

# Modern Slavery Act Transparency Statement 2021

# Preface

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## by Simon Eaves

Managing Director  
Accenture (UK) Limited

The collective challenges we face in the world today also provide opportunities for positive change. By combining human ingenuity and the power of technology we can drive positive impact and create a fairer, more sustainable world.

As an organisation, how we harness our impact for good must be at the forefront of how we operate. We should use our impact to create value for our clients and success for our people, society and the world around us. Thinking about the holistic value we deliver to—and the impact we have on—clients, people, shareholders, partners and communities is part of our commitment to being a responsible and ethical business. Protecting and enshrining human rights in how we operate, and encouraging others to do the same, is a critical part of that.

At Accenture we maintain a long-standing commitment to respecting human rights, including the elimination of slavery and human trafficking<sup>1</sup> in our supply chains and business operations. We seek to foster an environment where respect for the individual and their rights is at the heart of how we operate. We encourage any individual who has concerns about unethical behaviour in any part of our business or operations to speak up and

to do so without fear of retaliation, and we have put in place policies, processes and procedures, primarily technology-enabled, to support this approach. We have also extended this approach to clients and charity partners.

Given the nature of our business, and the risk assessments that we have undertaken to date, we believe that the risk of slavery and human trafficking in our business is low. But we cannot be complacent and are always reviewing how we can improve and evolve in response to changing circumstances—COVID-19 for example. Our intention is always to be thoughtful and targeted in how we select and engage with our suppliers—particularly in relation to higher-risk sectors and higher-risk countries.

I am determined that we will continue to bring these values and commitments to life in our own business, and in our work with our clients—both in the United Kingdom and around the world—to support the elimination of slavery and human trafficking.

It is in this context that we publish our 2021 Modern Slavery Act Transparency Statement.

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This statement sets out the steps Accenture is taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business.

This statement is made by Accenture UK<sup>2</sup> in accordance with the requirements of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

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1. In this statement, when we refer to 'slavery and human trafficking,' this includes modern slavery, servitude, forced or compulsory labour and human trafficking, as each of these terms is explained or defined in the Modern Slavery Act 2015.  
2. In this statement, references to 'Accenture UK' mean Accenture (UK) Limited.

# Accenture's Global Business

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Accenture is a global professional services company with leading capabilities in digital, cloud and security. Combining unmatched experience and specialised skills across more than 40 industries, we offer Strategy and Consulting, Interactive, Technology and Operations services—all powered by the world's largest network of

Advanced Technology and Intelligent Operations centers. Our 514,000 people deliver on the promise of technology and human ingenuity every day, serving clients in more than 120 countries. We embrace the power of change to create value and shared success for our clients, people, shareholders, partners and communities.

## Our Commitment to Human Rights and Responsible Business

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Accenture is committed to supporting and respecting internationally proclaimed human rights. As a LEAD signatory to the United Nations Global Compact since 2008, we adhere to the 10 Principles of the Global Compact and to the United Nations Guiding Principles.<sup>3</sup>

Accenture's commitment to doing business responsibly, ethically and legally is the foundation for the company's global culture and is espoused by all its people.

Accenture's culture is shaped by our core values, and our core value of 'Respect for the Individual' underpins our commitment to the elimination of slavery and human trafficking. We expect all our people to treat each other, and those we deal with, respectfully and with dignity. We do not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behaviour, bullying or harassment of any kind.

We actively encourage our people to raise ethical and legal concerns, including any concerns about human rights issues, and we make multiple channels available for them to do so—including anonymously, where legally permitted. See [Global Policy on Raising Legal and Ethical Concerns and Prohibiting Retaliation](#).

We also stress that we have zero tolerance for retaliation against anyone who speaks up in good faith. Accenture investigates any potential human rights breach it becomes aware of and seeks to appropriately remedy or mitigate those breaches.

We have a [Global Policy on Prohibition of Human Trafficking Forced Labor and Child Labor](#) expressly prohibiting our employees from engaging in or supporting human trafficking, forced labour and child labour in connection with Accenture's activities, including in our supply chains.

3. In this statement, when we refer to the 'UN Guiding Principles' this means the United Nations Guiding Principles on Business and Human Rights.

Our [Code of Business Ethics](#) applies to all Accenture employees around the world and provides a framework within which our people make responsible behaviour a natural part of what we do every day—with each other, our clients and business partners, and our communities where we work and live. Our Code highlights our support and respect for human rights, which includes helping to eliminate slavery and human trafficking wherever these may occur.

Collaboration across our one Global Network is fundamental to how we drive innovation and deliver value for our clients. As part of this collaboration, Accenture UK receives services from other companies within the Accenture global group. All Accenture group companies adhere to our core values, our Code of Business

Ethics and our global policies.

We continue to review and assess our own employment practices as part of our wider risk management processes, and consistent with our commitments under the UN Guiding Principles.

For example, **this year**, we have conducted a global review of our employee retention practices across our global group of companies. This follows from similar reviews in previous years and we remain committed to take appropriate action if we identify concerns.

