

EY Modern Slavery Statement

2024



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Introduction

This Modern Slavery Statement has been prepared in accordance with s54(1) of the Modern Slavery Act 2015, and sets out the steps taken by Ernst & Young LLP and its affiliates (together, 'EY UK'¹ or 'the firm') during our financial year from 1 July 2023 to 28 June 2024 ('FY24') to deal with modern slavery risks within our business and supply chains. This is our ninth Modern Slavery Statement and our previous statements can be found on our [website](#).

Executive summary

At EY, our purpose is building a better working world, and our initiatives to deal with modern slavery risks are part of our wider procurement and our corporate social responsibility goals, which help us to achieve this purpose.

We will not tolerate any form of human rights abuse within our business or supply chains. Our commitment to ethical behaviour is enshrined in our [Global Code of Conduct](#), which sets out our core values and beliefs, and provides a behavioural framework to guide the business decisions that we make every day. The Global Code of Conduct applies to all EY partners and employees across the globe and imposes a duty to take the most ethical course of action available and to report any behaviour which is inconsistent with the principles set out in the code. All EY Partners and employees worldwide are required to sign an annual declaration to confirm that they have read, understood and are in full compliance with the code.

EY's [Global Human Rights Statement](#) builds on the code and acts as a written demonstration of EY's commitment to uphold and promote human rights and our belief that this is fundamental to our purpose of building a better working world.

¹ Comprising Ernst & Young LLP and its UK Affiliates. As at 28 June 2024, the UK Affiliates consisted of the following entities: EY Corporate Secretaries Limited, E&Y Trustees Limited, Ernst & Whinney Limited, Foviance Group Limited, Ernst & Young Limited, Rolls House Holdings Limited, Garrard House Executor & Trustee Co. Limited, Ernst & Young Services (UK) Limited, EY Securities Limited, Ernst & Young Services Limited, EYGS UK Participation Limited, Ernst & Young International Limited, EY-Seren Limited, EY Incentives Limited, EY Private Client Services Limited, EY Professional Services Limited, Whyaye Limited, Digital Detox Ventures Limited, Digital Detox Limited, Peak EPM Limited, Seaton Partners Limited, Lane4 Management Group Holdings Limited, Lane4 Management Group Limited, Pythagoras Comms Holdings Limited, Pythagoras Comms Limited, Pointbeyond Limited, Creative SharePoint Limited, AgilityWorks India Private Limited, Ernst & Young Property (Jersey) Limited, New Street Nominees Limited, Ernst & Young Resources (CI) Limited.



The firm has made further progress with our anti-modern slavery initiatives during FY24 and have met the key aims for the year, as set out in our 2023 Modern Slavery Statement. Throughout the year, we have:

1. Expanded our internal modern slavery training programme to include targeted training to our client-facing business.
2. Further developed our approach to assess our exposure to modern slavery risks, including classifying higher risk suppliers based on their links to higher risk geographical locations. We also carried-out a review of the firm's recruitment and vetting processes, to confirm they are robust and fit-for-purpose.
3. Improved our education, reporting and access to modern slavery resources, through the drafting of a risk and initiative progress report for senior leadership within the firm, as well as launching a dedicated modern slavery area on our intranet, hosting all of our anti-modern slavery tools, resources and information.
4. Expanded our environmental and social governance (ESG) assessments to a wider proportion of our suppliers who we have assessed as being in Higher Risk and/or High Spend² areas and continued to work with suppliers from previous assessments to monitor their progress against areas identified for improvement.

We have set out further key aims for our FY25 below to help ensure that our initiatives to detect and prevent modern slavery within our business and supply chains continue to progress.

About us

Ernst & Young LLP is a limited liability partnership incorporated in England and is the parent organisation of the entities which make up EY UK. Ernst & Young LLP is a member firm of Ernst & Young Global Limited, a company limited by guarantee incorporated in England.

EY UK is a leading professional services firm in assurance, tax, strategy and transaction and consulting services. All the companies which make up EY UK comply with the same standards and policies.

