



UK Modern Slavery Statement 2024

In respect of the year ended 30 September 2024



Introduction

At KPMG, we recognise the prevalence of modern slavery globally and do not tolerate modern slavery in our operations and value chains. While the professional services industry is not typically considered a high-risk sector for labour-related breaches – given that most of our people are highly skilled, permanently employed professionals – we remain acutely aware that risks can arise across our operations and value chains. As such, we recognise that we have an important role to play in identifying and mitigating potential harm to people.

This Statement sets out the actions taken to identify, assess, address, and prevent modern slavery in our operations and value chains for the financial year ended 30 September 2024 (“FY24”). It has been prepared for KPMG LLP (“KPMG”) pursuant to section 54 of the UK Modern Slavery Act. This Statement also covers the following wholly owned subsidiaries of KPMG: KPMG United Kingdom plc and KPMG Crimsonwing Limited¹.

References within this Modern Slavery Statement to our “people” means employees, members (partners) and contingent workers of KPMG LLP, KPMG Crimsonwing Limited and KPMG United Kingdom plc do not have any employees but are serviced by the employees, partners (members), and contingent workers of KPMG LLP.

KPMG commits to respect the human rights of our people and other individuals with whom we deal. As part of the global KPMG member firm network, we are required to implement policies and procedures consistent with the Universal Declaration of Human Rights, the International Labour Organisation’s (“ILO”) Core Conventions, the United Nations Guiding Principles on Business and Human Rights (“UNGPs”) and the Organisation for Economic Co-operation and Development’s (“OECD”) Guidelines for Multinational Enterprises.

KPMG International’s commitment to respecting human rights builds on its longstanding commitment to the UN Global Compact, to which KPMG International has been a participant since 2002.



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¹ KPMG UK Limited, a subsidiary covered in last year’s statement, ceased trading in April 2023, and as such, did not generate revenue in FY24.

Our business structure and supply chains

KPMG is constituted in the UK as a limited liability partnership under the Limited Liability Partnerships Act 2000. KPMG is part of the KPMG global organisation of professional services firms providing Audit, Tax, and Advisory services to a wide variety of public and private sector organisations. KPMG Crimsonwing Limited provides advisory services and KPMG United Kingdom plc provides tax and advisory services to clients on behalf of KPMG LLP.

We often utilise our global KPMG member firm network to support on elements of our client engagements or operations to improve efficiency or take advantage of specialist knowledge available in jurisdictions outside the UK. In some instances, our staff are engaged by other KPMG member firms across the world to support on client engagements. Our relationship with KPMG member firms differs from that with external third parties. Therefore, we have excluded these relationships from “our value chain” in this Statement.

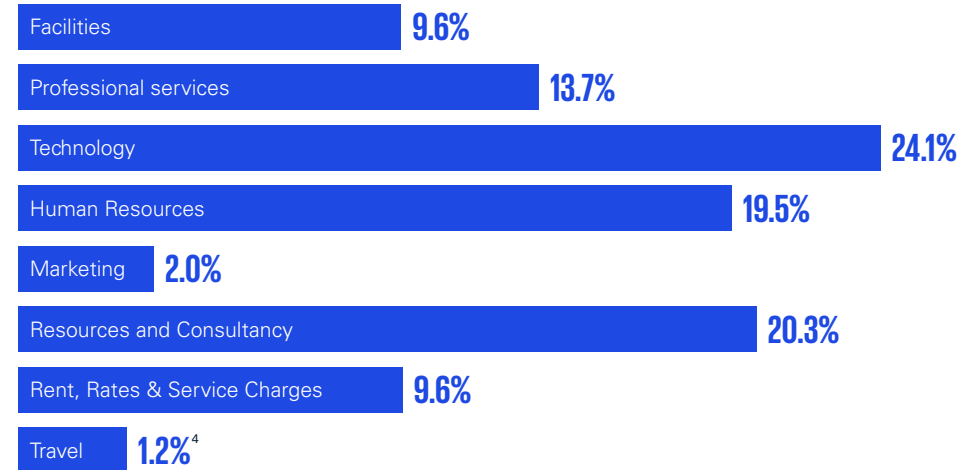
KPMG International acts as the coordinating entity for the overall benefit of KPMG member firms. KPMG International is a private English company limited by guarantee which does not provide professional services to clients or audited entities. Further details about KPMG International and its business, including our relationship with it, are available in the [2024 KPMG International Transparency Report](#).

