



PREFACE

by Oliver Benzecry

Chairman and Managing Director, Accenture (UK) Limited

Accenture maintains a long-standing commitment to respecting human rights, including the elimination of slavery and human trafficking in its supply chains and business operations. We welcome the transparency that the Modern Slavery Act encourages.

We seek to have the right policies, processes and procedures in place. Further, and as importantly, we seek to foster an environment where respect for the individual and their rights is a core value. 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. While much of what we do in this area will remain the same from year to year, we cannot be complacent and are always looking to improve. Therefore, in the last year we have made a number of enhancements to the protections described in our previous Modern Slavery Act Transparency Statement. These enhancements are detailed below.

I am proud of who we are at Accenture, the ethical values we share and the human rights commitments we seek to uphold in our business. It is in this context that we are publishing our 2018 Modern Slavery Act Transparency Statement below.

This statement sets out the steps Accenture is taking to ensure that slavery and human trafficking¹ are not taking place in any of our supply chains or in any part of our own business.

This statement is made by Accenture UK² 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.

1. In this statement, when we refer to 'slavery and human trafficking,' this includes 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, 'Accenture UK' means Accenture (UK) Limited.

INTRODUCTION

Accenture's global business

Accenture is a leading global professional services company, providing a broad range of services and solutions in strategy, consulting, digital, technology and operations.

Combining unmatched experience and specialised skills across more than 40 industries and all business functions underpinned by the world's largest delivery network—Accenture works at the intersection of business and technology to help clients improve their performance and create sustainable value for their stakeholders.

With more than 435,000 people serving clients in more than 120 countries, Accenture drives innovation to improve the way the world works and lives.

OUR COMMITMENT TO HUMAN RIGHTS

Accenture is committed to supporting and respecting internationally proclaimed human rights. As a 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.³

Accenture's commitment to doing business ethically and legally is the foundation for the company's global culture, which is shaped by our six core values—Client Value Creation, One Global Network, Respect for the Individual, Best People, Integrity and Stewardship. This commitment is manifested through Accenture's ethics and legal compliance programmes. Our approach is based on a framework to ensure we meet our legal obligations and human rights commitments. This framework includes the visible support of our senior leadership, regular risk assessments, written standards and controls (including global and local policies), ongoing training and communications, and

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

auditing, monitoring and response procedures. We have zero tolerance for violations of applicable law.

'Respect for the Individual' means fostering a trusting, open and inclusive environment within the company and treating each person we deal with in a manner that reflects Accenture's values. This core value underpins Accenture's 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.

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. Last fiscal year, we published a new global policy 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.

This fiscal year we have also published our new Code of Business Ethics, which applies to all Accenture employees around the world. With our Code of Business Ethics, we want to help our people make ethical 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.

OUR DUE DILIGENCE WITHIN OUR OWN BUSINESS

As part of our wider risk-management processes, and consistent with our commitments under the UN Guiding Principles, we regularly conduct appropriate due diligence assessments to review our employment practices and workplace environments around the world, and we are committed to take appropriate action if we identify concerns.

OUR SUPPLIER STANDARDS OF CONDUCT

The relationship between Accenture and our Accenture suppliers⁴ is a critical component of our support for human rights. Consistent with Accenture's standard procurement process, Accenture UK requires all Accenture suppliers to comply with our Supplier Standards of Conduct or to make an equivalent commitment. These Standards reflect our core values, our ethical principles and our commitment to human rights. **In the last fiscal year,** we have revised these Standards so that they more clearly explain the labour standards that Accenture suppliers must adhere to, particularly in relation to slavery and human trafficking.

^{4.} In this statement, an 'Accenture supplier' means a third-party supplier with whom Accenture UK has a direct and enduring contractual relationship through our procurement function (excluding Accenture group companies).

ACCENTURE UK'S SUPPLY CHAIN

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

Accenture UK has a multi-million pound supply chain and buys goods and services every year from approximately 1,850 Accenture suppliers: about 95% of this spend is with companies that have a presence in the United Kingdom, about 5% of this spend is with companies based elsewhere in the European Union and Switzerland or in North America, and less than 1% of our spend is with companies in 30countries around the world. The top three categories of Accenture UK's procurement spend (accounting for more than 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 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.

