



# Modern slavery statement

2026

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## 1. Introduction

Grant Thornton UK (“Grant Thornton”, “we”, “our”, or “the firm”) is committed to respecting and promoting human rights and to taking robust action to prevent modern slavery and human trafficking in our operations and supply chain.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and describes the steps we have taken during the financial year ended 31 December 2025 to help ensure that modern slavery is not taking place in our business or supply chains.

Our approach builds on our purpose and values and our long-standing support for the UN Global Compact. We expect the same high standards from the organisations we work with, and we collaborate with suppliers and clients to raise awareness and improve practices across our value chain.

## 2. Our business and organisational structure

Grant Thornton UK (Grant Thornton UK LLP and Grant Thornton UK Advisory & Tax LLP together) is a member firm of Grant Thornton International Limited (GTIL), a global network of independent member firms across more than 150 markets. Each member firm is a separate legal entity and not a worldwide partnership. This statement relates to Grant Thornton UK only, its structure and supply chain. GTIL provides periodic support to member firms to increase education and awareness on modern slavery risks.

We are a firm led by over 250 partners, employing 5,000 people in the UK across 23 offices.

## 3. Policies and standards

Our policy is to identify, assess and address risks of human trafficking and modern slavery across our operations and supply chain by applying risk-based due diligence, clear supplier standards, colleague training, and proportionate remediation where concerns are found. We maintain procedures intended to ensure modern slavery does not occur in our business or supply chains and we expect all organisations we transact with to adopt and enforce policies to comply with relevant legislation.

To date, no instances of modern slavery have been identified in our operations or supply chain. We will continue to be robust in our mapping and monitoring of this risk.

We operate the following policies and standards:

### Code of Conduct

Our Code of Conduct sets clear behavioural and ethical standards for partners, employees and contractors, including respect for human rights, fair treatment, speaking-up (without retaliation) and compliance with law and policy. It underpins training and reporting duties and links to our values and purpose.

### Third-party Code of Conduct

This applies to suppliers and subcontractors and converts our ethical expectations into contractual obligations, including compliance with the Modern Slavery Act, prohibition of forced, bonded and/or child labour, living-wage expectations, and co-operation with information requests. The code includes our right to terminate contracts for breaches of the code.

### Procurement policy

This policy sets the rules for selecting and managing suppliers, embedding modern-slavery checks into sourcing and renewals. We map suppliers with an annual spend of £100,000 and above (around 80% of our total spend) by location, size and industry to identify potential risk areas; apply risk-based pre-qualification; and include contract clauses on adherence to the code above, audit rights and termination for breach.

### Third-party financial crime due diligence standard

Our KY3P process screens third parties for integrity risks (e.g. identity and ownership, sanctions/politically exposed persons, adverse media, country or sector exposure) and triggers enhanced due diligence for higher-risk cases. We integrate modern-slavery indicators into this process so that adverse labour rights signals are escalated alongside financial crime risks.

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## 4. Risk assessment

We recognise elevated risk in parts of our supply chain including, for example, the labour-hire cycle, country-specific risks and higher risk industries.

To identify and manage risk, we:

- map suppliers to whom we pay £100,000 and above (representing around 80% of our spend) by services provided, location, size and industry to identify potential risk areas
- apply third-party screening and risk indicators (e.g., sector, geography, spend, service type) to prioritise review in accordance with the parameters of the Walk Free Foundation (an international human rights group focused on the eradication of modern slavery, in all its forms, in our lifetime)
- use our Third-Party Code of Conduct to set clear standards and expectations of suppliers
- collaborate with suppliers to support improvements and work towards compliance with the Act.

## 5. Due diligence

Our supplier due diligence is designed to be proportionate to risk and includes:

- Pre-engagement screening of new suppliers
- Requirement for adherence to our Third-Party Code of Conduct, including living wage expectations
- Contractual provisions enabling termination where standards are not met
- Ongoing monitoring and re-tender checks for material suppliers
- Enhanced due diligence for higher-risk suppliers.

The enhanced due-diligence review was undertaken in 2025 by the procurement and ESG teams. From this, higher risk suppliers were identified based on industry (amongst other factors), and we engaged with each supplier to validate:

- there were no recent examples of modern slavery within their own supply chain
- they abided by our Third-Party Code of Conduct or equivalent
- they have sufficient controls in place and governance to prevent or detect modern slavery
- they can provide evidence of the effectiveness of their controls through recent audits or reviews.



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## 6. Employment practices

We maintain fair and inclusive employment practices, including:

- robust and ethical recruitment processes, including right-to-work checks performed in line with UK law
- contracts of employment and checks to ensure everyone employed is aged 16 and above
- market-driven pay and rewards, reviewed at least annually
- a wellbeing strategy and initiatives to support colleagues' physical and mental health and lifestyle choices.

## 7. Training and capability building

We provide regular training, guidance and materials to partners, employees and contracted workers to help them recognise and report suspected instances of modern slavery and related unethical behaviour. Recent actions include developing and sharing training resources on the Act, directing colleagues to online resources for practical information and helpline details, and including our modern slavery statement within mandatory training.

100% of our people have now completed training on the risk of modern slavery in our operations and supply chain as part of our new 'Protecting People, Data and Information' training programme.

All UK-based members of the procurement team annually complete the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply Certificate. The procurement team were awarded the CIPS Corporate Ethics kitemark in recognition of our commitment to ethical sourcing and supplier management.

## 8. Speaking up and reporting concerns

We operate an internal whistleblowing hotline to enable anyone with concerns about supplier, client, partner or employee conduct to raise them confidentially. We also review our people policies to ensure compliance with human rights and to promote a safe, open and trusted culture.

The hotline is available as both a phone line and online portal and is managed by a trusted third party to ensure confidentiality in the process.

No instances of whistleblowing related to modern slavery were made in 2025.

## 9. Monitoring effectiveness and key performance indicators (KPIs)

We evaluate the effectiveness of our approach through regular oversight of supplier due diligence activities, training completion, and speak-up data.

Our key performance indicators and markers of effectiveness include but are not limited to:

- enhanced due diligence with higher-risk suppliers
- 100% CIPS Ethical Procurement & Supply certificate completion from UK procurement team
- 100% mandatory training completion rates and coverage of role-specific training
- zero concerns raised relating to labour rights
- zero remediation actions required.

## 10. Governance and accountability

Governance of our modern slavery programme sits within our risk management and procurement frameworks, with executive oversight and periodic reporting to senior leadership.

The modern slavery statement is owned by the ESG team at Grant Thornton, with our procurement team responsible for the management of risks in our supply chain, whether day-to-day or foreseeable as part of future operations.

Our Chief Executive Officer has overall accountability for approving the modern slavery statement, with reporting to the Board or Senior Leadership Team as necessary.



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## 11. Our international supply chain

The majority of our spend outside the UK is with GTIL member firms, which are required to follow the network's Code of Conduct. A small number of international suppliers outside the network are primarily large US technology companies, which we currently assess as lower risk. We will continue to monitor these relationships.

## 12. Future commitments

Over the next reporting period, we intend to:

- continue monitoring of higher-risk suppliers
- enhance supplier visibility through site visits (where appropriate)
- expand training for client-facing teams and refresh mandatory training annually
- improve KPI reporting, including publication of key metrics in future statements
- continue to monitor legal and regulatory developments, including any changes to modern slavery disclosure expectations.

## 13. Approval and signature

This statement has been approved by Grant Thornton UK and is signed on its behalf by:



Malcolm Gomersall, Chief Executive Officer

March 2026

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