

Modern Slavery Statement

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Arthur J. Gallagher Holdings (UK) Limited (the “Company”), its subsidiaries and associate companies (including Nordic Försäkring & Riskhantering AB that has a branch located in the United Kingdom) (together the “Organisation”, “our”, “we” or “us”) slavery and human trafficking statement (“statement”) in respect of the financial year ending 31 December 2020.

This statement sets out the steps that we have taken, and continue to take, to ensure that modern slavery and human trafficking is not taking place within any part of our business, or in any of our supply chains.

For this reporting period, we have changed the format of our statement so that it is clearer and more concise than previous versions.

Our Approach

We have zero tolerance to any form of slavery and human trafficking, 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.

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 34,000 employees worldwide and approximately 5,000 employees in the United Kingdom.

Our Business

The main operating companies are; Arthur J. Gallagher (UK) Limited, Arthur J. Gallagher Insurance Brokers Limited, Alesco Risk Management Services Limited, Pen Underwriting Limited (each a UK-regulated insurance firm) as well as Nordic Försäkring & Riskhantering AB (a Swedish-regulated insurance firm), through its UK branch. Between these companies, the main services are (re)insurance risk placement, risk consulting, underwriting services and (re)insurance claims management, across a wide spectrum of insurance classes, delivered to commercial and personal lines customers and insurers.

Our Supply Chain

Being a financial services organisation, that does not produce, manufacture or retail goods, we do not operate in an industry where modern slavery is 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. We are committed to taking steps to uncover any potential risks within our supply chain.

Common with other financial services organisations, the Organisation utilises business process outsourcing services from India. An important difference, is that the service in India (known as the “Gallagher Service Centre” or “GSC”) is part of the Gallagher Group rather than a third-party business process outsourcer and all staff are Gallagher employees. They perform various back office functions that are essential to the delivery of services to our clients. GSC staff are valued colleagues that adhere to the Group’s ethical standards, which enables our approach to modern slavery to be implemented efficiently. Over the last year, we have worked with GSC to raise the profile of our commitment to eradicating modern slavery, creating a review process that addresses modern slavery risk, with clearer reporting and governance. In addition, GSC applies our Modern Slavery Policy, Whistleblowing Policy and associated training within its operations, which includes raising and reporting risk events and near misses.

Our Policies

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 therefore expect our supplier network, or 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/about-us/global-standards/>.

An endorsement of the Group’s behavioural approach is it being consistently recognised by the Ethisphere Institute as one of the world’s leading ethical companies. We 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. In addition, our UK employing entity is an official Living Wage Foundation accredited employer

The Organisation has various policies and processes in place that aim to minimise the risk of modern slavery or human trafficking, and encourage reporting of any related concerns, including:

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

Suppliers are required to report what steps they are taking regarding identifying the risk of modern slavery within their particular supply chain, which allows the Organisation to better assess the potential risks of modern slavery in its own supply chain.

The Organisation includes a specific requirement for compliance with modern slavery legislation in its standard terms and conditions and contractual arrangements.

In addition, the Organisation utilises its Outsourcing & Critical Supplier Committee (that performs an oversight function) to assess material supplier performance and risk, with modern slavery being a key risk consideration.

- A Whistleblowing Policy that ensures all employees know how to raise concerns about how colleagues are being treated or regarding practices within our business or supply chain, without fear of reprisal.

Training

Our staff complete mandatory Modern Slavery Act training on a bi-annual basis. All new employees receive the training as part of their induction programme. It includes information on who staff should contact should they have any concerns. Staff are encouraged to report any concerns or suspicions regarding the presence of modern slavery within the supply chain.

Looking Ahead

We will continue to embed our approach to modern slavery within GSC, mindful that our GSC colleagues are an extension of our UK business and that GSC itself is (on a per capita basis) our largest supplier.

Our training module is due to be refreshed and will consider best examples available, including resources contained on the UK Government's resource page. The updated module will be incorporated into our induction training programme.

We will undertake an exercise to re-assess the level of modern slavery risks faced by the Organisation, which will then be reported through our Environmental Social and Governance workstreams and to the Organisation's senior management.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of the Company on 8 June 2021.

Simon Matson


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