

Modern Slavery

Modern Slavery Statement

Introduction

This modern slavery and human trafficking statement (“statement”) is made pursuant to section 54 of the Modern Slavery Act 2015. It applies to Arthur J. Gallagher Holdings (UK) Limited and each of the companies listed in Appendix 1, as well as the UK branch of Arthur J Gallagher Nordic AB, a company incorporated and regulated in Sweden (referred to as the “Companies”, “our”, “we” or “us”).

This statement is in respect of the financial year ending 31 December 2024 and outlines the steps that we have taken and continue to take to ensure that modern slavery and human trafficking are not taking place within any part of our business or in any of our supply

Our ethics

We are committed to implementing effective systems and controls to ensure neither slavery nor human trafficking occur within any part of our business or in any of our supply chains. Our ongoing commitment to ethics has been integral to the ultimate parent company of the Companies, Arthur J. Gallagher & Co, since it was established in 1927.

Our leadership sets the tone for our distinct culture and senior level accountability ensures commitment to do what is right for our customers and the communities that we operate in.

Group structure

Arthur J. Gallagher & Co, its subsidiaries and affiliates, including the Companies (together the “Group”) employs approximately 71,000 employees worldwide, with around 7,000 employees based in the United Kingdom.

Our business

The services we offer encompass (re)insurance risk placement, risk consulting, underwriting services, and (re)insurance claims management. These services span a wide spectrum of insurance classes and are provided to both commercial and personal lines customers as well as insurers.

Our supply chain

The Companies seek to promote best practices, and formal policies are in place that establish a governance and control framework for suppliers. This framework includes the use of auditable sourcing and evaluation processes for supplier selection, the agreement of transparent and regulatory compliant contractual terms, and continuous monitoring of supplier performance and risk.

Suppliers used by the Companies include maintenance and support of our offices, including cleaning and technical support services for office infrastructure and IT, and for outsourcing certain functions ordinarily performed by the Companies.

The Companies utilise certain offshore business process outsourcing services in India and Sri Lanka. A key factor is that the service providers in India and in Sri Lanka are part of the Group, rather than third-party business process outsourcers, and all their staff are Group employees. They perform

various functions that are essential to the delivery of services to our clients. They remain committed to our approach to management of modern slavery and human trafficking risk, and integration of our policies and training is ongoing. This includes addressing employee well-being, risk management and establishing a process for reporting risk events.

In 2024, we undertook a physical review of our India operations as part of an ongoing programme to verify the working environment.

Due diligence process

Our procurement team require new suppliers to complete a Request for Information (“RFI”), as part of the selection and on-boarding process, to assess their ability to comply with a range of requirements including legal, regulatory and financial. This includes compliance with modern slavery and human trafficking reporting requirements.

As determined by spend and risk, our critical service suppliers to the Companies are also required to provide comprehensive information and disclosures through our Environmental, Social and Governance (“ESG”) Supplier Attestation Questionnaire. This includes modern slavery, human trafficking and labour standards, and aids us in continuously improving our approach to supply chain management and the prevention of modern slavery and human trafficking.

In 2024 we expanded the scope of our ESG Attestation questionnaire to increase insights into supplier ESG related practices. The attestation now comprises 64 questions across 11 ESG-related risk domains and seeks to evaluate how well suppliers integrate ESG values into their operations, including ethical practices, labour standards, health and safety, whistleblowing and effective governance.

Additionally, we increased the coverage of the attestation from 23 to 57 of our most critical service suppliers to the Companies across multiple categories including IT, consultancy, facilities management and HR services.

Our policies and governance

The Companies are committed to upholding the highest standards of moral, professional, and ethical behaviour. We prioritise acting with integrity and transparency in all our business relationships. We therefore expect our suppliers to comply with the Gallagher Global Standards of Business. These standards can be accessed by visiting: <https://www.ajg.com/about-us/global-standards/>.

The ‘Gallagher Way’ serves as a statement of our shared values and forms the foundation that underpins the Group culture. In addition, a Professional Standards Manual (“PSM”) is in place and accessible by all staff. This suite of core policies reinforces our commitment to upholding the highest professional standards and ethics, both within the workplace and in our business dealings with others.