KPMG has 16,860 employees and members (partners), operating out of 20 offices across the UK.

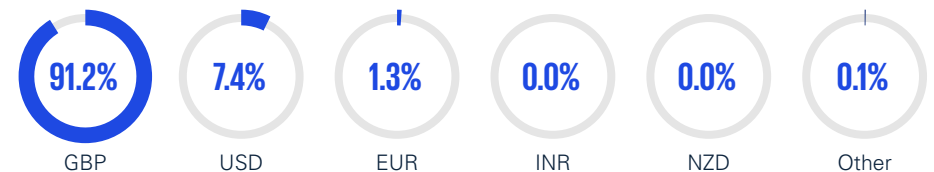
Where we source

As a professional services firm, we procure goods and services from suppliers for the operation of our business. In FY24, KPMG sourced from ~2,200 suppliers². We track our supplier spend by currency. Most of our supplier spend is in GBP and USD, which are predominantly used in lower-risk jurisdictions where compulsory modern slavery legislation is in place, and where the prevalence of modern slavery is lower according to Walk Free’s 2023 Global Slavery Index. However, we are acutely aware that slavery-like practices can and do occur in the UK and the US and we recognise that our relationships with suppliers may still expose us to modern slavery risks, which must be identified and managed.

Annual procurement spend by key categories across FY24³



Annual procurement spend by currency across FY24^{3,5}



² Spend listed in this Statement does not include certain suppliers in the travel category, expenses, and member firms providing us with products and services.

³ Figures are rounded.

⁴ The travel category captures spend made through our P2P platform and does not include air travel, rail, car rental, or hotels.

⁵ The “Other” category captures the minimal spend (spend under £100,000) in each of the following currencies over the course of FY24: AED, AUD, DKK, BMD, SEK, SGD, CAD, CHF, CNY, CRC, ZAR, HKD, JPY, MAD, SAR. In FY24 spend in GBP, USD, EUR, INR, NZD was over £100,000.

Our policies

KPMG’s approach to identifying and mitigating modern slavery is upheld by a framework of policies which help us identify and combat risks and impacts to the firm and the people with whom we deal, including forced or compulsory labour. Our people are required to adhere to our policies which are made available on our internal intranet. The third parties with whom we engage are also required to adhere to certain policies.



Our rolling commitments

Progress

Conduct an annual review of our policies and supporting process maps

Complete for FY24

KPMG International Human Rights Statement

KPMG International has made a commitment within the [KPMG International Business and Human Rights Statement](#) to respect human rights. The statement sets out that, in following the UNGPs, KPMG International, its related entities and member firms undertake to avoid causing or contributing to adverse human rights impacts, address any impacts that may occur, and seek to prevent impacts they are linked to through business relationships. The commitment outlines a requirement for KPMG member firms to implement policies and procedures in line with international human rights standards and guidance, such as the Universal Declaration of Human Rights, the UNGPs, ILO Core Conventions, and the OECD’s Guidelines for Multinational Enterprises.

Anti-slavery and Human Trafficking Policy

Our internal Anti-slavery and Human Trafficking Policy applies to our people and subcontractors. The policy reaffirms our approach to reporting instances of modern slavery and our responsibilities under international human rights guidance.

Our Code of Conduct

KPMG commits, in Our Code of Conduct (“Our Code”), to respect and support the human rights of our people and other individuals with whom we deal. Our Code is applicable to all our people. Third parties acting as subcontractors for KPMG are made aware of Our Code within our contractor guidance document. Where subcontractors and alliance partners do not have their own code of conduct, or where their code of conduct does not meet the standards set within KPMG’s, they may be required to agree to sign up to KPMG’s Code of Conduct.

Speak Up Policy

Our internal Speak Up Policy encourages our people to raise suspicions or concerns about suspected wrongdoing, including those relating to modern slavery. The policy outlines the avenues through which a concern can be raised, how concerns are investigated, and our zero-tolerance approach to retaliation.

Grievance Policy

KPMG has an internal Grievance Policy through which employees can raise concerns if they feel they have been directly impacted by the matter in question or have been victimised for whistleblowing.

Financial Crime Policies

Our internal policies, procedures, and controls concerning Anti-bribery and Corruption, Anti-money Laundering and Counterterrorist Financing, Corporate Criminal Offences, Anti-fraud, and Sanctions, support KPMG in identifying, assessing, managing, and mitigating financial crime risks, including modern slavery and human trafficking, given these can be predicate crimes to money laundering, bribery, and/or corruption.

