

Slavery and Human Trafficking Statement

Introduction

The UK Modern Slavery Act 2015 (the “**Act**”) is a significant step in confronting all forms of human trafficking and slavery, both in the UK and the rest of the world. Each of Deloitte Global Services Holdings Limited (“**DGSHL**”) and Deloitte Global Services Limited (“**DGSL**”) has a strong commitment to being a responsible business. This statement provides details of how we operate and the steps we have taken to help give comfort that modern slavery and human trafficking are not taking place in our supply chains or any part of our businesses.

Background; About Deloitte

“Deloitte” is the brand under which tens of thousands of dedicated professionals in independent firms throughout the world collaborate to provide audit, consulting, financial advisory, risk advisory, tax and related services to select clients. These firms are members of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“**DTTL**”). DTTL and its member firms, together with other entities like DGSHL and DGSL, are referred to herein as the “Deloitte organization”. Please see www.deloitte.com/about to learn more about the Deloitte organization.

DGSHL and DGSL are UK companies subject to the Act. DTTL, while also a UK company, is not subject to the Act. This statement is therefore applicable only to DGSHL and DGSL.

DGSHL and DGSL provide internal services to DTTL member firms. DGSHL and DGSL do not have employees. DGSHL relies on DGSL for all operations. DGSL operations are carried out by personnel of DGSL’s wholly-owned subsidiary, Deloitte Touche Tohmatsu Services, LLC (“**DTTS**”), a Delaware limited liability company, and personnel from various DTTL member firms assigned to or providing services to DGSL and its subsidiaries.

DGSHL, DGSL, DTTS and other wholly-owned subsidiaries of DGSL are referred to herein as the “**DGSL Entities**”. References in this statement to “we”, “us”, and “our” are to the DGSL Entities, and do not refer to other entities within the Deloitte organization. References in this statement to “**DGSL Personnel**” mean employees of DTTS and its wholly-owned subsidiaries as well as personnel from DTTL member firms assigned to DGSL or other DGSL Entities.

Steps we take within the DGSL Entities to address modern slavery

The Act has prompted us to review where our business and supply chain are most at risk of encountering modern slavery. We have considered our existing controls and processes and their effectiveness in guarding against modern slavery in our own operations.

DGSL Personnel are required to abide by the Global Principles of Business Conduct (the “**Global Principles**”) and DTTL Code of Ethics and Professional Conduct (the “**DTTL Code of Ethics**”). The Global Principles and the DTTL Code of Ethics are in each case unequivocal in respect of the importance of maintaining a “responsible supply chain” and not condoning any illegal or unethical behavior by our suppliers or contractors.

The Global Principles reflect a core belief that ethics and integrity are both fundamental and non-negotiable elements of our professional lives. The DTTL Code of Ethics includes information on resources and guidance to enable DGSL Personnel to make professional choices that are consistent with the Global Principles. DGSL Personnel must confirm on an annual basis that they will adhere to the Global Principles and the DTTL Code of Ethics and/or their DTTL member firm code of ethics when they provide services on behalf of the DGSL Entities.

In addition to the above, DGSL Personnel are expected to make decisions based on the following **Shared Values**, which were updated this past year, and describe how we live our purpose:

- Lead the way
- Serve with integrity
- Take care of each other
- Foster inclusion
- Collaborate for measurable impact

Finally, we expect and actively encourage DGSL Personnel to report any issues or concerns they may have about potential ethics violations. There is a confidential and independently managed “Deloitte Global Integrity Helpline” available by phone and through a secure website. The DTTL Chief Ethics Officer is authorized to investigate any inquiries arising from the Integrity Helpline.

