



Deloitte Modern Slavery and Human Trafficking Statement: FY24

In this year's statement we share:

- The structure of our firm
- The steps we take to ensure slavery does not take place in our business
- Our supply chain controls to ensure that the goods and services we buy remain slavery free
- Our future plans

Introduction

We are pleased to share the ninth edition of our annual modern slavery and human trafficking statement. In this document we outline the important steps we took to ensure that slavery and human trafficking did not take place in our supply chain or any part of our business during the period of Deloitte's¹ financial year ending 31st May 2024 ("FY24"). We will detail the key checks and balances our firm has implemented alongside the progress we have made against our strategy to continue to evolve and improve these controls. Deloitte is committed to complying with both the spirit and letter of the Modern Slavery Act 2015 ("the Act") and this statement acts as testament to that commitment.

We are one of the largest professional services firms in the UK and that gives us an important opportunity to do good through our supply chain. We understand the responsibility that comes with that opportunity and the positive impact that we can have by sharing the high expectations we set for ourselves, as evidenced by the controls we implement to ensure slavery does not take place within our business or our supply chain. All of our Suppliers² must adhere to these 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.

¹ 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.

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



FY24 Summary:

- Evaluated current and new Suppliers for slavery related risks - screening over 1,000 third parties through our Third-Party Risk Management ("TPRM") process;
- Provided refreshed training and discussion points for those working in roles that interact with our Suppliers;
- Identified the Suppliers operating 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 27,000 partners, employees, and contractors, providing a broad range of leading professional 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 operating 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

Our purpose is central to our ambition. It's reflected in our values, the investment we make in our people and our commitment to equality and inclusion. It shows in our work with clients and the entities we audit, as well as our support for social enterprises and charity partners.

Our Shared Values lay out the behaviour and actions we expect everyone working for, or on behalf of, Deloitte to exhibit. Our Shared Values are:

- 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 formally commit to upholding these Shared Values.

Embedding our Shared Values within our business

Code of Conduct

Deloitte's NSE³ Code of Conduct, which incorporates our [Global Principles of Business](#), documents the values that we expect of our business, the people representing us, and our Suppliers to uphold. On an annual basis, including in FY24, all Deloitte partners, employees and contractors must read and confirm that they will comply with the Deloitte NSE Code of Conduct as part of our regular compliance activities.

Doing the right thing

In FY24 we continued to deliver training on Ethics and our Shared Values to all our people. Most training took the form of e-learning, but we continued our series of interactive Ethics Roadshows where we talked to our people in a transparent manner about Ethics at Deloitte. Our objective is to increase understanding of the Speak Up processes raising awareness and confidence to use it—if our people

³ Deloitte, as an affiliate of Deloitte NSE LLP, is a party to the NSE Code of Conduct.

see wrongdoing of any type, we want them to report it in full confidence that the firm will take action. All new Deloitte partners continue to participate in a mandatory training course, Leading with Integrity. This training ensures that our leaders are aware of their responsibility to be the role models for our Shared Values. Further to this, there is continued focus on the importance of culture within the firm and this is supported by a range of activities. For our people entering Deloitte at the outset of their careers, we delivered engaging ethics sessions to a large cohort of our early years' new joiners. This allows us to emphasise the importance of ethics to our people from the very start of their journey with us and in FY25 we will extend these sessions to the entirety of our early years' new joiners.

Business-wide modern slavery awareness campaign—"Can you spot it?"

In October 2023, timed to align with Anti-Slavery Week, we ran a major campaign across our business highlighting the actions all our people can take to recognise and raise awareness of modern slavery. The campaign outlined that modern slavery was very much an issue that afflicts the UK and every country around the world, as well as being a significant issue that we should be alert to in our business, our clients' businesses, and our supply chain. Through the campaign we shared information on what modern slavery is, how it may present itself, and contact details, both internal and external, for reporting any concerns. The campaign included a short film which subsequently won a number of awards⁴.