Supplier Code of Conduct

Our [Supplier Code of Conduct](#) (“SCoC”) reiterates our dedication to eradicating modern slavery and human trafficking in our supply chain and sets out the values and commitments our suppliers are expected to adhere to in order to meet KPMG’s standards. Our SCoC outlines our expectations for our suppliers to operate speak-up mechanisms, provides details of KPMG’s Speak Up hotline, and incorporates clear provisions on minimum working age requirements and applicable laws regarding wages, working hours, and forced labour.

KPMG’s suppliers are asked to agree to our SCoC during the procurement process. Where a supplier does not agree to our SCoC, detailed analysis and risk review are undertaken by our Responsible Supply Chain and Professional and Ethical Standards teams which will include a comparison of the supplier’s own code of conduct and commitments to KPMG standards.

Where we feel a supplier has fallen short of our standards, KPMG may require suppliers to undertake remediation activities. If the supplier fails to resolve the issue in an acceptable manner, we will consider termination of the supplier relationship altogether.

Our risk assessment, management, and due diligence processes

Our rolling commitments

	Progress
Undertake a biennial modern slavery self-assessment questionnaire (SAQ) process for suppliers	Complete for FY24

Our annual commitments

	Year set	Progress
Look to implement recommendations arising from our subject matter expert (SME) ⁶ review of the risk assessment process for suppliers, where appropriate, during our refreshed supplier risk assessment process	FY23	Complete
Look to implement recommendations arising from our SME review of the SAQ scoring methodology, where appropriate, when reviewing supplier responses to the SAQ	FY23	Complete
Incorporate modern slavery and human rights provisions into our Contractor Guide known as "Working at KPMG. Important information for Contractors" which is circulated to subcontractors	FY23	Complete
Look to implement recommendations arising from our review of modern slavery risks in tandem with client facing teams where appropriate. This includes adding specific modern slavery questions to our Client Risk Assessment ("CRA"), Third Party Risk Assessment ("TPRA"), and Engagement Risk Assessment ("ERA") processes (if applicable)	FY23	Complete ⁷
Amend our procurement guidance to include information regarding how purchasing practices can exacerbate modern slavery risks	FY24	Complete
Assess the findings from our modern slavery risk assessment and create actions to drive improvements in our modern slavery programme	FY25	New
Engage with those suppliers who have scored lower in the SAQ over the course of FY25 with the aim of supporting improvements to their modern slavery programme	FY25	New

⁶ Our modern slavery SMEs are members of our consulting practice who specialise in reviewing, designing, and implementing modern slavery and human rights policies, processes, and controls.

⁷ As at year end FY24 we have made updates to guidance within our ERA process. We have also set targets to integrate agreed upon updates to the TPRA process, including providing modern slavery training for the relevant teams. These updates will be actioned in FY25.

The risk of modern slavery or slavery-like practices increases when the following indicators are present:

- High-risk sectors and products, such as IT hardware, catering, and vending services.
- High-risk jurisdictions, such as areas where there is conflict, corruption, or weak rule of law, which increases the risk of modern slavery.
- Vulnerable worker populations, such as base-skilled or unskilled labour, temporary, seasonal or migrant workers, workers from historically excluded groups, or children, all of which present a higher risk of modern slavery.
- Business models structured around high-risk work practices, such as reliance upon subcontracting and outsourcing or entities with complex ownership structures.

Where multiple modern slavery risk indicators are present, there is a greater likelihood of harm to people occurring. In FY24, KPMG began formalising and refreshing our Modern Slavery Risk Assessment to re-review our exposure to modern slavery risks and ensure we can continue to focus our efforts where the risk of harm to people is highest.



Living Wage

We're proud to be an accredited Living Wage employer and continue to provide strategic support to the Living Wage Foundation as a principal partner. We are committed to ensuring that all our people are paid fairly. We expect our suppliers to maintain a just and fair approach to remuneration and pay at least the applicable minimum wage. As an accredited Living Wage employer, we also require our supplier staff who are working on site at KPMG premises in the UK to be paid the real Living Wage (national or London Living Wage depending on location) by their employers.

In October 2023, the Living Wage rates for 2023-2024 were announced and our Responsible Supply Chain team have communicated with our suppliers providing onsite staff to ensure payment is in line with the uplifted rate. This process is due to take place again following the announcement of new Living Wage rates in October 2024.

