

# SASB Disclosures

The Sustainability Accounting Standards Board (SASB) has established disclosure standards, by industry, relating to sustainability matters. We have considered SASB's professional and commercial services industry standard in providing the disclosures set forth below. For a detailed explanation of the framework, visit the SASB website: sasb.org.

### **DATA SECURITY**

Our chief information security officer, working together with our chief information officer, oversees a team of employees dedicated to information and cybersecurity. We strive to protect sensitive information through various means, including technical safeguards, procedural requirements and policies. This includes a robust network monitoring program to detect and address unauthorized modification or misuse of sensitive information coupled with a global incident response capability, a dedicated vendor assessment team, global training and awareness mandates, and a focus on identity and access management, including privileged access management requirements. In addition, we continuously test and assess our cybersecurity, including annual third-party risk assessments based on FAIR (Factor Analysis of Information Risk), and align our program to notable control frameworks such as NIST (National Institute of Standard and Technology Cybersecurity) and ISO (International Organization for Standardization). Based on these tests and assessments, our management team and board are regularly briefed on top risk scenarios and risk mitigation.

Our chief privacy officer, reporting to our chief compliance officer, coordinates with privacy leads across our business units and countries in which we operate for privacy matters in their respective jurisdictions and oversees all ongoing activities related to the development, implementation, maintenance, and adherence to our policies and procedures relating to the processing of personal information.

The Global Privacy Office coordinates closely with our chief information security officer in this effort. We have established processes to carry out data protection impact assessments of existing and new products, services or projects as required by applicable privacy laws.

### **WORKFORCE DIVERSITY**

Set forth below are percentages for gender and racial/ethnic group representation among our employees for 2022. We have also included information regarding our executive officers and board of directors as of December 31, 2022. Our policies and programs that foster equitable employee representation across our global operations may be found here, and our EEO-1 report, as updated from time to time, may be found here.

Racial/Ethnic Diversity—US. only <sup>1,2</sup>	Diverse	Non-Diverse
Total Workforce	26%	74%
Managers	17%	83%
Producers	19%	81%
Executive Officers	8%	92%
Board of Directors	20%	80%

 $<sup>^{\</sup>rm 1}$  "Diverse" category includes individuals with an ethnicity of Hispanic or Latino and/or a race that is not "White."

<sup>&</sup>lt;sup>2</sup> The ethnicity or race of 0.3% of US employees was not disclosed.

Gender Diversity <sup>1</sup>	Female	Male
Total Workforce	58%	42%
Managers	46%	54%
Producers	40%	60%
Executive Officers	8%	92%
Board of Directors	30%	70%

<sup>&</sup>lt;sup>1</sup> The gender of 0.01% of our global employees was not disclosed.

### **PROFESSIONAL INTEGRITY**

Our global compliance program is dedicated to ensuring ethical behavior across Gallagher. Our Global Standards of Business Conduct, approved by our board of directors, are core to this program and apply to all Gallagher directors, officers and employees. We also expect Gallagher Global Alliance members, strategic vendors, suppliers and other business partners or agents acting on our behalf to adhere to similar high standards of behavior. The Global Standards establish clear expectations and guidelines for all employees, prohibiting corruption, bribery, facilitation payments, fraud, discrimination, antitrust/anti-competitive practices, money laundering, insider trading and more; they also require employees to avoid and disclose conflicts of interest.

The Global Standards also set forth expectations and guidelines for positive behaviors, including treating everyone with respect, valuing diversity, protecting human rights, and speaking up to report Global Standards violations and any other compliance-related concerns without fear of retaliation. As part of our program, we require employees to certify annually that they have reviewed and will comply with the Global Standards.

Our ethics and compliance helpline is managed by an outside company and is available 24 hours a day, 7 days a week in multiple languages. We ensure that callers to the helpline can remain anonymous if they choose and if allowed by local law, and if they do not choose to remain anonymous, their identity will be kept confidential to the extent permitted by the investigation, and the information they provide will be relayed to the appropriate company resources to complete a full investigation.

#### POINT OF CONTACT

Communications and questions as they relate to our SASB Disclosures and Gallagher's global sustainable practices should be directed to:

## Thomas J. Tropp, M.A. Global Chief Ethics Officer

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Statistics and metrics relating to Environmental, Social and Governance ("ESG") matters are estimates and may be based on assumptions or developing standards, and actual results could differ materially. Except as noted otherwise, the reporting period for the SASB Disclosures focuses primarily on the year ended December 31, 2022, The SASB Disclosures were updated on March 16, 2023 and the information herein is only as current as the date indicated. We assume no obligation to update the information herein. Forward-looking statements speak only as of the date that they are made, and we do not undertake any obligation to update any such statements or release publicly any revisions to forward-looking statements to reflect events or circumstances after the date hereof or to reflect new information, future or unexpected events or otherwise, except as required by applicable law or regulation. The inclusion of information in the SASB Disclosures should not be construed as a characterization regarding the materiality or financial impact of that information under the securities or other laws of the United States or any other jurisdiction, or as used in the documents we file from time to time with the Securities and Exchange Commission ("SEC"). Further information concerning Gallagher, including factors that could materially affect our financial results, is included in our filings with the SEC, including, but not limited to, the factors discussed in Item 1A, Risk Factors of our most recent annual report on Form 10-K, and quarterly reports on Form 10-Q. No part of the SASB Disclosures shall be deemed to constitute an invitation or inducement to invest in Gallagher. Terms such as "sustainability" can be subjective in nature and there is no representation or guarantee that these terms will reflect the beliefs, policies, frameworks or preferred practices of any particular investor or other third party, or reflect market trends. Any goals, commitments, incentives and initiatives outlined herein are, unless explicitly stated otherwise, purely voluntary, not binding on us, our business or management, and do not constitute a guarantee, promise or commitment regarding actual or potential positive impacts or outcomes. In addition, historical, current and forward-looking ESG-related statements may be used based on standards for measuring progress that are still developing, internal controls and processes that continue to evolve, and assumptions that are subject to change in the future. © 2023 Arthur J. Gallagher & Co. | CRP44234