aurenda Training Services Pty Ltd

9. Statement Endorsement and Approval

This statement was approved by the Board of Directors of Gallagher Bassett Services Pty Limited on 22 June 2023.

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

Signed: 
Peter Cameron Nicholson

Date: 23 June 2023