



Grant Thornton

An instinct for growth™

United Nations Global Compact and Grant Thornton UK LLP

Communication of progress

August 2019







Grant Thornton

An instinct for growth™

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Secretary-General
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14 August 2019

Dear Mr. Secretary-General,

At Grant Thornton UK LLP we have a strong focus of purpose, which has been fundamental to the growth of our brand as well as being a key factor in attracting and retaining talent. Our sense of social responsibility ensures we speak out on issues that impact our clients, our people and our industry.

Our culture is one of Shared Enterprise and this creates the space to share ideas on how, as a firm, we can better fulfil our purpose. It is our way of saying we're creating a different kind of firm – one where every one of us will have an opportunity to share our views and have their ideas listened to. A firm where our best thinking will be done together, where our leaders are open and transparent, where everyone is actively involved in playing their part and where everyone will be rewarded for achieving superior business performance. All of our people are empowered to take responsibility for bringing our purpose to life and then in return are able to share in the rewards.

With this in mind I am pleased to confirm that Grant Thornton supports and actively promotes the adoption of The Ten Principles of the United Nations Global Compact (UNGC) with respect to human rights, labour, environment and anti-corruption. In our third annual Communication on Progress (COP), we describe our actions to integrate The Ten Principles into our business strategy, culture and daily operations and how we may look to continually improve our adoption in future years through our engagement in collaborative projects.

Yours sincerely,

David Dunckley
Chief Executive, Grant Thornton UK LLP

Awards



Queen's Awards for Enterprise 2018
Promoting Opportunity through Social Mobility



MPF Awards for Management Excellence 2018
Most Innovative Client Service
Most Inclusive Firm



2019 Ranked No.1
UK M&A Financial Adviser (H1)



Finance Awards - Corporate LiveWire 2018
Excellence in International Tax Law Services



Yorkshire Accountancy Awards 2018
Brand of the Year (Yorkshire Live Labs)



Global Awards - Corporate LiveWire 2017
Best in Corporate Valuation Services



Top Employers for Working Families Special Awards 2017
Best for Innovation



The Social Mobility Employer Index 2017
#1 for Social Mobility



The British Accountancy Awards 2017
Practice Excellence - International Firm of the Year



Who's Who Legal Awards
Asset Recovery Experts Firm of the Year

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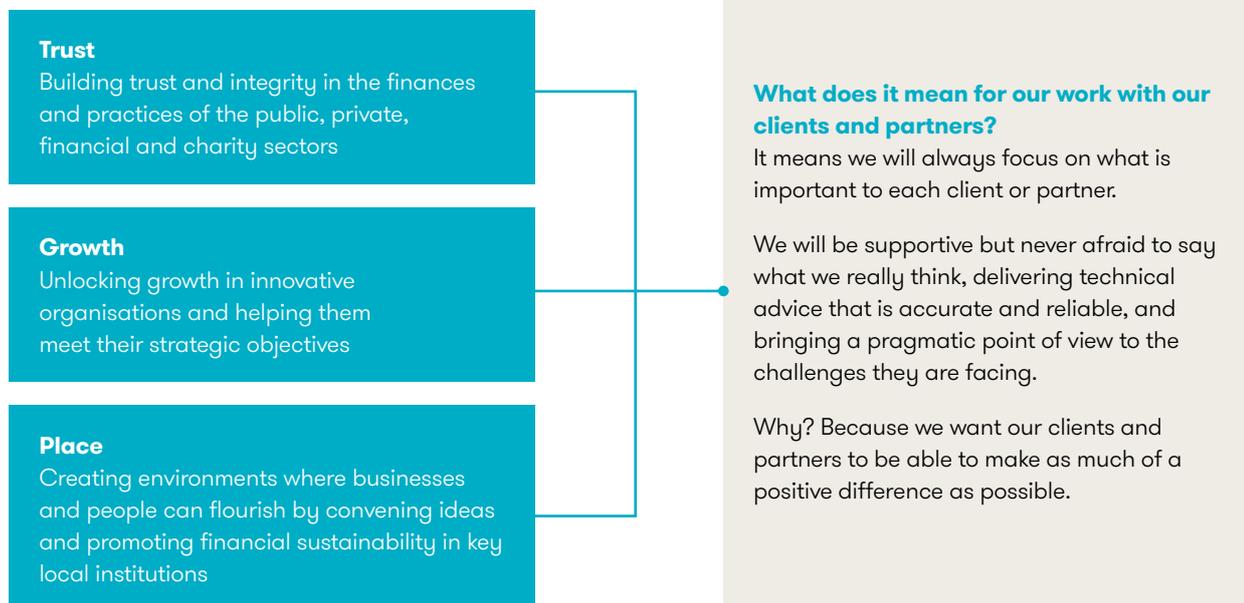
What makes us different

