



Modern Slavery Statement 2023

Arthur J. Gallagher & Co (AUS)
Limited



Gallagher

Insurance | Risk Management | Consulting



Our aim is to build trust with our clients, and in the broader insurance and risk management industry. We earn that trust by upholding the values of integrity and fair dealing.

A message from our CEO

This Modern Slavery Statement is made on behalf of Arthur J. Gallagher & Co (Aus) Limited (Gallagher Broking Australia) (the reporting entity) in response to the Australian Modern Slavery Act 2018 (Cth).

Gallagher Broking Australia 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 endeavor will ultimately end the practice of Modern Slavery.

Across our business, we are committed to identifying and investigating any potential risks in our operations and supply chains to ensure that human rights violations are not occurring.

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.

Client excellence is a fundamental value at Gallagher. 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 endeavor 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.

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Sarah Lyons

*CEO – Australia and Asia
Structure and Operations*



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 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.

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 Modern Slavery Statement is made on behalf of Arthur J. Gallagher & Co (Aus) Limited (Gallagher Broking Australia) (reporting entity) in response to the Australian Modern Slavery Act 2018 (Cth) (MSA). It describes our present and ongoing commitment to minimise the risk of Modern Slavery and human trafficking occurring within our supply chains and business.

The statement covers the period for the financial year ending December 2023.

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Our Policy

Gallagher Broking Australia 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 Broking Australia is also committed to adhering to the highest standards of professional and ethical behavior 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 we conduct business with.

An endorsement of Gallagher's behavioral approach has been consistently recognized 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 or integrity, professionalism and the strength of the Gallagher Group's culture and core values.

1. Our Organisation

Structure and Operations

We are the chosen partner to more than 125,000 Australian businesses, from small businesses through to multinational corporations and iconic brands. Through our network of more than 30 regional and metropolitan branches across Australia and approximately 1,060 Australian staff we understand local business communities because we are part of them ourselves.

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 55,000 people and our global network provides services in more than 130 countries.

Our parent company Arthur J. Gallagher & Co (AJG&Co) is headquartered in Illinois, USA and it is a separate legal entity distinct from its subsidiaries that operate across the globe.

Gallagher Australia provides insurance brokerage and risk management services to a wide variety of individual, commercial, industrial, institutional and governmental clients. This includes planning, designing, and administering a wide array of insurance and risk management programmes. Our broking and risk management services help our clients reduce their risk costs and manage their risks effectively.

Our registered office is located at Level 16 100 Arthur Street , North Sydney, New South Wales.

Our People

Gallagher primarily operates in the highly regulated financial services sector of Australia which maintain labour and award safeguards for employees as well as safe working environment protections. Due to the office-based nature of our work, the low presence of vulnerable workers, and the higher skill level required in the financial services sector, the industry and jurisdictions we operate in pose a low inherent risk of forced labour, child labour, and other forms of modern slavery.

Our highly skilled and often tertiary-educated staff perform most of our roles. We conduct background checks for all new employees, with the extent of the checks varying based on local procedures and the specific roles involved. These checks may

include criminal checks, verification of working rights, verification of education credentials or confirmation of previous employment.

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.

Staff are remunerated in line with all relevant awards and requirements and most staff are employed on a full-time and part-time basis. We also use third-party recruitment and labour agencies to support our staffing arrangements. In addition, we may rely on third-party recruitment and labour agencies to assist us with our staffing needs and most of these workers are highly skilled professionals with expertise in their respective fields. However, it is important to note that we do not engage labour hire companies for manual labour or low-skilled positions.

Supply Chains

We employ external service providers contracted for the maintenance and support of our offices including:

- Information, communications and technology
- Financial and professional services
- Corporate travel & entertainment
- Marketing, advertising and printing services
- Office support including cleaning, repairs, office space and leasing
- Solicitors

Although most of our suppliers are in Australia and are rated as low risk, Gallagher Broking Australia engages the services of the Gallagher Center of Excellence (GCoE) in India that provides outsourced administrative services on an ongoing basis 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 organisation is dedicated to upholding a culture embedded in integrity, transparency, and accountability. We prioritise compliance with all relevant laws pertaining to our business operations and supply chain. Similarly, we hold our suppliers, agents, and joint venture partners to the same high standards, expecting their firm commitment to compliance within their own businesses and supply chains.



