

**MODERN
SLAVERY ACT
TRANSPARENCY
STATEMENT** 2019

ACCENTURE (UK) LIMITED

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 trafficking¹ in our 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. As in previous years, our intention has been to be thoughtful and targeted in our reviews of our suppliers and in our engagement with them. We explain below some of the key steps we have taken since our last Modern Slavery Act Transparency Statement.

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 2019 Modern Slavery Act Transparency Statement below.

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 in accordance with the requirements of section 542 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

In this statement, 'Accenture UK' means Accenture (UK) Limited.

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.

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 469,000 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.

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 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

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

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.

Our [Code of Business Ethics](#), applies to all Accenture employees around the world and provides a framework within which 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.

As part of our wider risk-management processes, and consistent with our commitments under the UN Guiding Principles, we have continued to conduct appropriate 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

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.

These Standards 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.

ACCENTURE'S SUPPLY CHAIN

Accenture UK currently assesses our overall risk profile in relation to Accenture suppliers³ 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 2,000 Accenture suppliers: about 90% of this spend is with companies that have a presence in the United Kingdom, about 9% 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 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.

3. 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).

OUR SUPPLY CHAIN DUE DILIGENCE AND MONITORING PROCESSES

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.

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

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 modern 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. **In this fiscal year** therefore, we have actively engaged with senior global leadership and local teams at Jones Lang LaSalle ('JLL'). Like Accenture, JLL is a signatory to the United Nations Global Compact and has been recognized by Ethisphere as one of the world's Most Ethical Companies.

JLL has over 10,000 personnel involved in the provision of facilities management and related services to Accenture in India and the Philippines. Their services cover a wide range of activities, including buildings maintenance, janitorial, security and catering management services. Our engagement with JLL has enabled Accenture to appreciate the level of commitment and focus that JLL brings to this critical issue in terms of its operations and supply chains around the world.

Our engagement has also enabled Accenture to better understand the specific risks JLL has identified in its industry and countries of operation, and to more fully understand the extent and nature of the protections that JLL has in place to prevent modern slavery and human trafficking. Finally, both JLL and Accenture benefitted from this opportunity to share our respective views on how to continue to evolve best practices and smart strategies in this complex area.

Separately, we continue to work with 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 and they are now monitoring 100% of Accenture suppliers in the UK (about 2000 companies).

LIVING WAGE

Accenture UK is an accredited 'living wage' employer⁴. 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.

This fiscal year, building on our requirement of Accenture suppliers in the UK to pay a living wage, Accenture has conducted living wage reviews in 10 key countries. We reviewed wage levels of over 36,000 managed contractors⁵ provided by our external vendors. Outside the UK and Ireland, we developed both country and location-specific points of view using a range of external and internal reference and data points (e.g.

publications on living wage, cost-of-living information, internal and external salary benchmarks). Our review confirmed that the vast majority of these managed contractors already received a living wage. We found discrepancies in fewer than 2% of cases and these have now been remediated.

This fiscal year, Accenture is also seeking to drive the adoption of living wages with all our suppliers around the world. To this end, we have set a new expectation in our global Supplier Standards of Conduct: we strongly encourage all our suppliers to pay a living wage to their people who directly provide services to Accenture and/or our clients.

4. In this statement, the "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.

5. In this statement, 'managed contractors' means contractors employed on a time and materials basis through our Contractor Exchange (also called agency workers in some countries)

OUR TRAINING ON SLAVERY AND HUMAN TRAFFICKING

We continue to provide targeted training on slavery and human trafficking to 100% of our Procurement specialists in the UK who are responsible for sourcing and contracting with Accenture UK suppliers.

This fiscal year we will also be ensuring that all relevant Procurement professionals across the global Accenture organisation are aware of and reinforcing with suppliers the underlying human rights messaging in the new living wage provision in our updated Supplier Standards of Conduct.

In this fiscal year we published a short [video animation](#) on our global enablement page for Accenture suppliers. The purpose of the video is to articulate our commitment to the United Nations Global Compact around environment, social and governance factors and the human rights and high labour standards we require of our global network of suppliers, with a particular focus on slavery, forced labour and human trafficking.

We use this video as part of the wider expectations we set with our supplier community around ethical and responsible business (including decent working conditions), building on the commitments we set out in our global Supplier Standards of Conduct. We have presented this video animation at a number of events in UK and Ireland this year to raise awareness across the procurement ecosystem.

In this fiscal year, Accenture led and hosted a day-long workshop in Dublin in June 2018, for 25 of our key suppliers with attendees from the United States, United Kingdom and Ireland. The purpose of the workshop was to collaboratively explore themes of human rights and modern slavery.

LOOKING AHEAD

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. Accenture is also an active participant in the UN Global Compact's Action Platform, which provides a launch pad for participants to take specific actions to help promote the goal of decent work in global supply chains.

We also continue to look for opportunities to support our clients in this important area. As part of the National Analytics Solution (a UK Home Office funded project) we have **in this fiscal year** worked with the West Midlands Police and other law enforcement bodies to develop and pilot an analytics solution to help identify and prevent slavery and human trafficking.

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 15 February 2019, 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

FURTHER INFORMATION

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](#) and [2018](#) are also available.

RAISING CONCERNS

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

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 specialized 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 469,000 people serving clients in more than 120 countries, Accenture drives innovation to improve the way the world works and lives.

Visit us at www.accenture.com.