



GALLAGHER GROUP MODERN SLAVERY STATEMENT 2026

This Statement is made by Gallagher Holdings Limited on behalf of the Gallagher Group and covers Gallagher Holdings Limited and its wholly owned subsidiaries (Gallagher Group or Gallagher).

Gallagher Group is committed to conducting business lawfully, ethically and with integrity. We expect the same standards of our employees, distributors, suppliers and other business partners. Gallagher opposes all forms of modern slavery and is committed to taking steps to identify, assess and address modern slavery risks in its operations and supply chains. In this Statement, references to modern slavery are used broadly and include, where relevant, forced labour, child labour and human trafficking.





Introduction

This Statement has been prepared for the financial year ended 31 March 2026. It describes the steps Gallagher took during the reporting period to identify, assess and address the risk of modern slavery in its operations and supply chains. Gallagher issued its inaugural modern slavery statement in 2022, and this Statement reflects the continued development of Gallagher's programme over time. This Statement is intended to address the reporting requirements of the Australian Modern Slavery Act 2018, the United Kingdom Modern Slavery Act 2015, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Structure and Operations

Gallagher Group manufactures and distributes products for the agricultural and physical security sectors. In the agricultural sector, Gallagher's products include electric fencing systems, stock weighing systems and electronic identification systems. In the security sector, Gallagher supplies access control, intruder alarm management and perimeter security solutions. Gallagher Holdings Limited is headquartered in Hamilton, New Zealand and is the ultimate holding company of Gallagher Group. Gallagher operates through subsidiaries in several jurisdictions with over 1,700 employees worldwide.

Gallagher has four principal manufacturing sites: Hamilton and Pukekohe in New Zealand, and sites in New South Wales and Victoria in Australia. The Hamilton and New South Wales sites manufacture electronics products. The other two sites manufacture farm gates and associated farm equipment.

Gallagher products are sold globally through retailers, ecommerce channels, channel partners and system integrators. Gallagher has key sales and support teams across New Zealand, Australia, North & South America, Europe, Asia and Africa, with distribution centres in several regions. In some markets Gallagher also uses regional distribution partners that are not part of Gallagher Group and are not covered by this Statement.





Supply Chain

Gallagher sources raw materials, components, finished goods and services from a broad international supplier base.

We have focused our modern slavery programme on our manufacturing supply chain, which includes purchasing of raw materials, components, finished goods, contract manufacturing, and freight. Indirect suppliers (e.g. professional services, software, travel etc.) are not the primary focus of our programme as we currently assess them as materially lower risk than our manufacturing suppliers.

In prior years the primary focus was the New Zealand manufacturing operations. This year the programme was expanded to include the supply chains for our Australian manufacturing sites, finished goods suppliers, contract manufacturing suppliers and freight suppliers supporting key regions. Gallagher's current modern slavery diligence programme covers approximately 125 of its larger suppliers, selected through a spend-based review and representing approximately 75% of Gallagher's manufacturing related direct global expenditure. Those suppliers reported operating across approximately 70 countries, with the most common locations including China, New Zealand, Australia, the United States and Taiwan.



Governance

Responsibility for addressing modern slavery is shared across Gallagher's People, Operations (including Procurement), and Legal and Risk teams. Procurement has an important role in supplier onboarding, due diligence and supplier engagement, with support from other relevant functions as required.

Gallagher's governance framework includes our modern slavery programme, our global Procurement Policy, our Contractor Conduct Policy, our supplier due diligence processes, and whistleblowing channels.



Modern Slavery Risks

Gallagher considers the inherent risk of modern slavery in its own operations to be lower than in many global manufacturing businesses because our principal manufacturing locations are in New Zealand and Australia, and are supported by formal recruitment, employment and remuneration review processes.

That said, Gallagher recognises that modern slavery risk can exist in any business, particularly where workforces include migrant, temporary or other potentially vulnerable workers. Gallagher therefore continues to review workforce data, recruitment practices and employment controls as part of its operational risk assessment.

