

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 ^{1,2}	Diverse	Non-Diverse
Total Workforce	26%	74%
Managers	17%	83%
Producers	19%	81%
Executive Officers	8%	92%
Board of Directors	20%	80%

¹ "Diverse" category includes individuals with an ethnicity of Hispanic or Latino and/or a race that is not "White."

² The ethnicity or race of 0.3% of US employees was not disclosed.

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

¹ 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:

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