

# United Nations Global Compact and Grant Thornton UK LLP

Communication of progress

August 2022



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22 August 2022

Dear Mr. Secretary-General,

At Grant Thornton UK LLP, we believe in conducting business sustainably by working with clients who value what we do whilst attracting and retaining the best talent. And we will continue to speak out on issues that impact our clients, our people and our industry.

The past few years have demanded a different mindset and response to continued uncertainty from our firm. To guide our thinking and action, we strive to create an inclusive environment to grow. By excelling in our chosen markets consistently, achieving exceptional results sustainably and investing in talent, technology and infrastructure continually, we focus on doing the right thing for our clients, people and stakeholders. Our communication of progress outlines how we work with stakeholders to address environmental and societal issues while keeping our standards high and encouraging others to do the same.

We are aware that scrutiny upon the accounting profession will only increase – whether from the public, politicians, or regulators – and we continue to build trust and embed quality at the core of our firm’s thinking and action.

To enable better decision-making, we recognise our best work will be done together, when our leaders are open and transparent and when everyone is actively involved in creating a culture which is genuinely inclusive every day. Cultivating an open and respectful culture strengthens our collective resolve to achieve long-term, sustainable business performance and to make our firm one we can all be proud to work for.

Fresh perspectives are required to address the greatest issues of our time, such as climate change and social inequality, and we continue with our efforts to achieve net zero, improve diversity and make our firm more inclusive.

Therefore, I am pleased to confirm that Grant Thornton supports and actively promotes the adoption of The Ten Principles of the United Nations Global Compact (UNGC) with respect to human rights, labour, environment and anti-corruption. In our sixth annual Communication on Progress (COP), we outline our actions to integrate The Ten Principles into our business strategy, culture and daily operations.

Tomorrow’s success begins with making the right decisions today. We are wholeheartedly committed to sustainable growth earned through positive progress and doing what’s right ahead of what’s easy.

Yours sincerely,



David Dunckley  
Chief Executive, Grant Thornton UK LLP

# An experience that goes beyond

What do today's businesses need? Advisers that offer a different experience. A better experience. One that delivers technical expertise and a service that goes beyond. Personal, proactive, and agile. That's Grant Thornton.

We're the UK member firm in a global network that employs 58,000 people in 135 countries. Whether we're helping clients grow in one market or many, looking to operate more effectively, managing risk and regulation, or realising stakeholder value, we combine global scale with local insight, quality of delivery and understanding, to provide the assurance, tax, and advisory services they need to realise their ambitions.

## **We make business personal.**

We invest in listening, building relationships, and understanding concerns, to consistently provide a great service people can trust. We collaboratively engage and constructively challenge, to always deliver positive solutions that are clear and actionable.

## **Commitment to delivering consistently high quality.**

On every engagement, our rigorous approach and commitment to excellence always delivers a quality service.

Constant leverage of our technical expertise ensures we always offer the right advice.

## **The pace we work at is the pace that matters.**

Issues arise, goals evolve, needs change as does the external environment. We're poised to change with them. Our flatter structure and agile approach means we can quickly adapt. The complex is simplified, the technical is accessible.

## **Diverse perspectives are valued.**

Sometimes the path forward isn't clear until you change your point of view. Our culture is always open, inclusive and respectful. Celebrating fresh thinking and diverse perspectives brings proactive insights and positive progress.

## **Helping shape the future.**

We bring proactive insights matched to practical applications. Working closely with regulators, funders, standard setting bodies and stakeholders to help instil trust and integrity in markets. We're committed to sustainable growth through positive progress.

# What makes us different

We're focused on delivering a great service for our clients while making our people proud to work for Grant Thornton.

## Happy clients

We want our clients to be delighted with the service they get from us, which is why we put our clients at the centre of all we do. Whether it's regular catch ups, insightful thinking or just taking the time to take a step back and think about the wider context of what it is we're doing, our people take pride in the quality of their client relationships.

## How do we know this works?

Our clients tell us in their annual service reviews that we're doing a great job. This has been confirmed independently by Meridian West Ltd. As you can see in the graphic to the right, their 'Business Buyers Barometer 2021', a survey of senior professional services buyers in the UK rated us as outperforming the market average in several key service attributes.

## Client service attributes



**Managing  
Partners' Forum  
Awards  
2019**

**Winner**  
Exceptional  
Achievement  
by a Firm

## Happy us

We know our greatest asset is our people. So making sure they're happy and have access to the tools and resources they need to do their job well is essential.

