



Gallagher

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GLOBAL GIFTS AND ENTERTAINMENT POLICY

May 2024



INTERNAL USE ONLY



G&E POLICY OVERVIEW

Gallagher recognizes that business gifts and entertainment are exchanged to encourage strong working relationships with existing and potential clients, insurance carriers, vendors and other business partners, and that sponsorships and charitable donations contribute to our community and help establish goodwill. However, giving or receiving gifts or entertainment, making charitable donations or engaging in sponsorships are not appropriate activities if they create a sense of obligation, give the appearance that Gallagher may be biased or have the intent to improperly influence business decisions.

This G&E Policy sets out Gallagher's expectations and rules for your conduct related to the giving and receiving of gifts and entertainment from business partners, making charitable donations and engaging in sponsorships. The G&E Policy reinforces our commitment to maintaining the highest standard of business ethics as set forth in the Gallagher Global Standards of Business Conduct and helps us comply with applicable anti-bribery and anti-corruption laws, including, but not limited to, the US Foreign Corrupt Practices Act 1977 and the UK Bribery Act 2010.

GIFTS AND ENTERTAINMENT OF GALLAGHER EMPLOYEES BY GALLAGHER

Please note this G&E Policy does not apply to the receipt of gifts or entertainment from Gallagher to its own employees. However, you should be aware that there may be tax consequences to you personally if you receive:

- Gifts or entertainment from Gallagher, including if you receive Gallagher-sponsored tickets to sporting or other events. Please consult [Gallagher's Event Ticket Policy](#) on Gallagher One if you have questions.
- Gift certificates or other cash equivalent forms of awards or recognition/appreciation from your manager or other team members.

Some tangible property awards and incentive travel can also be considered additional taxable income to employees. Please consult Gallagher's Finance or Payroll departments if you have questions in this regard.

DEFINITIONS

For purposes of this G&E Policy:

- **BUSINESS PARTNER** means existing or potential clients, vendors, suppliers, (re)insurers, intermediaries and any other external parties collaborating or hoping to collaborate with Gallagher, or employees or agents of the same. It does not include other Gallagher companies or Gallagher employees.
- **ENTERTAINMENT** means an occasion where (a) both Gallagher and business partner colleagues attend the event, (b) either Gallagher or a business partner pays for both parties to attend and (c) there is an opportunity for business discussions. Entertainment could include meals or attendance at sports, music or cultural events. If event tickets or admissions are provided without both Gallagher and business partner colleagues attendance, this should be treated as a gift rather than entertainment.
- **GIFT** means anything of value deliberately given to or from a specific party external to Gallagher, without payment in return. It does not include prizes that are drawn at random (e.g., raffles), nor offers made as compensation, nor gifts made to employees. For information regarding gifts to employees, please consult your business's travel and expense policies, or your business's finance/payroll department.
- **GOVERNMENT OFFICIAL** is a broad term, which includes but is not limited to the following in respect of a domestic or foreign government, or a public international organization;
 - » A public entity;
 - » Officers and employees of agencies and institutions that are majority government-owned;
 - » Officers and employees of majority state-owned or controlled commercial enterprises, such as certain hospitals and schools;
 - » Officers and employees of public entities;
 - » Persons representing a government in an official capacity;
 - » Candidates for political office and politicians;
 - » Officers, employees or representatives of public international organizations such as the United Nations or the World Bank; or
 - » Anyone acting under a delegation of authority from a government to carry out government responsibilities, including any private person acting temporarily in an official capacity for or on behalf of any of the foregoing (such as a consultant retained by a government agency).

If you are not sure whether an individual or entity is a public official, contact your local compliance officer for direction.

- **A PUBLIC ENTITY** is (a) any national, state, provincial, municipal or local government or (b) any department, agency or other instrumentality of a national, state, provincial, municipal or local government.
- **SPONSORSHIP** is the act of supporting an event, activity, person or organization financially or through the provision of products or services with the intention of gaining a business advantage.

GENERAL RULES

GIFTS AND ENTERTAINMENT MUST:

- Be modest, infrequent and reasonable under the circumstances;
- Be free of any intent to influence business decisions improperly; and
- Be consistent with the Gallagher Global Standards of Business Conduct and your local T&E Policy.

