

BDO Modern Slavery Act Statement 2020

The Modern Slavery Act 2015

The Modern Slavery Act 2015 (“the Act”) signalled a new drive in the fight against slavery. It includes a duty on businesses to play their part in stopping modern slavery in global supply chains.

BDO LLP (“BDO”) is committed to being a responsible business and complying with the requirements of the Act.

Section 54 of the Act (*Transparency in Supply Chains*) requires BDO to publish a statement on its website of the steps taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our own business. Suppliers are those businesses that supply either goods or services (or both) to BDO.

Firm Structure and supply chain

BDO is a UK accountancy and business advisory firm that provides tax, audit and advisory services to a wide range of clients in domestic and international markets. We are driven by our core values, are proud of our culture and see it as our purpose to help others succeed.

As at our financial year end, 3 July 2020, we had 348 partners and employed 5,249 people and use contractors to support client facing teams and business operations. We are the UK member firm of the BDO International network.

The BDO International network provides business advisory services in 167 countries, with over 91,000 people working out of over 1,650 offices worldwide¹.

Other member firms in the BDO global network are part of our supply chain. However, for the purpose of the Act, the relationship we have with these firms is different from those with third party external suppliers. Member firms are required to comply with the ethical principles set by BDO International. For this reason, we have excluded BDO member firms from the definition of ‘suppliers’ in our Modern Slavery Act Statement.

BDO operates the following policies and procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Supplier Code of Conduct

One of BDO’s core principles is to operate its business both lawfully and ethically, which includes working with suppliers that are aligned to the same values. BDO encourages and

¹ As at 30 September 2020

expects its suppliers to operate in accordance with applicable laws, respecting individuals' human rights, and mindful of environmental and safety impacts of products and services. BDO's Supplier Code of Conduct sets out the standards expected of any supplier doing business with BDO. Our Supplier Code of Conduct is publicly available on our website.

Key requirements of BDO's Supplier Code of Conduct are for our suppliers:

- to have policies, systems and/or procedures in place to ensure the prevention of unethical business practices, including, but not limited to, human rights abuses, money laundering, fraud, bribery, corruption, and other improper payments, benefits or gifts
- not to use slave labour, child labour or forced labour, nor to engage in or support human trafficking
- to ensure that working hours, wages, overtime pay and working conditions are in compliance with all applicable laws, and
- to provide a clean, safe and healthy working environment to protect the occupational safety of all employees.

Culture and Ethics

BDO strives to maintain the highest standards of professional conduct and ethical behaviour. All partners and staff are required to abide by the ICAEW Code of Ethics, which requires the Firm and our people to act in accordance with five fundamental principles:

- Integrity
- Objectivity
- Professional competence and care
- Confidentiality
- Professional behavior

We promote a unifying culture where people are encouraged to be themselves, are inspired and challenged, work together and are successful.

We are guided by our Values which are:

- Being responsible and acting with integrity
- Being genuine
- Being collaborative
- Being bold

Our Values work interdependently and are built on three fundamental principles:

- Our Values ensure that as a regulated business we act with integrity, we do what is right and they guide everything that we do

- Our Values start with each of us as an individual. We live the Values, we lead by example and it is our fundamental way of 'being'
- Our Values help us all to be the best version of ourselves and encourage an environment that is inclusive and open.

Ultimately our Values nurture and protect our culture, one that is ethical, empowering, collaborative, inclusive and ambitious. Together with our Code of Conduct, they guide us in our day to day interactions and decision making with each other, our clients and society as a whole.

Our Code of Conduct is a framework to help us do the right thing. It is an expression of our shared values and the way we do business, which helps us to work openly, honestly and ethically. The Code of Conduct includes the following principles:

- We act with integrity. We are open, honest and fair
- We reject unethical or illegal business practices
- We maintain our objectivity
- We are alert to and deal with perceived and actual conflicts of interest
- We foster a culture where professional scepticism is appropriately applied
- We protect the confidential and personal information of our clients, our people and others with whom we do business
- We only undertake professional activities we are competent to do
- We keep our professional knowledge up to date and share best practice
- We conduct ourselves professionally and strive at all times to protect and enhance our brand and reputation
- We are accountable for our actions.

Recruitment

BDO uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Our policies include ensuring that all candidates produce original documentation indicating that they have the right to work in the UK prior to commencing employment.

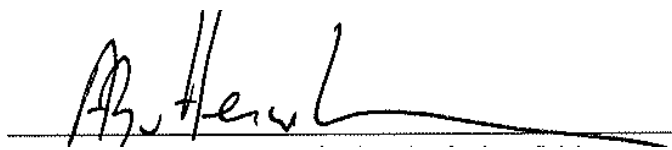
Speaking Up

BDO encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, BDO. BDO's Speak Up policy and procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can follow our confidential reporting process.

Supplier Risk Assessment & Due Diligence

- We recognise our responsibility to identify and address potential or actual human rights impacts linked to the goods and services we purchase.
- A risk triage process is in place to assess modern slavery and human rights risk with our suppliers.
- We have developed a more comprehensive supplier due diligence questionnaire where there is a higher risk of modern slavery. Any exception responses are followed up with the supplier and investigated further.
- In cases where suppliers fail to provide adequate evidence of appropriate procedures to prevent modern slavery and human trafficking in their supply chains, we will seek to help them achieve the appropriate outcome.

This statement constitutes the modern slavery and human trafficking statement of BDO LLP and its subsidiary undertakings, BDO LLP Limited and BDO Services Limited for the financial year ended 3 July 2020. It has been approved by the members and signed on their behalf by:

A handwritten signature in black ink, appearing to read 'A. Butterworth', is written over a horizontal line.

Andrew Butterworth

Designated Member

20 January 2021