We're under no illusions that the calibre, and type, of organisations we work with, together with our values and our culture is a major draw when attracting great candidates into the business and retaining them in the longer term.

### How do we know this works?





# Human rights

At Grant Thornton we respect and support the internationally proclaimed human rights and ensure the firm is not complicit in human rights abuses. Where possible and applicable, the firm adopts 'human rights' principles in line with current legislation and various employment best practices and values of the firm; some of which include respecting others, valuing diversity both in the workplace and in the supply chain and maintaining a workplace that is free from discrimination, harassment and bullying.

Grant Thornton advocates the fundamental rights and freedoms that everyone in the UK is entitled to.

## Human Rights

### Principle 1.

Businesses should support and respect the protection of internationally proclaimed human rights: and

### Principle 2.

Make sure that they are not complicit in human rights abuses.

## Assessment, policy and goals

We as a firm are dedicated to upholding human rights and creating an inclusive and diverse working environment for all our people.

In a fast paced, changing world Grant Thornton is committed to making sure all firm policies remain fit for purpose, are inclusive and aligned to best practice. Through regular reviews we make every effort to ensure we are compliant with all current regulation and legislation.

Our culture provides us with the opportunity to explore new ideas and firm wide goals together, allowing us to continually review and develop the practices, processes and policies we have in place, ensuring the firm's ongoing support and commitment to our people in relation to human rights.

## Implementation

The firm looks to encourage and support the UN Global Compact Human Rights Principles through various initiatives and policies. Here are some of the ways we are doing this:

### Firm value implementation

Our CLEARR values: Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility underpin our culture and influence how we conduct business. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is inclusive, transparent and trusted.

### Policy implementation

We are committed to continually developing and implementing the various practices, processes and policies that fully support and abide by current UK employment legislation and regulation, supporting the eradication of discrimination in respect of employment and occupation.

A selection of policies that support the elimination of workplace discrimination are highlighted below:

- Adoption and surrogacy leave policy
- Bullying and harassment policy
- Capability policy
- Disciplinary policy
- Dress code policy
- Family leave policies, including a Neonatal leave policy
- Fertility treatment policy
- Flexible working policy
- Grievance resolution policy
- How we work policy
- Inclusion policy
- Matched leave for carers policy
- Maternity leave policy
- Neonatal leave policy
- Ordinary paternity leave policy
- Parental leave policy
- Pregnancy loss policy
- Redundancy policy

- Remuneration policy
- Shared parental leave policy
- Sickness absence policy
- Time off for reserve forces
- Transitioning at work policy
- Whistleblowing policy

To improve our understanding of our workforce and to identify potential barriers to success, we track the demographics of our people to compare with external benchmarks and to monitor progression internally. The firm maintains records of this data solely for this purpose. The diversity details of any member of the firm will not be shared internally or externally without their permission. We also support leading academic research to further our collective understanding of wider diversity and inclusion trends in the workplace.

### Training implementation

As part of standard training, managers are issued with a copy of the Equality Act 2010 – Guidelines for Managers. Ongoing training in this area includes various upskilling and refresher workshops for our people managers. We have embedded sessions exploring diversity and inclusion and our obligations in this area, particularly when dealing with day-to-day people issues such as managing sickness absence, underperformance and general grievances. We have a people manager community and share a monthly newsletter with relevant updates and hold regular people manager community calls to enable our people managers to best support their people. We are leading a firm-wide project to professionalise the role of the people manager and create a community of high performing, dedicated and inspiring managers.

This includes a two-hour inclusive decision-making workshop that has been rolled out for all Partners, Leaders and People Managers in our firm around the impact of unconscious bias in decision-making both in terms of progression of talent and selecting individuals for certain jobs. We also ran this workshop for those responsible for the firm's recruitment and promotion decisions (for example, partner selection panels), our own People and Culture team, our Inclusion Allies and the firm's Inclusion working group.

We have also developed an online programme to further encourage our managers to think about inclusive decision making and have run mandatory bullying and harassment online training for everyone in the firm. We are continually looking for ways to improve our established ways of working and further remove barriers to success.

### Modern Slavery policy and Third Party Code of Conduct implementation

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 and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation. We actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced or child labour and we have our firm's Third Party Code of Conduct to assist.

Please [click here](#) to read the firm's Modern Slavery Statement.

## Measures and outputs

As a result of the various human rights policies and processes the firm has in place, we note some of the following measures and outputs:

Our Third Party Code of Conduct integrates human rights into the way we do business throughout our supply chain, so we create value, preserve natural resources and respect the interests of the communities we serve and from whom we procure goods and services.

