Introduction

The UK Modern Slavery Act 2015 (the "Act") addresses modern slavery and human trafficking in internal and external supply chains, both in the UK and the rest of the world. The Deloitte organization has a strong commitment to being a responsible business, and this statement provides details of how we operate and the steps we have taken to address and prevent modern slavery and human trafficking 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 deloitte.com/about to learn more about the Deloitte organization.

Certain of the central network entities are subject to the Act, namely Deloitte Global Services Holdings Limited (DGSHL) and Deloitte Global Services Limited (DGSL) and certain of their subsidiaries that provide internal services to Deloitte member firms. DTTL itself is not subject to the Act because it does not carry on any trading activities in the UK and does not meet the turnover threshold contained in the Act.

DGSHL, DGSL and other entities that are directly or indirectly wholly-owned or controlled by 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**" refers to individuals employed by one of the DGSL Entities or providing services on their behalf.

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 involving 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 Code") and DTTL Code of Ethics and Professional Conduct (the "DTTL Code of Ethics"). The Global Code 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, under any circumstances, any illegal or unethical behavior by our suppliers or contractors.

The Global Code reflects 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 Code. DGSL Personnel must confirm on an annual basis that they will adhere to the Global Code and the DTTL Code of Ethics and/or their 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:

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

To support adherence to the Global Code, DTTL Code of Ethics, and Shared Values, DGSL Personnel also undertake ethics training (at onboarding; biennially thereafter; and at promotion to Manager, Senior Manager, and Managing Director) and receive communications designed to support their understanding of our expectations and promote ethical leadership.

Further, Deloitte's Human Rights Statement affirms our commitments and approach to respecting human rights within the Deloitte organization. Those human rights include:

- Employment and worker's rights
- Equality and non-discriminatory treatment

Deloitte's Human Rights Statement is publicly available on the <u>Deloitte.com</u> website and should be read alongside this Modern Slavery Act statement.

Finally, we expect and actively encourage DGSL Personnel to report any issues or concerns they may have about potential ethics violations directly to Ethics or Talent teams; via managers, team leaders or partners (and equivalents); or using our third-party ethics helpline *Deloitte Speak Up*. This confidential and independently managed helpline is available by phone and through a secure website and allows for anonymous reporting. The DTTL Global Chief Ethics Officer or their delegate responds to any enquiries and works alongside our Talent and Legal leaders to investigate any reports arising from *Deloitte Speak Up*.

Steps we take in our supply chain to address modern slavery

Deloitte organization supply chain

On occasion, we contract with Deloitte member firms to provide us with specialized goods. Those member firms and their personnel are bound to the same Global Code and Shared Values as the DGSL Entities and the DGSL Personnel. In addition, each member firm builds on the Global Code 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 Code and/or the local ethics code. Like the DGSL Entities, each member firm adheres to the Shared Values.

The Deloitte organization further sets forth its resolve for ethical business conduct in its Commitment to Responsible Business Practices statement, which is publicly available on the

<u>Deloitte.com</u> website and should be read alongside this Modern Slavery Act statement. The Commitment to Responsible Business Practices sets forth the responsible 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

We take various steps to reduce the risk of modern slavery and human trafficking in the external supply chain for DGSL Entities and Deloitte member firms. Our Procurement organization enters into contracts with suppliers throughout the world, which cover the vast majority of our purchases. We maintain a database of those contracts, allowing us to quickly identify the geographical location of a supplier, terms to which a supplier is bound, and the types of goods it provides. If any questions arise regarding the conduct of a supplier, we can swiftly react to enforce relevant contract terms.

Our supplier contracts require that suppliers take efforts to reduce the risk of modern slavery and human trafficking in their operations and supply chains. Specifically, our supplier contracts require that (i) suppliers comply with the International Labour Organization Principles in respect to human rights and conditions of employment; (ii) suppliers publicly report annually on their efforts to minimize slavery, including forced labor and child labor, in their operations and supply chains; and (iii) that upon our request, a supplier's procurement executive meet with leadership from our Corporate Responsibility/Sustainability and Global Procurement groups to discuss sustainability issues in supplier's operations and supply chain, including supplier's actions to minimize modern slavery. For higher risk suppliers, such as those that supply technology hardware, we expect that those suppliers also maintain full membership in good standing in the Responsible Business Alliance (RBA) (currently www.responsiblebusiness.org). The RBA expects that its members treat their workforce humanely and with dignity and respect and prohibits its members from using any form of modern slavery, including forced labor and child labor, in their workforce.

We also maintain a Supplier Code of Conduct, which outlines minimum expectations for suppliers to any entity within the Deloitte organization, including Deloitte Global. We provide suppliers with the Supplier Code of Conduct during the Request for Proposal process, and upon execution of a contract. The Supplier Code of Conduct is also publicly available on the <u>Deloitte.com</u> website and should be read alongside this Modern Slavery Act statement.

The Supplier Code of Conduct includes, among other requirements, 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 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 organization would also engage with our Chief Ethics Officer, General Counsel, Risk Group and/or other subject matter experts to take appropriate steps in connection with the supplier's actions. Reporting violations of the Supplier Code of Conduct is encouraged, and the Supplier Code of Conduct includes access to and information about DTTL member firm ethics officers, to enable the reporting of information directly to those individuals or through the Deloitte.com website.

Looking forward

In the financial year to 31 May 2025, we will continue to focus on the legal responsibilities which we expect suppliers to bear in order to do business with Deloitte Global, and we will continue seeking to identify additional areas which would enable us to combat modern slavery more effectively. We will also continue to implement contractual measures with our suppliers to reduce modern slavery in our supply chains. 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 2024.

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:

Anna Marks

Chair