Modern Slavery Statement September 2022

Modern Slavery Act Statement for the Financial Year to 31 March 2022

This statement is made on behalf of Crowe U.K. LLP (Crowe UK) in respect of its financial year to 31 March 2022 and pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act).

Overview

Crowe UK does not tolerate improper business conduct of any sort and we are committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the Modern Slavery Act in any part of our business or in our supply chain.

Crowe UK

Crowe UK is a Limited Liability Partnership incorporated in England and Wales with company number OC307043. Crowe UK is a leading audit, tax, advisory and risk firm. The Firm is regulated by the Institute of Chartered Accountants In England and Wales and the Financial Conduct Authority. Crowe UK has seven offices based in England, and although it provides services to business located elsewhere, the majority of its business is conducted with UK based clients. The annual turnover for the year to 31 March 2022 was £127 million. Further details, including the address of the registered office, are available on the website.

Crowe UK is also the UK Member of Crowe Global, a network that consists of more than 800 offices in 150 countries around the world. All of these firms are involved in the provision of accountancy and related services and most are similarly regulated by professional bodies in their own jurisdictions.

This statement relates to actions and activities of Crowe UK during the financial year to 31 March 2022.

People/Services/Goods

The services Crowe UK provides to its clients are office-based, remote working based, or site-based at clients' premises (offices, homes and sites being, for the most part, located in the UK).

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The large majority of its work is undertaken by its own people. The Firm has employment policies that protect its people from unfair treatment and promote a fair and inclusive workplace, and Crowe UK reviews pay/rewards annually. The Firm's recruitment processes are in line with employment laws.

Crowe UK's professional service supply chain consists, on the whole, of other regulated professional service firms and individuals. Its assessment is that this represents a very low risk of anyone supplying it with services being involved in slavery and/or human trafficking.

Additionally, on the occasions where Crowe UK contracts others to assist in the provision of services, the Firm takes steps to ensure such third parties have any required accreditations and are appropriately qualified as necessary for the work that is undertaken. Given the nature of these relationships and the fact that they are predominantly UK-based, Crowe UK also deems them very low risk and so considers that there are no additional steps required over and above its supplier approval processes. Where such relationships are not UK-based, appropriate enquiry, procedures and/or diligence have been undertaken.

In terms of goods and non-regulated services supplied to Crowe UK, almost all goods will be items for use in its UK offices, or UK services in respect of normal business operations such as office space, stationery, travel and accommodation costs etc. The Firm assesses this to result in a very low risk profile that anyone providing it with these goods or indirect services will be involved in slavery and/or human trafficking.

The Firm's Risk Manual, a policy document which applies to all partners and employees, makes specific reference to the Modern Slavery Act and the Firm's position on improper business conduct of any sort. Partners and employees confirm compliance with this and other policies annually.

The Firm encourages the reporting of any concerns in this area, whether under its Whistleblowing Policy or otherwise, in order that partners and employees can be confident that, if they consider it appropriate to raise a concern, they can report it without fear of retribution, victimisation or detriment. We log complaints received and, to the date of this statement, Crowe UK has had no identified instances of modern slavery.

We undertook a review of our supply chain to identify primary risk areas based on supplier activity types, with enhanced due diligence for certain suppliers over a defined threshold. We did not identify issues relating to, or instances of, modern slavery. We are in the process of reviewing whether to adopt a Supplier Code of Conduct and embed that into our processes, increase obligations for smaller, lower risk suppliers, and introduce firm-wide modern slavery training.

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Given the low risk profile of anyone supplying our Firm with goods/services being involved in slavery and/or human trafficking, we believe the current policies and procedures are sufficient. Crowe UK will review and update these in accordance with The Act.

This statement is available on the Modern Slavery Statements Registry.

This statement was approved by the Executive and Supervisory Board of Crowe UK on behalf of its members, and is signed by:



Nigel Bostock

Chief Executive, Crowe U.K. LLP

For further details on our Modern Slavery Act Statement, contact us.

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