The Companies have various policies and processes aimed at minimising the risk of modern slavery and human trafficking. These measures also encourage the reporting of any concerns related to these issues. Some of these policies and processes include:

- A Modern Slavery Policy, which outlines the expected behaviours for all employees and provides guidance on the reporting procedure and obligations.
- A Procurement Policy, which implements a proportionate supplier assessment process and establishes due diligence requirements.

- Supplier Code of Conduct, which is issued to all critical service suppliers to the Companies, outlines our expectations in terms of ethical conduct, human rights, labour practices, and environmental stewardship. By adhering to these principles, we aim to foster a responsible and sustainable supply chain.
- A Whistleblowing Policy, that ensures all employees are aware of how to raise concerns about the treatment of employees or any practices within our business or supply chain, without fear of reprisal. There have been no reported incidents related to suspected modern slavery or human trafficking activity since the date of our 2023 statement.
- Recruitment Policies that, amongst other things, mitigate against the use of external agencies that do not adequately safeguard individuals offered for roles. Important elements include robust Right to Work checks, as well as background and criminal records checks.
- Where relevant, we aim to incorporate a requirement for compliance with modern slavery legislation into our standard terms and conditions and contractual arrangements.
- Our Outsourcing & Critical Supplier Committee, which performs an oversight function and sets the standards for material supplier performance and assessment of suppliers' approach to social responsibility.

Training

All new employees undergo training as part of their induction programme, which includes information on who they should contact if they have any concerns about modern slavery or human trafficking. Employees are also encouraged to report any concerns or suspicions regarding the presence of modern slavery or human trafficking within the supply chain.

Modern slavery is also included within the Group's global mandatory "Leading with Integrity" training module, which is assigned to all new and existing employees on an annual basis.

Our Modern Slavery UK training module is mandatory for any employees operating in supply chain roles and is available and encouraged to all employees regardless of their role. The training aims to equip our employees with the necessary knowledge and tools to effectively identify signs and indicators of different types of modern slavery and understand how to respond and report potential cases. In 2024, this training was extended to our India operations leadership team.

By implementing this training, we actively encourage our employees to contribute to the eradication of modern slavery and to establish a safer and more ethical working environment for everyone involved.

Looking ahead, continuous improvement and ambition

To improve the oversight of our modern slavery risk, our UK & EMEA ESG Committee is leading on shaping how we assess and report on the risk of modern slavery.

We embrace a culture of continuous improvement, striving to incorporate best practices in all aspects of our operations. By doing so, we aim to and continue to take steps to ensure that modern slavery and human trafficking are not taking place within any part of our business or in any of our supply chains, including the following:

- Performing gap analysis, consultancy, training and site assessment, utilising external risk consultants (i.e. Slave Free Alliance) when required.

- Continuing to deploy tailored modern slavery training to key employees in order to raise awareness of modern slavery and human trafficking, identify specific risks, and promote effective reporting of any concerns related to modern slavery or human trafficking.
- Extending UK Modern Slavery training to India senior leadership colleagues.
- Continuing to roll-out best practice to support consistency across the Companies.
- Continuing to be vigilant in monitoring and reporting any suspected instances of modern slavery and human trafficking, and encouraging employees to report through the appropriate channels.
- Continuing our ongoing work with our critical service suppliers to the Companies, including addressing any improvement actions that arise from the ESG Supplier Attestation Questionnaires.
- Reviewing and updating our ESG Attestation to reflect evolving requirements and standards
- Reviewing our Supplier Code of Conduct to outline our expectations for suppliers, with the aim of fostering a responsible and sustainable supply chain.
- Continuing to work alongside our partnerships and to collaborate with industry.
- Undertaking modern slavery due diligence checks where we explore intra-group services from high-risk overseas territories.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Arthur J. Gallagher Holdings (UK) Limited on 8 May 2025.

Appendix 1

- Arthur J. Gallagher (UK) Limited
- Arthur J. Gallagher Insurance Brokers Limited
- Alesco Risk Management Services Limited
- Pen Underwriting Limited
- Arthur J. Gallagher Services (UK) Limited
- Risk Management Partners Limited



[Michael Rea](#), Chief Executive Officer, Global Broking, UK & Ireland.

Note: The above statement does not include:

Gallagher Benefit Services Holdings Limited UK and their relevant subsidiaries, [click here](#) for their statement.

[Modern Slavery Statement - Gallagher Specialty](#)

[Modern Slavery Statement 2023](#)