Through our Procurement policy and Third Party Code of Conduct, we expect our suppliers to keep to all laws relating to their business, as well as the principles of the United National Global Compact, the United Nations Declaration of Human Rights and the International Labour Organisation.

### Education

We are founding members of Access Accountancy, a one-week placement to provide those from less privileged backgrounds the opportunity to develop critical skills and develop a professional network. We have an annual commitment of at least 1% of our headcount to be placed on the programme and we also support participants progressing to our school leaver scheme or talent pool them for future opportunities.

In 2021, we became founding partners of the Rise initiative, alongside industry peers. Rise is an employability skills workshop aimed at 14-15 year olds living in social mobility cold spots of the UK.

Our School Enterprise Programme aims to equip Year 7 and Year 8 pupils from low socio-economic backgrounds with financial and entrepreneurial skills.

Since 2013, we have had flexible academic entry requirements for all our graduate, school leaver/apprentice, internship, placement and work experience programmes. We do not stipulate any minimum grade requirements and use a balanced screening scorecard to assess potential across a range of areas.

All our entry level roles are advertised openly and formally on the careers section of the Grant Thornton website. We actively partner with third party advertising providers who can provide reach across all spectrums of society. We work with Milkround specifically to target students via e-marketing channels who go to 'new' universities which have a much more diverse student population. We work with specialist providers such as Pure Potential and Pathway CTM, to target students of school age from less advantageous backgrounds. All new advertising partnerships and providers have to be able to demonstrate that their breadth of reach encompasses students from all backgrounds before we embark upon any advertising with them.

### Employee assistance helpline

To help employees better prepare for and cope with life events – including the things that could potentially cause anxiety and stress – Grant Thornton provides access to a free and confidential service offering expert advice, valuable information, specialist counselling and support.

“By many standards, I do not fit the typical image of a corporate employee in the UK. I’m a female, an ethnic minority, from a low income, deprived area. Statistically speaking, it’s much more likely that I would be unemployed or even in the prison system in the UK than working for a professional services firm. I’m now a mature student, and an associate on a 12 month placement with Grant Thornton. This year, I will more than likely be the highest earner in my immediate family. If that isn’t exemplary of Grant Thornton’s social mobility agenda, I don’t know what is.”

**Audit Associate, Birmingham office**



# Labour

Grant Thornton is committed to upholding the UN Global Compact Principles in relation to labour. The firm is dedicated to ensuring that all labour standards are an active component of our people's daily working environment and experience and implement policies and practices that encourage the adoption of such standards.

## Labour

### Principle 3.

Business should uphold the freedom of association and the effective recognition of the right to collective bargaining

### Principle 4.

The elimination of all forms of forced and compulsory labour

### Principle 5.

The effective abolition of child labour; and

### Principle 6.

The elimination of discrimination in respect of employment and occupation.

## Assessment, policy and goals

The firm recognise we are responsible for the health, safety and welfare at work of all our people, whether that be on the firm's premises or carrying out the firm's business elsewhere.

Notwithstanding the firm's legal responsibilities to comply with legislation, the firm is committed to keeping the workplace, our clients and suppliers, and the local community safe from any adverse consequences of our work activity and ensuring all efforts are made to remove or reduce the risks of any potential impact.

As a firm we have various processes and policies in place that support the UN Labour Principles highlighted opposite. These policies are frequently reviewed and updated so as to reflect any changes in UK law and legalisation.

## Implementation

The firm looks to encourage and support the UN Global Compact Labour Principles through various initiatives and policies. We highlight some areas of firm involvement below:

### Policy implementation

We are committed to continually developing and implementing the various practices, processes and policies that fully support and abide by current UK employment legislation and regulation, supporting the eradication of discrimination in respect of employment and occupation.

A selection of policies that support the elimination of workplace discrimination are highlighted below:

- Adoption and surrogacy leave policy
- Bullying and harassment policy
- Capability policy
- Disciplinary policy
- Dress code policy
- Family leave policies, including a Neonatal leave policy
- Fertility treatment policy
- Flexible working policy
- Grievance resolution policy
- How we work policy
- Inclusion policy
- Matched leave for carers policy
- Maternity leave policy
- Neonatal leave policy
- Ordinary paternity leave policy
- Parental leave policy
- Pregnancy loss policy
- Redundancy policy
- Remuneration policy
- Shared parental leave policy
- Sickness absence policy
- Time off for reserve forces
- Transitioning at work policy
- Whistleblowing policy

As a responsible employer, Grant Thornton understand that health and safety management is the key to shaping a positive, successful and inclusive culture.

