

## MODERN SLAVERY STATEMENT

### 1. Introduction

This statement relates to the Gallagher group of companies (Gallagher Group), covering all our wholly owned subsidiaries.

Gallagher Group is dedicated to conducting business whether with end customers, suppliers, or distributors, in a lawful manner with the utmost integrity and to high standards of business ethics. We expect our employees, distributors, and suppliers to conduct business to the same high standards.

Gallagher Group opposes all forms of slavery and human trafficking and is committed to ensuring modern slavery does not exist in any part of the global Gallagher Group. All our businesses, wherever they are located are required to respect people. We strive to achieve this by acting ethically and with integrity, and by acting in accordance with our standards and principles as outlined in this policy.

Gallagher Group continues to believe that, due to the nature of our business, our exposure to the risk of human rights abuses and modern slavery is low within our own business and supply chain; however, we welcome the opportunity to contribute positively to global efforts to ensure that human rights are observed. The statement has been drafted by us to help us understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

This global statement has been formulated by Gallagher Group pursuant to the requirements in accordance with Part 6, Section 54 of the UK Modern Slavery Act 2015 (**UK Act**) and joint Modern Slavery Statement under the Australia Modern Slavery Act 2018 (**Australian Act**). The statement is issued by Gallagher Group Limited which is an organisation with a reporting obligation under the UK Act, and the Australian Act. This document explains the steps Gallagher Group Limited and each of its subsidiaries is undertaking to prevent, detect and respond to modern slavery within our business and supply chains. This is the first Modern Slavery Statement (**Statement**) for Gallagher Group for the financial year ending 31 March 2022.

### 2. Structure, operations, and supply chains

#### Structure

The ultimate holding company in the Gallagher Group is Gallagher Holdings Limited. Gallagher Holdings Limited is a company based in New Zealand. Gallagher Holdings Limited has subsidiaries based globally, with key offices in New Zealand, Australia, the United States, Hong Kong and the United Kingdom. The Gallagher Group operates in different jurisdictions through its various subsidiaries. There is an expectation and requirement that each of the Gallagher Group companies acts in accordance with this policy and its jurisdictional obligations.

Gallagher Group has approximately 1200 employees across its various companies.

#### Business

Gallagher Group was founded in 1938, opening an office in Hamilton, New Zealand. Gallagher Group's original business focus was on electrical fences for the farming industry. Since then, the company has expanded and is now comprised of two key business units:



(a) Animal Management, which broadly includes:

- Electric Fence Systems;
- Weighing and EID Systems; and
- Gallagher On Farm Services.

(b) Security, which broadly includes:

- Electronic access control systems;
- Fully integrated intruder alarm management; and
- Energised perimeter fencing

### **Supply Chain**

Gallagher has many suppliers across its two business units.

These suppliers include third party providers of components for the hardware products manufactured by Gallagher Group. These suppliers also include suppliers of products which are then distributed by Gallagher Group. Our third-party component suppliers fall into the following categories:

- Electronic Components
- Metals and Plastic Resins
- Traded Goods
- Printing, Packaging and Maintenance, Repairs and Operations (MRO)

In addition, Gallagher has various contracts with suppliers of software and hardware vendors. Gallagher also procures products and services related to office management, such as printers and provision of catering.

### **3. Identifying Risks**

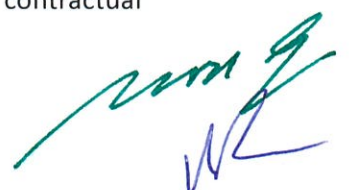
As we are a New Zealand based manufacturer, Gallagher Group considers the risk of modern slavery and human trafficking to be of low risk. While the global nature of our sourced raw material and components exposes us to some risk of modern slavery in our operations and supply chain, we consider that we have processes in place to ensure that any concerns of modern slavery and human trafficking are reported to us in an efficient manner.

There have been no reported concerns relating to modern slavery and human trafficking via our whistleblowing channels.

### **4. Risk Mitigation**

Gallagher Group employs a range of methodologies, processes, and practices to ensure that we reduce our exposure, both internally and externally, to the risks of modern slavery. Gallagher is committed to continual improvement and has implemented practices and measures to minimise the risk of modern slavery and human trafficking taking place within our supply chain. These include:

- (a) Confirming all employees have a written contract of employment that enshrines our employees' rights and entitlements at law.
- (b) Requiring that suppliers, subcontractors, and third-party service providers do not engage in any modern slavery via our Contractor Conduct Statement. This is a contractual



obligation in our standard supply agreement, and we also require distributors of our products to comply with our Contractor Conduct Statement.