DONATIONS AND SPONSORSHIPS MUST:

- Be free of any intent to influence business decisions improperly; and
- Be consistent with the Gallagher Global Standards of Business Conduct and your local T&E Policy.
- The payment of donations by Gallagher is governed by the Financial Policies Manual. Additionally, for sponsorships, please reach out to the marketing team ([Contributions and Donations](#)).

GIFTS, ENTERTAINMENT, DONATIONS AND SPONSORSHIP MUST:

- Not have the appearance of a bribe, payoff or improper loan;
- Not be tied to a specific award, retention or maintenance of business;
- Not include any out of town transportation or accommodations;
- Not be of a sexual or illegal nature;
- Not be offered or accepted by or through another party in order to circumvent this G&E Policy or any other Gallagher G&E Policy; and
- Not involve other activity that, if made public, would cast Gallagher in an unfavorable light.

Remember, you must not offer, make or accept gifts, entertainment or donations, or enter into a sponsorship relationship through another party in order to circumvent the [Gallagher Global Standards of Business Conduct](#) or this or any other Gallagher policy.

REQUIREMENTS MATRIX

The following standards apply across Gallagher globally unless your local or regional compliance officer has implemented a more stringent G&E Policy or set of rules. You can find such stricter rules in the Gifts and Entertainment G&E Policy addendum:

	REQUIREMENTS	MONETARY CAP OR LIMIT
Charitable contributions	<p>Charitable contributions may only be made in compliance with the Financial Policy Manual (Contributions and Donations).</p> <p>Charitable contributions may not confer any personal benefit on any individual, even if the recipient organization is a bona fide charitable, athletic or cultural institution.</p>	Not applicable.
Gifts for Government Officials	<p>You must exercise extra caution in providing gifts to government officials because of the higher risk of bribery or corruption, and the higher risk of an appearance of impropriety.</p> <p>Gifts may not consist of cash or cash equivalents such as gift cards, debit or check cards, or vouchers.</p> <p>You are prohibited from giving gifts if they are solicited by the recipient.</p>	US \$30 or lower per year per government official unless a government official has notified you that there are lower caps on gifts applicable to such official, in which case that lower amount shall serve as the cap.
Entertainment for Government Officials	<p>You must exercise extra caution in providing entertainment to government officials because of the higher risk of bribery or corruption, and the appearance of impropriety.</p> <p>You are prohibited from inviting spouses, partners, children or other third parties to an entertainment event unless their attendance is appropriate and consistent with the business purpose of the entertainment.</p>	Entertainment for Government Officials must be approved in advance by Compliance. Contact your compliance officer or email gallagherethicsandcompliance@ajg.com .

	REQUIREMENTS	MONETARY CAP OR LIMIT
Gifts From Business Partners (Other Than Government Officials)	<p>You are prohibited from soliciting gifts.</p> <p>Note that gifts you receive may be considered taxable income to you individually. Consult with Gallagher's Finance or Payroll department if you have questions.</p> <p>When you are supported by a team, where possible you should share the gift with your team.</p>	Total value of US \$300 or less per year per business partner unless a business partner has notified you that there are lower caps on the gifts that business partner is authorized to provide, in which case that lower amount shall serve as the cap.
Gifts to Business Partners (Other Than Government Officials) (Except Gallagher-Sponsored Team Events)	<p>You are prohibited from giving gifts if they are solicited by the recipient.</p> <p>Gifts may not consist of cash or cash equivalents such as gift cards, gift certificates, debit or check cards or vouchers except as provided below in connection with raffles.</p>	Total value of US \$300 or less per year per business partner unless a business partner has notified you that there are lower caps on gifts applicable to such partner, in which case that lower amount shall serve as the cap.
Gifts of Gift Cards for Raffles of Business Partners Other Than Government Officials	You may provide gift cards for raffles which are hosted or attended by business partners.	For gifts of gift cards for raffles, you may not gift more than US \$300 worth of gift cards to any one business partner unless the raffle qualifies as tax deductible donation under the tax code of your jurisdiction.
Gifts of Tickets to Official Gallagher-Sponsored Team Events to Business Partners Other Than Government Officials	<p>You are permitted to gift tickets to official Gallagher-sponsored team events. You can find a list of official Gallagher-sponsored teams here.</p> <p>You are prohibited from giving gifts if they are solicited by the recipient.</p>	Not applicable.
Entertainment for or by Business Partners Other Than Government Officials (Except Gallagher-Sponsored Team Events)	<p>You are prohibited from soliciting entertainment.</p> <p>You are prohibited from providing entertainment if solicited by the recipient.</p> <p>You may offer to, give or receive meals and other entertainment from business partners for legitimate business purposes.</p> <p>You are prohibited from inviting spouses, partners, children or other third parties to an entertainment event unless their attendance is appropriate and consistent with the business purpose of the entertainment.</p>	<p>Not applicable unless: (a) A business partner has notified you that there are caps on entertainment applicable to such business partner; or</p> <p>(b) there is a lower cap specified by your local gift/entertainment policy, if any, or your local T&E Policy.</p> <p>Any entertainment with total value of more than US \$500 per business partner should be scrutinized for compliance with the General Rules in this Policy.</p> <p>See below for Gallagher employee travel expenses related to business partner entertainment.</p>

