

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 2020 and was approved by the GTIL Board of Governors on 21 April 2021.

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 millions of people 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 organisation structure and supply chains

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 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.

Our external suppliers are mostly UK and US based companies in low risk sectors (such as professional services) as well as suppliers in the events and travel sectors, which are potentially higher risk.

Our policies in relation to slavery and human trafficking

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, member firms, vendors 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 specific procedures to address modern slavery risk include:

- 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
- An ethics hotline that allows for anonymous reports to be submitted by our people
- A process for handling complaints raised by people outside of GTIL
- 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
- A 'Procurement policy' for how we deal with suppliers and a 'Supplier code of conduct' making clear the standards we expect.

Due diligence processes, risk assessment and management

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our procurement policy. A heightened risk area is the use of hotel and conference facilities. To mitigate against this risk, we assess the companies that we deal with as part of the decision making process for events and travel.

When we admit a new member firm to the Grant Thornton network, a thorough due diligence process takes place 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.

Key performance indicators to measure effectiveness of steps being taken

We log complaints received via our ethics hotline system or through other sources, together with the actions taken. To the date of this statement, GTIL has had no identified instances of modern slavery.

Training on modern slavery and trafficking

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 Spring 2021 and is due to be repeated annually.

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

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

Updated 21 April 2021