

GALLAGHER GROUP MODERN SLAVERY STATEMENT 2025

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.



INTRODUCTION

The Gallagher group of companies operate globally, manufacturing and distributing products for the agricultural and physical security sectors. Our headquarters and main manufacturing hub are in New Zealand, though our supply chain is global. As a responsible global organisation with a global supply chain, 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.

This document is Gallagher Group's modern slavery statement for the financial year ending 31 March 2025; our inaugural Statement was released in 2022. This Statement outlines the steps we have taken during the financial year ended to identify and prevent modern slavery within our operations and manufacturing supply chain. This Statement also outlines our actions to assess and address modern slavery risks, how effective those actions have been, and our future actions to address modern slavery further.

This modern slavery statement has been formulated by Gallagher Group pursuant to the requirements in accordance with Part 6, Section 54 of the U.K. Modern Slavery Act 2015 (U.K. Act), the Australia Modern Slavery Act 2018 (Australian Act), and the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (Canadian Act).

THE GALLAGHER GROUP

Gallagher Group manufactures and distributes products for the agricultural and physical security sectors. In the agricultural sector, our products include virtual and physical electric fence systems for animals, stock weighing systems, and stock electronic identification systems. Our products in the physical security sector include electronic access control systems, fully integrated intruder alarm management, and energised perimeter fencing.

Gallagher Group products are sold globally, primarily through retailers for animal management products and channel partners and system integrators for security products. Gallagher Group has sales and support teams globally, with key offices in New Zealand, Australia, the United States, Hong Kong, the EU and the United Kingdom to support retailers, channel partners and system integrators. Sales and support are provided by regional distribution partners in some parts of the world; these partners are not part of the Gallagher Group and are excluded from this Statement.



THE GALLAGHER GROUP STRUCTURE AND OPERATIONS

The ultimate holding company in the Gallagher Group is Gallagher Holdings Limited. Gallagher Holdings Limited is a company based in Hamilton, New Zealand. Gallagher Holdings Limited has subsidiaries based globally and the Gallagher Group operates in different jurisdictions through its various subsidiaries.

Gallagher Group has approximately 1500 employees worldwide, with approximately 920 in Hamilton, New Zealand.

The responsibilities for addressing modern slavery are shared widely across the Gallagher Group, including the People, Operations (including Procurement), Risk and Responsibility, and Legal teams.

Our Operations

The Gallagher Group has four main manufacturing sites, two in New Zealand – including the Group's largest site in Hamilton – and two in Australia (New South Wales and Victoria). The Hamilton and New South Wales sites manufacture electronics products; the others manufacture farm gates and associated farm equipment.

Products from the Hamilton and Australian sites are sold domestically and abroad. Most products are delivered directly from our manufacturing sites to retailers, channel partners and system integrators. However, the Gallagher Group does have distribution centres in Australia, Canada, New Zealand, Chile, Brazil, the United Kingdom, EU and the United States.



Our Supply Chain

We source raw materials, components, products, and services globally. Our Hamilton and Pukekohe manufacturing sites in New Zealand dominates our procurement spending, and a significant proportion of its supply chain is from Asia and the Pacific, the region with the highest amount of modern slavery (Global Estimates of Modern Slavery (2022)). The New Zealand manufacturing sites present the most significant supply chain modern slavery risks, so we have focused our supply chain risk assessment and actions on these site for this Statement. Over time, we will broaden the Statement's scope to include all our manufacturing sites and our contract manufacturers.

We have around 260 suppliers to the Hamilton and Pukekohe manufacturing sites though heavily concentrated, with 55 suppliers representing 90% of expenditure. Within the top 90% of expenditure, our most common categories (which includes contract manufacturers used by New Zealand manufacturing sites) are:

- . electronic components,
- . steel (pipes, wire, and fasteners)
- . plastic resin,
- . print and packaging, and
- . freight.

To understand our supply chain, we engaged with our top 40 suppliers representing 75% of expenditure and they completed a modern slavery survey. These 40 suppliers were asked for the past financial year: (1) the countries where they sourced their materials; (2) any modern slavery processes or procedures they had or are planning; and (3) any modern slavery issues.

