

Global Social Media Policy

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Effective immediately and last updated in March 2025. This policy is the global policy of Arthur J. Gallagher & Co. and its subsidiaries, collectively referred to herein as 'we', 'our', 'us', 'the company' or 'Gallagher'. As such, this policy supersedes any and all other social media policies in various divisions or geographic locations.

1. PURPOSE

The purpose of this policy is to minimize the risks to our business arising from the use of social media, to protect Gallagher's reputation, and to ensure consistency in the way Gallagher and its businesses are presented on social media channels. It contains standards of behavior to which all employees (as defined below) must adhere to when (i) utilizing social media channels in work-related activities, (ii) identifying themselves as Gallagher employees on social media channels, and (iii) conducting any other social media activity that could impact Gallagher or otherwise violate this policy, including personal social media sites and profiles.

This policy applies to the use of social media including, but not limited to: blogs, wikis, social networks, virtual worlds, and employee applications, as well as social media activities both inside the corporate network and on external sites, including enterprise social networks like Chatter and Microsoft Teams.

The **Global Social Media Policy** co-exists with additional policies, guidelines and our shared values - The Gallagher Way, including the:

- **Global Standards of Business Conduct;**
- **Insider Trading Policy;**
- **IT Policy Manual;**
- **Global Policy on Acceptable Use of IT;**
- **Global Third-party Messaging Policy** which prohibits all employees from using third-party messaging platforms (including but not limited to mobile messaging such as SMS, ephemeral/disappearing messaging such as WhatsApp, social media such as X (formerly Twitter) and other online messaging platforms such as personal email) to conduct business communications or transmit Gallagher Information.
- **Gallagher Securities Policy**, applicable to employees registered or certified with Gallagher Securities.
- Creating an inclusive workplace;
- **Broker Dealer Social Media Policy;**
- **Financial Promotions Approval Policy and Financial Promotions Guidelines for Social Media (UK)**
- Media and communications including **Corporate Disclosure Policy** and crisis communications;
- Global and local marketing and communications guidelines;
- Style guides; and
- Global and local data protection policies.

2. DEFINITION

For purposes of this policy, social media is a type of interactive online media that allows parties to communicate instantly with each other or to share data in a public forum. This includes internal employee and online social forums

such as Core360 Live! X, Facebook and LinkedIn. Social media also covers blogs and video or image-sharing websites such as YouTube and TikTok and instant messaging applications such as WhatsApp. This is not meant to be an exhaustive list since new social media platforms are released on a regular basis.

3. SCOPE

This policy applies to all employees of Gallagher including employees of acquired companies and companies in which Gallagher has a majority-owned interest or otherwise maintains management control. It also applies to agencies, contractors, contingent workers, contracted resources and third parties, to the extent involved in social media on behalf of Gallagher or any of its divisions, business units or other affiliates of Gallagher. Throughout this policy, employees and contractors will be referred to collectively as “employees” unless specifically referred to separately.

Employees must follow this policy when using any and all forms of social media. It is essential that employees understand the company’s expectations on how they may use social media, as well as the risks and consequences associated with any breaches of this policy, both for Gallagher and for individuals.

4. GENERAL

This policy sets out the general approach that Gallagher follows. We may change or make exceptions to this policy from time to time (including, but not limited to, changing the circumstances in which the policy applies; for example, access to specific websites or multimedia) in our sole and absolute discretion.

5. ACCESS TO SOCIAL MEDIA

Personal Social Media Accounts and Sites

Gallagher recognizes that many employees make use of social media, instant messaging apps and online community forums in a personal capacity. The following rules apply to the use of personal social media:

- Even though you may not be speaking specifically about or on behalf of the company on these channels, this policy still applies since your use of personal social media and instant messaging apps could damage our business interests or reputation, directly or indirectly.
- Employees may promote the fact that they work for Gallagher on their personal social media channels and are encouraged to engage with and share authorized Gallagher content that has been published on official company social media channels.
- Employees are responsible for all content they publish online, whether in a blog, social networking site or any other form of user-generated media including, but not limited to, LinkedIn, X, Facebook, Instagram, Snapchat, WhatsApp, Messenger, TikTok, YouTube, Pinterest and other sites and blogs. Employees must understand and adhere to each site's terms and conditions.

Company Social Media Accounts and Sites

- Only authorized social media employees or third parties authorized by them are permitted to setup, administer or maintain social media accounts and/or sites using any of the Gallagher brand(s) or any of our subsidiary or affiliate brands and only then for the agreed purpose.
- At times, Gallagher also provides access to social media platforms to employees who are authorized to comment or blog about aspects of the business as part of marketing or sales initiatives, including corporate communications.

- All requests for and access to company accounts and sites should be sent to socialmedia@aig.com.

6. USING SOCIAL MEDIA

Regardless of whether social media is accessed via the company's IT resources for business-related activities or for personal reasons, the following standards apply to all employees.

Behavior and Conduct

- Use of social media must be consistent with applicable law, the requirements of the **Global Standards of Business Conduct** and other company policies relating to bullying, harassment, discrimination, equal opportunity and privacy. This list is not exhaustive and may include other policies and standards of conduct and behavior.
- You are expected to understand these standards and conduct yourself in a manner that is consistent with these standards.
- Be aware that you can be held personally responsible for anything that you write or present online.

