

# Modern Slavery Statement 2020

Grant Thornton is committed to working towards the eradication of modern slavery in all its forms.

We have a responsibility to respect and uphold human rights in our operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy instances of modern slavery wherever it is found.

This Grant Thornton Modern Slavery Statement is given by Grant Thornton Australia Limited (ABN 41 127 556 389) and covers its subsidiaries and related entities.

This Statement has been prepared in accordance with the requirements in the Modern Slavery Act 2018 (Cth) for the reporting period 1 July 2019 to 30 June 2020.



## Our purpose and commitment

We care for our people, clients and communities and support them to thrive. Making a commitment to play our part in eradicating Modern Slavery is the critical first step in our Modern Slavery program. This commitment is not a one-time exercise. It needs to be continually revisited and renewed. Our 1200+ people working in offices in Sydney, Brisbane, Cairns, Perth, Adelaide and Melbourne are at the centre of this commitment.

We know there is no easy solution or one course of action that will easily safeguard against modern slavery. It is an ongoing and systemic issue which will require our organisation to continually test and review our systems and relationships.

This Statement outlines the actions we are taking to prevent, mitigate and remedy instances of modern slavery, as well as our forward commitments to understand and address modern slavery risks in our operations and supply chains.

## Our structure and operations

Grant Thornton Australia Ltd (Grant Thornton) is an unlisted public company with wholly owned special purpose subsidiaries. All shareholders are associated investment entities of the Partners of Grant Thornton Australia. There are no outside shareholders.

We are a professional services firm providing audit, tax and advisory services to dynamic businesses primarily in Australia, but also overseas. We are committed to being responsive to our clients' needs and to working with them to achieve the goals and aspirations they have for themselves and their organisations.

Our services include:

- Audit
- Tax
- Private Advisory
- Financial Advisory, and
- Consulting

Grant Thornton Australia Limited is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership and are each a separate legal entity.

Grant Thornton Australia has access to the expertise of fellow Grant Thornton professionals in over 135 countries. We are active on Grant Thornton Global Committees and work to influence these committees to promote continuous improvement in risk management, compliance and quality across the network.

## Our Supply Chain

As a professional services provider our activities are primarily focussed on the provision of accounting, advisory and consulting services to our clients. In order to provide these services and support our operations we utilise various products and services.

Through the process of mapping out our supply chain we know that the majority of our suppliers are registered and operate in Australia.

Key areas of supply include:

### Technology

Including computer hardware, computer software, cloud services, virtual data room services, virtual document exchange services, printers, audio/visual equipment and services, mobile phones, and wide area network and internet connection.

### Professional services

Including external legal, tax and auditing, marketing and consulting, education and professional development services.

### Property related

Covering premises leasing, our office building upgrades and fit outs, workspace design, office furniture and facilities, property maintenance, property insurances, and utilities.

### Operations

Including document management and storage, stationery, cleaning, security, professional insurances, subscriptions, courier and postal services.

### Business travel

Including air and ground transport and accommodation.

### Hospitality

Including events management and in-house and external event catering.

# Assessment of our Modern Slavery Risks

## Grant Thornton's Operations

We commenced our Modern Slavery program by looking at our operations and, in particular, by reviewing our policies to make sure they were aligned with our risk management methodology for identifying and dealing with modern slavery risks.

Existing policies that form the basis of our efforts to create a safe, inclusive and fair workplace; and promote our social procurement program include:

- Code of Conduct
- Equal Employment Opportunity Policy
- Gifts and Hospitality and Anti-Bribery and Corruption Policy
- Grievance and Disputes Handling Policy for employees
- Talent Sourcing and Selection Policy
- Whistleblower Policy
- Workplace Health and Safety Policy

We recognise that our talent recruitment and selection policies play an important role in managing modern slavery risk in our organisation. We also considered the policies and procedures which promote and facilitate the reporting of suspected or actual instances of modern slavery. People from within and from outside the firm should be able to bring Modern Slavery risks that they identify, or suspect are occurring, to the attention of Grant Thornton personnel who are trained and have the authority to act on the reports.

While, as providers of professional services, our operations inherently carry a low risk of modern slavery, we cannot be complacent and will continue to review and re-assess our residual risk in this space to make sure that our modern slavery risk controls – including our policies, procedures and reporting protocols – are operating as intended.

## Grant Thornton's Supply Chain

We commenced the process of assessing the risk of Modern Slavery in our supply chains by initiating a desktop review of current suppliers. Our review of Tier 1 suppliers is ongoing.

Our modern slavery risk assessment rates each supplier as high, medium, or low risk of modern slavery against the following criteria:

- product or service supplied
- industry the supplier operates in
- jurisdiction (country of registration)
- countries where the supplier has operations
- workforce and the possibility/probability that the workforce contains vulnerable workers

For each of these we assess the modern slavery risks that attach to each criteria and rate the supplier accordingly.

Finally we look at whether or not there are any modern slavery risks associated with the particular supplier including any known history of non-compliance with laws or regulations related to modern slavery, or evidence of human rights abuses.