Gallagher considers the most material modern slavery risk arises in its supply chain, particularly within manufacturing and international logistics. This reflects the global nature of Gallagher's supply chain, which includes sourcing from geographies which have higher modern slavery risks, supplier components that may involve labour-intensive manufacturing processes, multi-tier supply chains and the use of third-party manufacturers or freight providers.

Gallagher uses a risk-based approach to assess supply chain risk. This includes considering supplier location, category risk, workforce practices, materials used, supplier policies and controls, as well as the degree of transparency available across the relevant supply chain.





Supply chain risk assessment summary

We have assessed our supply chain modern slavery risks as set out below:

| Risk | How this may arise for Gallagher | Gallagher context and current controls |
|---|---|--|
| Sourcing from Higher risk geographies | Some electronic components, steel, plastics, finished goods and other inputs are sourced from jurisdictions that may present elevated modern slavery risk. | Gallagher prioritises due diligence and follow-up for suppliers operating in higher-risk countries and has assessed approximately 125 suppliers operating across approximately 70 countries. |
| Multi-tier supply chains and lower-tier visibility | Gallagher contracts mainly with tier-one suppliers, but lower-tier subcontracting for raw materials and components is not always directly visible. | Gallagher has expanded the number of suppliers included in our programme to continue to improve our supply chain visibility. |
| Labour-intensive manufacturing and the use of migrant or temporary labour | Electronics assembly, metal fabrication, plastics processing and logistics can involve labour-intensive work and, in some jurisdictions, reliance on migrant, agency or temporary labour. | Gallagher's Contractor Conduct Policy prohibits practices such as excessive working hours, child labour, payment of recruitment fees by employees and the surrendering of identification documents as a condition of employment. |
| Third-party manufacturing and freight services | Gallagher uses third-party manufacturers for some finished goods and engages freight and logistics providers that may subcontract across borders. | Gallagher expanded this year's modern slavery programme to include selected contract manufacturing, finished goods and freight suppliers. |
| Reliance on supplier self-reporting | Much of Gallagher's current visibility comes from supplier questionnaires and attestations. | Gallagher records responses in a central modern slavery management system and has commenced a deeper review of supplier practices. |



Actions Taken to Mitigate Modern Slavery Risks

Gallagher Group has taken various actions to mitigate modern slavery in our operations and supply chain. Our core actions are described below.

Operations

- Prospective employees are screened to confirm age and legal right to work in accordance with local laws.
- Employees are employed under written employment agreements that set out their rights and entitlements.
- Gallagher reviews remuneration on an annual basis and employment controls as part of its operational oversight.
- Gallagher maintains confidential whistleblowing and Speak Up channels, supported by awareness activities and training.

Supply Chain

- Gallagher consults with other manufacturers in New Zealand to collaborate and continue to develop our modern slavery controls.
- Gallagher carries out a supplier due diligence survey through a central modern slavery management system. This reporting period, approximately 125 larger suppliers were selected based on spend which reflects approximately 75% of Gallagher's manufacturing related direct global expenditure. The survey assessed jurisdictional risk, workforce practices, materials used, and supplier policies and controls.
- Gallagher used a central modern slavery management system to record supplier responses, risk assessments and due diligence outcomes.
- Gallagher maintains a Contractor Conduct Policy, which expressly prohibits practices such as excessive working hours, child labour, payment of recruitment fees by employees and the surrendering of identification documents as a condition of employment.
- Through the modern slavery survey process, Gallagher obtains supplier acceptance of updates to our Contractor Conduct Policy or confirmation that an equivalent policy applies.
- Modern slavery considerations are built into procurement, supplier onboarding and sourcing processes so that risk assessment forms part of due diligence rather than a standalone exercise.
- Gallagher prioritised further review of suppliers assessed as higher risk, including by reviewing labour policies, governance frameworks and other controls and, where appropriate, planning or undertaking deeper audit activity.



Training and awareness

- Gallagher continued targeted modern slavery training and refresher awareness for procurement personnel and relevant employees involved in sourcing and supplier management. This training supports staff to recognise relevant risk indicators, understand Gallagher's supplier requirements and escalation pathways, as well as use Gallagher's due diligence tools effectively.
- Gallagher also continued to promote the availability of its Speak Up and other reporting channels so that concerns can be raised confidentially and, where appropriate, anonymously.