Based on the surveyed suppliers, we have suppliers headquartered in eight countries, who, on average, source from seven countries. The surveyed suppliers' source from 27 countries; the most common are China, Taiwan, and New Zealand.



Figure 2. Overview of New Zealand's manufacturing supply chain

ASSESSING OUR MODERN SLAVERY RISKS

Risks within Operations

All key Gallagher Group operations are in very low modern slavery risk countries: New Zealand, Australia, Hong Kong, the United Kingdom, Canada, EU and the United States. Most of our employees are in New Zealand (just over nine hundred), followed by Australia (just over two hundred). Approximately 5% of employees in Australia and New Zealand are on a working visa; with half of these employees in operational roles. Approximately 6.2% of employees in Australia and New Zealand work on a fixed-term or casual contract. Our youngest employee is 17.

We assess our modern slavery risks within our operations as very low because we predominantly operate in very low risk countries and have very low numbers of potentially vulnerable workers.

Risks within our Supply Chain

To assess our modern slavery supply chain risk, we mapped 75% of our New Zealand manufacturing sites spend against published modern slavery risk information from [Global Slavery Index \(2023\)](#) and [U.S. Bureau of International Labour Affairs \(2022\)](#). Table 1 below lists the countries our suppliers manufacture in and the associated risk level.

Table 1. Countries our suppliers manufacture in and the modern slavery risk level

Countries our suppliers manufacture in	Modern Slavery Risk	Countries our suppliers manufacture in	Modern Slavery Risk
Saudi Arabia	Very High	Spain	Low
India	High	France	Low
Philippines	High	Singapore	Low
Indonesia	Moderate	Austria	Low
Mexico	Moderate	United Kingdom	Low
Malaysia	Moderate	Taiwan	Low
Thailand	Moderate	Australia	Low
Vietnam	Moderate	New Zealand	Low
China	Moderate	Japan	Low
Portugal	Low	Germany	Low
South Korea	Low	Netherlands	Low
Italy	Low	Switzerland	Low
United States	Low	Fiji	Low
Hong Kong	Low		

Note: Gallagher procures less than 0.01% of goods and services from countries identified as high to very high risk for modern slavery, based on spend from our New Zealand manufacturing operations.



IDENTIFIED MODERN SLAVERY ISSUES IN THE LAST 12 MONTHS

No modern slavery issues were identified in the last 12 months within our operations or with our largest manufacturing suppliers representing 75% of expenditure. We acknowledge that there is the possibility that modern slavery issues may have occurred in unexamined parts of the supply chain. However, with our focus on our largest suppliers and a high proportion of manufacturing spend, we believe the possibility of modern slavery issues is low. For our entire supply chain, examined and unexamined, our Contractor Conduct Policy requires suppliers not to use any form of forced, bonded, compulsory labour, slavery or human trafficking.



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

- Screening potential employees to ensure they fit the requirements to be employed, including identifying their age is appropriate as per local laws, and that they have the legal right to work.
- Employees have a written contract of employment that enshrines our employees' rights and entitlements at law.
- Annual reviews to ensure that all staff are paid at or above the minimum wage requirements applicable to their employment.
- Annual Risk Assessment: conducting a modern slavery assessment based on identifying the potential number of employees vulnerable to modern slavery.

Supply Chain

- Contractor Conduct Policy: suppliers, subcontractors, and third-party service providers must comply with the policy (or have an equivalent policy of their own), which covers (among other things) labour and human rights. Specifically covered is that contractors:
 - must not use any form of forced, bonded, compulsory labour, slavery or human trafficking;
 - must not require employees to surrender any government-issued identification, passport or work permit or other personal document as a condition of employment;
 - may not require its employees to pay the employer's or agent's recruitment or any other fee for their employment; and are strictly prohibited from employing children.
- We have reviewed and updated our Contractor Code of Conduct during the year to align with emerging global standards. The Contractor Code of Conduct is now contractually incorporated into Gallagher Group supplier agreements. This provides a stronger legal foundation for our expectations and enforcement of labour standards across our supply chain. The updated version is being rolled out from February 2025, ensuring consistency across newly initiated supplier contracts and renewals.
- A new procurement policy has been rolled out to the business. This increases the awareness across the business of modern slavery risks and the requirement to utilise procurement when sourcing. Part of the procurement process is to assess modern slavery risks as part of the due diligence process.
- Two-yearly Supplier Engagement and Due Diligence Survey: our largest manufacturing suppliers were engaged on modern slavery through a survey that covers: (1) the countries where they sourced their materials; (2) any modern slavery processes or procedures they had or are planning; and (3) any modern slavery issues in the past year.