Business Continuity/Crisis Communications

- Social media may only be used with company approval and in conjunction with other emergency notification systems to communicate with Employees and clients when real-time, critical information is needed to ensure business continuity.
- It is especially critical that we not comment during highly publicized world or business events, incidents or controversies. Social media can help as well as harm in a crisis. As such, any comments being made on social media in connection with a crisis situation must be evaluated prior to being issued in order to address potential legal, financial and reputational risks.
- All media interactions should be vetted by the **Corporate Communications** team.

Confidentiality

- Disclosing confidential information about the company or any affiliate of Gallagher without the prior written consent of authorized company personnel is prohibited. Information is considered confidential when it is not readily available to the public or is otherwise proprietary to Gallagher. In addition, certain laws and regulations prohibit the sharing of such information.
- Employees must not share any confidential information relating to a client, prospective client, carriers, vendors or other business contacts, or colleagues over any personal social media channel or instant messaging application.

Content

- Content published by employees reflects on the company's brand and reputation. Ensure that content is accurate, informative and meets all applicable legal and regulatory standards. Any errors should be acknowledged and corrected as soon as practicable.
- Social media must never be used, either alone or in connection with other means, as a method to disseminate commercially sensitive material, non-public information regarding the company.

- Do not use social media to provide quotes or disclose any information that is financial, operational or legal in nature. This includes unannounced financial results or sales, crisis-related matters, pending product releases, business strategies, client data, pending claims or legal matters, or any other material information that has not previously been reported.
- Do not make predictions (forward-looking statements) about the company or its future financial or other prospects.

Intellectual Property and Copyright

- Employees must obtain prior written permission from clients, partners, suppliers or colleagues before publishing their intellectual property, logos, trade names, trademarks or other proprietary information and must never publish this type of information without prior written approval from **Marketing** even where you consider that you have obtained written permission from the relevant client, partner, supplier or colleague. Likewise, never quote colleagues, clients, partners or suppliers without their and **Marketing's** prior written approvals.
- Use of material created by others must be appropriately referenced and cited. Information must not be published in breach of copyright, trademark or other intellectual property rights. Links should be provided back to the source.
- In general, copyrights protect creative works from being reproduced or distributed to the public. When sourcing images for social media posts, be certain to obtain approval for the use of the imagery, select royalty-free images, or source images that would not create copyright concerns.

Language, Written and Visual

- Using offensive language, racial slurs, personal insults, obscenities, or any other illegal, offensive or degrading comments and images is unacceptable and is strictly prohibited.
- Consider the audience and adapt the use of language and images to be appropriate to the target audience and ensure this meets expected standards of appropriate behavior and conduct.
- It is Gallagher's policy to remain politically neutral, and you are responsible for upholding this policy.

Privacy

- Consider the privacy of others and do not disclose any personal and/or sensitive information about the company, clients, carriers, partners, suppliers or other employees. You are responsible for following all applicable privacy and data protection requirements, and consulting the **Global Chief Privacy Officer** or your [local privacy resource](#) with any questions.

Reputation and Branding

- Employees are encouraged to consider how content reflects on their own image and reputation, including how clients, customers, employees and other stakeholders will perceive them. This includes posting images or video content, including photos from company-sponsored events and social occasions.
- Any company branding including logos, copies of promotional material and other documents may only be used with permission and approval from Gallagher.
- Your personal account's social media name, handle and URL should not include any of our company names or logos unless it is preapproved by Gallagher.

- If a social media account identifies an individual as an employee, include a disclaimer on the account profile/bio or within a post that is related to our business that reads, “*views expressed are mine and don’t necessarily reflect those of my employer.*” When space is restricted, use “*views are my own.*”
- Upon termination of employment, Employees agree to update their social media to reflect that they are no longer employed by the company.

Security

- All posting on company social media should be done through the company-approved social media management platform by authorized people only.
- In the event of any actual or suspected breach of a corporate-approved social media channel, change the password and notify the **Chief Information Security Officer** and **Corporate Communications**.

Transparency

- Employees must identify themselves (including name, position and the nature of the employment or contractual relationship with the company) when discussing the company or business-related matters.
- Employees must disclose whether comments are made in a personal capacity or are authorized comments made on behalf of the company.
- Employees must not edit any Wikipedia pages related to any of our companies.

7. MONITORING SOCIAL MEDIA

We reserve the right to monitor, intercept or review without notice, employee activities on social media and their use of our IT resources and communications systems, in accordance with the **IT Policy Manual** and the **Global Policy on Acceptable Use of IT**.

This includes, but is not limited to, social media postings and activities to ensure that employees and other users comply with our rules and for the legitimate purposes of protecting the reputation, confidential information and interests of our business, employees, prospective, current and past clients, suppliers and other relevant third parties.

The company will monitor compliance with applicable law, the **Global Standards of Business Conduct**, company policies relating to standards of behavior and conduct, and this policy.

8. BREACHES OF THIS POLICY

Use of social media in a manner inconsistent with this policy may result in disciplinary action, up to and including termination of employment, as well as potential legal action. Please report any breach of this policy to [**socialmedia@ajg.com**](mailto:socialmedia@ajg.com).

9. GENERAL QUESTIONS AND PERMISSIONS

Contact [**socialmedia@ajg.com**](mailto:socialmedia@ajg.com) with questions or exception requests pertaining to this policy.