Our approach is consistent around the world. We also note that **this year** Accenture Australia<sup>4</sup> is publishing its own modern slavery transparency statement which can be found on [its website](#).

## Our Supplier Standards of Conduct

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More broadly, the relationship between Accenture and our Accenture suppliers is a critical component of our support for human rights. Consistent with Accenture's standard procurement process, we require all Accenture suppliers to comply with our global [Supplier Standards of Conduct](#) or to make an equivalent commitment.

Our Standards of Conduct reflect our core values, our ethical principles and our commitment to human rights. They set out clearly the labour standards that Accenture suppliers must adhere to, particularly in relation to slavery and human trafficking.

We seek to encourage a culture of transparency within our supply chains and provide a mechanism to enable employees of Accenture suppliers to speak up about legal or ethical concerns, including slavery and human trafficking. Employees of Accenture suppliers may report concerns or violations (anonymously where permitted by local law) through the [Accenture Business Ethics Helpline](#). To date, we have not received through this Helpline, or otherwise, any complaints from third parties raising concerns about slavery or human trafficking.

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4. In this statement 'Accenture Australia' means Accenture Australia Pty Ltd ABN 49 096 776 895 and Accenture Australia Holdings Pty Ltd ABN 61 096 995 649, with their registered offices at 2 Sussex Street Barangaroo, Sydney, NSW 2000, and all their Australian subsidiaries.

# Accenture's Supply Chains

Accenture UK has a multi-million pound supply chain and buys goods and services every year from approximately 2,200 Accenture suppliers: about 92% of this spend is with companies that have a presence in the United Kingdom, about 7% of this spend is with companies based elsewhere in the European Union/ European Economic Area and Switzerland or in North America, and less than 1% of our spend is with companies in remaining countries around the world.

The top three categories of Accenture UK's procurement spend (accounting for just over 70% of our UK spend) comprise:

- Contractors (including the use of contingent labour and other service providers).
- Travel costs and services (particularly with airlines, hotels and other travel service providers).
- IT and telecom equipment and financial services.

Accenture UK also receives services (such as technology, digital and business process services) from other members of the Accenture global group, including from Accenture's service delivery centres in Europe, Asia Pacific and South America.

Accenture UK currently assesses our overall risk profile in relation to Accenture suppliers<sup>5</sup> by referencing several factors, including the geographic location of the Accenture supplier and the industry in which they operate.

**In this year**, Accenture has undertaken a global refresh of our Procurement Sustainability Strategy. A key outcome is that Accenture is investing in a new blockchain-enabled global Sustainability Hub. This Hub will help to better assess and drive transparency around Accenture suppliers' environmental, social and governance (ESG) performance, including in relation to slavery and trafficking.

## Our Supply Chain Due Diligence and Monitoring Processes

### **Our onboarding checks for all Accenture suppliers in the UK**

Accenture follows robust processes to assess human rights, ethical and environmental risks when sourcing suppliers. New Accenture suppliers

in the UK must provide detailed information about their human rights policies, processes and risk assessments, including the prevention of slavery and human trafficking within their own organisation and supply chains.

5. In this statement, an 'Accenture supplier' means a third-party supplier with whom Accenture has a direct and enduring contractual relationship through our procurement function (excluding Accenture group companies).

We continue to monitor and assess all responses from potential new Accenture suppliers in the UK, and we weight our procurement decisions accordingly.

### **Impact of COVID-19 pandemic on our UK supply chains**

We recognise the concerns of the UN Special Rapporteur on contemporary forms of slavery, that the COVID-19 pandemic has increased the risk of slavery and human trafficking. We have therefore taken specific steps this year to assess the implications in the UK of the COVID-19 pandemic.

Almost all Accenture UK people have been working from home since March 2020 in accordance with government guidance. Nevertheless, we still needed some services such as security and maintenance to be provided in our offices during this period. We therefore required all our UK suppliers whose people attended or worked at Accenture offices since March 2020 to confirm that any such attendance was voluntary, and that appropriate personal protective equipment (PPE) was provided to the workers. All have confirmed this to be the case. We have also confirmed with our PPE suppliers in the UK that all PPE provided has been responsibly sourced.

As well as our focus on UK-based suppliers we continue to engage with key suppliers around the world to understand and assess their strategies around combatting slavery and human trafficking.

In **each fiscal year**, we target our due diligence efforts on those industry areas and geographies that we consider to be higher risk for us.

We recognise that there is real value in an open and transparent dialogue with our key suppliers, and that no single business can tackle the problem alone.

Due to COVID-19 we were unable to host our planned in-person workshops with our suppliers in two of our higher risk geographies so instead, **in this year** we led and hosted a number of very successful online training and knowledge-building seminars.

### **Our global monitoring**

Separately, we continue to work with a specialist global firm to provide a continuous monitoring service that provides insight into our suppliers and their industries to assess them against six key indices: child labour, decent wages, forced labour, migrant workers, modern slavery, trafficking on persons. One hundred percent of Accenture suppliers in the UK, Ireland and **in the last fiscal year** Australia are covered by this monitoring. In total this monitoring covers around 4,000 suppliers to Accenture. Where there is a credible report of supplier engagement in slavery and human trafficking Accenture is notified. We have not received any such reports in the **last fiscal year**.