As of the end of FY24, EY UK had 892 equity partners and 19,528 employees operating in 28 offices within the United Kingdom and Channel Islands.

EY UK is a member firm of the global EY Network, which has member firms in more than 150 countries which share our commitment to building a better working world.

² 'Higher Risk and/or High Spend' suppliers were identified using our CCaSS ESG and human rights risk tool. Higher risk sectors included technology hardware, onsite cleaning and maintenance services, catering and hospitality, furniture and fixtures, promotional items, office supplies and equipment, integrated facilities services, outsourced service providers, data centre and IT managed services. High spend suppliers were assessed as having a high level of spend for their sector.

Progress against our key aims

In our 2023 Modern Slavery Statement, we set out four key aims to be completed in FY24, with the intention of expanding awareness of modern slavery risks and reporting within our business and extending our enhanced ESG due diligence programme to a wider section of our supply chain.

We successfully met the key aims set out in our 2023 statement, as follows:

FY24 aims

Expand our internal modern slavery training programme and provide targeted training to further areas of our client-facing business.

Further develop our Modern Slavery Risk Assessment and Key Risk Indicators to facilitate enhanced insights and reporting on modern slavery hotspots, issues and initiatives, to reach senior leadership across the firm.

Prepare and launch a dedicated modern slavery area on our intranet, to ensure that all of our anti-modern slavery tools, resources and information are easily accessible to our people and to help raise further awareness of modern slavery issues within our business.

The ESGES³ team will be expanding our in-depth ESG assessments to a wider proportion of our suppliers who we have assessed as being in higher risk and/or high spend areas and will continue to work with suppliers from previous assessments and monitor their progress against areas identified for improvement.

FY24 progress

The Compliance Risk Management team expanded the modern slavery training module to make it available to all our client-facing teams. This optional training focussed on spotting signs of modern slavery during client interactions and due diligence processes throughout the client life cycle, which ties in with the requirement provided in our Client & Engagement Acceptance UK Policy. The topic of modern slavery will also be a part of the annual mandatory Financial Crime training in the coming year which will be assigned to all EY UK personnel.

The Compliance Risk Management team have enhanced the Modern Slavery Risk Assessment process to include geographical location as a factor in increasing the risk profile of a supplier (e.g., where a supplier has operations in a location without strong human rights laws or labour protections).

A UK firm status and impact report has been drafted, consolidating emerging risks and trends in modern slavery and providing further management insights to senior leadership on EY UK's initiatives and plans.

The Compliance Risk Management team launched the Modern Slavery SharePoint site; a centralised repository to host all our modern slavery related resources in one easily accessible place. The site creates awareness, aids the client-facing teams and other functions to stay up-to-date with their obligations and facilitates the reinforcement of our anti-modern slavery policies and processes.

In FY24, we expanded our existing ESG assessment programme with a review of 24 Higher Risk and/or high spend suppliers to EY UK and continued to work with suppliers who were involved in our previous pilot. Like the 2022 pilot, suppliers are required to respond to questions about their policies, programmes and impacts across ESG, human rights and DEI and we will work with them to monitor their progress and encourage improvements.

³ Our Environmental Social Governance Enablement Services ("ESGES") team is a sub-team within Supply Chain Services, which has a particular focus on modern slavery strategy and monitoring. The team regularly reviews our processes, policies and training relating to modern slavery and carries out the supplier due diligence initiatives mentioned below.



Details of our key aims and initiatives for our FY25 are set out below.

Ensuring modern slavery does not take place within our business

EY UK's business operates in the professional services sector, which is not typically considered to be a higher risk industry for modern slavery practices. Nevertheless, we believe it is essential to be vigilant, implement robust measures to identify and mitigate against any potential risk, and are committed to ensuring fair, safe and inclusive working rights and conditions for our personnel.