Our purpose

We believe it's important to our clients that the suppliers they work with are committed to making a contribution to social change and mobility through their working culture. Grant Thornton's culture focuses on two key elements: how we can make a difference in the places and communities where both we as a firm and our clients are based; and how we need to change internally to make that happen.

Our social role and value

Our external focus has 3 primary components, around which we have built our firm's objectives and which inform how we approach our work with every client and partner.





An internal culture promoting change

Changing ourselves to help add more to the economy and society has meant looking closely at how we work. For example, we recognised that our firm could be more diverse in all dimensions so we completely revamped our recruitment process. We removed the requirements for minimum A-Level results and we don't ask for personal statements that might benefit those with access to opportunities, such as internships, that might be unavailable to others. We now recruit far more people post-16 and through our Access Accountancy programme where we work directly with state schools to offer meaningful work experience opportunities that wouldn't otherwise be available. We've made our working culture more flexible for family members through new technology, recognising this change in both our people and our clients.

As a result we were rated No.1 for social mobility by the Government-endorsed Social Mobility Employer Index and won the Queen's Award for Enterprise.

**UK
Social
Mobility
Awards™**

UK Social Mobility Awards 2018
Organisation of the Year





Human rights

At Grant Thornton we respect and support the internationally proclaimed human rights and ensure the firm is not complicit in human rights abuses. Where possible and applicable, the firm encourages and adopts relevant 'human rights' principles as in line with current legislation and law into various employment practices and values of the firm; some of which include respecting others, valuing diversity both in the workplace and in the supply chain and maintaining a workplace that is free from prejudice, harassment and bullying.

Grant Thornton advocates the fundamental rights and freedoms that everyone in the UK is entitled to.



Human Rights

Principle 1.

Businesses should support and respect the protection of internationally proclaimed human rights: and

Principle 2.

Make sure that they are not complicit in human rights abuses.

Assessment, policy and goals

We as a firm are dedicated in upholding human rights and creating an inclusive and diverse working environment for all our people.

In a fast paced, changing world Grant Thornton is committed to making sure all firm policies remain fit for purpose, are inclusive and aligned to best practice. Through regular reviews we make every effort to ensure we are compliant with all current regulation, legalisation and law.

Our Shared Enterprise culture provides us with the opportunity to explore new ideas and firm wide goals together, allowing us to continually review and develop the practices, processes and policies we have in place, ensuring the firm's ongoing support and commitment to our people in relation to human rights.

Human rights

Implementation

The firm looks to encourage and support the UN Global Compact Human Rights Principles through various initiatives and policies. Here are some of the ways we are doing this:

Firm value implementation

Our CLEARR values: Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility underpin our culture and influence how we conduct business. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted.

Policy implementation

We are committed to continually developing and implementing the various practices, processes and policies that fully support and abide by current UK human rights law and regulation. To support this we have already implemented a number of wide ranging policies across the firm encouraging and supporting human rights across all areas of the business. Such policy implementation examples include the following:

- Inclusion policy
- Bullying and harassment policy
- Capability policy
- Disciplinary policy
- Grievance policy
- Redundancy policy
- Remuneration policy
- Sickness absence policy

To improve our understanding of our workforce and to identify potential barriers to success, we track the demographics of our people to compare with external benchmarks and to monitor progression internally. The firm maintains records of this data solely for this purpose. The diversity details of any member of the firm will not be shared internally or externally without their permission.

We also support leading academic research to further our collective understanding of wider diversity and inclusion trends in the workplace.

Training implementation

As part of standard training, managers are issued with a copy of the Equality Act 2010 – Guidelines for Managers. Ongoing training in this area includes various up skilling and refresher workshops for our people managers. Recently some of these sessions have explored diversity and inclusion and our obligations in this area, particularly when dealing with day-to-day people issues such as managing sickness absence, underperformance and general grievances.