Steps we take in our supply chain to address modern slavery

Deloitte organization supply chain

On occasion, we contract with DTTL member firms to provide us with specialized goods and services. Those member firms and their personnel are bound to the same Global Principles and Shared Values as the DGSL Entities and the DGSL Personnel. In addition, each member firm builds on the Global Principles by developing specific codes of ethical conduct similar to the DTTL Code of Ethics, but which are tailored to local requirements. These local codes are supplemented by ethics training and programs that build ethical judgment and decision-making skills. Each member firm also appoints an Ethics Officer whose duties include investigating all reported violations of the Global Principles and/or the local ethics code. Finally, like the DGSL Entities, each member firm adheres to the Shared Values. This year, the Deloitte organization further set forth its resolve for ethical business conduct in its Commitment to Responsible Business Practices statement. This statement is publicly available on the Deloitte.com website, and should be read alongside this statement. The Commitment to Responsible Business Practices sets forth the business principles we believe in and the commitments we have made; these principles and commitments are embedded in our policies and inform our decision making.

External supply chain

Our Procurement Group enters into contracts with suppliers which cover the vast majority of our purchases. Our external supply chain crosses industries and regions of the world, and our vendor contracts database allows us to identify the jurisdictions in which vendors operate and the types of goods and services they provide. If any questions arise regarding the conduct of a vendor, we are able to use the database to identify the region of the world in which the goods and services are provided, and the terms to which the vendor is bound, so that we can swiftly react to enforce relevant contract terms.

This year the Deloitte organization undertook significant steps to reduce the risk of modern slavery and human trafficking in the external supply chain for DTTL member firms and for DGSL by issuing a Supplier Code of Conduct, which outlines minimum expectations for suppliers to any entity within the Deloitte organization, including us. The Supplier Code of Conduct is publicly available on the Deloitte.com website, and should be read alongside this Modern Slavery Act statement.

The Supplier Code of Conduct, includes, among other things, prohibitions against forced or involuntary labor; that work must be conducted based on freely agreed terms; that documents relating to workers' identity or immigration status may not be withheld or destroyed, concealed, confiscated or otherwise

made inaccessible by the supplier; and that there be no exploitation of child labor or employment of workers under the age of 15 or the minimum legal working age, whichever is greater. Importantly, suppliers are expected to apply standards comparable to those set forth in the Supplier Code of Conduct downstream, in their own supply chains.

Any violation of the Deloitte Supplier Code of Conduct may result in asking the supplier to audit its own organization or its supply chain and to report on its findings; recommending or requiring corrective-action plans; or making the supplier a nonpreferred supplier. In some cases, such as where a supplier is found to materially violate laws relating to modern slavery or the fair treatment of workers, we would typically have the right to treat such violation as a material breach of the contract, and a right to terminate the relationship with that supplier. In such an event, our Procurement Group would also engage with our Chief Ethics Officer, General Counsel, Risk Group and/or other subject matter experts to ensure that we take appropriate steps in connection with the supplier's actions. Reporting violations of the Supplier Code of Conduct is encouraged, and the Code includes access to and information about DTTL member firm ethics officers, to enable the reporting of information directly to those individuals.

Looking forward

In the financial year to 31 May 2020, we continued to monitor our existing controls. We also continued to focus on our supply chain, seeking to identify areas which would enable us to more effectively combat modern slavery. This included having our Procurement Group reflect on our vendors in higher risk countries and industries as well as looking at the basic ethical responsibilities which we expect suppliers to bear in order to do business with the DGSL Entities, including not using any form of involuntary labor and otherwise operating a fair and ethical workplace. To that end, as stated above, we adopted the Deloitte Supplier Code of Conduct. We also continue to implement contractual measures that will require suppliers in higher risk industries to adhere to more exacting standards. For example, in our contracts with computer hardware suppliers, we will require them to report to us data regarding their efforts to combat forced labor in their supply chain and corrective actions they have taken. Representatives from those suppliers must also meet annually with our Procurement Group as well as technology and sustainability professionals, to discuss such data and actions and work to further address any identified forced labor issues.

We will continue to carefully monitor our standards and benchmark our approach against the regulatory requirements and available guidance in this area.

This statement has been published in accordance with section 54 of the Act. It sets out the steps the DGSL Entities have taken to protect against slavery and human trafficking within our operations and within our supply chain. This statement applies for the financial year ending 31 May 2020.

This statement has been approved by the Board of Directors of Deloitte Global Services Limited and by the Board of Directors of Deloitte Global Services Holdings Limited.

Signed:



Sharon Thorne