

# Modern slavery statement

At Grant Thornton UK LLP we have a strong focus on purpose, and our sense of social responsibility ensures we speak out on the issues that impact our clients, our people and our industry. Our policy is to assess and address anti-modern slavery laws in our own business and we expect organisations with whom we work also to adopt and enforce policies to comply with the legislation. Collaboration is at the heart of achieving this with our people, suppliers and clients.



## What is modern slavery?

Modern slavery is an international crime affecting over 40 million people around the world. 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, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.



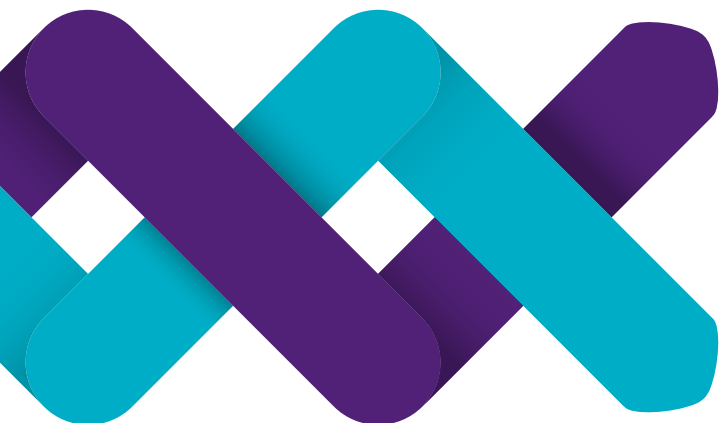
## Our policy

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 and we expect organisations with whom we do business to adopt and enforce policies to comply with the 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, and together with Leadership, Excellence, Agility, Respect and Responsibility, 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 the world at large
- 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 in line with our culture and values.





## Our structure and supply chains

**190**  
Partners

**4,500+**  
Direct employees

**27**  
UK offices

Grant Thornton UK LLP is a member firm of Grant Thornton International Ltd (GTIL), an international network of member firms across 135 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.

Grant Thornton UK LLP has over 770 suppliers across a wide range of sectors, including information technology, marketing, insurance, and facilities management. In addition, we work with a number of professionals, consultants, and contractors. Suppliers paid over £100,000 per year make up 84% of our supplier spend and suppliers paid over £1m per year make up 48% of our supplier spend.

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 a number of 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 recruitment processes in line with UK employment laws, including: 'right to work' document checks; 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

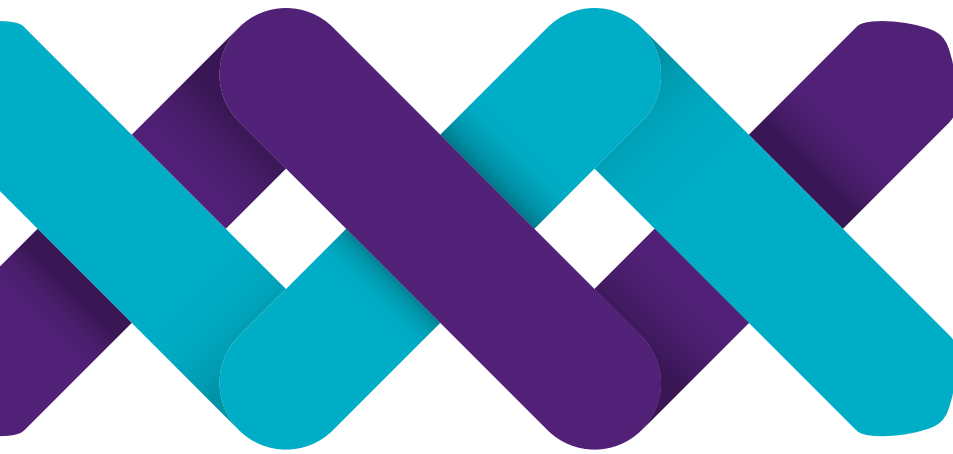
We recognise that our firm is exposed to greater risk when dealing with its suppliers, particularly those who have operations/suppliers in other territories. The following measures are in place to review and manage the risk:

- we have examined our supply chains and have identified over 770 suppliers from 1 January to 30 September 2020.
- we have mapped those suppliers to whom we pay £100,000 and above (84% of spend), according to location, size and industry, to identify potential indicators of slavery. Of these:



- confirmation by our top 250 suppliers, in terms of spend, of compliance to the Act through their own modern slavery statements
- 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 to and focus on suppliers' ethical supply chain(s)
- 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.





### Supporting our people

Following the Act, we have enabled our people to understand more about this growing issue by setting out the steps taken by the firm. We also provide guidance to help them to report any concern they may have within business or in a personal context. We have:

- developed and shared resources, including summary documents with an overview of the Act, and links to the modernslavery.co.uk website
- signposted our people to 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 in our Annual Declaration a requirement that everyone reads and acknowledges the firm's modern slavery policy
- introduced an internal whistleblowing hotline to enable anyone who has concerns (for example, how suppliers, clients, partners or employees behave) has a means of raising their concerns confidentially
- delivered a Modern Slavery workshop with Government Home Office and NGO experts to elevate internal awareness in recognising this crime, its impact and the appropriate reporting channels.

### 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 may be impactful. In addition, we are able 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

Going forward, we aim to provide:

- continued guidance on spotting modern slavery to increase awareness for our people and clients.

Grant Thornton UK LLP shall take responsibility for this Statement and its related objectives, and review and update it in accordance with The Act.



### 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
- Responsible purchasing policy
- Third Party Code of Conduct

**David Dunckley**  
Chief Executive Officer

Updated: December 2020