Key policies and compliance

Our UK Modern Slavery Policy applies to all EY UK partners, employees and contractors and sets out guidance as to what Modern Slavery is, key red flags to help spot it and how to report potential instances of it. Those caught by the policy are required to take individual responsibility for implementing our anti-modern slavery controls by:

- Reporting any suspected instances of modern slavery
- Adhering to the relevant procurement procedures when procuring goods or services from external suppliers
- Ensuring that our client and engagement acceptance measures relating to ESG are followed when considering new client relationships or engagements
- Following our policies in relation to the recruitment and treatment of employees and contractors

We also maintain a Modern Slavery Response Plan, which compliments the UK Modern Slavery Policy by explaining how the firm will handle reports of potential Modern Slavery within the business or supply chains. The Response Plan defines the investigation process that the firm will follow, the further escalation and reporting measures that apply and guidance as to potential remedial actions to help ensure the safety of potential victims of modern slavery.

These policies are accessible via the dedicated Modern Slavery site on our intranet. Compliance with these policies is taken very seriously and any failure to do so can result in disciplinary action up to and including summary termination. A serious breach may also result in a report to relevant regulators or professional bodies where the member of staff is a regulated professional.

Recruitment and pay

We have identified that our recruitment practices and pay structures are two key areas where we can take positive action to minimise the risk of modern slavery occurring within our business.

We are an accredited Living Wage Employer, certified by the Living Wage Foundation, and ensure that all employees of EY UK are paid at least the Living Wage (as set by the Living Wage Foundation) or the London Living Wage, ensuring that all staff receive a fair level of pay. We also require that our suppliers of on-site services in our UK offices pay their on-site staff at least the Living Wage or the London Living Wage. Our Compliance Risk Management⁴ team carried out a review of our internal pay controls and our engagements with our on-site suppliers during FY24 to confirm that the updated Living Wage and London Living Wage are being paid to all of our staff and supplier staff who work on our sites.

⁴ Our Risk Management team is responsible for oversight of the firm's Modern Slavery policy and associated procedures, carrying out the firm's annual Modern slavery risk assessment and recommending enhancements to controls and oversight arrangements.



All employees joining EY UK are also subject to robust vetting checks by our specialist independent screening advisor, including identity checks, reference checks, right to work checks, criminal record checks, and where applicable, education and professional qualification checks.

Our Talent Recruitment team are trained to identify potential red flags for modern slavery during the recruitment, screening and pre-onboarding processes along with our procedures for handling any discrepancies or irregularities, in-line with our Modern Slavery Policy and Modern Slavery Response Plan.

Our Talent Recruitment team continuously works with our Risk Management and GCO teams to ensure that our recruitment checks are relevant, fit-for-purpose, and industry-standard or above. Our Internal Standard on Quality Management 1 ('ISQM1') team carried out a review of our recruitment processes during FY24, including a full review of the controls and an end-to-end check of sample cases across our three recruitment streams, graduate hire, experienced hire and partner hire. Our controls were deemed to be effective without any remedial work required.

Training and raising awareness

We provide annual in-depth training to teams who we consider are more likely to observe potential indicators of modern slavery or who are responsible for implementing measures or controls to help mitigate modern slavery risks, included our GCO⁵, SCS⁶ and Talent⁷ Recruitment teams during FY24. These sessions included training explaining what modern slavery is, what indicators employees in the relevant team may observe, and how to report potential concerns.

Additionally, we run the Responsible Sourcing Week each year, a series of training sessions primarily targeted at supplier Sourcing Managers, to teach them about the required actions on them, and to inspire them on ESG topics. Responsible Sourcing Week FY24 reinforced our commitment to sustainability by providing our workforce with the tools and knowledge necessary to navigate the evolving landscape of ESG requirements, including human rights and modern slavery. In FY24 all supply chain professionals were also required to go through Sustainable Procurement training on EY's online learning tool, which includes training on human rights (including modern slavery) and the need to carry-out appropriate supplier due diligence.