Health and Safety is everyone's responsibility as well as being a particular obligation for all levels of management. Grant Thornton UK LLP expects everyone to be aware of their role in workplace health, safety and wellbeing. Notwithstanding the firm's legal responsibilities to comply with legislation, the firm is committed to keeping the workplace, our people (whether they are working in our offices, at home, on client sites or working elsewhere) our clients, suppliers (including third parties) and the local community safe.

### We will:

- Identify the principal hazards to employees and others affected by our work and control the associated risks adequately.
- Meet the basic requirements of the Health and Safety at Work etc Act 1974 – namely to maintain, so far as is “reasonably practicable” healthy and safe working conditions.
- Meet the additional health and safety requirements of the Management of Health and Safety at Work Regulations 1999 including conducting risk assessments, developing emergency procedures, and providing health surveillance.
- Make sure that employees have the necessary competency and equipment to carry out the tasks expected of them and provide appropriate and adequate health and safety training.
- Consult employees on health and safety issues and provide them with the necessary information, training, equipment, and supervision to carry out their role without putting themselves or others at risk.
- Regularly review and if required, revise our Health and Safety Policy
- Meet specific immediate and long-term health and safety performance targets.
- Have the resources to achieve the objectives outlined above.

### Modern Slavery Policy and Procurement policy implementation

As referenced in Human Rights, our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws.

Our Procurement policy reflects our overall business purpose and in so doing seeks through the application of a rigorous procurement process to not only purchase goods and services at best value for money but to consider the ethical, social, environmental, economic and legal impacts of the supply chain. This means making purchasing decisions which reflect not only the best price in total cost terms over the lifetime of a contract but also require suppliers to:

- comply with all applicable UK and European laws and regulation, and
- reflect the firm's ethical, social and environmental standards.

All suppliers will be required to comply with, or work towards compliance with, the requirements of our Third Party Code of Conduct. The Code sets out the minimum standards of behaviour expected of our suppliers so that they act in a way that is corporately responsible and sustainable and aims to ensure compliance with applicable laws and regulations.

We only expect our suppliers to maintain standards that we ourselves adhere to.

### Living Wage

We are proud to be a Living Wage employer – meaning all our own people and our third party contracted employees are paid the Living Wage, helping to tackle in work poverty. The real Living Wage is based on the cost of living and is voluntarily paid by around 10,000 UK employers who believe a hard day's work deserves a fair day's pay. It is good for business, good for the individual and good for society.

### Employee Survey implementation

We conduct annual company-wide employee engagement surveys to get a better understanding of employee morale, satisfaction, and engagement at Grant Thornton. The results of these surveys are used to improve the firm's culture and performance. We then conduct shorter 'Pulse' surveys each quarter to ascertain whether the changes put in place are having the desired effect. Due to recent world events, surveys have been more frequent in order to understand the wellbeing of our people. Pulse surveys also help us to understand our people's Inclusion & Diversity experience, with recent results used to inform an action plan while highlighting areas for development.

## Measures and outputs

As a result of the various labour policies and processes the firm has in place, we note some of the following measures and outputs:

### Health and Safety (H&S)

Premises inspections – the location Health and Safety Officer (HSO) is required to ensure regular reviews of the workplace are carried out using the safety inspection checklist. The inspection will cover all areas of the workplace which are the responsibility of the firm. A quarterly review will be undertaken in conjunction with our co-sourced facilities partners and recorded in the Health and Safety (H&S) document schedule.

Annual returns are completed by stakeholders which the Practice Leader will sign off as the responsible person. The annual H&S return includes information relating to property people, policy, and legislation compliance.

### Social Mobility

We have a market leading and a data-driven approach to identify and remove barriers to entry and progression for those from lower socio-economic backgrounds and are currently ranked No. 4 in the Social Mobility Index. IWe were named a finalist in the UK Social Mobility Awards Organisation of the Year category (2021) and were recognised in The Times Top 50 Employers for Women (2022). Our social mobility strategy is based on data analysis, transparency, community and advocacy and we aim to maintain our position in the Top 10 of the Social Mobility Index to 2025 and beyond.

To improve our understanding of our workforce, and to identify potential barriers to progression, we track the demographics of our people to compare with external benchmarks and to monitor progression internally. The firm maintains records of this data solely for this purpose. The diversity details of any member of the firm will not be shared internally or externally without their permission. We also support leading academic research to further our collective understanding of wider diversity and inclusion trends in the workplace.