Our risk assessment, management, and due diligence processes

Continued

How we approach modern slavery risk in our operations

Our employees

KPMG operates in the professional services sector, employing highly skilled individuals. Although the risk of labour-related breaches is lower in our sector, we are mindful of the possible risks regarding our people and carry out robust checks prior to membership/employment to ensure that modern slavery does not take place in our business. This includes screening once an offer of employment has been accepted. This process may differ between roles but, as a minimum, checks include:

- Right to work checks
- Ethics and independence clearance
- Criminal record checks
- Financial probity checks
- Activity checks
- Fraud checks
- Highest academic qualification checks if appropriate
- Any other regulatory or professional checks relevant to the role
- Where a candidate has been living in another country for 90 days or more over the last 12 months, our screening checks are run in relation to both the UK and the country in question

Our externally hired Partners and Directors undergo enhanced screening.

Our UK Talent and Acquisition team work closely with our Risk and Compliance teams to monitor our recruitment process in line with the Equality Act and Rehabilitation of Offenders Act as well as other UK legislative requirements.

Our recruitment and screening processes are operated by an external provider. All recruitment suppliers engaged are subject to our Responsible Supply Chain processes described below.

How we approach modern slavery risk in our value chain

If any of our strategic third-party arrangements, our clients, or audited entities are associated with slavery-like practices, we could inadvertently be linked to such practices through the provision of our services.

Our suppliers

We have an ESG-focused Responsible Supply Chain programme, which drives improvements on sustainability and social issues. Managing modern slavery risk, in relation to suppliers providing KPMG LLP with goods and services, is made up of our risk assessment and due diligence processes. These processes are set out below.

Risk assessment

Every two years, those suppliers with whom we have an annual spend over £50,000 are assigned a high, medium, or low modern slavery risk rating. Ratings are determined by the jurisdiction of the supplier and our Modern Slavery Procurement Taxonomy which determines risk by sector. In FY24 we completed our review of the Modern Slavery Procurement Taxonomy and our high-risk jurisdiction list using data from the 2023 Global Slavery Index.

Due diligence

Our approach to due diligence is led by good practice guidance. At the supplier tender stage, suppliers with estimated spend greater than £100,000 are requested to complete the Responsible Supply Chain Questionnaire, which includes questions relating to modern slavery. Suppliers' responses are reviewed and scored to assess their modern slavery risks and the controls they have in place to mitigate them. At onboarding, all suppliers undergo adverse media screening, which includes modern slavery and human rights indicators. Tier one and tier two suppliers are also subject to continuous risk monitoring, including weekly screening for adverse media using terms relating to a range of issues including modern slavery. Those suppliers deemed high- or medium-risk according to our procurement taxonomy, very high-risk according to our assessment of jurisdiction risk, or where adverse media has been identified, are required to complete a modern slavery SAQ.

The SAQ is based on the Modern Slavery Assessment Tool (MSAT) produced by the UK Government and focuses on the key policies and procedures that our suppliers have in place to identify, assess, and address modern slavery risk in their operations and supply chains. Following the review, our Supplier Managers or members of the Responsible Supply Chain team engage with suppliers on areas in need of development to support in strengthening their anti-modern slavery controls. In FY24, we finalised a review of the SAQ and our scoring methodology. SAQs were sent to our suppliers in FY24 as determined by our risk assessment process described above and their responses have been scored. Using our updated scoring methodology, each supplier is scored overall and against four priority focus areas to support the assessment of their anti-modern slavery approach. We have made a commitment to engage with those suppliers who scored lower in the SAQs over the course of FY25 with the aim of supporting improvements to their modern slavery programme.

Our risk assessment, management, and due diligence processes

Continued

Our alliance partners

KPMG forms alliances with external organisations where we intend to work with a company for multiple engagements, transactions, or events, or to work on common interests, or create a common go-to market approach. Typically, our alliance partner relationships are considered lower risk for modern slavery given many of our alliance partnerships are with technology software providers. However, there is a growing trend of alliances with organisations operating in healthcare and other sectors. To manage any risks which may be associated with our alliance partner relationships, KPMG operates an Alliances Policy which outlines the controls we have in place and is subject to annual review. Our Alliance partners go through our TPRA process, which allows our teams to consider

any potential Anti-Money Laundering (“AML”) risks, Know Your Client (“KYC”) risks, or risks picked up by adverse media checks including those relating to modern slavery, associated with the alliance partner, and whether its policies and processes are aligned to KPMG’s standards. If any material modern slavery risks were to be picked up during these processes, the KPMG partner (member) accountable for the risk in the relevant department must be notified and is required to engage with the Money Laundering Reporting Officer (“MLRO”) or the MLRO’s team to determine the level of risk and any actions to be taken. Where risks are deemed unacceptable, the relationship may be suspended or terminated. The TPRA process must be completed prior to the contract being signed and on an annual basis or more frequently if any material changes occur.

