

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. Within the DGSHL Group (defined below), we have 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 mitigate the risk of modern slavery and human trafficking in our supply chains or any part of our businesses during the period of our financial year ended 31 May 2025.

Background; About Deloitte

“Deloitte” is the brand under which tens of thousands of dedicated professionals in independent member firms (or their respective related entities) throughout the world collaborate to provide a broad range of professional services to clients. These member firms are members of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“**DTTL**”). The member firms, their respective related entities, DTTL, and the other central network entities (collectively referred to as the “**Deloitte network**”) are legally separate and independent, cannot obligate or bind any other, and are liable only for their own acts and omissions and not those of any other.

This statement covers certain central network entities, namely Deloitte Global Services Holdings Limited (“**DGSHL**”) and its direct and indirect subsidiaries (the “**DGSHL Group**”). The principal activity of the DGSHL Group is to provide services to the member firms (or their respective related entities) to further the international alignment, cooperation, and cohesion among the member firms. The DGSHL Group does not provide services to out-of-network customers or clients.

References in this statement to “we”, “us”, and “our” are to the DGSHL Group, and do not refer to other entities within the Deloitte network. References in this statement to “**DGSHL Personnel**” refers to individuals employed by one of the entities in the DGSHL Group or providing services on their behalf.

Steps we take within the DGSHL Group to address modern slavery and human trafficking

We review where our businesses and supply chains are most at risk of involving modern slavery and human trafficking. We have considered our existing controls and processes and their effectiveness in guarding against modern slavery and human trafficking in our own operations.

DGSHL Personnel are required to abide by Deloitte’s Global Principles of Business Conduct (the “**Global Code**”) and DTTL Code of Ethics and Professional Conduct (the “**DTTL Code of Ethics**”) as well as their member firm code of ethics, for those who provide services on behalf of the DGSHL Group.

The Global Code reflects a core belief that ethics and integrity are both fundamental and non-negotiable elements of our professional lives. One of the Global Code’s key principles is maintaining a “Responsible supply chain” and not condoning any illegal or unethical behavior by suppliers, contractors, alliance partners or technology relationships. Building on the Global Code, the DTTL Code of Ethics includes information on resources and guidance to enable DGSHL Personnel to make professional choices that are consistent with the Global Code. DGSHL Personnel must confirm on an annual basis that they will adhere to the Global Code and,

depending on the nature of their employment, either the DTTL Code of Ethics or local member firm codes of ethics.

In addition to the above, DGSHL 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; and
- collaborate for measurable impact.

To support adherence to the Global Code, DTTL Code of Ethics, and Shared Values, DGSHL 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 network. Those human rights include:

- employment and workers' rights; and
- equal opportunity and non-discriminatory treatment.

Deloitte's Human Rights Statement is publicly available on the [Deloitte.com](https://www.deloitte.com) website and should be read alongside this Modern Slavery Act statement. We expect organisations with which we have business relationships to uphold our commitment to human rights.

The Deloitte network further sets forth its resolve for ethical business conduct in its Commitment to Responsible Business Practices statement, which is publicly available on the [Deloitte.com](https://www.deloitte.com) 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.

Finally, we expect and actively encourage DGSHL Personnel to report any issues or concerns they may have about potential ethics violations directly to the Ethics and/or Talent teams; via managers, team leaders or managing directors (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 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* that concern the DGSHL Group.

Steps we take in our supply chain to address modern slavery and human trafficking

Within the DGSHL Group, our supply chain consists of other Deloitte entities in the Deloitte network ("**Deloitte network supply chain**") and entities external to the Deloitte network ("**Out-of-network supply chain**").

Deloitte network supply chain

We contract with Deloitte member firms (or their related entities) to provide us with services and access to facilities and equipment. Those member firms and their related entities and personnel are bound to the same Global Code, Shared Values, Human Rights Statement, and Commitment to Responsible Business Practices as the DGSHL Group and the DGSHL 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 concerning their firm and/or their local ethics code.

Out-of-network supply chain

We take various steps to mitigate the risk of modern slavery and human trafficking in our out-of-network supply chain. Our Procurement group is primarily responsible for entering into contracts with out-of-network suppliers throughout the world and those contracts require that suppliers take efforts to mitigate the risk of modern slavery and human trafficking in their operations and supply chains.

Specifically, our standard supplier terms require that (i) suppliers comply with the International Labour Organization Principles with respect to human rights and conditions of employment; (ii) suppliers report on their efforts to mitigate the risks of slavery, including forced labor and child labor, in their operations and supply chains; and (iii) that upon our request, a supplier's executive meet with leadership from our Sustainability and Procurement groups to discuss their supplier's actions to mitigate the risks of modern slavery and human trafficking. For technology hardware suppliers, standard contract language also includes an expectation of 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 network, including the DGSHL Group. 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 Deloitte.com 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 personnel's 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. Importantly, suppliers are expected to apply standards comparable to those set forth in the Supplier Code of Conduct in their own supply chains.

The Supplier Code of Conduct provides that violations should be reported upon discovery by the supplier to primary contacts within the DGSHL Group or the Global Chief Ethics Officer. Any violation may result in asking the supplier to audit its own organisation or its supply chain and to report on its findings; recommending or requiring corrective action plans; or making the supplier

a nonpreferred supplier. Where appropriate, 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 the Global Chief Ethics Officer, Global General Counsel, Global Chief Risk Officer and/or other subject matter specialists to take appropriate steps in connection with the supplier's actions.

Looking forward

In the financial year to 31 May 2026, we will continue to focus on the legal responsibilities which we expect suppliers to bear in order to do business with us, and we will continue seeking to identify potential opportunities to help address and mitigate the risk of modern slavery and human trafficking. We will also continue to implement contractual measures with our suppliers aimed at mitigating the risk of modern slavery and human trafficking 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 DGSHL Group has taken to protect against slavery and human trafficking within its operations and within its supply chain. This statement applies for the financial year ended 31 May 2025.

This statement has been approved by the Board of Directors of DGSHL.

Signed:



Anna Marks
Chair