Optional Modern slavery training has also been made available to client-facing staff across all service lines. We plan to make modern slavery training a mandatory module within our annual Financial Crime training from FY25, which all UK based personnel are required to complete each year.

The firm also maintains a Safeguarding Policy and an online learning module called "Safeguarding People at EY", which are both available via our intranet and online training portal respectively and include information about modern slavery and how to report concerns.

We also marked Anti-Slavery Day on 18 October 2023 and the International Day for the Abolition of Slavery on 2 December 2023 via email and poster-based communication campaigns, which reminded employees of our Modern Slavery Policy and details of how to raise queries or concerns about modern slavery to the firm.

⁵ Our General Counsel's Office ("GCO") team advise SCS on procurement matters by working to ensure robust terms are in place with our suppliers, covering their obligations and required practices when providing services to EY. They also advise our Talent team and other internal teams on modern slavery matters.

⁶ Our Supply Chain Services ("SCS") team procure goods and services from our external suppliers and are involved in assessment and evaluation of potential suppliers, including in relation to ESG factors such as modern slavery risks and mitigations.

⁷ Our Talent team monitors for signs that recruits may be subject to modern slavery. The team work closely with our external screening provider to carry out pre-employment checks. The team also work closely with our legal team to investigate any whistleblowing reports or other issues raised involving our people. They also check that we are, as per our commitment, compliant in paying the real Living Wage to our employees.

Reporting concerns

Our Modern Slavery Policy, Modern Slavery Response Plan and Safeguarding Policy each contain guidance on how staff can report any concerns or raise any queries that they may have about Modern Slavery. There are various methods that our people can use to raise concerns or queries, including:

- By emailing our dedicated modern slavery mailbox, which is monitored by our GCO and Risk Management teams
- By contacting our Help HR mailbox, helpline or chat messaging facility
- By contacting an appropriate manager
- By using our ethics hotline

Through messaging from our senior leadership team and mandatory training, we regularly communicate with our staff to emphasise the importance of speaking up and raising concerns about potential breaches of our Code of Conduct, values, or other ethical matters and that such concerns will be taken seriously and appropriately investigated.

Our ethics hotline is operated by a specialist independent external organisation, NAVEX Global, which provides details of each report to the firm's General Counsel. This ensures that each report is reviewed at a senior management level within the firm, before being investigated with support from our Talent, Risk Management and/or GCO team, as appropriate. Reporters have the option to engage with the investigation anonymously via NAVEX Global's portal, which allows reporters to provide information and documentary evidence without revealing their identity.

The ethics hotline is available to the general public and details of how to make a report are prominently displayed on our website, such that anyone who has concerns about modern slavery within our business or supply chains can raise them with us directly.

During FY24, no complaints or concerns were raised about modern slavery or human trafficking to the firm.

Ensuring Modern Slavery does not take place within our supply chains

Structure of our supply chains

Our supply chains cover a wide range of products and services, which fall into the following general categories and are under the management of our SCS team:

- **Global Procurement**, which has four principal supply categories:
 - **Technology procurement**
Supporting client servers and Technology teams to enable client revenue and winning in the market, delivery of secure and resilient technology services for EY people, and a comprehensive, coordinated security ecosystem.
 - **Talent procurement**
Managing global EY spend relating to the Automotive, Health and Insurance, Human Capital, Learning and Development and Total Rewards subcategories across the EY organisation.
 - **Brand, Marketing and Communications procurement**
Managing global EY spend relating to media buying, digital marketing and public relations.





■ Alliances procurement

Building and strengthening our relationships across the EY Alliance ecosystem, ensuring visibility and value realisation across our account base while supporting the building of new platforms and seamlessly shifting to protect EY investments.

- Real Estate and Workplace Services which provides services such as planning, transaction management, design and construction, workplace standards, workplace procurement (e.g., facilities management, furniture and office furnishings) and lease/sublease administration (e.g., rent payments and sublease collections).
- Travel, Meetings and Events Services which supports the mobility of our people, enabling engagement with our clients and internal teams, and enhancing the culture and shared values whilst minimising the organisation's total travel costs.

