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# Deloitte Modern Slavery and Human Trafficking Statement: FY22

## This statement covers:

- the structure of our firm
- steps we take in our core business to address modern slavery
- how we manage our thirdparty external supply chain
- our future focus

#### Introduction

The Modern Slavery Act 2015<sup>i</sup> (the "Act") is a significant step in confronting all forms of human trafficking and slavery. Deloitte has a strong commitment to maintaining a responsible business where, in this statement, we provide details on how our firm operates and the steps we have taken to ensure that modern slavery and human trafficking do not take place in our supply chains or any part of our business.

The Act has prompted us to review where the firm's business and supply chains are most at risk of encountering modern slavery. We have reconsidered our existing controls and processes regarding their effectiveness in guarding against Modern Slavery.

#### The structure of our firm

Deloitte<sup>ii</sup> is a leading professional services firm with over 3,000 partners, staff and contractors which are dedicated to; providing high-quality audit, tax, consulting and financial and risk advisory services to global, national, public and private sector clients spread across multiple industries.

We employ staff and use contractors to support our client facing teams and conduct our business operations. Facilities support roles (e.g. cleaning, maintenance and catering) are typically undertaken under a third party supply contract.

We are part of a globally connected network of independently owned Deloitte member firms in more than 150 countries, to whom we often subcontract elements of our client engagements or operations, for example to provide advice in relation to jurisdictions outside Ireland.

For the purpose of the Act, the Deloitte entities in our global network of member firms are part of our supply chain. However, the relationship we have with these firms is different from our relationships with third party external suppliers.

Each member firm adheres to globally consistent policies and governance processes. While we do not have control over how other member firms manage their own suppliers (each member firm manages their suppliers independently), all staff and partners in each member firm subscribe to the Global Principles of Business Conduct. These principles are based on our Shared Values (see below) which outline our commitment made by our people across all member firms. These reflect our core belief in ethics and integrity being fundamental and non-negotiable elements of our business. The Deloitte Global Principles of Business Conduct contains unequivocal statements around maintaining a "responsible supply chain" and refraining from conducting any illegal or unethical behaviour by our suppliers, contractors or alliance partners.

Further details on the structure of Deloitte are available in our latest <u>Transparency</u> <u>Report</u>.

## Steps we take in our core business to address Modern Slavery

## Deloitte's principles, values, and culture

Deloitte partners, staff and contractors are expected, and annually commit, to upholding Deloitte's Shared Values and must consistently demonstrate this commitment through their actions and behaviours. We expect all our people to:

- Lead the Way
- Serve with Integrity
- Take Care of Each Other
- Foster Inclusion
- Collaborate for Measurable Impact

Deloitte has a strong culture of integrity which is embedded throughout the business and is critical to ensuring that we retain the trust of our clients, our people, and our society. We strive to ensure this ethos exists throughout our business and aim to remind our people of this both through training and by leadership demonstrating their commitment to these values and requiring the same from all our people.

## Upholding our values within our business

We recognise that ethical dilemmas in business can be challenging and therefore believe it is important to help all our people make the right choices in their daily work, with a focus on ongoing training and support.

All our people, including contractors, are required to read NSE Code of Conduct. They must confirm they will adhere to these when they join Deloitte and annually thereafter. Both the NSE Code of Conduct and the Global Principles of Business Conduct contain unequivocal statements around maintaining a "responsible supply chain" and not condoning any illegal or unethical behaviour by our suppliers, contractors or alliance partners. The NSE Code of Conduct is adhered to within

Deloitte and we have an assigned Ethics Partner and a supporting team to embed the principles within the Code of Conduct into all our operations.

We expect and actively encourage our people to report any issues or concerns they may have relating to potential ethics violations. There is a confidential and independently managed "Speak Up" service for all staff and contractors. Whilst our people are increasingly using this option to report ethical concerns, to date there have been none related to modern slavery. In addition, our people are encouraged to raise concerns to whomever they feel most comfortable to ensure that unethical behaviour is tackled.

The Ethics Partner, who is independent of our procurement and business teams, is authorised to investigate any enquiries arising from the "Speak Up" service. Our employee relations team, part of our Human Resources function, supports employee in difficult work situations and interacts with the Ethics Partner should the situation require.

## Ensuring slavery does not take place in our supply chain

This statement sets out the measures Deloitte has taken during its financial year to ensure that slavery or human trafficking is not taking place in any supply chains or within Deloitte itself.

### Supply chain/Procurement

Deloitte recognises that the firm is exposed to a greater slavery and human trafficking risk when dealing with suppliers of products and services, particularly those who have operations and suppliers in other territories. However, Deloitte, and our suppliers, are not in industries with a high risk of modern slavery.

Deloitte's supply chains are primarily confined to Ireland and the UK, which both have a low risk of modern slavery and human trafficking. Nevertheless, we have identified areas we need to develop in conjunction with our supply chain, and a risk-based approach is under development.

This is to identify and review supply chains that fall within industries and/or countries that can carry a higher risk of modern slavery and human trafficking. Deloitte are developing additional measures to assist in the review and management of this area of risk.

If there are found to be breaches of the Act, then Deloitte will seek to support organisations in their efforts to comply with the applicable legislation. If it is established that an organisation is involved in slavery, human trafficking, forced or child labour then Deloitte will review the continuation of business with such organisations and retains the right to cease business with them. Deloitte is committed to acting with integrity and professionally in all its business dealings and relationships whether in Ireland, the UK or anywhere else.

#### **Looking forward**

Deloitte will continue to develop and implement the measures mentioned above in respect of our supply chain.

Our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2022 and beyond.

#### **Our impact**

Deloitte's policy is to comply with all applicable legislation and to conduct all business in an honest, ethical manner. This aim is implicit in Deloitte's policies and procedures, and we aim to ensure that neither modern slavery nor human trafficking supports the supply chain to our business.

For more information on how we are embedding responsible business throughout our firm, and making an impact for our people, our clients and society, please see our Impact Report.

Our Modern Slavery Statement This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps Deloitte Ireland LLP have taken to ensure slavery and human trafficking is not taking place in its supply chains or in any part of its business. The statement applies for the financial year ending 31 May 2023.

Signed:

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## Get in touch:

If you have questions in relation to our Modern Slavery Act Statement, please contact us online.

If you have any specific concerns about modern slavery or human trafficking taking place in any part of our business or supply chain, Please contact the Ethics Speak Up Line by clicking on link or by calling 1800 55 00 00 and then dialing 866-294-8693 after the prompt.

i. The (UK) Modern Slavery Act 2015 sets out that all bodies corporate and partnerships who (irrespective of where they are incorporated) (1) carry on business, or part of a business, in the UK supplying goods or services, and (2) have a consolidated global turnover of above £36 million (or Euro equivalent) per annum, are required to prepare and publish an annual "Slavery and Human Trafficking Statement". The Republic of Ireland has similar legislation in the form of the Criminal Law (Human Trafficking) (Amendment) Act 2013.

ii. Deloitte in this document refers to Deloitte Ireland LLP. Deloitte Ireland LLP is a limited liability partnership registered in Northern Ireland with registered number NC1499 and its registered office at 27-45 Great Victoria Street, Lincoln Building, Belfast, BT2 7SL, Northern Ireland.

# **Deloitte.**

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