## Diversity and Inclusion

We are committed to making everyday inclusion a reality at Grant Thornton. We focus equally on five strands of diversity: disability; ethnicity, religion and cultural heritage; gender; LGBTQIA+; and social mobility. Each strand has a Board sponsor and a partner responsible for delivery as well as investment of secondees to drive actions and commitments.

We work with and are members of Inclusive Employers and have trained over 380 Inclusion Allies firmwide.

We work with and are members of the Business Disability Forum and have signed a commitment to support the Valuable 500.

We have support available for individuals with disabilities, with a disability defined as a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.

We are Disability Confident Level 3, which is a Government scheme designed to help employers recruit and retain skills and talent of people with disabilities. In addition, as part of our recruitment process, we also offer a guaranteed interview scheme for any candidate with a disability or long-term condition to opt into during the process.

We have signed the Race at Work Charter and the Charter for Black Talent, are part of the 10,000 Black Interns programme and sponsor of the Amos Bursary.

We are a founding member of the Black Professional Services collective.

We publish our ethnicity pay gap as a public declaration of our commitment to encourage the recruitment and progression of all people regardless of ethnic background.

We are a signatory of the Women in Finance Charter and are a Top 10 Working Families employer.

We have completed an equal pay review for all our people and have actively taken steps to rectify any equal pay issues related to gender. We support the progression of our female talent through our female-only coaching programme, European mentoring programmes and ensuring our family leave policies are diverse. In July 2017, Grant Thornton won the "Working Families – Allen & Overy innovation award" for our flexible approach to family pay. This award means we are standing out in the market for our unique approaches to tackling the root cause problems of progressing healthy diversity and inclusion in our people experience.

We are part of the Stonewall Index that measures our progress for LGBTQIA+ people and we have been ranked 143 out of 403 in the 2022 Stonewall Workplace Equality Index, which reflects the large amount of work being done in this area. We are increasing visibility, acceptance and celebration of difference and aim to be in the Stonewall Top 50 by 2025. We have also been handed a Silver Award in recognition of the actions we have taken that have led to our progression through the index.

We take mental health seriously and have over 40 Mental Health First Aiders trained in the business to support our people with mental health concerns, as well as over 100 Health champions in our offices focusing on awareness and preventative measures to support people with mental health issues.



# Environment

As a purpose-led firm, we care about the work we do for our clients, the way we treat our people and the impact we have on our society and environment. We wholeheartedly support the UN Global Compact Environment Principles and are committed to the protection of the world around us and reaching net zero.

We continually review and change the way we work so we can make a positive difference in the world around us through:

- the efficient use of resources and systems
- encouraging our people to complement our corporate activity with their efforts
- sustainable procurement.



### Environment

#### Principle 7.

Business should support a precautionary approach to environmental challenges

#### Principle 8.

Undertake initiatives to promote greater environmental responsibility; and

#### Principle 9.

Encourage the development and diffusion of environmentally friendly technologies.

### Assessment, policy and goals

At Grant Thornton we are committed to the protection of the environment and to reducing carbon emissions to slow down anthropogenic climate change.

#### The firm's environmental policy focuses on the following:

- meeting or exceeding our improvement targets
- complying with ISO14001 and its verification
- adhering to all compliance obligations and keeping up to date with new legislation
- promoting our targets, performance and further actions to our people
- engaging our people in managing our environment impact
- ensuring our policy is visible to our people, clients and communities.

To ensure we contribute to achieving the Intergovernmental Panel on Climate Change recommended goal of limiting global warming to 1.5°C, we have set science-based targets verified and published by the Science Based Targets initiative.

#### Our science-based carbon targets are to reduce absolute:

- Scopes 1 and 2 greenhouse gas emissions by 21% by 2023 from a 2018 base year
- Scope 3 greenhouse gas emissions by 21% by 2023 from a 2018 base year.

We are in the process of setting a long-term Net Zero target, which we are aiming to have validated by the Science Based Target initiative. This means that we will be prioritising real reduction of carbon by 90% rather than relying on offsetting.

We are members of We Mean Business, a coalition of the world's most influential businesses who are working together to take action on climate change and catalyse business leadership to drive policy ambition and accelerate the transition to a zero-carbon economy.

We have embedded responsibility for achieving our emission reduction goals within the firm's Strategic Leadership Team.

## Implementation

The firm looks to encourage and support the UN Global Compact Environment Principles through various initiatives and policies. Here are some of the ways we do this:

At Grant Thornton we are constantly seeking ways to improve the environmental performance of our buildings and operations, focusing on energy efficiency, promoting hybrid working and engagement across all offices. Our ISO 14001 Environmental Management System informs our annual objectives, related targets and agreed actions.

