



**Gallagher**

Insurance | Risk Management | Consulting

## 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 recognized by organizations 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 52,000 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. 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 are essential to 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 and integration of our policies and training is ongoing covering, amongst other things 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 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/us/about-us/global-standards/>.

A Professional Standards Manual (“PSM”) is in place and accessible by all staff. 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.

In addition to the Gallagher Global Standards of Business and PSM, the Organisation has various policies and processes in place that aim to minimise the risk of adverse impacts on fundamental human rights and decent working conditions, and encourage reporting of any related concerns, including:

- Procurement Policy that implements a proportionate supplier assessment process and establishes due diligence requirements.
- 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 set the standards for material supplier performance and assessment of suppliers’ approach to social responsibility.
- A Supplier ESG Attestation Questionnaire, which includes Modern Slavery and Labour Standards. Through this, the Organisation gains assurance of third-party compliance with applicable regulations and richer insights into the policies and practices applied throughout our critical supply chain.
- Third Party and Client Vetting Policy for business relationships other than suppliers establishes a proportionate risk assessment process and due diligence requirements.
- 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.

- Recruitment Policies that, amongst other things, mitigate against utilising external agencies that do not adequately safeguard individuals offered for roles or are employed by the agency. Important elements include robust Right to Work checks and background and criminal records checks.
- The ‘Gallagher Way’ a statement of Gallagher shared values which acts as the foundation that underpins the Group culture.

## Training

Our global “Leading with Integrity” training module, which is assigned to all new and existing employees on an annual basis, includes a segment on modern slavery.

It includes information on who staff should contact should they have any concerns about modern slavery. Staff are also encouraged to report any concerns or suspicions about modern slavery within the supply chain.

In the past year we have developed tailored Modern Slavery training for colleagues in procurement, human resources and recruitment to raise awareness of modern slavery, specific risks to identify and the effective reporting of any human trafficking concerns.

## Looking ahead, continuous improvement and ambition

To improve the oversight of our modern slavery risk, our Environmental, Social and Governance (ESG) Committee is leading on shaping how we assess and report on the risk of modern slavery.

Gallagher embraces a culture of continuous improvement, endeavoring to incorporate best practice. This includes increasing transparency in our operations by embedding modern slavery within our global ESG strategy. We have also embedded modern slavery into the ESG agenda and continue to develop our strategy for implementation and risk monitoring.

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.



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Signed by the Directors of the Board for and on behalf of Arthur J. Gallagher (Norway) Holdings AS, its subsidiaries and associate companies, on 27<sup>th</sup> June 2024:

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