

Transparency Act: Due Diligence Report

Introduction

This statement is made pursuant to section 5 of the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions ("The Transparency Act"). It constitutes Arthur J Gallagher (Norway) Holdings AS (the "Company"), its subsidiaries and associate companies' (together the "Organisation", "our", "we" or "us") statement on fundamental human rights and decent working conditions.

This statement sets out the steps that we have taken, and continue to take, to ensure that fundamental human rights and decent working conditions are upheld and respected in every part of our business, including throughout our supply chains and other business relationships.

Our ethics

We have zero tolerance to any form of abuse of, or adverse impact on, fundamental human rights and decent working conditions, and are 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. Social impact is an important part of our ongoing commitment to ethics and has been since Arthur J. Gallagher was founded in 1927. Our leadership sets the tone for our distinct culture and senior level accountability demonstrates commitment to ensuring we do what is right for our customers and the communities that we operate in. Since 1927, Gallagher has led with integrity, ethics and purpose — consistently recognised by organisations such as JD Powers & Associates, Forbes, Fortune 500, Ethisphere, and the Human Rights Campaign.

Group structure

The Organisation is part of the Arthur J. Gallagher & Co's group of companies (the "Group") that provides insurance brokerage and consulting services, and third-party claims settlement and administration services to clients globally. The Group has approximately 56,000 employees worldwide and approximately 35 employees in Norway.

Our business

The main operating companies are Gallagher Norway AS and Gallagher Re Nordic AS, each a regulated insurance intermediary firm in Norway. Gallagher Norway AS is an insurance brokerage, serving clients in Norway and internationally within shipping, offshore, energy, and renewable industries. Gallagher Re Nordic AS provides reinsurance risk placement, risk consulting, underwriting services, and claims management, across a wide spectrum of insurance classes.

Our supply chain

Being a financial services organisation, that does not produce, manufacture, or retail goods, we do not operate in an industry where adverse impacts on fundamental human rights and decent working conditions are prevalent. We do employ external service providers for 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 Company.

Common with other financial services organisations, the Organisation utilises business process outsourcing services from India, but only in a limited capacity. An important difference is that the service provider in India (known as the "Gallagher Center of Excellence" or "GCoE") is part of the Gallagher Group rather than a third-party business process outsourcer and all staff are Gallagher employees. They perform various functions that support the delivery of services to our clients. GCoE

continues to subscribe to how we manage the risk of adverse impacts on fundamental human rights and decent working conditions, with ongoing integration of our policies and training, covering aspects such as employee well-being and risk management.

Our policies and governance

The Organisation is also committed to adhering to the highest standards of moral, professional, and ethical behaviour, and acting with integrity and transparency in all our business relationships. We are committed to enforcing effective systems and controls to ensure these standards are upheld in every part of our business and supply chains. Our leadership sets the tone for our distinct culture, and senior-level accountability demonstrates our commitment to doing what is right for our customers and the communities we operate in. We therefore expect our supplier network, and those involved in procurement for the Organisation, to comply with the Gallagher Global Standards of Business, which is available to view by accessing <https://www.ajg.com/us/about-us/global-standards/>.

This suite of core policies reflects the shared values of the Gallagher Way and Gallagher Global Standards of Business, reinforcing the Organisation's commitment to upholding the highest professional standards, and ethics, both in the workplace and in business dealings with others.

We implement robust systems and controls to ensure compliance with human rights standards. This includes supplier assessments, due diligence processes, and comprehensive training programs like "Leading with Integrity", tailored Modern Slavery training for specific departments, and encourage reporting of any related concerns.

Risk Assessment and Management

We actively assess, prevent, and manage risks related to human rights and working conditions. Our Outsourcing & Critical Supplier Committee and Supplier ESG Attestation Questionnaire play crucial roles in identifying and assessing risks. We prevent and manage risks through structured measures, regular assessments, and employee support resources.

Looking ahead, continuous improvement and ambition

We regularly evaluate our operations and supply chain to identify any risks or areas for improvement. Gallagher embraces a culture of continuous improvement and the implementation of best practices, and our ESG Committee leads efforts to shape policies

Looking ahead, we aim to perform gap analyses, consultancy, training, and site assessments, utilising external risk consultants when required. We remain vigilant in monitoring and reporting any suspected instances of non-compliance and encourage colleagues to report through appropriate whistleblowing channels.

Psychosocial Work Environment Compliance

Effective January 1, 2026, The Working Environment Act has updated the requirements concerning the documentation on compliance with the legal requirements for the psychosocial work environment. These updates emphasize the importance of preventing work-related stress, bullying, and harassment, while also promoting well-being and collaboration within the workplace. The law now requires employers to implement more structured measures to assess and improve the psychosocial conditions of their work environment.

The company has long been committed to maintaining a positive psychosocial work environment, and we are well-prepared to meet these updated requirements. While we already have robust strategies in place, we are dedicated to further enhancing our efforts to comply with these legal requirements. We

regularly conduct assessments of our workplace environment and foster an inclusive culture that encourages open communication and mutual respect among employees. Mental health and stress management were the topic of our all hands meeting Q2 2025, underscoring their importance within our organization.

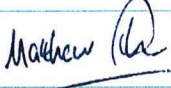


Our commitments include:

- Regular Assessments: We will maintain our practice of conducting periodic evaluations of the psychosocial work environment to identify areas for improvement and ensure ongoing compliance.
- Support Resources: We provide employees with access to Employee Assistance Programs, flexible work arrangements, and regular check-ins with line management to support them in managing stress, preventing bullying and harassment, and promoting overall well-being and collaboration.
- Inclusive Culture: We continue to promote a workplace culture that values diversity, inclusion, and open dialogue, ensuring all employees feel supported and respected.

In addition, our ambition is to achieve the following:

When by	What
1-3 years	Perform gap analysis, consultancy, training and site assessment, utilising external risk consultants (i.e. Slave Free Alliance) when required.
Ongoing	Continue to be vigilant in the monitoring and reporting of any suspected modern slavery instances and encourage colleagues to report through the appropriate whistleblowing channels.
Ongoing	Wider roll-out of any best practice to support global consistency.

Signed by the Directors of the Board for and on behalf of Arthur J. Gallagher (Norway) Holdings AS, its subsidiaries and associate companies, on 30th June 2025:

Matthew Pike	
Anders Mjaaland	
Henrik Mjaaland	
Dag Magne Torjussen	