The last 12 months have been challenging in many ways however limited travel and low office occupancy during the pandemic has resulted in a dramatic reduction in our emissions. We have also undertaken the following activities to implement environmental policies and reduce environmental impact.

Area	Action
<b>Energy</b>	<ul style="list-style-type: none"> <li>• Monitored electricity consumption</li> <li>• Improved access to accurate supplier data</li> <li>• Collected energy data for offices where the energy contract is controlled by the landlord</li> <li>• Increased hybrid working across our offices during the pandemic once we were allowed to return to offices</li> <li>• Further virtualisation of our data centre with the aim of total virtualisation in future.</li> </ul>
<b>Travel</b>	<ul style="list-style-type: none"> <li>• 60% decrease in the total number of flights – 792 in 2021 compared to 2029 in 2020</li> <li>• 55% decrease in car distances [company fleet, taxis and employee vehicles] from 2020 to 2021</li> <li>• 39% decrease in rail distances from 2020 to 2021</li> </ul>
<b>Paper</b>	<ul style="list-style-type: none"> <li>• 1% increase in absolute paper consumption from 2020 to 2021. However, when a retrospective approach is taken to compare paper usage in 2021 compared to before Covid-19 pandemic, paper usage has decreased by 92%. This is a result of employees working from home</li> <li>• Between February 2020 and April 2022, we signed over 86,500 documents using our e-signing tool, DocuSign which is a digital solution for managing sign-off processes. It also benefited our environment as follows: <ul style="list-style-type: none"> <li>• 12090 kilogrammes of carbon were averted</li> <li>• 114 trees were protected</li> <li>• 5,131 litres of petrol saved</li> <li>• 411,674 litres of water conserved</li> <li>• 4,148 kilogrammes of waste eliminated.</li> </ul> </li> </ul>
<b>Waste</b>	<ul style="list-style-type: none"> <li>• Recycling rate of 75% achieved in 2021, compared to 86% in 2018-19, and 88% in 2020.</li> <li>• This reduction in recycling rate may be due to Covid-19. For example, increased PPE and an attitude of disposal to stop the spread of the virus.</li> <li>• Overall total waste in 2021 has decreased by 41% since 2017-18.</li> </ul>
<b>Communication</b>	<ul style="list-style-type: none"> <li>• Disclosed annually through the CDP Climate Change Questionnaire</li> <li>• Usage of internal and external social media platforms</li> <li>• Communicated internally and externally around key environmental days including Earth Hour, World Environment day and Zero Waste week</li> <li>• Shared our plans to set a long term Net Zero target through whole firm communications channels</li> <li>• Reported publicly on our energy use and carbon emissions through our annual report.</li> </ul>
<b>Procurement</b>	<ul style="list-style-type: none"> <li>• We will launch a more robust supplier selection process, which requests suppliers to share their sustainability credentials</li> <li>• All paper cups used throughout the UK firm are now fully recyclable</li> <li>• DPD re-use plastic boxes instead of cardboard boxes during PC monitor deliveries</li> <li>• We continually monitor how we work with our suppliers to become more sustainable within future procurement activity</li> <li>• The pandemic has led us to re-evaluate paper-based health and safety reports/assessments, which are now stored electronically and use digital signatures</li> <li>• We are reviewing electrical office-based equipment, such as coffee machines, to see how these can be more efficient</li> <li>• Failing light bulbs across the office estate are being replaced with LED bulbs.</li> <li>• Commercial's provision of office supplies, print and technology has led to Grant Thornton reducing Carbon output due to deliveries by 73.78% based on a 2019 baseline.</li> </ul>

## Measures and outputs

As a result of the various environment policies and processes the firm has in place, we note some of the following measures and outputs:

Our environmental management system across the UK is UKAS certified to ISO 14001 and is audited annually. It focuses on objectives and actions on areas that will have the most significant environmental impact both in the short and long term.

We undertook energy audits as part of the Energy Savings Opportunity Scheme Phase II in 2019, report to CDP (formerly the Carbon Disclosure Project) annually and report publicly on our energy use and carbon emissions through our annual report.