Inclusive decision making training has recently been introduced to Grant Thornton. We have run a session involving our Senior Leadership Team around the impact of unconscious bias in decision making both in terms of progression of talent and selecting individuals for certain jobs. We also ran this workshop for those responsible for the Firm's recruitment and promotion decisions (for example the partner selection panels), our own People and Client Experience team and the Firm's Inclusion working group.

We have also developed an on line programme to further encourage our managers to think about inclusive decision making. We are continually looking for ways to improve our established ways of working and further remove barriers to success.

Modern Slavery policy and Supplier Code of Conduct implementation

Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation. We actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced or child labour and we have our firm's Supplier Code of Conduct to assist.

Please [click here](#) to read the firm's Modern Slavery Statement

Measures and outputs

As a result of the various human rights policies and processes the firm has in place, we note some of the following measures and outputs:

Procurement

Our procurement policies integrate human rights into the way we do business throughout our supply chain, so we create value, preserve natural resources and respect the interests of the communities we serve and from whom we procure goods and services.

Through our Responsible Purchasing Policy and Supplier Code of Conduct, we expect our suppliers to keep to all laws relating to their business, as well as the principles of the United National Global Compact, the United Nations Declaration of Human Rights and the International Labour Organisation.

Social mobility

Grant Thornton UK LLP has previously been awarded Social Mobility Business Compact “Champion” status by the Department for Business, Innovation and Skills (BIS), one of only 12 firms, for demonstrating leadership and exemplary practice in the field of social mobility. As a Champion, the firm have been working with BIS to deliver approximately 30 commitments across the areas of: outreach; work placements; recruitment; monitoring and evaluation; and leading, championing and communicating best practice

We work with and are members of the Business Disability Forum. We have support available for individuals with disabilities, with a disability defined as a physical or mental impairment which has a substantial and long-term adverse effect on a person’s ability to carry out normal day to day activities.

Education

We are involved in Access Accountancy, a one-week placement to provide those from less privileged backgrounds the opportunity to develop critical skills and develop a professional network. We have an annual commitment of at least 1% of our headcount to be placed on the programme and we also support participants progressing to our school leaver scheme or talent pool them for future opportunities.

Since 2013, we have had flexible academic entry requirements for all our; graduate, school leaver/apprentice, internship, placement and work experience programmes. We do not stipulate any minimum grade requirements and use a balanced screening scorecard to assess potential across a range of areas.

All our entry level roles are advertised openly and formally on the careers section of the Grant Thornton website. We actively partner with third party advertising providers who can provide reach across all spectrums of society. We work with Milkround specifically to target students via e-marketing channels who go to ‘new’ universities which have a much more diverse student population. We work with specialist providers such as Pure Potential and Pathway CTM, to target students of school age from less advantageous backgrounds. All new advertising partnerships and providers have to be able to demonstrate that their breadth of reach encompasses students from all backgrounds before we embark upon any advertising with them.

Employee assistance helpline

To help employees better prepare for and cope with life events – including the things that could potentially cause anxiety and stress – Grant Thornton provides access to a free and confidential service offering expert advice, valuable information, specialist counselling and support.

“By many standards, I do not fit the typical image of a corporate employee in the UK. I’m a female, an ethnic minority, from a low income, deprived area. Statistically speaking, it’s much more likely that I would be unemployed or even in the prison system in the UK than working for a professional services firm. I’m now a mature student, and an associate on a 12 month placement with Grant Thornton. This year, I will more than likely be the highest earner in my immediate family. If that isn’t exemplary of Grant Thornton’s social mobility agenda, I don’t know what is.”

Audit Associate, Birmingham office



Labour

Grant Thornton is committed to upholding the UN Global Compact Principles in relation to labour. The firm is dedicated to ensuring that all labour standards are an active component of our people's daily working environment and experience and implement policies and practices that encourage the adoption of such standards.



Labour

Principle 3.

Business should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4.

The elimination of all forms of forced and compulsory labour

Principle 5.

The effective abolition of child labour; and

Principle 6.

The elimination of discrimination in respect of employment and occupation.

Assessment, policy and goals

The firm recognise that we are responsible for the health, safety and welfare at work of all our people, whether that be on the firm's premises or carrying out the firm's business elsewhere.

