



## Deloitte Modern Slavery and Human Trafficking Statement: FY22

In this year's statement we will share:

- How our firm is structured
- The steps we are taking to ensure slavery does not take place in our business
- The controls we have implemented to ensure slavery does not take place in our supply chain
- Our future plans

### Introduction

This statement covers Deloitte's financial year ending 31st May 2022 ("FY22") and represents the seventh year that we have produced a statement detailing the steps we have taken to ensure that modern slavery and human trafficking do not take place in our supply chain or any part of our business. We are pleased to once again share detail on the controls our firm has in place, the progress against the strategy goals we shared in last year's statement and our plans for the future. This statement supports our commitment to comply with both the spirit and letter of the Modern Slavery Act 2015 ("the Act").

As one of the UK's largest professional services firms we are aware of the positive impact that we can have by disseminating the high standards we set for ourselves throughout our supply chain. All of our Suppliers must adhere to our expectations and ensure similarly stringent controls are in place within their own business and supply chains. Whilst the risk of slavery within our business remains low, we continue to ensure strict controls are in place to maintain early warning detection and mitigation of any risks which may emerge.

<sup>1</sup> Deloitte in this document refers to Deloitte LLP and its UK subsidiaries. Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and registered office at 1 New Street Square, London, EC4A 3HQ. From 1 June 2017 Deloitte LLP is the United Kingdom affiliate of Deloitte NSE LLP, a member firm of Deloitte Touche Tohmatsu Limited. Each member firm in the network is a legally separate and independent entity. Please see [About Deloitte](#) to learn more about global network of member firms.

<sup>2</sup> Any reference to 'Suppliers' (with capitalised S) made in this Statement denotes third party external suppliers of Deloitte LLP and its UK subsidiaries.



### FY21 Summary:

- Utilised our Third Party Risk Management (“TPRM”) tool to support the screening of current and new Suppliers for slavery related risks;
- Continued providing training and discussion points for those working in roles that interact with our Suppliers;
- Reviewed which of our Suppliers operate in Higher Risk industries; and
- Engaged with high risk Suppliers to assess the controls they have put in place themselves.

### The structure of our firm

Deloitte is a leading professional services firm, with over 23,000 partners, employees and contractors, providing high-quality audit, tax, consulting, and financial and risk advisory services to global, national, and public and private sector companies and clients spread across multiple industries. We employ staff and use contractors to support our client facing teams and to conduct our business operations. Facilities support roles (e.g. cleaning, maintenance and catering) are typically undertaken by third party suppliers.

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 the UK.

For the purpose of the Act, the Deloitte entities in the global network of member firms are part of our supply chain. However, the relationships we have with these firms are different from our relationships with third party external suppliers. Each member firm adheres to many globally consistent policies and governance processes and whilst we do not have control over how other member firms manage their own suppliers, all staff and partners in all member firms subscribe to the [Global Principles of Business Conduct](#). These principles are based on our Shared Values (see below) and outline commitments made by our people across all member firms, reflecting our core belief that ethics and integrity are fundamental and non-negotiable elements of our business.

The Deloitte 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.

Given the differences between our relationship with other entities in the Deloitte network and our relationships with third party external suppliers, we have excluded Deloitte member firms from the

definition of “Suppliers” for the rest of this statement. Our focus for the purpose of this statement will therefore be on our core business and third party external Suppliers.

### How we ensure that Modern Slavery does not take place in our business

#### Our shared values and culture

We take the obligation to act honestly and responsibly very seriously, and believe it is a fundamental part of maintaining our reputation with our clients, our people and society. Deloitte’s Shared Values are enshrined in the ethos of our firm and represent a key cornerstone of our commitment to being a responsible business. Our Shared Values underline our expectations that anyone working for, or on behalf, of Deloitte must:

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

On an annual basis all Deloitte partners, employees and contractors commit to upholding these Shared Values.

#### Embedding our Shared Values within our business

#### Code of Conduct

Each year, annual compliance activities mandate that all Deloitte partners, employees and contractors read and comply with the Deloitte NSE Code of Conduct which incorporates our Global Principles of Business Conduct. Within these documents are the values and standards to which we hold our own business, people and suppliers responsible for maintaining. After reading the Code of Conduct partners, employees and contractors confirm that they will uphold the values contained within the Code.

#### Integrity Imperative

FY22 was the fifth anniversary of our global Integrity Imperative initiative. Through the activities associated with the Integrity Imperative initiative Deloitte employees completed an e-learning course entitled

Speak Up for Values whilst all new Deloitte partners participated in a mandatory training course, Leading with Integrity.