Our subcontractors

Subcontractors are entities which KPMG engages on a temporary basis to support the delivery of services to clients/audited entities, often where KPMG requires specialist knowledge to deliver the services. A subcontractor may advise KPMG in connection with the services KPMG is providing to its clients/audited entities or may be responsible for producing a specific deliverable to form part of KPMG’s services. Subject to complying with the subcontractor’s contract with KPMG, the subcontractor determines how it provides the advice/deliverable and is responsible to KPMG for such advice/deliverable. Individuals working for subcontractors are skilled individuals at low risk of modern slavery. As with our alliance partners, subcontractors are required to pass our TPRA prior to being engaged and are required to undergo further TPRA screening on at least an annual basis.

Our contingent workers

Our contingent workers are skilled individuals who are not employees of KPMG, but who directly or indirectly provide services to KPMG on a temporary basis. A contingent worker will perform a specific role for KPMG, which may include supporting the delivery of services to clients/audited entities. As skilled individuals, contingent workers are at a low risk of modern slavery. KPMG requires contingent workers to pass screening checks, the minimum requirement being equivalent to that required for KPMG’s employees. Contingent workers are also required to adhere to Our Values and Our Code of Conduct whilst providing services to KPMG. Contingent workers have access to

KPMG’s online policy library and are required to confirm they can access this and navigate it. KPMG operates a Contingent Workforce Policy, which provides guidance to our Hiring Managers on screening requirements and Hiring Managers’ responsibilities to ensure contingent workers are living Our Values and adhering to Our Code of Conduct.

Our clients and audited entities

KPMG’s primary focus is to provide professional services to clients and audited entities (“clients”). KPMG has a comprehensive CRA and ERA process that screens each client and engagement. As part of the CRA, clients undergo risk-based KYC and due diligence checks. Our client due diligence checks are conducted using a risk-based approach and include sanctions and politically exposed person screening, as well as watchlist screening, ownership checks, and adverse media checks using specific search terms which encompass modern slavery risk.

Our people have a responsibility to follow the firm’s mandatory client and engagement acceptance and continuance processes and use a decision-making framework called ACCEPT to make decisions on the work that we perform and who we work with. KPMG recognises that modern slavery is a predicate crime to money laundering and corruption. We have in place mechanisms for reporting concerns pertaining to modern slavery or human trafficking in relation to our clients, operations, and other third parties. Where modern slavery concerns are identified in relation to our clients, these would be escalated to the MLRO and the client engagement and acceptance partner for review.



Our risk assessment, management, and due diligence processes

Continued



Speaking up

Our people have a responsibility to report any instances where they witness or experience failings to respect the human rights of our people and the individuals with whom we deal. We have multiple channels for reporting concerns, including through our network of Ethics Champions and our Speak Up hotline. Our Speak Up hotline is a secure and confidential channel available to our people, clients, audited entities, subcontractors, suppliers, and other third parties for reporting any concerns about possible illegal, unethical, or improper conduct, including issues related to modern slavery. The hotline is available 24 hours a day, 7 days a week, in 27 languages. Concerns can be raised anonymously, and the hotline is operated by Clearview, a third-party provider of hotline services. In addition, we have appointed an independent ombudsman who oversees investigations, monitors the hotline's operation, and reports formally to our Board on the effectiveness of the firm's investigations into the reports received. Our Ethics Champion network comprises of a fully trained group of over 100 employees located across all offices and capabilities of KPMG. They serve as a point of contact for colleagues to raise concerns about

any ethical or integrity matter on engagements, non-compliance with policies, or any concerns around non-values-compliant behaviour by our people, clients, or suppliers. Concerns raised via Ethics Champions are escalated internally as appropriate, and those issues deemed to be of high severity are overseen by our independent ombudsman.