In FY24, our annual UK spend with external suppliers under the management of our SCS team was approximately £353,122,674.75 with just over 2,116 suppliers.

Our procurement strategies focus on partnering on a long term, strategic basis with suppliers who share our commitment to socially and environmentally sustainable procurement, which includes taking appropriate measures to ensure that modern slavery plays no part in their businesses or supply chains.

Our client-facing service lines also procure some minor services which are below the spend threshold for SCS team management directly from third-party suppliers, including area-specific legal services, professional services, insurances and regulatory expenses. These suppliers are not under the management of our SCS team, but are managed via our procurement system and are subject to the supplier assessment measures set out below.

We also outsource some support functions and sub-contract some areas of client work to other member firms within the global EY Network. As members of our Network, the relationships with other EY firms are not managed by our SCS team and do not fall within the procurement initiatives referenced below, but all EY member firms are required to comply with the Global Code of Conduct and with local employment law and best practice.

Procurement due diligence

Prior to engaging with potential suppliers for a particular product or service, our sourcing managers use our Sustainable Sourcing Framework (a practical guide for sourcing managers on how to approach ESG matters, including supplier selection) to assess the potential ESG risks associated with the particular product or service and prepare a tailored due diligence programme to assess the potential suppliers' ESG credentials and suitability to partner with us. All potential suppliers are required to complete a core set of Request for Proposal ('RFP') questions in relation to ESG risks within their business and supply chain, including modern slavery, and must provide appropriate documentation to evidence their responses. The RFP questions include requests for information about the due diligence that potential suppliers have carried out in relation to their business and supply chains.

In order to score responses to our due diligence process appropriately and consistently, our ESGES team provide Sourcing Managers with scoring guidance to assess the potential supplier's compliance with our anti-slavery, sustainability and supplier diversity targets and strategies. Our scoring approach gives additional weighting to questions which align to EY's ESG goals, such that suppliers with higher ESG standards are more likely to be successful in being chosen to partner with us.

Additional monitoring of higher risk and high spend global suppliers

In addition to conducting tailored due diligence when assessing potential new suppliers, we also piloted enhanced ESG due diligence on a small population of existing global suppliers we have assessed as being higher risk and/or high spend, in FY22, and have expanded this assessment programme to a further selection of global suppliers in FY24.

To assess which suppliers are higher risk and/or high spend, our Global SCS team utilise EY's ESG Risk Assessment Tool, a proprietary tool developed by our CCaSS⁸ team, to assess the expected ESG risk areas and risk levels of our suppliers. The listing of high-risk supplier types by product and service helped us shortlist a further selection of global suppliers for the 2024 ESG due diligence programme which includes a review of supplier Ecovadis scorecards, and for those that have not completed Ecovadis accreditation⁹, an EY ESG assessment. While this is a global review, 16% of this population supply directly to the UK firm and account for 27% of the UK firm's supplier spend.

The review is ongoing and will be completed during FY25, where suppliers will be assessed and have their scores and any areas for improvement shared with them with targeted and time bound remediation plans agreed and monitored by ESGS.

We plan to further expand this assessment programme of higher risk and/or high spend suppliers in our FY25.



Supplier management and governance

Our governance and compliance framework for suppliers is set out in our Global Procurement Policy, which contains the codes and policies that govern supplier engagement and the minimum requirements and prohibitions that apply within our supply chain.

A key policy within this framework is our Supplier Code of Conduct ('Supplier Code'), which is publicly available on our website and sets out the minimum standards of business conduct that we expect from all of our suppliers, which includes a requirement to comply with all applicable labour laws and to have policies and improvement plans in place confirming the supplier's commitment to human rights and social sustainability, including having specific policies which cover freedom from forced labour and human trafficking, prohibition of child labour, the right to a safe and hygienic work environment, the right to regular employment, prohibition of harsh or inhumane treatment and demonstration of reasonable modern slavery due diligence. Our Supplier Code is incorporated into our supplier terms, with a requirement to comply with all aspects of the code, unless the supplier can evidence that they have their own equivalent code that meets or exceeds all of the standards set out in the Supplier Code.