- (c) Developing and implementing policies for safe and respectful work environments which promote health and wellbeing.
- (d) Identifying and working with companies that are known to us and that have standards that are aligned with our own.
- (e) Agreeing on contractual terms with our suppliers and subconsultants requiring compliance with applicable laws.
- (f) Carrying out regular reviews to ensure that all staff are being paid at or above the minimum wage requirements applicable to their employment.
- (g) When carrying out supplier audits, including a review on ethical treatment of employees and employee welfare.
- (h) Ensure clarity on processes for whistle-blowers in New Zealand, the United Kingdom and Australia for them to report concerns to management.
- (i) Screening potential employees once offered employment to ensure that they fit the requirements to be employed, including.
  - identifying their age is appropriate as per local laws.
  - their right to work legally in the state of employment.
  - that they are not being forced to work to benefit others inappropriately or in contravention of the UK Act or Australian Act.

(Together known as **Compliance Activities**).

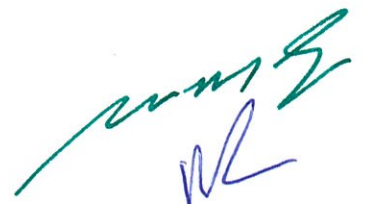
## 5. Effectiveness of actions to assess and address risks

In order, to facilitate and ensure that we adhere to our Compliance Activities Gallagher Group has formed a multi-disciplinary team comprising of representatives across the business, including people from People and Brand, Risk & Responsibility, Legal and Procurement (**Review Team**). The Review Team will meet to conduct a review every year, from the date of this Statement, to review the processes and outcomes of our Compliance Activities. At these meetings the Review Team will examine:

- New staff employment confirmations, ensuring that police checks are conducted where required and that the necessary checks relating to modern slavery are conducted as part of the pre-employment process
- Service providers, contractors and third-party suppliers are onboarded properly by being provided our Contractor Conduct Statement.
- Service providers, contractors and third-party suppliers that have already been onboarded are actively complying with our Contractor Conduct Statement.

In the event of a detection or suspicion of any activities, either internal or external, relating to modern slavery (**Slavery Risk**), the Review Team shall report their findings to the Risk & Responsibility Executive as soon as possible for the Risk & Responsibility Executive to analyse and take appropriate action.

Modern Slavery related risks are recorded in Gallagher's Enterprise Risk Register. This includes a risk category, risk likelihood and consequence and identification of existing controls in place. This risk will be reviewed on an annual basis to assess the effectiveness of existing controls and progress made in mitigation actions, and to identify any new or emerging risks.



On the detection of a Slavery Risk, the Review Team will record the specific Slavery Risk in the Risk Register.

The expected actions on any such detection or suspicion of a Slavery Risk are as follows:

- On detection or suspicion of an employee, either existing or potential, being exposed to forced labour, debt bondage, slavery, servitude or deceptive recruiting, the Review Team shall:
  - Engage with Legal to obtain legal advice as required
  - Document all information in as much detail as possible
  - Where appropriate, meet with the reporting manager to understand the situation in full
  - Where appropriate, meet with the employee, along with a support person or People & Brand representative, to discuss the company's concerns and obtain further information to assess the situation
  - If the situation requires, then report the matter to the authorities along with all the evidence obtained
  - Where appropriate, suspend the employment of the employee, on full pay, until the investigation is resolved
  
- On detection or suspicion of a service provider/contractor or supplier having an employee who has been exposed to forced labour, debt bondage, slavery, servitude or deceptive recruiting, the Review Team shall:
  - Engage with Legal to obtain legal advice as required
  - Document all information in as much detail as possible
  - Meet with management of the third-party service provider to discuss the company's concerns and obtain further information to assess the situation
  - If the situation requires then report the matter to the authorities along with all the evidence obtained
  - Where appropriate, suspend the usage of services provided by that third-party until the investigation is resolved

## 6. Consultation Process


The risk of the Gallagher Group subsidiaries has been considered and incorporated into this statement, and no consultation is required.


## 7. Other relevant information

Not applicable.

This statement was approved by the Board of Gallagher Holdings Limited on: 5 April 2022

Handwritten signatures in green and blue ink, likely representing the Board of Gallagher Holdings Limited.

Signature	
Name	Sir William Gallagher
Position	President Gallagher Holdings Ltd
Date	28-4-2022

Signature	
Name	KATE BETHAM.
Position	CEO + DIRECTOR
Date	28/4/2022