	REQUIREMENTS	MONETARY CAP OR LIMIT
Entertainment Consisting of Tickets to Official Gallagher-Sponsored Team Events for Business Partners Other Than Government Officials	<p>You are permitted to take business partners to official Gallagher-sponsored team events. You can find a list of official Gallagher-sponsored teams here.</p> <p>You are prohibited from inviting spouses, partners, children or other third parties to an entertainment event unless their attendance is appropriate and consistent with the business purpose of the entertainment.</p> <p>If you are unsure whether a spouse, partner or guest qualifies, please reach out to your local compliance officer for guidance.</p>	Not applicable.
Entertainment by Business Partners Other Than Government Officials – Industry Events and Sponsored Travel	<p>You are prohibited from soliciting entertainment.</p> <p>From time to time, Gallagher employees are invited to join (re)insurance carriers or other business partners at sponsored trips and industry-related events.</p> <p>You are prohibited from receiving payment or reimbursement for entertainment-related lodging and other travel expenses from a business partner.</p>	You may expense reasonable travel expenses for approved travel as authorized by your business's travel and expense policy.
Sponsorship Requests	Please contact the marketing department for any sponsorship requests.	
Political Contributions	Prohibited. See Financial Policy Manual (Contributions and Donations) for more information.	

Prior written approval from your regional compliance officer, as well as your supervisor, is required for any proposed gifts or entertainment which would exceed the above thresholds. Exceptions will be granted only in limited circumstances.

Remember that gift and entertainment, charitable donation and sponsorship expenses will only be reimbursed if compliant with this G&E Policy and in accordance with the applicable travel and expense policies for your business and geography.

Please see the [Gifts and Entertainment Policy FAQs](#) for additional information.

G&E POLICY COMPLIANCE

Noncompliance with this G&E Policy may result in disciplinary action, up to and including termination of employment, as well as significant legal consequences for you and for Gallagher.

You must contact one of the resources below immediately if you become aware of (a) a violation or a potential violation of this G&E Policy or (b) a promise of a benefit or a threat in connection with a contribution request.

In case of conflict between this G&E Policy and the [Event Tickets/Spotlight Policy](#) and [FAQs](#), this G&E Policy governs.

ADDITIONAL RESOURCES

Divisions and geographies may adopt supplemental procedures and protocols pursuant to this policy. Your regional Compliance, Legal, Finance or Treasury teams will communicate these to you, if applicable.

Corporate policies and guidance materials related to this policy include:

[G&E Policy FAQs](#)

[Event Tickets/Spotlight Policy](#)

[Event Ticket Policy FAQs](#)

[Contributions and Donations Policy](#)

[Global Anti-Bribery Policy](#)

[Global Anti-Bribery Policy FAQs](#)



SPEAK UP

If you have any questions or concerns, or are aware of a violation or a potential violation of this policy, please contact one of the resources below.

The Compliance Department email
GallagherEthicsandCompliance@ajg.com

The Gallagher Ethics and Compliance Helpline
<https://gallagher.ethicspoint.com>

You may also contact your local Compliance officer or the [Chief Compliance Officer](#).



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