OUR UK SUPPLY CHAIN DUE DILIGENCE AND MONITORING PROCESSES

Accenture UK follows robust processes to assess human rights, ethical and environmental risks when sourcing Accenture suppliers. New Accenture suppliers 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. We continue to monitor and assess all responses from potential new Accenture suppliers, and we weight our procurement decisions accordingly.

Accenture UK is an accredited 'living wage' employer. We therefore require Accenture suppliers to pay the 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. In addition, as part of a holistic review of our supplier risk-management strategy, we have implemented enhancements around our auditing and ongoing monitoring of Accenture suppliers. Finally, 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. In this fiscal year therefore, we have spoken with key Accenture suppliers in the United Kingdom who operate in the sectors of events management, workplace design and refurbishment, facilities management, hotels, location services and corporate accommodation. We wanted to better understand their (present and future) strategies and assessments around slavery and human trafficking, and to share our own perspectives on best practices.

OUR GLOBAL SUPPLY CHAIN DUE DILIGENCE AND MONITORING PROCESSES

Our strategy in this area continues to evolve. **In this fiscal year,** we have started targeted reviews of the practices of our key external recruitment firms in India and all of our staffing agencies in India.⁵ We focused our effort this year on India as it is Accenture's largest delivery centre geography. We want to ensure that the practices of these critical suppliers to Accenture meet our fundamental standards and requirements (as set out in our Supplier Standards of Conduct). Amongst other checks, we received confirmation that none of these recruitment firms or staffing agencies require payments or deposits that could prevent Accenture employees or contractors from freely leaving our company. **In this fiscal year**, we also commissioned a specialist global firm to provide a continuous monitoring service whereby Accenture is notified of any credible report of supplier engagement in human trafficking or other prohibited activities.

^{5.} For the purposes of our reviews in India, we reviewed: (1) our top 20 employee recruitment agencies (covering 75% of our 7,000 employees recruited this fiscal year via this channel); (2) our top 4 campus recruitment partners (covering most of our 13,000 employees recruited via this channel); (3) Linked In and Naukri (who together cover 97% of our employees recruited via social media); (4) all of our temporary staffing and manpower agencies.

OUR TRAINING ON SLAVERY AND HUMAN TRAFFICKING

Accenture UK continues to provide targeted training to 100% of our Procurement specialists who are responsible for sourcing and contracting with Accenture suppliers. Specifically, we continue to train our Procurement teams to understand the nature of slavery and human trafficking risks, and the critical need to assess and understand what steps our proposed suppliers are taking to prevent slavery and human trafficking. For example, we commissioned a training video to raise awareness of our human rights commitments and what we expect of our people and of our suppliers: this is mandatory training for our UK Procurement team.

OUR WIDER EFFORTS TO SUPPORT THE ELIMINATION OF HUMAN TRAFFICKING AND SLAVERY

To illustrate the wider efforts Accenture makes around the world to help eliminate human trafficking and slavery, we jointly developed with the Child in Need Institute an innovative mobile-based solution called "GPower" (short for Girl Power).

This solution uses cloud technologies and analytics in real time to track

vulnerabilities of adolescent girls and facilitate access to government services for education, protection, health and nutrition. GPower is currently used by more than 6,000 families in India, and has succeeded in saving more than 200 girls from trafficking and child marriage in a single year.

LOOKING AHEAD

Accenture continues 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 Accenture UK's active membership of the United Nations 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.

David Sawyer continues, as our nominated Modern Slavery Act Officer, 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 Oliver Benzecry as its designated director, at its board meeting on 21 February 2018, and the information in this statement is accurate as at that date.

Signed for and on behalf of Accenture (UK) Limited



OLIVER BENZECRY

Chairman and Managing Director, Accenture (UK) Limited 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 <u>Corporate Citizenship</u> <u>report.</u>

To see our Code of Business Ethics and our key policies relating to slavery and human trafficking, please see:

- Our Code of Business Ethics
- Our global Policy on Raising Legal and Ethical Concerns and Prohibiting Retaliation
- Our global Policy on Prohibiting Human Trafficking, Forced Labour and Child Labour.

To see our Modern Slavery Act statement from 2017 please click <u>here</u>.

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 <u>https://businessethicsline.com/</u> <u>accenture/.</u>

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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