Notwithstanding the firm's legal responsibilities to comply with legislation, the firm is committed to keeping the workplace, our clients and suppliers, and the local community safe from any adverse consequences of our work activity and ensuring that all efforts are made to remove or reduce the risks of any potential impact.

As a firm we have various processes and policies in place that support the UN Labour Principles highlighted opposite. These policies are frequently reviewed and updated so as to reflect any changes in UK law and legalisation.

Labour

Implementation

The firm looks to encourage and support the UN Global Compact Labour Principles through various initiatives and policies. We highlight some areas of firm involvement below:

Policy implementation

We are committed to continually developing and implementing the various practices, processes and policies that fully support and abide by current UK labour law and regulation, supporting the eradication of discrimination in respect of employment and occupation.

A selection of policies that support the elimination of workplace discrimination are highlighted below

- Inclusion policy
- Bullying and harassment policy
- Capability policy
- Grievance policy
- Redundancy policy
- Remuneration policy

Health and Safety implementation

As a responsible employer, Grant Thornton knows that health and safety management is key to shaping a positive, successful and vibrant culture. We are committed to protecting the health and safety of all our people, as well as any visitors or general public on our premises.

We aim to:

- Identify and act upon any health and safety risks which are identified
- Prevent accidents in the work place and when travelling
- Mitigate work related to ill health and support attendance at work
- Provide adequate control of any health and safety risks arising from work activities both on our premises, or for our people carrying out business elsewhere

To do this we will:

- Comply with all relevant health and safety legislation
- Ensure our people receive sufficient information, training and supervision to enable them to carry out their duties safely and effectively
- Ensure our place of work is safe and well maintained
- Engage and consult with our people on day to day health and safety requirement conditions

Modern Slavery policy and Responsible Purchasing policy implementation

As per referenced in Human Rights, our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws.

Our Responsible Purchasing Policy reflects our overall business purpose and in so doing seeks through the application of a rigorous procurement process to not only purchase goods and services at best value for money but to take into account the ethical, social, environmental, economic and legal impacts of the supply chain. This means making purchasing decisions which reflect not only the best price in total cost terms over the lifetime of a contract but also require suppliers to:

- comply with all applicable UK and European laws and regulation, and
- reflect the firm's ethical, social and environmental standards.

All suppliers will be required to comply with, or work towards compliance with, the requirements of our Supplier Code of Conduct. The Code sets out the minimum standards of behaviour expected of our suppliers so that they act in a way that is corporately responsible and sustainable and aims to ensure compliance with applicable laws and regulations. We only expect our suppliers to maintain standards that we ourselves adhere to.

Living Wage

We are proud to be a Living Wage employer – meaning all our own people and our third party contracted employees are paid the Living Wage, helping to tackle in work poverty. The real Living Wage is based on the cost of living and is voluntarily paid by over 5,000 UK employers who believe a hard day's work deserves a fair day's pay. It is good for business, good for the individual and good for society.

Employee Survey implementation

We conduct company-wide employee surveys to get a better understanding of employee morale, satisfaction, and engagement at Grant Thornton. The results of these surveys are used to improve the firm's culture and performance.

Measures and outputs

As a result of the various labour policies and processes the firm has in place, we note some of the following measures and outputs:

Health and Safety (H&S)

Workplace inspections – the Health and Safety Officer (HSO) is required to ensure regular reviews of the workplace are carried out using the safety inspection checklist. The inspection will cover all areas of the workplace which are the responsibility of the firm. A quarterly review will be undertaken in conjunction with our co-sourced facilities partners and recorded in the H&S document schedule.

Annual Practice Leader sign off is the overall responsibility of the Practice Leader to ensure compliance with the firm's H&S procedures by reviewing the completed annual H&S compliance confirmation/H&S compliance documents submitted by the local HSO.

Social Mobility

Grant Thornton was ranked number one in the first ever Social Mobility Employer Index, and we are currently number two, grading UK businesses on their openness to accessing talent from all backgrounds. We actively share best practices to other organisations to encourage industry wide access to the accountancy profession, for those of lower socio economic backgrounds. We also won the Queen's award for services to social mobility and won organisation of the year in 2018.

