

Modern slavery statement

Grant Thornton International Ltd (GTIL) has taken steps to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement is only in relation to GTIL and its business, not the business of its member firms (as further explained below). References to "our people" only refers to those individuals working on behalf of GTIL, not the member firms.

In accordance with Section 54, Part 6 of the Modern Slavery Act 2015 (the Act), this statement sets out the steps that GTIL has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement is in respect of GTIL's financial year ended 31 December 2019 and was approved by the GTIL Board of Governors on 22 April 2020.

Overview

The Act requires commercial organisations supplying goods or services with a turnover of more than £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 business or supply chain.

What is modern slavery?

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world - a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

Our policy

GTIL has established a zero-tolerance position on violations to the UK's anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation.

Our CLEARR values of Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility, are the pillars of our culture. They embody everything that we do at GTIL and how we do business. They outline the expectation of our people's behaviour with colleagues, clients and people around the world.

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 Modern Slavery Act are in line with our culture and values.

Our structure

GTIL is a private company limited by guarantee, incorporated in England and Wales. It is the coordinating entity for a network of independently owned and managed accounting and consulting firms based around the world. Each member firm is a separate legal entity and membership in the global organisation does not make GTIL or any of its member firms responsible for the services or activities of other member firms.

Our procedures

GTIL has procedures to address modern slavery risk:

- A 'Modern slavery policy' for our people, which sets out the key issues and how we should respond including a process for raising concerns internally as well as to an ethics hotline that allows for anonymous reports to be submitted
- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace



- · Robust recruitment processes in line with relevant employment laws
- Market-related pay and rewards reviewed annually
- · Wellbeing strategy and initiatives to support our people's physical and mental wellbeing and lifestyle choice
- We are continuing to develop a 'Procurement policy' for how we deal with suppliers and a 'Supplier code of conduct' for use by our suppliers making clear the standards we expect.

If you would like to find out more about the above, please email gti.legal@gti.gt.com.

Our business and supply chains: assessment and management of risk

Our business largely uses professionally qualified people employed directly by GTIL or seconded from a member firm in a limited number of countries. Our people policies ensure fair treatment of our people around the world.

When we admit a new member firm to the Grant Thornton network, a thorough due diligence process happens to ensure that the firm has a good reputation with appropriate practices in a number of areas including people and culture. Once admitted as member firms, compliance with global policies is a condition of membership. Some of those member firms provide services to GTIL.

Our external suppliers are mostly UK and US based companies in low risk sectors (such as professional services). One heightened risk area is when we use hotel and conference facilities in other countries. To mitigate against this risk, we assess suppliers that we deal with.

Our training

GTIL provides periodic training to our people on the subject of modern slavery and our policies to address the risks to help increase education and awareness, which was last held in January 2020 and is due to be repeated annually.

GTIL takes responsibility for this Statement and its related objectives and will review and update it in accordance with The Act.

Updated 22 April 2020.

Peter Bodin CEO Grant Thornton International Ltd