⁸ Our Climate Change and Sustainability Services ("CCaSS") team provide expert advice to clients on sustainability and human rights in relation to their business practices. We utilise the team's expertise within our own business too. They devise and deliver training on human rights and modern slavery issues and advise on our related policies and processes.

⁹ Ecovadis provides businesses with a recognised industry rating for their ESG standards, based on their policies, processes and impacts.



To ensure that we can respond decisively to any failure to adhere to our standards, our supplier terms include the right to immediately terminate the supplier relationship where the supplier has committed a material breach of the Supplier Code or any applicable law, including the Modern Slavery Act or any relevant labour law.

We also provided training to Higher Risk and/or High Spend suppliers during FY24, which focussed human rights (including modern Slavery), what EY's expectations of suppliers are, EY's Supplier Code and how this should be interpreted and met and what a best practice programme looks like. Human rights and measures to detect and prevent Modern Slavery are key components of our supply chain strategy and this is reported on to EY's Chief Supply Chain Officer and Global CEO on a regular basis.

Higher risk areas in our supply chain

Some of our suppliers operate in industries where there is a higher risk of modern slavery practices occurring. Our UK Risk Management team conduct periodic assessments of the EY UK Procurement spend on availing goods and services from the suppliers against a pre-defined list of high-risk industries for modern slavery. Our high-risk industries list undergoes regular evaluations to ensure that it remains up to date and to into account any new risks.

In FY24, we added Ground Transportation as an additional industry in our higher-risk taxonomy due to the potential modern slavery risks associated to this sector and included this during our assessment exercise. The following were also identified as the higher risk areas for the firm during FY24:

Onsite cleaning services and maintenance

This involves onsite cleaning, maintenance, physical security and other facilities related services provided around the EY office premises. These services are largely provided to EY UK by a selected group of suppliers who are managed by the Workplace Services team. This is a dedicated team within SCS managing all workplace facilities services for EY who ensure robust that contractual rights are built into our processes and mandate the suppliers to adhere to EY policies and EY Supplier Code of Conduct.

In these areas, EY is indirectly exposed to potential risk of modern slavery in the recruitment and provision of people by our selected suppliers to carry out these services at our various UK premises. The service providers in these sectors, or the sub-contracted labour recruiters further down their supply chain, could find themselves targeted by traffickers and gangmasters offering labour.

We use robust contractual rights (including an obligation for our supplier to perform various background checks on all recruits supplying services to us), regular governance and management discussions with the supplier, as well as rights to audit the supplier at our request to manage the associated modern slavery risks in the supply of services from these sectors.

Further we require our suppliers to pay the Living Wage to all its people involved in the supply of services to us, monitor their working hours and require that they are not engaged using zero-hours contracts. The UK Risk Management team reviewed this process in FY24 to ensure the supply staff are being remunerated as per the annual changes in Living Wage.





Food catering and hospitality

This includes food service and preparation through external and in house catering, external meals and entertainment, venue hire and usage, and travel accommodation usage. These services are largely facilitated to EY UK by a selected group of suppliers and outsourced providers who are ethically aligned with EY values.

A number of our offices contain supplier managed in-house staff restaurants. Catering staff are recruited directly by our catering supplier. Our staff in the course of their employment will use hotels and entertainment venues all of which are booked through our travel and entertainment booking partners and suppliers. Common targets of exploiters in the food service and preparation industry can include irregular migrants, those with financial difficulties, learning disabilities or minors working in the sector. Victims can often be subject to debt bondage, non-payment of National Minimum Wage or withheld wages, long working hours and concerns for workers' health and safety are also common. In the travel and hospitality sector it's common for providers to use agency employees and may not have complete visibility over their staff's terms of employment.