### Senior Ownership

We are proud of the culture of responsibility we have built within our business. To ensure our values remain robustly upheld we require our leaders to take ownership of encouraging these values throughout the firm. Our Ethics Partner is responsible for ensuring firm-wide compliance with the Deloitte NSE Code of Conduct described above.

### Reporting instances of unethical behaviour

We encourage our people to report any concerns regarding breaches of our Shared Values or Code of Conduct to whomever in our business they feel most comfortable approaching. This could be a line manager, a Respect and Inclusion advisor or a trusted colleague. It may be possible for the issue to be resolved locally. However, more serious matters may be referred to our Ethics and/or Employee Relations teams, and dealt with as described below.

Our partners, employees, contractors and Suppliers all have access to our confidential "Speak Up" line which is hosted by an external third party, although reported issues are managed by our Ethics team. While many reporters feel able to identify themselves, concerns may also be reported anonymously. The Speak Up line may be used for inquiries or to report any misconduct, including suspected violations of our Shared Values, which would include any suspected instances involving slavery. Whenever such reports are made we are committed to a timely and appropriate investigation without fear of reprisal and our Employee Relations and Partner Matters teams support our people in difficult work situations.

To date we have received no reports of instances or suspected instances of modern slavery through either of the methods described above.

### Our commitment to a fair wage for all

We are proud to continue to be recognised as an accredited Living Wage employer. This means that anyone who works in a role that

is primarily located at one of our offices will be paid the Living Wage (as determined by the Living Wage Foundation) or the London Living Wage in the capital. This applies to both Deloitte employees and contractors as well as anyone who works for a third party delivering on-site services. This commitment to the Living Wage represents another key control in ensuring slavery does not take place within our business or supply chain.

### Ensuring Modern Slavery does not take place in our supply chain

Our reputation is synonymous with the quality of services we provide to our clients and the companies we work with. To maintain these standards we operate a broad, robust, global supply chain<sup>3</sup> which provides us with access to the highest quality goods and services from market leading Suppliers. The broad scope of our supply chain brings with it challenges related to the potential for slavery in higher risk industries and geographies.

### Sustainable Procurement Policy

During FY22 we issued an updated [Sustainable Procurement Policy](#) which is publicly available on our internet site. All Suppliers are expected to comply with this Policy as a pre-requisite for working with Deloitte. This document makes it clear that Suppliers must:

- Comply with the International Labour Organization (ILO) principles in respect to human rights and conditions of employment
- Ensure that slavery, human trafficking, and corruption is not taking place in any of their supply chains and in any part of their business
- Pay the Living Wage as set by the Living Wage Foundation (at a minimum) to UK based employees, and ensure their contractors do likewise
- Adhere to our [Global Supplier Code of Conduct](#).

Our Sustainable Procurement Policy applies to all Suppliers, regardless of where they are located or the industry in which they operate. The Policy is incorporated into our standard contractual terms of business and any breach of the

expectations set out in this Policy would be considered a material breach of contract.

### Procurement process

Our standard sourcing template, which is released to Suppliers replying to RFP activities, includes a number of questions related to modern slavery. Through these questions we investigate the controls each potential Supplier has put in place to ensure that slavery does not take place in their business and supply chain.

### Third Party Risk Management Platform

We have described the implementation of our Third Party Risk Management platform ("TPRM") in previous issues of our modern slavery statement. TPRM identifies, assesses, manages and monitors the risks inherent in our procurement of goods and services from Suppliers and is a mandatory step for any Supplier entering Deloitte's supply chain. One of the risk domains which forms part of TPRM is Modern Slavery. This risk domain is designed specifically to ensure that supply chain risks associated with modern slavery are identified and mitigated. During FY22 TPRM assessed 898 Suppliers; 20 were flagged for detailed risk analysis after triggering the modern slavery risk domain. No instances of slavery, or conditions where slavery may arise, were identified.

<sup>3</sup>The steps outlined in this statement relate to Suppliers contracted and/or paid through our procurement team, representing the vast majority of our third party supplier spend. Incidental and/or low value goods and services may be provided to us outside of this channel from time to time.