Based on this desktop assessment we have identified the following supplier groups who carry an inherently higher risk of modern slavery.

## Technology suppliers

Technology suppliers covers hardware supply including mobile phones, coding, virtual services and supply involving cloud services, particularly those product and service types where suppliers may utilise a high proportion of outsourced workers, or where product inputs may be sourced from industries or countries with a known risk of Modern Slavery.

Key risk areas for technology suppliers include:

- Product – sourcing manufacturing inputs and raw materials
- Industries – certain industries carry an inherently higher risk of modern slavery
- Countries of operation – whether a country is known to have a higher risk for modern slavery (particularly when combined with the risk assessment result for product and industry)
- Workers – prevalence of the use of outsourced workers

## Operations and Hospitality suppliers

Operations and Hospitality suppliers which includes cleaning, security, courier and catering and accommodation services, especially where the services might be procured indirectly and the workforce generally includes a higher proportion of migrant workers and those paid at or close to the minimum wage (vulnerable workers).

Key risk areas for Operations and Hospitality include:

- Industry - certain industries carry an inherently higher risk of modern slavery
- Workers – is any part of the workforce likely to include vulnerable workers and where, due to the indirect nature of supply, there is less transparency of the workforce



## Actions to assess and address Modern Slavery Risks

In our first reporting period we focused on researching and setting up our modern slavery program including factoring modern slavery risk into our Supplier Risk Assessments.

- We prepared our Modern Slavery Compliance Plan and commenced drafting materials to support our program.
- Modern slavery training was provided to those directly involved in procuring supply and conducting Supplier Risk Assessments.
- We liaised with teams in the business to gain an understanding of particular areas in our operations which might require deeper investigation and engaged with those teams who are integral to the effective development and ongoing operation of the modern slavery program.
- We reviewed our policies and our Code of Conduct and updated them as necessary.
- We collated our supplier list and determined the risk criteria (product, industry, jurisdiction, operations, workers and supplier specific) that would be applied to each.
- We prepared our Supplier Modern Slavery Questionnaire as an e-form which is used to obtain further, more detailed information from Medium or High rated suppliers as part of our modern slavery risk assessment process.
- We commenced rating our existing Tier 1 suppliers for each of the criteria and have highlighted those where we may consider conducting further due diligence, particularly as regards their supply chain (our Tier 2 and subsequent tier suppliers).

As at the date of this statement we have identified no instances of modern slavery in our operations or supply chain and so have not been required to take steps to mitigate risk or undertake remedial action.

## Assessing the effectiveness of our actions

While our focus in our first reporting period was to set up a robust and effective modern slavery program, our attention now moves to assessing how effectively the program is operating. We intend to adopt similar processes for assessing the effectiveness of our modern slavery program as we do for our enterprise risk management and compliance frameworks.

Our ongoing review process will continue to monitor the outputs from the various reporting mechanisms that are in place. We will use those reports to assess, update and modify our program so that its effectiveness is continually strengthened and it remains relevant and fit for purpose.

We will continue to monitor employee participation in modern slavery training modules and assess feedback provided by participants on the effectiveness of the training.

All Grant Thornton policies are subject to periodic review. The review includes consideration of any legislative or regulatory changes, new or updated standards or codes, and changes to Grant Thornton International Ltd Policies for member firms. We will also look at feedback and reports from internal and external sources and will take steps to benchmark our policies against best practice.

Our modern slavery supplier risk assessment methodology will follow the same review protocol as for our enterprise risk management framework. For modern slavery risk assessments this will include an evaluation of the continued relevance of the criteria used to assess supplier risk, and we will determine whether or not the ratings applied are consistent across the risk criteria for each supplier.

## Consultation

This Statement was prepared by the Grant Thornton national Quality and Excellence team. Parties consulted included the People and Culture, Data and Technology, and Finance teams; Office Support teams; and other business units. These discussions helped us to understand and map our supply chains, assess our operations for possible modern slavery risks, and prepare this Statement.


## Forward commitments

We are committed to the continuous improvement of our modern slavery program.

During the next reporting period we plan to:

- consider the further use of supplier questionnaires to gather information from our suppliers and look for trends and systemic issues that will help us to implement controls to better manage modern slavery risk in our supply chain, including improved and more informed supplier selection
- examine ways to apply technology to certain processes, including supply chain risk assessments, to enhance data collection and analysis with the objective of continuously expanding the way we utilise information collected from multiple sources to progress our modern slavery program
- collate and assess feedback and reports that include information in relation to matters of concern regarding modern slavery and action appropriately
- release our updated Supplier Code of Conduct and incorporate it into our Social Procurement Framework, and
- revise our policies and draft new policy where necessary so that we continue to reflect our commitment to combatting modern slavery in all its forms

Signed by



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Greg Keith  
Chief Executive Officer / Director  
Grant Thornton Australia

20th April 2021

As authorised signatory on behalf of Grant Thornton Australia Limited.

This statement has been approved by the Board of Grant Thornton Australia Limited ABN 41 127 556 389 on 20th of April, 2021 and applies to Grant Thornton Australia Limited and its subsidiaries and related entities.



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