To improve our understanding of our workforce, and to identify potential barriers to progression, we track the demographics of our people to compare with external benchmarks and to monitor progression internally. The firm maintains records of this data solely for this purpose. The diversity details of any member of the firm will not be shared internally or externally without their permission. We also support leading academic research to further our collective understanding of wider diversity and inclusion trends in the workplace.

Diversity and Inclusion

We have signed the Race at Work charter and published our BAME pay gaps as a public declaration of our commitment to encourage the recruitment and progression of all people regardless of ethnic background.

We are part of the Stonewall Index that measures our progress for LGBT+ people and we are actively working through an active network to improve our position in this index through leadership commitment, internal story telling and commitment.

We are disability confident level two and introduced a positive action interview scheme that guarantees an interview for anyone with a disability. We are actively working towards a plan to gain disability confident level 3.

We take mental health seriously and have 70 mental health first aiders trained in the business to support our people with mental health concerns, as well as being champions in our offices focusing on awareness and preventative measures to support people with mental health issues.

We have completed an equal pay review for all our people and actively taken steps to rectify any equal pay issues related to gender. We support the progression of our female talent through our female only coaching programme, European mentoring programmes and ensuring our family leave policies are diverse. In July 2017, Grant Thornton won the "Working Families – Allen & Overy innovation award for our flexible approach to family pay. This award means we are standing out in the market for our unique approaches to tackling the root cause problems of progressing healthy diversity and inclusion in our people experience.

Continuing Professional Development

Our culture is one that encourages the continued development of all our professional people both in terms of their technical expertise and their up-to-date knowledge and understanding of our market place. This is underpinned by our firm-wide Continued Professional Development policy which is rigorously implemented and monitored.



Environment

As a purpose led firm we care about the work we do for our clients, the way we treat our people and the impact we have on our society and environment. We wholeheartedly support the UN Global Compact Environment Principles and are committed to the protection of the world around us, including playing our part in limiting global warming, preventing pollution and minimising our environmental impacts.

We continually review and change the way we work so we can make a positive difference in the world around us through:

- the efficient use of resources and systems
- encouraging our people to complement our corporate activity with their efforts
- sustainable procurement.



Environment

Principle 7.

Business should support a precautionary approach to environmental challenges

Principle 8.

Undertake initiatives to promote greater environmental responsibility; and

Principle 9.

Encourage the development and diffusion of environmentally friendly technologies.

Assessment, policy and goals

At Grant Thornton we are committed to the protection of the environment and to reducing carbon emissions in order to slow down anthropogenic climate change. We use our purchasing power to manage and minimise the negative ethical, social and environmental impacts of our supply chain to make a positive contribution to ethical business practices, quality of life in society and to protection of the environment.

The firm's environmental policy focuses on the following:

- meeting or exceeding our improvement targets
- complying with ISO14001 and its verification
- adhering to all compliance obligations and keeping up to date with new legislation
- promoting our targets, performance and further actions to our people
- engaging our people in managing our environment impact
- ensuring our policy is visible to our people, clients and communities.

To ensure we contribute to achieving the Intergovernmental Panel on Climate Change recommended goal of limiting global warming to 1.5 degrees, we have set science-based targets verified and published by the Science Based Targets initiative.

Our science-based carbon targets are:

- to reduce absolute Scopes 1 and 2 greenhouse gas emissions by 15% by 2023 from a 2018 base year
- to reduce absolute Scope 3 greenhouse gas emissions by 13% by 2023 from a 2018 base year.

Environment

Implementation

The firm looks to encourage and support the UN Global Compact Environment Principles through various initiatives and policies. Here are some of the ways we do this:

At Grant Thornton we are constantly seeking ways to improve the energy efficiency and environmental performance of our buildings and operations. Our ISO 14001 Environmental Management System informs our annual objectives, related targets and agreed actions. Over the past year we have undertaken the following activities to implement environmental policies and reduce environmental risk.