- Two-yearly Risk Assessment: conducting a modern slavery assessment based on published risk data and the due diligence survey.
- Modern Slavery Management System: maintain a record of supplier information on modern slavery, including the due diligence survey results and risk assessment.
- We endeavour to conduct regular in-person visits or third-party audits with higher-risk suppliers where feasible, taking into account budgetary constraints, geographic accessibility, and the level of risk. While direct visits to some suppliers have been limited in recent years due to factors such as COVID-19, we are actively working to increase engagement, including leveraging trusted partners or agents where direct travel is not possible.
- Modern slavery internal refresher training: trained procurement staff on modern slavery.

Other Actions

- Internal communication on modern slavery: We advertised the Statement internally and made it available on an internal SharePoint site.
- Statement externally available: the Statement was registered in Australia, Canada and the United Kingdom, and made available on www.gallagher.com, security.gallagher.com, and am.gallagher.com.
- Whistle-blower policy: processes exist for whistle-blowers across our global companies to report concerns to management.
- Over the past 12 months, we have successfully launched the "Speak Up" portal, providing a secure platform for employees to report concerns anonymously, and conducted extensive training to ensure awareness and effective use of the whistleblowing process.

EFFECTIVENESS OF ACTIONS TO MITIGATE MODERN SLAVERY RISKS

Gallagher Group measures effectiveness by the number of modern slavery issues identified and the level of operations and supply chain transparency. In the last 12 months, no modern slavery issues were identified. However, as discussed earlier, we have supply chain modern slavery information on a high proportion of expenditure (75% of our spending), but not complete transparency. Additionally, where we have transparency, we have not verified suppliers' claims of no modern slavery issues although we intend to implement regular audits of key suppliers. We believe our approach is effective though further action is needed to strengthen supply chain transparency. The following section outlines our planned actions.



HUMAN RESOURCE INFORMATION SYSTEM

While there are no concerns with the effectiveness of actions taken for operations, over the last 12 months, a new human resources information system was implemented; this makes it easier to analyse information on potentially vulnerable employees. This system also allows us to easily review historical contracts.

ACTIONS TO BE TAKEN TO MITIGATE MODERN SLAVERY RISKS

Supply Chain

The focus for the next 12 months is to:

- Roll out an online tool to automate supplier questionnaires and declarations. The online tool will help with improved weighted assessments to identify areas or risk.
- Re-survey and broaden the suppliers engaged with: strive to engage with (including surveying) at least 75% of supplier expenditure across all four manufacturing sites (Hamilton and Pukekohe in New Zealand, New South Wales and Victoria in Australia).
- Engage with higher risk suppliers: investigate these suppliers and work with them to mitigate modern slavery risks. The investigation will include improving transparency through detailed modern slavery self-assessment surveys and, where necessary, auditing. The guiding principle is first to encourage suppliers to improve their practises before changing a supplier.
- Establish processes for addressing higher risk suppliers: take the learning from the engagement in action three to develop processes for future high risk suppliers.
- Continue to incorporate modern slavery in supplier onboarding, including an automated risk assessment and due diligence process for new suppliers which includes assessment of their modern slavery risk.

Additionally, Gallagher Group will investigate working with other organisations to assess and address high-risk parts of the supply chain and share learnings.



CONSULTATION IN PREPARING THIS STATEMENT

Entities owned or controlled in the Gallagher Group have been included in our risk-based approach to the identification, assessment, and mitigation of modern slavery risks. 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.

This Statement was approved by the Board of Gallagher Holdings Limited on 30 April 2025.

Signed on behalf of the Gallagher Group:

Signature	
Name	<u>Kahl Betham</u>
Position	<u>CEO and Executive Director</u>
Date	<u>29/06/2025</u>