2. Risks of Modern Slavery Practices

Risks that may contribute to Modern Slavery practices include acts or omission that may facilitate or incentivise Modern Slavery.

Risks where Gallagher Broking Australia 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, or any of its subsidiaries has a contract or relationship.

In reviewing our operational environment and our business structures in Australia, we do not consider that we operate in sectors that are considered high risk in relation to modern slavery and human trafficking.

Gallagher 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 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.

Because we are a financial services firm, we do not procure goods and services from sectors typically considered to contain high modern slavery risks.

Gallagher's core business is the provision of insurance, Risk Management and consulting 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.

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





Risk Management, Due Diligence, Remediation

The nature of our business means that Gallagher Broking Australia is considered to face a low risk of Modern Slavery. Our aim is to emphasize 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 section describes the ongoing steps we have undertaken to mitigate modern slavery and human trafficking risks within our organisation and supply chains through our codes, policies, processes and procedures.

Policies & Procedures

Business Conduct

Every member of the Gallagher team is responsible for their conduct, and we collectively uphold a dedication to ethical conduct across the company. We also 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 also expect anyone representing us, including

consultants, agents, third-party representatives, and service providers, to adhere to our values and conduct themselves accordingly. If a business partner fails to meet our standards or contractual obligations, appropriate actions will be taken. Gallagher Australia strives 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.

Whistleblower Policy

Our whistleblower channels will be available to all employees and suppliers. Our Whistleblower 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 Legal, Risk and Compliance team, or through the whistleblowing channels as well as through our parent company which operates an international Ethics and Compliance Hotline.

Ongoing Training

We conduct annual training for all Gallagher 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.

New and current staff complete annual mandatory training modules relating to equal opportunity, ethics, anti-corruption and integrity.

Other Remediation

Our HR team will be issued a copy of this Statement and will report any risks identified across the business to the Risk and Compliance team.

Reference to compliance with our Modern Slavery Statement will be included on our website, and across relevant contracts and agreements.

Annual review of all aspects of our Modern Slavery programme is carried out by the Gallagher Broking Australia, Risk and Compliance team. Risk assessment will be a combination of research and risk-based questionnaires.

Suppliers and service providers will be listed on a register. If the supplier issues their own Modern Slavery Statement, a copy will be kept on file. Suppliers who do not issue a Statement will be issued with a Modern Slavery Risk Questionnaire which will assess Modern Slavery risks for suppliers and offer support and corrective action plans to address the risk should an instance be identified.

Due Diligence

Due diligence will be carried out on an ongoing basis for our register of suppliers and for new acquisitions. All suppliers who do not publish their own Modern Slavery Statement 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.

Governance & Remediation

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 Initiatives

In addition to our regulatory requirements, Gallagher will continue to participate in company and community initiatives to combat Modern Slavery in our global and local community.

All employees are eligible for an annual charitable day (including offering support to disadvantaged people in our community).

3. Effectiveness & Monitoring

Effectiveness

The effectiveness of our programme will be monitored and assessed by the Risk and Compliance team. The Risk and Compliance team will complete an annual review of performance indicators including reports of instances of Modern Slavery or human trafficking instances identified by employees, the public, law enforcement, or our suppliers.

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

Future Commitment

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

Corporate acquisitions form a key part of Gallagher's growth agenda. Appropriate due diligence is required to ensure Gallagher is adequately aware of modern slavery risks as part of the acquisition process, both prior to the acquisition and after a target is acquired.

All new corporate acquisitions will be 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 and Compliance team, assesses the Modern Slavery risk of the target and aligns its practices with the Gallagher approach to Modern Slavery.

4. Consultation – Entities owned by Gallagher

This Statement was created in consultation with and covers the entities listed below which are wholly controlled subsidiaries of Arthur J. Gallagher & Co (Aus) Limited 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)
- A.C.N. 003 030 180 Pty Ltd (formerly OAMPS Gault Armstrong Pty Ltd)



5. Statement Endorsement and Approval

This Statement was approved by the Board of Directors of Arthur J. Gallagher & Co (Aus) Limited on 26 November 2024. This Statement in its entirety has been signed by the CEO Australia & Asia (page 1) and the Chairman (page 6).

A large, stylized handwritten signature in black ink, belonging to Peter Searson.

Peter Searson

Chairman



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