Within our SCS function, there are specialist teams such as the Travel, Meetings & Event team who ensure there are sufficient controls in our supply chain processes to manage exposure to such areas. They oversee EY's engagements in this sector and ensure adequate contractual obligations are in place with this category of suppliers and providers. The UK Risk Management team conducted a targeted training session with the sourcing managers in this area to discuss potential red flags for modern slavery typically associated with this sector and advised on how to be vigilant during their engagement with the supplier.

Consumable items

We procure various consumables including stationery, promotional merchandises as well as furniture, fixtures and office equipment which are used at our workplaces and for home working. The suppliers who provide these goods to EY UK often have manufacturing operations in global locations, some of which may not have strict human rights and labour laws or may carry a risk of forced or child labour occurring in global supply chains or minimum wage requirements not being met.

Our sourcing is primarily from a select group of suppliers who have been onboarded as per EY UK contractual terms and who are required to abide by the EY Supplier Code of Conduct.

The UK Risk Management team reviewed the Modern Slavery statements of the higher risk suppliers in this sector, and it demonstrated that most suppliers have a strong Supplier Code of Conduct, with focus on employees training and robust internal processes to identify and report modern slavery instances. Some suppliers also perform onsite audits and other desk-based risk assessments on their supplier population to ensure robust supplier due diligence.

Compliance with upcoming legislation

We are also conscious of forthcoming ESG-related legislation and regulations that will apply to the EY network's operations, such as the Corporate Sustainability Due Diligence Directive and the Corporate Sustainability Reporting Directive. Our ESGS team is working in collaboration with our Global Corporate Responsibility and CCaSS teams to prepare for these incoming regulations by conducting a formal assessment of our current processes and maturity as it relates to areas such as:

- Supplier risk mapping
- Supplier due diligence
- Training
- Policies

Findings from this related to modern slavery or human trafficking will inform our future planned activity in this area. Global Corporate Responsibility are also coordinating a broader review of our processes outside of supply chain.

Our next steps

To ensure that we continue to assess and develop our anti-modern slavery strategy and measures, we have the following key aims for FY25:

1. Progression of our ESG Assessment of existing suppliers

This will include follow through on feedback and remedial actions for suppliers that took part in our ESG Assessment. Linked to this, we will re-assess our criteria for Higher Risk and/or High Spend Suppliers with whom we will have a material sourcing relationship regarding ESG and human rights risks and consider what further due diligence and audit programmes may be required for this cohort in FY25 and beyond.

2. Continue to roll out targeted training on ESG and modern slavery to suppliers

Facilitate further training sessions for an appropriate cohort of suppliers on sustainable sourcing and meeting EY's ESG requirements, including in relation to modern slavery.

3. Continue to roll out targeted training on ESG and modern slavery to our people

Expand the training provided to our personnel on recognising and combatting modern slavery, including expanding the training programme provided to personnel within our client-facing business and by including modern slavery as a module within our mandatory annual Financial Crime training.

4. Refresh our Sustainable Sourcing Framework

The update will ensure that our Sustainable Sourcing Framework remains a practical guide for sourcing managers during the supplier selection and supplier relationship management stages and accurately reflects the risks in our supply chain, including those related to modern slavery. Our Global SCS team will also work with our CCaSS team to carry out an updated supply chain risk assessment.



Responsibility and compliance

The firm's Board has overall responsibility for our Modern Slavery Policy and for ensuring that all staff under the firm's control comply with it. Our General Counsel has responsibility for the production of our annual Modern Slavery Statement. Our UK&I Risk Management Leader has primary and day-to-day responsibility for implementing our Modern Slavery Policy, monitoring its use and effectiveness, dealing with any queries about it and ensuring the firm's internal control systems and internal auditing procedures are effective in countering modern slavery and human trafficking within our business and supply chains.

The firm remains committed to improving its practices to combat modern slavery and human trafficking.



Lisa Cameron

General Counsel and Designated Member for and on behalf of Ernst & Young LLP

12 September 2024

EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

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