Area	Action
Energy	<ul style="list-style-type: none">• Procured certified 100% renewable electricity contracts for all our supplies• Monitored electricity consumption• Improved access to accurate supplier data• Used profiling to identify energy savings opportunities• Increased employee awareness through environmental campaigns (e.g. switch off campaign “Goodbye Standby)• Adopted an agile working environment across our offices• Adjusted settings of Building Management Systems in some offices to reduce energy wastage• Further virtualisation of our data centre with the aim of total virtualisation going forwards
Travel	<ul style="list-style-type: none">• Every month reported rolling twelve month carbon emissions from travel to incentivise employees to increase virtual meetings and lower carbon travel modes• Communicated environmental benefit and cost reduction of reducing travel across the group• Initiated working group to target air travel reductions through alternative travel, virtual meetings and reduction in non-essential flying
Paper	<ul style="list-style-type: none">• Further reduced printing by 14%
Waste	<ul style="list-style-type: none">• Continued rollout of our waste and recycling strategy across the UK• Replaced waste contractor with one providing high quality data and top class recycling facilities• Replaced single-use cups with reusable cups• Eliminated single-use plastic• Improved accuracy of monitoring• Improved employee awareness.• Improved signage on waste stations
Communication	<ul style="list-style-type: none">• Rolled out new posters across UK offices• Enhanced usage of internal social media platforms• Communicated fun and engaging blog relating to our environmental objectives and targets• Disclose annually through the CDP Climate Change Questionnaire
Procurement	<ul style="list-style-type: none">• Further engaged our suppliers on sustainability performance• Rolled out Responsible Purchasing Policy and Supplier Code of Conduct