Compared to pre-pandemic, we have reduced:



Paper usage by 92%. This is a result of employees working from home



Annual electricity consumption by 34% between 2017-18 and 2021, from 7,336,067 kWh to 4,837,466 kWh. This is a result of low office occupancy during Covid-19



Scope 1 gas usage intensity, kWh/m<sup>2</sup> has decreased by 22% since the 2017-18



Overall totally waste in 2021 has decreased by 41% since 2017-18



“As a responsible, and sustainable business, we believe in our purpose of ‘Doing what is right ahead of what is easy’. This extends to our Sustainability strategy and commitment to driving positive impact on our environment so that we can meet the needs of today without compromising our future generations.

We have already implemented SBTi-validated near-term environmental targets and are now building on these to further reduce our emissions and become a Net Zero organisation. During 2022 we are developing a plan to reduce our own emissions and the emissions within our supply chain and more broadly seeking to influence change in thinking and behaviour around our environmental impact and the environmental impact of our suppliers and the clients we work with. We anticipate our long-term Net Zero strategy and target will be SBTi-validated, meaning 90% real carbon reduction - not offsetting.”

**Jenn Barnett, Head of Inclusion & Diversity, Environment and Sustainability**



# Anti-corruption

Grant Thornton does not tolerate any forms of corruption, either by our people or others who are associated with us. Compliance with our Anti-Bribery and Corruption Standard is mandatory for all of our people. We expect our Third Parties to comply with relevant laws relating to bribery and corruption in accordance with our Third Party Code of Conduct. The firm is fully committed to upholding the tenth UN Global Compact Principle of Anti-corruption.

## Anti-Corruption

### Principle 10.

Businesses should work against corruption in all its forms, including extortion and bribery.

## Assessment, policy and goals

Grant Thornton is committed to working against corruption in all forms. We have a Financial Crime Risk Management Programme in place which includes policies, processes and controls to detect, prevent and mitigate financial crime risks, including bribery and corruption.

We take a zero-tolerance approach to any activity which could involve breaches of relevant anti-bribery and corruption laws in the UK or abroad. This includes, but is not limited to, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act, and relevant legislation in other jurisdictions where we operate.

Our Anti-Bribery and Corruption Standard (ABC Standard) is based on UK law and sets the minimum requirements. Where the laws and regulations of other jurisdictions impose a higher standard, these must be followed where applicable.

Our ABC Standard sets out the following key prohibitions:

- It is expressly prohibited to engage in bribery either directly or via a third party
- It is expressly prohibited to bribe a Public Official
- Facilitation payments are prohibited (unless there is a genuine risk to life or wellbeing)
- Donations to political parties, elected politicians or political candidates are prohibited
- Lobbying of governments on behalf of individual clients is prohibited.

Grant Thornton is also subject to regulation for its compliance with anti-money laundering legislation. Our Customer Due Diligence procedures are designed to identify corruption risks, alongside other Financial Crime risks, and prevent our services being used to facilitate the corrupt, or wider criminal, activities of others.

We are also subject to ethical and independence standards set by the UK's Financial Reporting Council, the Institute of Chartered Accountants in England and Wales (ICAEW), and the International Federation of Accountants (IFAC).

## Implementation

The firm supports the UN Global Compact Anti-corruption principle through leadership, policy and training. We highlight some areas of firm involvement below.

We recognise the impact of our individual and collective behaviours on our reputation. We help our people to understand their anti-corruption responsibilities by providing clear policies and procedures, a strong culture of support and consultation, training and awareness programmes.

### Governance and Leadership

The firm's Strategic Leadership Team (SLT) is ultimately responsible for the oversight of policies, procedures and controls relating to bribery and corruption risk. One SLT member has been assigned responsibility for Financial Crime Risk management and day-to-day lead on these issues is the responsibility of the firm's Money Laundering Reporting Officer / Head of Financial Crime and their team. Oversight of the firm's Financial Crime Risk management programme, which include bribery and corruption, is achieved through the Financial Crime Risk Oversight Committee, attended by senior representatives of the SLT. The firm also participates in the Transparency International Business Integrity Forum and annual Anti-Corruption Benchmark exercise.

### Anti-Bribery and Corruption Standard Implementation

Grant Thornton takes the risks associated with bribery and corruption extremely seriously and is bound by the legislation contained in the Bribery Act 2010. We do not tolerate any forms of bribery or corruption, either by our people or others who are associated with us. Our ABC Standard is based on UK law and sets the minimum requirements. Where the laws and regulations of other jurisdictions impose a higher standard, these must be followed where applicable.