### Suppliers in higher risk industries

Around 2.5% of our third-party spend during FY22 was with Suppliers in higher risk industries<sup>4</sup>. Industries that we consider to be higher risk include:

- Agriculture
- AV equipment
- Business meals
- Cafeteria services
- Catering agencies
- Construction management
- Courier services
- Engineering
- Facilities management
- Furniture
- IT consumables
- IT equipment
- IT peripherals
- IT server infrastructure
- IT storage infrastructure
- Laptops
- Meetings & events
- Meeting facilities
- Office supplies
- Outside print services
- Paper
- Print
- Print hardware
- Real estate
- Stationery
- Steel
- Taxis
- Textiles

We have a longstanding commitment to work with Suppliers in higher risk industries to confirm that they comply with our standards to ensure that modern slavery does not take place in our supply chains. All Suppliers operating in higher risk industries that were paid over £50,000 by Deloitte during FY22 were asked to complete a questionnaire. This questionnaire asked the Supplier to confirm that they complied with our Sustainable Procurement Policy, had not identified any slavery related issues in their business or supply chain and had not been convicted of any slavery related offences.

### FY22 supply chain summary

During FY22 no instances of slavery in our supply chain were identified. Whilst we are encouraged by these results, we remain vigilant to the threat of slavery and will continue to maintain our approach of pro-actively working with Suppliers through the measures described above. A breach of our Sustainable Procurement Policy, including any violation of our expectations that Suppliers must ensure their business and supply chain remain slavery free, would be treated as a material breach of contract. Dependent upon the severity of the incident we would consider actions ranging from working with a Supplier to ensure that relatively minor issues identified are remediated up to termination of contract and reporting to relevant authorities if any instance of slavery was identified.

### Training for key team members

Our people in internal Procurement and Office of General Counsel (legal) teams interact most regularly with Suppliers and are a key line of defence against slavery entering our supply chain. It is important that these teams are trained and empowered to identify and raise concerns around potential conditions which may result in slavery in our supply chain. We provided training to these teams during FY22 to ensure they have the skills necessary to:

- lead conversations with our Suppliers to explore and comment on the controls they have in place;
- identify potentially non-compliant Suppliers and to escalate potential concerns appropriately; and
- feel empowered to refuse to enter into (or to terminate) Supplier contracts if there are any concerns or insufficient evidence of steps being taken commensurate with the risk of the industry in which they operate.

### FY23 plans (1 June 2022 to 31 May 2022)

As discussed in this statement, we consider the risk of slavery within our business to be low and our robust supply chain controls have identified no slavery related issues during FY22. However, we understand the imperative to maintain focus and continually review the steps we take to ensure we can maintain a slavery free business and supply chain.

### During FY22 we will also continue to:

- Train Deloitte's Procurement and Office of General Counsel teams to ensure they are equipped with the skills required to identify and challenge any risks relating to modern slavery.
- Work with Suppliers in higher risk industries to ensure that they are compliant with our Sustainable Procurement Policy.
- Screen all new and existing Suppliers through TPRM.
- Include modern slavery related questions in our sourcing activities.
- Ensure all Deloitte partners, employees and contractors complete our mandatory ethics training courses so that our Shared Values and the Deloitte Code of Conduct remain as visible influences on the behaviour and actions of our people.

### Additional activities for FY23:

As part of our engagement with higher risk Suppliers we will investigate demand for a training session where we share the expectations we have of our supply chain. We would also use this training session as an opportunity to share the best practice controls we have implemented in our business and supply chain.

Also, during FY23 we will work with our internal communications department to publicise our Modern Slavery Statement on our intranet site and other relevant channels.

<sup>4</sup>We have identified high risk industries in our supply chain based on the Global Estimates of Modern Slavery report published by the International Labour Organization in 2017

Finally, we are working with our TPRM team to review the modern slavery risk domain and the questions which are asked of Suppliers deemed to be higher risk. The purpose of this activity is to ensure we continue to apply an approach based on industry best practice in the evaluation of modern slavery risks in our supply chain.

### Responsibility and additional information

Deloitte's UK Managing Partner, Stephen Griggs continues to be responsible for Deloitte's compliance with the Act, although that responsibility will transfer to Philip Mills, our current Global Tax & Legal Leader from 1 June 2023.

### Other resources

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 [Annual Review](#).

Our Modern Slavery Statement has been published in accordance with section 54 of the Act. It sets out the steps Deloitte LLP and its UK subsidiaries (collectively "Deloitte") have taken to ensure slavery and human trafficking are not taking place in its supply chains or in any part of its business. The statement applies to the financial year ending 31 May 2022.

This statement has been approved by the designated members of Deloitte LLP on behalf of Deloitte.

Signed



**Stephen Griggs**

UK Managing Partner  
30 November 2022

### 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 on 0808 234 1778 or at the [link](#).

# Deloitte.

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