Our people are made aware of the Speak Up channels through Our Code, our annual Building Public Trust Training, and via the KPMG Intranet and other communications. When our people and third parties speak up, we are committed to listening, acting, and protecting those who raised the concern. Concerns can be raised anonymously, and we do not tolerate retaliation against any individual who speaks up. We operate a number of proactive processes to identify retaliation and we respond robustly if it is detected. During FY24, no complaints or concerns were raised regarding modern slavery or human trafficking in our operations or value chains via the Speak Up channels.

⁸ 2024 Global People Survey data is based on 10,805 responses. 2023 Global People Survey data is based on 13,434 responses.

Our approach to training

Modern slavery training is fundamental to raising awareness within organisations and building capabilities to mitigate risks and appropriately escalate concerns.

Our rolling commitments	Progress
Provide firm-wide modern slavery training biennially	Complete for FY24
Provide annual modern slavery training to Procurement and Supplier Managers	Complete for FY24
Offer modern slavery training to high-risk suppliers, particularly those who scored lower on SAQs	Complete for FY24
Continue to communicate with our people to build a culture of awareness around modern slavery, including who is accountable at the firm	Complete for FY24

Our annual commitments	Year set	Progress
Develop a training plan to raise awareness of modern slavery indicators and controls across a broader range of teams	FY23	Complete
Begin the implementation of elements of our modern slavery training plan as appropriate	FY25	New

9 Enables us to track and drive progress on our awareness raising activities across the firm. Note that firm-wide training is delivered biennially.

10 Enables us to track and drive progress on our awareness raising activities with teams most likely to come across modern slavery risks or incidents.

99.94%

of our people received firm-wide training on modern slavery.

FY24
(FY22: 99.10%)⁹

Building Public Trust Training

Firm-wide modern slavery training is provided to all our people biennially and was provided in FY24 as part of our wider annual Building Public Trust training. This is a mandatory requirement for all KPMG employees, members, and contingent workers. All outstanding training is strictly followed up and failure to complete training may feed into employees' performance reviews. The training on modern slavery for FY24 was built with input from our internal modern slavery SMEs.

Training on Our Code is also provided annually and is incorporated into the Building Public Trust training module. On an ongoing basis all new joiners to the firm are required to complete training on modern slavery as part of a broader Financial Crime module and, as of FY24, contingent workers and any suppliers or subcontractors with IT access are required to complete an equivalent module within a set period of joining. Given that modern slavery is a predicate crime to money laundering, everyone at the firm was required to complete mandatory training on Suspicious Activity Reporting as part of our Building Public Trust training in FY24.

Specialist modern slavery training

Our modern slavery SMEs provided modern slavery training to internal teams during FY24. This included training for Procurement teams and our Supplier Managers. This included a practical case study to enable our teams to better spot modern slavery risk indicators. Participants were asked to provide feedback regarding their understanding of modern slavery risks and confidence in managing these risks following the training. We are pleased that the feedback was positive. We will make efforts to continuously improve our training in future iterations.

71¹⁰

estimated internal team members provided with specialist modern slavery training.

FY24
(FY23: 44)

Our approach to monitoring effectiveness

FY24 Key Performance Indicators and metrics

We use the following Key Performance Indicators (KPIs) and metrics to better understand the effectiveness of our approach to managing modern slavery risks and drive improvements.

	KPIs and metrics	Why these risk metrics are important	FY21	FY22	FY23	FY24
Raising concerns	Number of confirmed instances of modern slavery identified	Enables us to track the number of incidents and concerns arising, as well as the effectiveness of our mechanisms for reporting modern slavery risks. While there were no confirmed instances of modern slavery identified in our operations or value chain we will continue to apply our modern slavery risk management controls and monitor our reporting mechanisms	0 ¹¹	0 ¹¹	0 ¹¹	0
Risk assessment, management, and due diligence¹²	% and # of medium- and high-risk suppliers assessed for residual risk ¹³	Enables us to track the number and percentage of medium- and high-risk suppliers that have undergone an enhanced due diligence process, supporting our efforts to mitigate the identified inherent risks	–	67 suppliers were invited to complete an SAQ, through which we assess residual risk, with 59 suppliers completing the SAQ, equating to an 88% completion rate ¹⁴	–	71 suppliers were invited to complete an SAQ through which we assess residual risk, with 66 suppliers completing the SAQ, equating to 93% completion rate
	% and # of assessed suppliers with a policy commitment that includes modern slavery / human rights provisions. In previous years this was reported as a percentage of suppliers who had published a modern slavery statement	Allows us to identify potential gaps in our suppliers' modern slavery programmes, enabling us to strengthen their controls through continuous engagement	–	100% of assessed suppliers had a Modern Slavery Statement	–	64 suppliers which equates to 90% of all suppliers invited to complete the SAQ
	% and # of assessed suppliers with a whistle-blowing/grievance mechanism in place. In previous years this reported as a percentage only		–	70%	–	69 suppliers which equates to 97% of all suppliers invited to complete the SAQ
	% and # of assessed suppliers with due diligence/risk assessment processes in place for modern slavery		–	–	–	69 suppliers which equates to 97% of all suppliers invited to complete the SAQ
Training	% of our people receiving firm-wide training on modern slavery ¹⁵	Enables us to track and drive progress on our awareness raising activities across the firm. Note that firm-wide training is delivered biennially	–	99.10%	–	99.94%

