

# Gallagher Bassett International Limited

## Slavery and Human Trafficking Statement 2017

### Introduction

This Slavery and Human Trafficking Statement is made on behalf of Gallagher Bassett International Ltd ("Gallagher Bassett") pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015 ("the Act"), for the financial year ending 31 December 2017.

It sets out the steps Gallagher Bassett has taken, and is continuing 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 Business Organisation, Structure and Supply Chains

Arthur J. Gallagher & Co ("AJG&Co") and its subsidiaries (the "Group") provide insurance brokerage and consulting services, and third party claims settlement and administration services to both domestic and international entities. The majority of the Group's revenue is generated in the USA with the remainder derived primarily from Australia, Bermuda, Canada, the Caribbean, Latin America, New Zealand and the United Kingdom.

AJG&Co is headquartered in Illinois, USA and it is a separate legal entity distinct from its subsidiaries. Gallagher Bassett's direct parent company is Gallagher Bassett Services, Inc. which is also headquartered in Illinois, USA.

Our supply chains are limited as we do not produce, manufacture or retail goods. Gallagher Bassett does employ external service providers contracted for the maintenance and support of our offices, including technical support services for office infrastructure and IT, and for outsourcing certain functions ordinarily performed by Gallagher Bassett.

### Our Policy and Approach

Holding persons in slavery or servitude, requiring persons to perform forced or compulsory labour, and the human trafficking of persons for exploitation, are crimes and violations of fundamental human rights. Gallagher Bassett has zero tolerance to any form of slavery and human trafficking, and is 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.

Gallagher Bassett is also committed to adhering to the highest standards of moral, professional and ethical behaviour, and acting with integrity and transparency in all of our business relationships. Gallagher Bassett therefore expects all those connected to our supplier network, or involved in procurement for the Company in any other part of our business, to comply with the AJG Global Standards of Business, which is available to view by accessing <https://www.ajg.com/about-us/global-standards>.

We comply with all laws, regulations and rules relevant to our business, and take our corporate and social responsibilities very seriously. We expect the same high standards from those we conduct business with.

An endorsement of AJG&Co's behavioural approach is it being consistently recognised by the Ethisphere Institute as one of the world's leading ethical companies. We are pleased to be part of this recognition and continue to conduct ourselves in a way that actively demonstrates our high standards of integrity, professionalism and the strength of our Group's culture and core values.

### **Our Policies and Standards of Business Conduct**

Gallagher Bassett operates in accordance with a number of global and local policies and procedures to ensure that we are conducting business in an ethical and transparent manner. We identify and mitigate risk across a range of areas, including slavery and human trafficking, through integrating these policies and procedures. All local policies are reviewed annually and are endorsed by senior management and our Audit and Compliance Director, and to take account of our Global Standards of Business Conduct (together "the Standards").

Collectively the Standards address both the environment and specific issues associated with slavery and human trafficking. They include Standards for our own business workforce covering: harassment and discrimination; diversity and equal employment opportunity; safe workplaces; wage and hour laws.

We have also taken steps to address slavery and human trafficking through the following local policies and procedures:

- Our suppliers and service providers where appropriate, are being required to confirm that their business does not contradict our zero tolerance approach.
- We endeavour to procure rights to terminate contracts at any time should any instances of modern slavery come to light. In addition we actively require our suppliers and service providers to comply with all laws and regulations that apply to their business, which may, for instance, include paying their employees at least the national minimum wage or the prevailing minimum wage for international suppliers.
- Our recruitment procedure includes UK work eligibility checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Our Business Terms and Conditions include the right to terminate relationships.
- The AJG Global Standards of Business Conduct explain our values and the manner in which we behave as an organisation.
- Our Anti-Money Laundering and Anti-Bribery Policies help address the business environment to reduce its potential for crime.
- Our Whistleblowing Policy ensures all employees know how to raise concerns about how colleagues are being treated or regarding practices within our business or supply chains without fear of reprisal.

### **Due Diligence**

We are embarking on a programme of carrying out risk-based analysis of the potential for slavery and human trafficking occurring as part of our due diligence processes when evaluating new business partners, suppliers and service providers before appointment. These checks will include as appropriate interviews, declarations, online searches and confirmation of working conditions. Thereafter, we intend to review these parties on an annual basis.

**Risk Management**

Overall, the nature of our business is considered to face a low risk that modern slavery and human trafficking will take place. While we have a focus on conducting risk analysis and risk management for those business partners, suppliers and service providers where risk may be higher, we are nonetheless keenly aware that the possibility does exist through our supply chains.

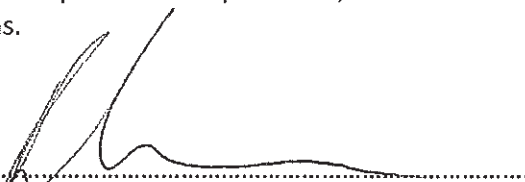
**Effectiveness**

Gallagher Bassett will use various local and Group resources, including our HR, Procurement, Legal and Compliance teams to monitor the effectiveness of the steps we have taken through applying performance indicators, which include, reports of instances where modern slavery or human trafficking practices have been identified, including from employees, the public, or law enforcement agencies, and grievance mechanisms and statistics.

**Further Steps**

In conjunction with our Group approach, we will continue to review what further steps can be taken to ensure our obligations under the Act are met in full. Specific measures include:

- Reviewing policies, procedures and terms of business for the procurement of goods and services;
- Conducting risk evaluation for supply chains, and procurement processes;
- Developing staff awareness of our obligations.

Signature of representative of Gallagher Bassett: ..... 

Representative's Name / Position: ..... BEN WIMBLEDON - HR DIRECTOR

Date: ..... 2 JANUARY 2017