



**Gallagher Bassett Services Pty Limited**  
**Modern Slavery Statement**

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# Message from our CEO John McNamara

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.



A handwritten signature in black ink that reads "John McNamara". The signature is fluid and cursive, written over a light grey background.

**John McNamara**  
Chief Executive Officer

We are committed to conducting our business activities with integrity ensuring that human rights violations are not occurring. 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.

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**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.**

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Client excellence is a fundamental value at Gallagher Bassett. 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 endeavour 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.

Finally, with trust being a key value of Gallagher Bassett, we strive to continue to build trust with our clients, and the broader insurance and risk management industry. We earn that trust by upholding the values of integrity and fair dealing.



## 1. 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 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 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's efforts to identify, assess and minimise Modern Slavery risks in our operations and supply chains.

## 2. Our Organisation - Gallagher Bassett Services Pty Ltd

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

### OUR POLICY

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](http://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 Bassett's behavioural approach has been consistently recognised 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 of integrity, professionalism and the strength of the Group's culture and core values.



# 3. Our Structure, Operations & Supply Chains

## ABOUT US

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 claims management and risk consulting. Gallagher Bassett forms part of the Arthur J Gallagher Group and has a long tradition of professionalism and integrity underpinned by Gallagher's Global Standards of Business Conduct.

## STRUCTURE

Gallagher Bassett Services Pty Ltd (ACN 009 778 018) is a limited by shares propriety 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 1300 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 and Christchurch.

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

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

Gallagher Bassett has a robust recruiting and onboarding program that is aligned with Fair Work Legislation, and includes 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.' GB will not knowingly do business with business partners, vendors or suppliers who engage in these practices.

## WHERE WE SOURCE

**Our supply chains are limited as we do not produce, manufacture or retail goods. Gallagher Bassett employs external service providers for the maintenance and support of our offices, including cleaning, repairers, Information Technology, solicitors, travel and the lease of office space.**

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

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 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. We will monitor supplier adherence to the Modern Slavery Act through ongoing risk assessments and due diligence.

Gallagher Bassett is 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 are taking 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 current suppliers and service providers. As part of our ongoing enhancements, we are introducing requirements for suppliers and service providers to complete a Modern Slavery Questionnaire and a copy of their Modern Slavery Annual Reporting Statement (where applicable). The Modern Slavery Questionnaire aims to identify and assess potential modern slavery risks to enable Gallagher Bassett to address the risk. Suppliers are 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 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 acquisitions will be subject to an additional due diligence review for Modern Slavery risks.
- Our HR team are provided a copy of this Statement and will report any risks identified across the business as per our existing risk and incident identification processes.
- We conduct annual training for all GB 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.



## **DUE DILIGENCE**

Due diligence will be carried out on an ongoing basis for our register of suppliers and for new acquisitions. All suppliers 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, 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 available as required.

## **6. Action Plan**

Gallagher Bassett will continue to conduct ongoing risk assessments and maintain 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.

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



## 7. Effectiveness of actions taken to address risks

### EFFECTIVENESS

The Compliance & Audit Committee will continue to 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.

### FUTURE COMMITMENT

An annual review will lead to updates to our Modern Slavery program 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. This Statement will outline Gallagher Bassett's efforts to identify and investigate Modern Slavery risks in our operations and supply chains.

## 8. Consultation - entities owned by Gallagher Bassett

This Statement was created in consultation with and covers the entities listed below which are wholly controlled subsidiaries of Gallagher Bassett Services Pty Limited and are the main operating entities in Australia ("Gallagher", "we", "us", or "our").

- Corporate Services Network Pty Ltd
- Gallagher Bassett Services Workers Compensation Victoria Proprietary Limited
- Aureka Pty Ltd
- Aureka Training Pty Ltd



## 9. Statement Endorsement and Approval

This statement was approved by the Board of Directors of Gallagher Bassett Services Pty Limited on 31 March 2022. This statement has been signed by the Chief Executive Officer of Gallagher Bassett Services Pty Limited.

**Signed:**

John McNamara  
Chief Executive Officer / Board Director

**Date: 31 March 2022**



GALLAGHER BASSETT

GUIDE. GUARD. GO BEYOND.