

# Modern slavery statement

At Grant Thornton UK, 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. Being actively curious is one of our values – together with being purposefully driven and candid but kind, 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 is a member firm of Grant Thornton International Ltd (GTIL), an international network of member firms across 156 markets. 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, its structure and supply chain.

GTIL provides periodic support to member firms on modern slavery and its policies to address the risks to help increase education and awareness across the international network.

### Our procedures

We have procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains. To date, no instances of modern slavery violations have been identified in our operations 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-driven 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 and 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 Conduct' 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 to 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 our suppliers' ethical supply chains.

#### Supporting our people

To support our people to recognise and report any suspected instances of modern slavery and related unethical behaviour, we provide regular training, guidance and materials to all our Partners, staff and contracted workers. In the previous year 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
- directed 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
- provided 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.

#### Expanding our reach

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 2025.

## Future developments

We will also closely monitor developments of the Act following the House of Lords Select Committee's review into its impact and effectiveness, published in October 2024.

## Additional links

[Grant Thornton culture and values](#)

[Grant Thornton code of conduct](#)

[Grant Thornton transparency report](#)

Grant Thornton UK has the following policies in place:

- Modern Slavery policy
- Third-Party Financial Crime Due Diligence standard
- Procurement policy
- Third Party Code of Conduct



## Malcolm Gomersall

Chief Executive Officer

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