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# Gallagher Group Bribery and Corruption Policy Statement

Gallagher is very proud of its reputation and we believe it is vital to the continued success and growth of our business. It builds trust and gives confidence to our customers, partners, suppliers, employees, sub- contractors and all the communities where we carry out work.

We are aware that any allegation of bribery or corruption can seriously damage our reputation, therefore it is our policy that we will not offer, give or receive bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage. Additionally, we won't use or consent others to do carry out these activities on our behalf.

## Our Policy:

The Company takes a zero-tolerance approach to bribery of any kind. We will not work with parties who refuse to commit to proper bribery and corruption policies and procedures.

No member of staff should offer or provide anything of value to a client or other third party that is intended to be or might be perceived as being a bribe, nor should they accept anything of value from a third party.

We pay fair market value for goods and services and never enter into agreements that do not have clear and proper commercial basis.

## Our Commitment:

- To conform with the Bribery Act 2010.
- To never participate in any form of corrupt behaviour.
- To report any attempts to bribe us, or to solicit bribes from us, and any suspicions we have about bribery and corruption.
- Actively encourage the reporting of any suspected wrongdoing.
- To record accurately and completely the true nature of our activities
- Pay fair market value for goods and services.
- Never enter into agreements that do not have clear and proper commercial basis.

**Pat Gallagher on behalf of the Gallagher Board:**

A handwritten signature in black ink, appearing to read "Pat Gallagher", with a stylized flourish at the end.

**January 2021**