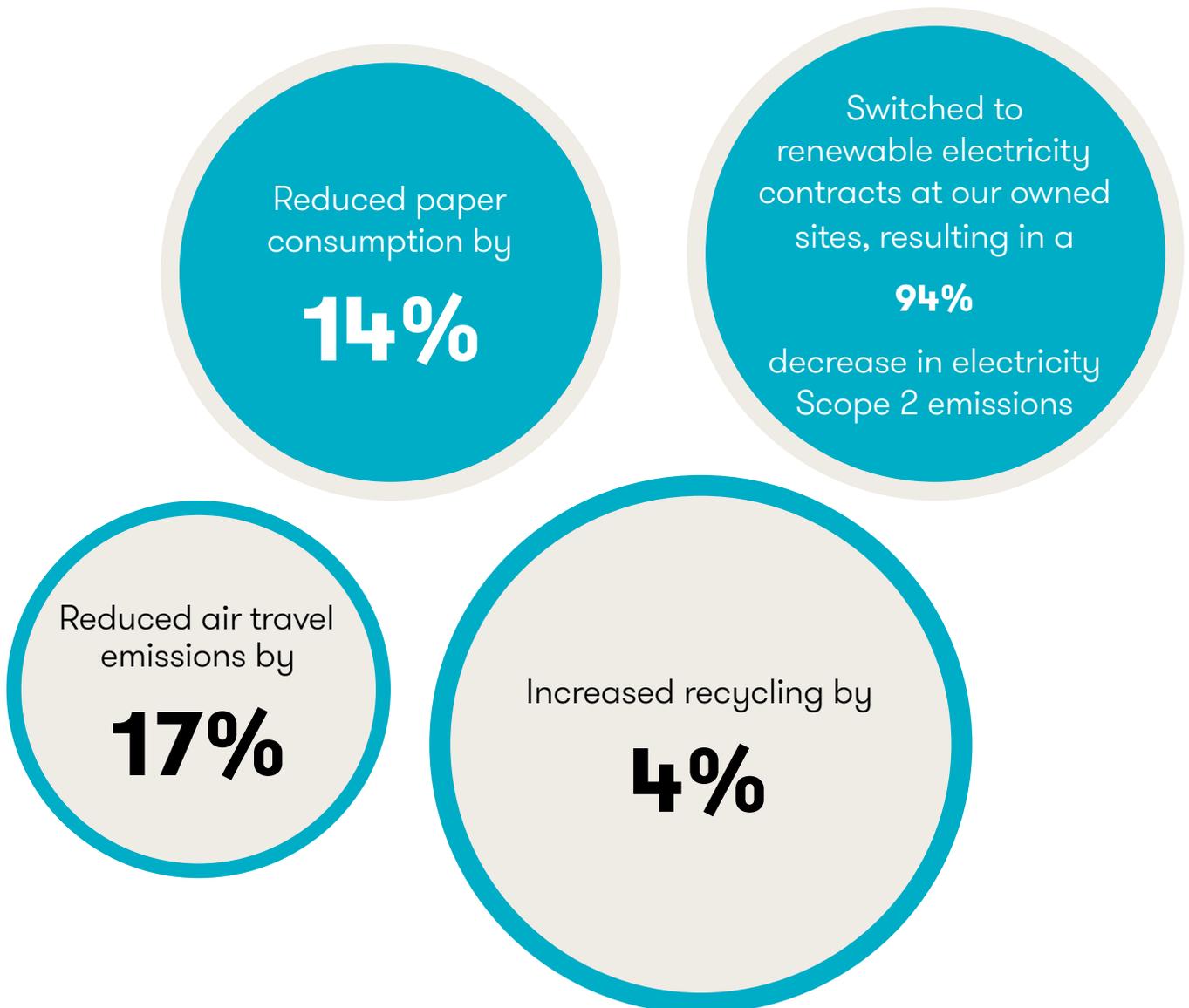
Measures and outputs

As a result of the various environment policies and processes the firm has in place, we note some of the following measures and outputs:

Our environmental management system across the UK is certified to ISO 14001 and is audited annually. It focuses on objectives and actions on areas that will have the most significant environmental impact both in the short and long term.

We also comply with the Energy Savings Opportunity Scheme which is in Phase II in 2019, and report to the Carbon Disclosure Project annually.

Over the past 12 months we have:





Anti-corruption

Grant Thornton UK LLP does not tolerate any forms of corruption, either by our people or others who are associated with us. Compliance with our anti-bribery and corruption policy is mandatory for all of our people. The firm is fully committed to upholding the tenth UN Global Compact Principle of Anti-corruption.



Anti-Corruption

Principle 10.

Businesses should work against corruption in all its forms, including extortion and bribery.

Assessment, policy and goals

Grant Thornton is subject to the UK Bribery Act 2010, and has a zero tolerance policy on bribery and corruption, avoiding even the appearance of impropriety.

We do not tolerate any forms of bribery or corruption, either by our people or others who are associated with us. Our internal anti-bribery and corruption policy is based on UK law and sets the minimum requirements. Where the laws and regulations of other jurisdictions impose a higher standard, these must be followed where applicable.

All of our people are required to undergo training on anti-bribery and corruption at the point of joining the firm and as issued from time to time thereafter.

The firm is also subject to ethical and independence standards set by the Financial Reporting Council, the Institute of Chartered Accountants in England and Wales (ICAEW), and the International Federation of Accountants (IFAC).

The firm is wholeheartedly committed to working against corruption in all forms and implementing the necessary policies, processes and controls to ensure compliance at both firm and individual levels.

Anti-corruption

Implementation

The firm supports the UN Global Compact Anti-corruption principle through leadership, policy and training. We highlight some areas of firm involvement below:

We recognise the impact of our individual and collective behaviours on our reputation. We help our people to understand their financial crime and ethical responsibilities by providing clear policies and procedures, efficient and intuitive systems, a strong culture of support and consultation, regular training and awareness programmes.

Policy implementation

Our bribery and corruption policy is monitored by Internal Assurance based on the result of the Annual Regulatory Statements and Declarations. On an annual basis, all partners and employees are required to confirm their understanding and knowledge of key statutory and regulatory policies, and reports on gifts and hospitality given, and received in line with the firm's policy. An internal audit is carried out to ensure that the policy and supporting procedures have been operated and are effective.

Bribery and Corruption

Grant Thornton takes the risks associated with bribery and corruption extremely seriously and is bound by the legislation contained in the Bribery Act 2010. The firm has a zero tolerance approach to bribery and corruption and our anti-bribery and corruption policy relates to: bribery, corruption, gifts and hospitality, interactions with public officials (including employees of state-owned companies), facilitation payments, political contributions, charitable contributions, recruitment and third party risk management.

Whistleblowing

A whistle blowing policy is also in operation and on an annual basis all our people are reminded of its existence and their responsibilities. Employees can report potentially corrupt practices to the head of their service line or use the confidential whistleblowing helpline.

An annual report of the audit of key risk areas is prepared and presented to the firm's senior management, who take action as appropriate. Any changes are approved by the board at regular meetings, however due to confidentiality we are unable to disclose details of these.

