

Modern Slavery Act Statement 2025

This statement is made on behalf of Saffery LLP and its UK subsidiary entities (a list of which are recorded in the firm's annual accounts available at Companies House). It sets out the steps we have taken to mitigate the risk of modern slavery and human trafficking occurring within our operations and supply chains.

This statement is made in respect of the financial year ended 31 March 2025.

References to 'Saffery', 'we' or 'our' are references to all of the entities noted above.

Our organisation

Saffery is a professional services firm providing accountancy, taxation and related services to a range of clients, including private individuals, corporates and not-for-profit organisations. Saffery operates out of 9 offices across the UK. It has approximately 90 partners and over 1175 employees.

Saffery is a member of the Institute of Chartered Accountants in England and Wales (ICAEW) which is the professional body in England and Wales regulating the activities of chartered accountants.

Our operations

Our principal activity is the provision of commercial accountancy and taxation services. Our practice is regulated, meaning our people are required to conduct themselves in accordance with the principles and standards required by the ICAEW as well as relevant legislation. In particular, Saffery and its people are subject to the Code of Ethics of the ICAEW which emphasises: (i) that its members are expected to demonstrate the highest standard of professional conduct in their working practices and (ii) the importance of ethical behaviour in their activities.

We consider the risk of modern slavery and human trafficking within our direct operations to be low given that we are a regulated practice providing professional services to our clients. Most of our people (being our partners and our employees) are qualified accountancy, taxation or other business professionals. However we acknowledge the prevalence of modern slavery and human trafficking globally and our corporate responsibility to ensure that our operations and supply chains do not contribute to adverse human rights impacts.

Our supply chain

Our work is conducted from our offices across the UK. Our supply chain is comprised predominantly of goods and services procured for use in those offices for the purpose of enabling our people to deliver our services to our clients.

We procure goods and services across the following areas: property leasing, facilities management, human resources, information technology, hospitality, events and catering. We also engage with

other professional services organisations across the UK and globally to support our work for our clients.

Our supply chain comprises a wide range of suppliers from smaller businesses to global companies. The majority of our supplier expenditure is concentrated in the UK.

We have a procurement process that sets out our requirements in relation to onboarding suppliers. This includes managing the potential modern slavery risk across our supply chain by undertaking appropriate due diligence into all suppliers and placing contractual requirements on suppliers to comply with legislation including the Modern Slavery Act 2015.

Our clients

There are potential modern slavery risks associated with the provision of our client services. As part of our client acceptance process, we have procedures in place that require an evaluation of the client's risk. We have a dedicated Financial Crime Compliance team who manage our evaluation of this risk.

Our people

Saffery takes its responsibilities as an employer seriously and complies with all relevant requirements in relation to its recruitment and engagement with its people. All employees who join Saffery are subject to standard checks including verification of identity, right to work, references and evidence of qualifications where appropriate. We continuously assess and update our policies as they relate to our people to ensure they remain aligned with good practice.

We are committed to recognising the contributions of our people through fair and meaningful pay practices.

We provide our people with training to support our ethical approach to business practices.

We maintain a dedicated page on our Intranet which provides links to the Modern Slavery legislation, various guides on understanding the Modern Slavery Act 2015 and the ICAEW's materials and guidance around modern slavery.

We have a dedicated partner with responsibility for ethical matters. This partner is supported by a Compliance team whose remit includes consideration of all ethical matters impacting our operations.

Our policies

The actions we take to reduce the risk of modern slavery and human trafficking in our operations are supported by various policies.

- Code of Conduct: this applies to all partners and staff and outlines our core business values of excellence, integrity, collegiality and enthusiasm. These principles underpin how Saffery operates as an organisation. It is available on our website: **[A responsible business – Saffery](#)**

- **Anti-Money Laundering:** we have rigorous processes to ensure compliance with anti-money laundering requirements which all of our people are required to comply with.
- **Procurement:** our procurement process covers our engagement with suppliers across property space, facilities management, human resources, hospitality and catering and information technology. It requires our people to undertake due diligence into potential suppliers to identify potential risks.
- **Responsible Business:** this policy recognises the importance of sustainable, responsible business practices and the impact they have on our people, our clients, the environment, and broader community. It outlines our commitment to integrating environmental, social, and governance considerations into our operations, decision making processes, and client services.
- **Diversity and Inclusion:** our three-year Equality, Diversity & Inclusion Strategy 'Everyone Belongs' was launched in 2023. It sets out our commitment to increasing diversity, fostering inclusion and establishing a robust governance for equality, diversity and inclusion.
- **Whistleblowing:** staff are encouraged to speak up without fear of reprisal to voice any concerns about activities encountered while working for Saffery. Saffery's policy on whistleblowing highlights its commitment to the highest possible standards of openness, honesty and accountability.
- **Bribery Policy:** this policy prohibits bribery and related corrupt activities and includes safeguards designed to detect and prevent bribery and corruption and to ensure compliance with regulatory requirements.

Looking ahead

For the financial year ending 31 March 2026, our focus is:

- Developing new training relating to modern slavery and whistleblowing. This training will be a mandatory annual requirement for all of our people.
- Developing training for those staff most actively engaged in procurement on the importance of conducting due diligence into potential suppliers and how to undertake effective due diligence.
- Reviewing our procurement process with a focus on ensuring modern slavery risks and responsible business practices are appropriately embedded as part of our procurement practices.

Matthew Burton
Managing Partner and Designated Member
Saffery LLP

31 March 2025