# Living Wage

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Accenture UK is an accredited 'real Living Wage' employer.<sup>6</sup> We, therefore, require Accenture suppliers to pay the real Living Wage to UK employees providing services to us, and before we engage any new Accenture supplier we take steps to verify that they meet this requirement.

Accenture continues our efforts to drive the adoption of living wages with all our suppliers around the world. We have set an expectation in our global Supplier Standards of Conduct, and strongly encourage all our suppliers to pay a living wage to their people who directly provide services to Accenture and/or our clients.

This approach is also applied to Accenture UK's Corporate Citizenship grant awards, ensuring our community impact partners are encouraged to be real Living Wage employers and that people helping to deliver our outreach programmes are paid a real Living Wage.

# Our Training and Advocacy on Slavery and Human Trafficking

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## Training for our people

We continue to provide training on slavery and human trafficking to our global Accenture Procurement team and **in the last fiscal year** have trained 100% of both the UK Procurement team and Australia procurement team along with key members of our global procurement teams responsible for sourcing and contracting with Accenture suppliers.

## Advocacy and collaboration within our ecosystem

Accenture is committed to advocating awareness of slavery and human trafficking within our global ecosystem of Accenture suppliers, and we are also committed to encouraging collaboration and the promotion of best practices to address potential risks. For instance, as part of our broader responsible business programme, we now encourage all of our UK social impact grant recipients to review their operations for Modern Slavery.

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6. In this statement, the "real Living Wage" refers (for the UK) to the living wages as determined by the Living Wage Foundation. For Ireland it refers to the living wage as determined by the Living Wage Technical Group. In all other jurisdictions it means a wage which is higher than the legal minimum wage requirement and will take into account relevant actual living costs.

We also continue to look for opportunities to lead the development of new technological capabilities in this arena, to support our clients, and to collaborate with other leading firms, agencies, non-profit organisations and other stakeholders.

For example, **in this year** our [Global Supplier Inclusion & Sustainability Virtual Summit](#), hosted by our Global managing director for supplier inclusion & sustainability, with our Chief Executive Officer, Chief Procurement Officer and UK Modern Slavery Officer as keynote speaker and panellists. The Summit had more than 800 participants across North America, Europe and Growth Markets.

Also **this year**, Accenture partnered with the Global Emancipation Network and Splunk, the Data-to-Everything Platform, to develop [Artemis](#), the world's first human trafficking content classifier. A machine learning-based solution, Artemis uses a risk scoring engine to analyse data and indicators for potential illegal activity. Artemis was originally designed to support law enforcement agencies, where it has successfully augmented team capacity and officers' abilities and has already led to prosecutions in the United States. However, Artemis is capable of application across many different industry sectors, including hospitality and banking, and we are exploring opportunities for such deployment both in North America and Europe.

## Looking Ahead

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We continue to review our human rights efforts, as well as best practices in the marketplace, to understand how we can further strengthen our commitment to ensure slavery and human trafficking are not taking place within our organisation or our supply chains.

An important component of our review of best practices is our active membership of the UN Global Compact UK Network's Modern Slavery Working Group. We regularly collaborate with this Working Group to share our view of corporate best practices to support the elimination of slavery and human trafficking, and to benchmark our own approach and strategies against those of other industry peers and thought leaders.

Our nominated Modern Slavery Act Officer, David Sawyer, continues to lead our compliance with the Modern Slavery Act. David is our managing director with

responsibility for geographic operations in the United Kingdom and Ireland; his responsibilities include workplace safety, procurement and corporate citizenship.

The board of directors of Accenture (UK) Limited has approved this statement to be signed on its behalf by Simon Eaves as Managing Director, at its board meeting on 9 February 2021, and the information in this statement is accurate as at that date.

Signed for and on behalf of Accenture (UK) Limited



**Simon Eaves**  
Managing Director,  
Accenture (UK) Limited



# Further Information

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For more information about Accenture's human rights agenda generally and how we adhere to our obligations under the United Nations Global Compact, please see our latest [Corporate Citizenship Report](#).

Our Modern Slavery Act statements from [2017](#), [2018](#), [2019](#), and [2020](#) are also available.

For more information about Artemis, please see [the case study](#).

# Raising Concerns

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If you have any questions about this statement, or any concerns about slavery or human trafficking within Accenture's supply chains or organisation (whether in the United Kingdom or overseas) please contact the Accenture Business Ethics Line:

- You can call the Accenture Business Ethics Line globally at +1 312 737 8262; or in India at +1 888 276 6226 with access code: 000-117. It is available 24 hours a day, seven days a week (you can reverse the charges); or
- You can report your concern via the Accenture Business Ethics Line website at <https://businessethicsline.com/accenture/>

You can raise concerns anonymously, if you prefer. Accenture treats all concerns raised seriously and in strict confidence.

Accenture prohibits and will not tolerate retaliation against any employee who comes forward to raise, in good faith, a concern about slavery or human trafficking or who assists us, or a law enforcement authority, by providing information to address such a concern.

## About Accenture

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