

Modern Slavery Act Transparency Statement

Introduction

The statement sets out the steps being taken by Gallagher Benefit Services Holdings Limited UK (“the Organisation”) to mitigate the risk of slavery or human trafficking taking place within its supply chains or in any part of its business, and intends to cover the activities and process undertaken by the Organisation which encompasses its subsidiaries, including those authorised and regulated by the Financial Conduct Authority (“FCA”) and the group owned and/or controlled Appointed Representatives of any of those companies (“we”, “us”, “our”).

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement (“statement”) in respect of the financial year ending 31 December 2021.

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.

Our Ethics

Gallagher does not tolerate any instance of modern slavery, forced or child labour, or human trafficking within its business and we are committed to acting ethically and with integrity in all our business dealings and relationships. We have systems in place to ensure this does not occur within our workplace and to ensure colleagues feel able to raise any concerns with confidence.

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. Our level of commitment is recognized by the Ethisphere® Institute that has recognised our Group as one of the World’s Most Ethical Companies® for the past eleven years.

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 39,000 employees worldwide and approximately 5,000 employees in the United Kingdom.

Our Business

The main operating companies in the Organisation are; Gatehouse Consulting Limited; Reward Management Limited; Anthony Hodges Consulting Limited; Gallagher Risk & Reward Limited; Gallagher Communication Limited; and Argentis Financial Management Limited. Between these companies, the main services include expertise and guidance in rewards and benefits planning, delivery and administration for a broad range of reward and benefit services (including executive benefits, pensions data analysis and benchmarking), retirement services,

benefits outsourcing, healthcare reform consulting, human resource services, employer benefit communication solutions and culture change consulting.

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 Organisation. 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 functions that are essential to the delivery of services to our clients. GSC continues to subscribe to how we manage modern slavery risk and integration of our policies and training is ongoing covering, amongst other things employee well-being and risk management.

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.aiq.com/about-us/global-standards/>.

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. Our shared values are the foundation of the Group and the Gallagher Way makes clear to colleagues the standards that are expected. We strive to maintain these high standards of behaviour at all times.

In addition to the Gallagher Global Standards of Business, the Organisation also has various policies, standards and procedures 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.
- **Recruitment Procedures** - we have stringent procedures in place to carry out background checks on all new joiners and check the identity documents and eligibility to work in the UK for all new colleagues. We use reputable recruitment agencies to source temporary agency workers that carry out the necessary right to work and identity checks on our behalf.
- **Whistleblowing** - the Organisation has robust processes for whistleblowing and raising concerns whether in relation to the Organisation, colleagues or clients. Colleagues are encouraged to raise any concerns regarding modern slavery with their manager or through the whistleblowing procedure. The Organisation’s Whistleblowing Policy is designed to make it easy for employees to make disclosures, without fear of retaliation.

- **Disciplinary Policy** - the Organisation will deal with any instances of inappropriate behaviour or misconduct through the Disciplinary Policy.
- **Equal Opportunities Policy** - the Organisation is committed to promoting equality for all employees and job applicants and does not discriminate on grounds of race, age, religion, sex, gender reassignment, sexual orientation, marital status, disability, or pregnancy and maternity.
- **Colleague Assistance Programme** - the Programme is an independent service that offers help with personal and work-related issues.
- **Procurement Policy** - this applies to all Procurement-led purchases the Organisation makes. It 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.
- **The 'Gallagher Way'** - a statement of Gallagher shared values which acts as the foundation that underpins the Group culture.

Training

There is currently no explicit mandatory Modern Slavery Act training undertaken by colleagues to date. However, colleagues are encouraged to raise any concerns regarding modern slavery with their manager or through the whistleblowing procedure as noted under the Whistleblowing Policy above.

Looking Ahead

To improve the oversight of our modern slavery risk, the Environmental, Social and Governance (ESG) Committee is leading on shaping how we assess and report on the risk of modern slavery. One of the Committee's stated, 2022 priorities is better modern slavery training and monitoring of how the risk is evolving through current socio-economic circumstances. Gallagher embraces a culture of continuous improvement, endeavouring to incorporate best practice. This includes increasing transparency in our operations by embedding modern slavery within our global ESG strategy.

We will continue to work with the wider Group to embed the 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.

We will be including an explicit awareness course on Modern Slavery for all colleagues as part of the future programme of mandatory learning and development courses.

We will continue to review the level of modern slavery risks faced by the Organisation, which will then be reported through our Risk & Audit Committee 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 Organisation on 1 August 2022.