Modern Slavery Issues Identified

We did not identify any instances of modern slavery in our own operations or through our due diligence and assurance activities undertaken during the reporting period, including in relation to suppliers covered by this year's programme.



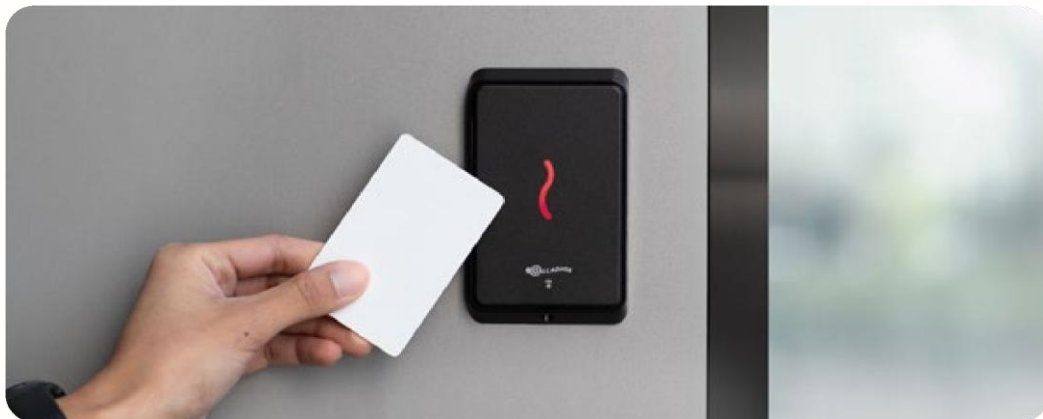


Assessing the effectiveness of Gallagher's actions

Gallagher assesses the effectiveness of its actions by looking at both outcomes and capability. This includes monitoring the level of visibility achieved across higher-risk direct manufacturing related spend, the completion and quality of supplier due diligence, the number and nature of issues or concerns identified, and the extent of follow-up undertaken with higher-risk suppliers.

During the year we expanded our visibility across higher-risk direct manufacturing related spend. The current programme provides modern slavery information covering approximately 125 larger suppliers, selected through a spend-based review and representing approximately 75% of Gallagher's manufacturing related direct global expenditure.

We recognise that the effectiveness of our framework is still maturing. Where we have transparency, we have not verified suppliers' claims of no modern slavery issues although we intend to implement regular audits of selected higher risk larger suppliers. We believe our approach is effective though we intend to continue to take further action to strengthen supply chain transparency. The section below outlines our planned actions for the next 12 months.



Planned focus for the next 12 months

Gallagher's priorities for the next reporting period are to:

- continue embedding modern slavery risk assessment and due diligence into supplier onboarding, sourcing and contract renewal processes.
- consider targeted audits or deeper reviews for selected higher-risk or critical suppliers.
- continue strengthening systems, data quality and reporting as Gallagher's programme matures.
- refresh policy, governance and training settings as legislative expectations and good practice continue to evolve.
- continue to look for opportunities to share learnings and, where useful, collaborate with other organisations on higher-risk supply chain issues.



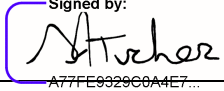
Consultation

Entities owned or controlled within Gallagher Group were included in Gallagher's risk-based approach to identifying, assessing and addressing modern slavery risk. The senior management of each such entity has been made aware of the content and development of this statement and what actions they need to undertake to manage modern slavery risk across the Gallagher Group.

Approval and attestation

This Statement was approved by the Board of Gallagher Holdings Limited on 28 May 2026. For the purposes of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, this Statement was approved by the Board of Gallagher Holdings Limited pursuant to section 11(4)(b)(ii) of the Act.

Signed for and on behalf of Gallagher Group:

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| Signature |  <small>Signed by: A77FE9329C0A4E7...</small> |
| Name | Steve Tucker |
| Position | Chairperson and Director of Gallagher Holdings Limited |
| Date | 29 May 2026 |

