

# Modern slavery statement

At Grant Thornton UK LLP, our strong emphasis upon purpose and social responsibility ensures we speak out on issues impacting our clients, people and industry. Our policy is to assess and address anti-modern slavery laws in our own business. Equally, we expect organisations we work with to adopt and enforce policies to comply with legislation. Collaboration between our people, suppliers and clients is vital for achieving this aim.



## What is modern slavery?

Modern slavery is an international crime affecting over 40 million people worldwide. This growing global issue transcends age, gender and ethnicities. It includes victims trafficked from overseas and vulnerable people in the UK who are forced illegally to work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

The Modern Slavery Act 2015 (the Act) requires commercial organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The Statement must set out the steps an organisation has taken during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.



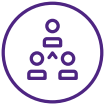
## Our policy

Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains. We also expect organisations we transact with to adopt and enforce policies to comply with legislation.

We are signatories of the UN Global Compact, supporting principles with respect to human rights, labour, environment and anti-corruption.

We support our people and clients to address issues arising from modern slavery. Collaboration is one of our CLEARR values. Together with Leadership, Excellence, Agility, Responsibility and Respect, our values underpin our culture and how we do business. We ensure:

- our values, which are embedded throughout our business, set the parameters for how we expect our people to behave with colleagues, clients and society
- we seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted
- our policies and procedures relating to the Act are aligned with our culture and values.



## Our structure and supply chains

**200+**  
Partners

**5,000+**  
Direct employees

**23**  
UK offices

Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL), an international network of member firms across 149 countries. Each of the member firms operates as a separate legal entity; and is not a worldwide partnership. This statement relates to the UK entity, Grant Thornton UK LLP, its structure and supply chain.

GTIL has raised awareness of modern slavery through a Legal Alert to all CEOs across its network of member firms. It will continue to do so on any related areas through periodic global updates.



## Our procedures

We have procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

### Employment

- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace
- Robust and ethical recruitment processes in line with UK employment laws, including: 'right to work' document checks (we operate these in line with GDPR and will not retain identity documents for longer than is necessary); contracts of employment and checks to ensure everyone employed is 16 and above
- Market-related pay and rewards reviewed annually
- Wellbeing strategy and initiatives to support our people's physical and mental wellbeing and lifestyle choices

### Transparency in our supply chains

We recognise our firm is exposed to greater risk when dealing with its suppliers, particularly those who have operations/suppliers in other territories. The following measures are in place to review and manage the risk:

- we map suppliers to whom we pay £100,000 and above (80% of spend), according to location, size and industry, to identify potential risk areas
- a Third Party Code of Contact is in place, used for all new major suppliers of goods or in re-tendering, clearly stating the firm's intention to step away (without penalty) if any occurrences of modern slavery are discovered and/or ignored.
  - This includes an expectation for our Third Parties to pay their employees the living wage
- our commitment to collaborate closely with suppliers to help them understand and work towards their own compliance with the Act
- a Know Your Third Party Financial Crime Due Diligence policy demonstrates our commitment in ensuring our suppliers are acting with integrity, and engagement with them will not expose us to risk
- a Responsible Purchasing Policy is in place, which reflects our commitment and focus on suppliers' ethical supply chain(s).

### Supporting our people

Following the Act, we have increased our people's awareness of this important issue by outlining specific actions our firm has taken. We also provide guidance to enable people to report any potential concerns within business or personal contexts. We have:

- developed and shared resources, including summary documents with an overview of the Act, and links to the [modernslavery.co.uk](https://modernslavery.co.uk) website
- signposted our people to [modernslavery.co.uk](https://modernslavery.co.uk) to provide them with useful information on how to recognise different types of slavery, how to spot the signs and details of their telephone helpline
- included training on our modern slavery policy in our mandatory Quality Matters training
- an internal whistleblowing hotline to enable anyone who has concerns (for example, how suppliers, clients, partners or employees behave) to raise these confidentially
- reviewed our people policies to ensure compliance with human rights.

## Supporting our clients

We continuously review how to support clients. This includes collaborating with government agencies and other reputable organisations to deepen and share knowledge so that we collectively address this challenge. In addition, to help our clients to:

- develop a modern slavery statement
- conduct supply chain mapping
- carry out supplier due diligence and routine spot checks
- develop any policies and practices clients may have in place.

## Future performance indicators

The majority of the firm's spend outside of the UK is with Grant Thornton International member firms who all need to follow the Network's code of conduct. A small number of international suppliers, which are not part of our Network, are US-based technology companies. We have deemed these to be low risk and will continue to monitor these in 2024.



## Additional links

[Grant Thornton culture and values](#)

[Grant Thornton code of conduct](#)

[Grant Thornton transparency report](#)

## Grant Thornton UK LLP has the following policies in place:

- Modern slavery policy
- Third Party Financial Crime Due Diligence Policy
- Procurement policy
- Third Party Code of Conduct

Malcolm Gomersall

Chief Executive Officer

Updated: March 2024

GRANTTHORNTON.CO.UK

© 2024 Grant Thornton UK LLP. All rights reserved.

'Grant Thornton' refers to the brand under which the Grant Thornton member firms provide assurance, tax and advisory services to their clients and/or refers to one or more member firms, as the context requires. Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. GTIL and each member firm is a separate legal entity. Services are delivered by the member firms. GTIL does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate, one another and are not liable for one another's acts or omissions. This publication has been prepared only as a guide. No responsibility can be accepted by us for loss occasioned to any person acting or refraining from acting as a result of any material in this publication. 0068