Our ABC Standard is implemented as follows:

- All gifts and hospitality (G&H) must be transparently declared, and given or received in line with our G&H Policy which is designed to address both bribery and independence risks and regulatory requirements. In particular, it is prohibited to offer or give any gifts to a public official.
- In relation to public officials, it is prohibited to offer any advantage to them in order to influence them in their official role (whether that would be considered improper or not). This includes not making facilitation payments, unless there is a genuine risk to life or wellbeing, even where such payments may be permitted by local or other laws in the country in which the payment is requested.
- We do not lobby government on behalf of individual clients. We operate a strict policy of not providing financial donations to political parties or individual politicians. Grant Thornton is politically neutral.
- Particular care and advice from the Financial Crime Team is required where a charity is connected to a client, a supplier, or a public official and charitable donations are requested. Due diligence must be undertaken to mitigate any bribery related risks. It is prohibited to provide a donation or sponsorship where that would influence, or could be perceived as influencing, a business decision by the person or organisation receiving it. Due diligence must be undertaken to mitigate any bribery related risks and all charitable donations must be in line with the firm's approach to charitable donations and fundraising.
- With regards to recruitment, the policy provides that no roles (including paid or unpaid work experience) should be created specifically for clients or known contacts of clients (including those of other Grant Thornton member firms). Similarly, creation of roles specifically for close friends or relatives of Grant Thornton employees is also prohibited.
- Risk-based Customer Due Diligence is undertaken on all of our clients and our procedures take into consideration risk factors relevant to corruption and money laundering risk such as: clients' source of wealth and source of funds; the risks associated with unusually or excessively complex ownership and control structures; jurisdictions or industry sectors which pose a higher risk of corruption and money laundering; the client being a politically exposed person (PEP) or a family member or known close associate of a PEP; and adverse media and other information related to financial crime risk. Our Financial Crime Risk Appetite Statement states that prospective and current clients who have committed bribery, and are not taking steps to address these risks, are outside of risk appetite.
- Risk-based due diligence must be applied to all Third Parties with the aim to ensure all third parties we engage with comply with relevant laws related to financial crime risk, and are prohibited through contractual agreements from engaging in bribery or corruption on the firm's behalf. Other than in exceptional circumstances, it is prohibited to engage a Third Party who is a Public Official, or any legal entity owned or controlled by a Public Official.

### **Whistleblowing**

Employees can report potentially corrupt practices to the head of their service line or use the confidential whistleblowing helpline. Our Public Interest Disclosure (Whistleblowing) Policy enables Grant Thornton to act quickly against any potential malpractice, including bribery and corruption, to ensure it conducts its business with the highest standards of integrity and honesty at all times. The policy also provides a clear framework to encourage individuals to inform management of concerns about malpractice so that this can be treated seriously.

A review of Whistleblowing reports is conducted by the Public Interest Committee (PIC), a sub-committee of the Governance board, at each meeting.

### **Training Programmes**

On joining the firm, all partners and employees are provided with the Code of Conduct and must complete mandatory compliance training encompassing financial crime. This includes a dedicated training module on anti-bribery and corruption. The course is designed to raise awareness of bribery and corruption risks and requirements within the firm's policies to comply with the Bribery Act.



## Measures and outputs

Ensuring appropriate anti-bribery and corruption measures are in place is vital for maintaining our reputation and protecting our business.

### Monitoring

We take steps to monitor our people's compliance with policies and procedures relating to bribery and corruption risks in the following ways:

- Our ABC Standard is monitored by the firm's second and third line monitoring processes, involving the Financial Crime Team (second line) and Internal Audit (third line), which include analysis of data on gifts and hospitality, expenses and Third Party payments.
- The Financial Crime Risk Oversight Committee meets quarterly, chaired by Head of UK Clients & Markets and attended by senior representatives of the Strategic Leadership Team (SLT), and considers bribery risks alongside other financial crimes.
- The PIC receive and provide comment on a report from the firm's MLRO at least annually, which includes details of the firm's anti-bribery procedures.
- Annually all of our people are required to confirm in the firm's Annual Regulatory Statements and Declarations process that they understand and have complied with the firm's policies relating to anti-bribery and corruption, independence, gifts and hospitality, and whistleblowing.

### Code of Conduct

Our Code of Conduct provides a clear set of standards for our business while creating an ethical and behavioural framework for how we apply our values to guide our people's response to the decisions they are required to make each day.

Our Third Party Code of Conduct sets out the expectations for all our Third Parties to comply with relevant laws relating to bribery and corruption, alongside other expectations.

### Quality

We continuously invest in processes and infrastructure that drive efficiency and compliance while providing direction and support to our people. The policies and procedures which drive our internal quality control systems are embedded in every part of our business.





Grant Thornton

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