Leadership

The firm's Head of Quality and Reputation, Jonathan Riley, provides guidance and support on the application of UK and international ethical standards. He is supported by the Firm's Financial Crime Team who provides advice on all issues related to bribery, corruption, tax evasion, money laundering, fraud and third party risk. He is also supported by the firm's Ethics Partner and our Ethics Function also provides advice on ethical issues and concerns to the wider practice. These teams' combined efforts enable our people to obtain advice on sensitive, high-risk or complex issues on a confidential basis.

Training and e-learning programmes

On joining the firm, all partners and employees are provided with the Code of Conduct and experience our orientation programme including online training programmes on key policies such as anti-money laundering, confidentiality and information security and The Bribery Act. Our ethical approach is embedded across all learning and communication programmes. We have a customised e-learning programme relating to bribery and corruption which is designed to heighten the awareness of the requirements of the Bribery Act and which must be completed by all client-facing partners and staff (grade 2 and above) and all those involved in procurement. Any instances of bribery and corruption within the firm will be treated as gross misconduct leading to instant dismissal.

In addition, on an annual basis everybody is required to confirm their understanding of, and compliance with, relevant ethical requirements and key policies as summarised in the Core Manual and the guiding principles set out in the Code of Conduct.

Measures and outputs

Ensuring appropriate anti-bribery and corruption measures are in place is vital to maintaining our reputation and to protect our business.

Anti-corruption Monitoring

We actively monitor our people's compliance with financial crime prevention, ethical and independence requirements in the following ways:

- on an annual basis all of our people are required to confirm in the firm's Annual Regulatory Statements and Declarations process that they understand and have complied with the firm's policies relating to anti-bribery and corruption, independence, confidentiality, market abuse, gifts and hospitality, and whistleblowing;
- all at Grant Thornton have the responsibility to prevent bribery and corruption from occurring, and to respond in the right way if it does. If anyone at Grant Thornton is asked to pay or is offered a bribe, or if anyone knows or suspects that another person in the firm or associated with us (including a client) has committed bribery, or other corrupt behaviour, then it is required by policy that they report this to the MLRO or Deputy MLRO for Anti-Bribery and Corruption as soon as possible. Alternatively, if they do not feel comfortable reporting to the MLRO or Deputy MLRO, employees can contact the firm's Whistleblowing Hotline. Reports of the hotline's activity are formally reviewed quarterly by the Risk and Audit Committee.
- all gifts and hospitality must be transparently declared, and when certain limits exceeded, prior approval sought. Our policy ensures any gifts and hospitality are appropriate from either an ethical or bribery laws perspective.
- regular risk reviews monitor the adequacy of our procedures thereby safeguarding our diverse range of stakeholders and protecting the relationships they build with Grant Thornton's engagement acceptance procedures and independence policies.
- we do not permit the creation of roles within our firm (including paid and unpaid work experience) where to do so would create unacceptable risks relating to bribery and corruption, or which would not be in line with the firm's social mobility principles.
- where we are engaged with, or are intending to engage, a third party to undertake work on our behalf, then the firm's

Know Your Third Party (KY3P) policy must be followed. All must consult and obtain approval from the Financial Crime Team if they are planning to enter into an agreement with a potentially high risk third party, namely: an introducer who is engaged to win or retain business for us, in the UK or overseas, and receives fees or commission; a joint venture: either a separate legal entity or via contractual agreement; where the third party is a public official, or politically exposed person (PEP), or is beneficially owned by a public official or PEP.

- we maintain a comprehensive log of instances which are reported to the Money Laundering Regulatory Officer. This not only includes suspicions of bribery but of any financial crime. The record includes any and all follow up and whether or not the matter was onward reported to National Crime Agency. We have no plans to delete the records after a predetermined period. It is our policy to retain the record in perpetuity.
- on an annual basis, the Global Independence System accounts of 10% of partners and 5% of managers are reviewed against evidence to support their recorded financial interests.
- the firm's internal audit function reviews compliance with key internal controls across every service line on a three-yearly basis and reports to the Senior Leadership Team and the Partnership Oversight Board through the Risk and Audit Committee

Code of Conduct

Our Code of Conduct provides a clear set of standards for our business, and creates an ethical and behavioural framework for how we apply our values to guide our people's response to the decisions they are required to make each day.

Quality

We continuously invest in processes and infrastructure that drive efficiency and compliance and provide direction and support to our people. The policies and procedures which drive our internal quality control systems are embedded in every part of our business.



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