Senior ownership

Responsibility for ensuring firm wide compliance with Deloitte's NSE Code of Conduct (described above) rests with our Ethics Partner. This is part of our commitment to ensuring that a culture of responsibility is disseminated throughout our business, starting at the very top with our leadership.

Reporting instances of unethical behaviour

If our partners, employees, contractors, and Suppliers witness, or believe they have experienced unethical behaviour, there are multiple routes to report their concerns:

- Our people are encouraged to report any concerns regarding breaches of our Shared Values or NSE 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.
- More serious matters may be referred to our Ethics and/or Employee Relations teams, and dealt with as described below.
- Deloitte's "Speak Up" line is a confidential phoneline hosted by an external third-party, with reported issues handled by our Ethics team. This line is made available to our partners, employees, contractors, and Suppliers, and while the majority of reporters chose to identify themselves, the facility to report concerns anonymously is available. There is also a link to Speak Up on our external website, and on occasion we receive reports from third parties through this route.

All reports are investigated in a timely and appropriate manner. We are particularly keen to ensure that those who fear retaliation are supported appropriately. In addition, our Employee Relations and Partner Matters teams are available to support our people in difficult work situations.

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

A fair wage for all

We are proud to be an accredited Living Wage Employer, certified by the Living Wage Foundation. To maintain this status we ensure that all of our employees and anyone who works in a third-party contractor role 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. 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

To ensure that we continue to provide our clients with services of the highest quality, we leverage a vast global network of market leading Suppliers who constitute our supply chain⁵. We know that the size, complexity, and geographic diversity of our supply chain brings both opportunities and challenges, particularly when we procure goods or services emanating from industries and locations which are at higher risk of modern slavery and human trafficking.

Sustainable Procurement Policy

All Suppliers are expected to comply with our [Sustainable Procurement 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](#).

Whilst the Sustainable Procurement Policy is issued by Deloitte in the UK, it is applicable to all Suppliers regardless of where they are located. 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.

⁴ Silver medallist at the Cannes Corporate Media & TV Awards, Category A7: Corporate Social Responsibility. Bronze medallist in the Social Good & Employee Engagement categories at the New York Festivals TV & Film awards.

⁵ 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.

Procurement process

To ensure consistency in our procurement activities we leverage a standard sourcing template for Request for Proposals. This document asks prospective Suppliers to answer a number of questions relating to modern slavery. Through investigating the responses to these questions, we are able to evaluate the controls potential Suppliers have in place to ensure that slavery does not take place in their business and supply chain before they become part of *our* supply chain.

Third Party Risk Management Platform

Our Third Party Risk Management Platform ("TPRM") is a fundamental control to ensure slavery and human trafficking do not take place in our supply chain. 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 and Human Rights. This risk domain is designed specifically to ensure that supply chain risks associated with modern slavery are identified and mitigated. During FY24 we assessed 1,111 third parties through our TPRM process with 75 flagged for detailed risk analysis after triggering the modern slavery risk domain (in the previous year this was 41). No instances of slavery, or conditions where slavery might arise, were identified.

Suppliers in higher risk industries

Around 3.5% of our third-party spend in FY24 was with Suppliers in higher risk industries⁶, which is broadly consistent with the previous financial year. 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 FY24 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.

FY24 supply chain summary

No instances of slavery in our supply chain were identified during FY24. Whilst this is consistent with findings in previous financial years, we are not complacent to the risk of slavery in our supply chain and will continue to use the controls above to ensure we have robust measures to keep our supply chain slavery free.

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 provide training to these teams to ensure they have the skills necessary to:

- i. lead conversations with our Suppliers to explore and comment on the controls they have in place;
- ii. identify potentially non-compliant Suppliers and to escalate potential concerns appropriately; and
- iii. 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.

During FY25 we will 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 NSE Code of Conduct remain as visible influences on the behaviour and actions of our people.

⁶ 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

Responsibility and additional information

As of 1st June 2024, Deloitte's UK Managing Partner, Philip Mills is responsible for Deloitte's compliance with the Act.

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 2024.

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

Signed



Philip Mills

UK Managing Partner
30 November 2024

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 at the link or by calling 0808 234 1778.

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