11 This metric was reported as the number of modern slavery reports to Speak Up in FY21 and FY22. In FY23 this was reported as the number of modern slavery reports to Speak up (via the hotline).

12 Figures reported reflect supplier's written responses to the SAQ. As outlined in our FY25 forward-looking targets, we will engage with our suppliers on the basis of their SAQ scores in FY25 as appropriate.

13 Our FY22 and FY21 statement reported that our SAQ process took place in FY21. A review of our previous SAQ process and responses has indicated that this review was initiated in November 2021 which is Q1 of our financial year 2022.

14 Our FY22 statement reported that 64 suppliers were invited to complete the SAQ process in the most recent review. A review of our FY22 SAQ process and responses has indicated that this figure should be reported as 67.

15 This figure reflects the completion rate for the total population of our people eligible for the training, however, excludes those who have exemptions, such as those who have left the firm, those on leave of absence, and testers.

Our approach to monitoring effectiveness

Continued

FY24 qualitative measures

We also use qualitative measures of effectiveness to enhance our approach to managing modern slavery risks. These include:

- We have reporting mechanisms in place and where concerns have been raised in relation to modern slavery throughout the year, these have been addressed and mitigated.
 - We have provided modern slavery training to specialist teams more likely to be exposed to modern slavery risk. This year training has been provided to our Supplier Managers and Procurement team.
 - We took part in the UN Global Compact's Business & Human Rights Accelerator programme in FY24.
 - We've continued to review our modern slavery KPIs to track and drive progress effectively.
 - As part of our annual Modern Slavery Statement refresh, we conduct interviews with relevant stakeholders and conduct peer benchmarking to support in the development of KPIs and metrics to drive progress.
 - We have updated our Anti-slavery and Human Trafficking Policy to include a more comprehensive list of modern slavery indicators to support our people to spot the signs.
- We've continued to review the membership of the Modern Slavery Working Group and add additional members as required.
 - We are undertaking a modern slavery risk assessment to formalise and refresh our understanding of our risk exposure to modern slavery across our value chain.
 - We have launched a collaboration site for our Procurement team and Supplier Managers for the Responsible Supply Chain programme as a whole. For modern slavery the relevant section provides guidance in relation to the requirements of the UK Modern Slavery Act and risk indicators.
 - We continually evaluate our forward-looking targets tracker in order to drive progress on our modern slavery programme.



Our approach to governance

The Modern Slavery Working Group brings together representatives from across our business operations to drive modern slavery risk identification, management, and reporting (which includes the drafting of the annual Modern Slavery Statement) processes.

Ultimate accountability for the management of modern slavery risk within our business and value chains rises to Board-level, as does the approval of the annual Modern Slavery Statement. Find out more about our UK leadership [here](#).

This Statement was approved by the members of the Board of KPMG LLP on behalf of KPMG LLP and its members, KPMG Crimsonwing Limited, and KPMG United Kingdom plc on 17 January 2025.

The Board has delegated authority to the Group Chief Executive and UK Senior Partner to sign the Statement on behalf of all reporting entities.



Jon Holt
Group Chief Executive and UK Senior Partner

KPMG LLP
29 January 2025



Get in touch

If you have any specific concern about modern slavery or human trafficking taking place in our business or value chains, please use the following Speak Up channels:

Internal: Follow guidance in KPMG's internal Speak Up Policy

External: [Speak Up hotline](#)



kpmg.com/uk

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