

# UK Modern Slavery Statement 2025

In respect of the year ended  
30 September 2025



January 2026 | [kpmg.com/uk/ourimpact](https://kpmg.com/uk/ourimpact)

**KPMG. Make the Difference.**

**At KPMG, we do not tolerate modern slavery; we act ethically and with integrity in all our business dealings and relationships. We enforce effective systems and controls to help identify, assess, address, and prevent modern slavery. While the professional services industry is not typically considered a high-risk sector for labour-related breaches, we remain vigilant.**

Our 2025 UK Modern Slavery Statement (the 'Statement') sets out the actions taken to identify, assess, address, and prevent modern slavery within our operations and value chains for the financial year ended 30 September 2025 ('FY25').

KPMG respects the human rights of Our People and other individuals with whom we deal. As a member of the global KPMG network, and in line with our obligation to follow global KPMG policies and standards, we are required to implement policies and procedures consistent with:

- The Universal Declaration of Human Rights
- The International Labour Organisation ('ILO')'s Core Conventions
- The United Nations Guiding Principles on Business and Human Rights ('UNGPs')
- The Organisation for Economic Co-operation and Development ('OECD')'s Guidelines for Multinational Enterprises

KPMG International, as the coordinating entity for the overall benefit of KPMG member firms, is committed to respecting human rights. This commitment builds on its long-standing support for the UN Global Compact, of which it has been a participant since 2002.

KPMG also supports anti-slavery efforts in the wider community. For example, in recent financial years, we have offered pro bono support by contributing the time and expertise of our modern slavery subject matter experts to relevant anti-slavery charitable causes.



## Contents

Our business structure and supply chains

**02**

Our policies

**03**

Our risk assessment, risk management and due diligence processes

**04**

Our approach to training and capability building

**06**

Our approach to monitoring effectiveness

**07**

Our approach to governance

**08**

# Our business structure and supply chains

**KPMG is incorporated in the UK as a limited liability partnership under the Limited Liability Partnerships Act 2000. KPMG Crimsonwing Limited, a UK incorporated company, provides advisory services and KPMG United Kingdom Limited, also a UK incorporated company, provides tax and advisory services to clients and audited entities on behalf of KPMG.**

As of 1 October 2024, KPMG LLP ('KPMG') operates under KPMG Holding LLP ('KPMG Holding'), a non-trading holding company that also encompasses KPMG AG ('KPMG Switzerland'). KPMG Holding does not itself provide goods or services to clients and audited entities.

KPMG and KPMG Switzerland provide Audit, Tax, and Advisory services to public and private sector organisations. While they remain separate firms and governed by their respective national laws, both firms are members of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee ('KPMG International'). All member firms of KPMG International are obliged to follow the principles and overarching requirements of the global KPMG policies and standards, including the Global Code of Conduct and Global Supplier Code of Conduct. KPMG's own policies, such as its Code of Conduct and Supplier Code of Conduct, are aligned with these global standards and explicitly include provisions against modern slavery and human rights abuses, as detailed below in the 'Our Policies' section of this Statement.

The information in this Statement relates to the entities under KPMG Holding that fall within scope of the UK Modern Slavery Act 2015, namely, KPMG and its wholly owned UK subsidiaries, KPMG United Kingdom Limited<sup>1</sup> and KPMG Crimsonwing Limited.

Within this Statement, 'Our People' refers to partners (also known as members), employees and contingent workers of KPMG. KPMG Crimsonwing Limited and KPMG United Kingdom Limited do not directly employ staff, but they are serviced by the partners, employees and contingent workers of KPMG, as well as third party subcontractors and alliance partners where required.



KPMG International acts as the coordinating entity for the overall benefit of KPMG member firms. It does not provide professional services to clients or audited entities. See our [2025 KPMG International Transparency Report](#) for further details<sup>2</sup>.

KPMG has approximately 16,951 partners and employees, operating out of 22 offices across the UK.

KPMG respects the rights of Our People to associate freely and does not prevent the formation of workers' unions, including the workers of our suppliers.

## Where we source

In FY25, KPMG sourced from ~2,500 suppliers<sup>3</sup>. We track supplier spend by currency, with most in GBP and USD – currencies which are predominantly used in lower-risk jurisdictions where modern slavery prevalence is lower<sup>4</sup>. We recognise that our supplier relationships may still expose us to modern slavery risks, which we are committed to identifying and managing.

KPMG maps both the currency and category data associated with our tier-1 suppliers, with the majority of our spend by category being in technology, resources and consultancy, professional services, human resources, rent, rates & service charges, facilities, marketing and travel<sup>5</sup>.

1 In September 2024, KPMG United Kingdom PLC changed its name to KPMG United Kingdom Limited.

2 Our relationship with other KPMG member firms differs from our relationship with external third parties. Therefore, we have excluded these relationships from "our value chain" in this statement.

3 Figures are rounded.

4 Walk Free's Global Slavery Index 2023.

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

# Our policies

**KPMG's approach to identifying and mitigating modern slavery is upheld by a framework of policies. Our People are required to adhere to our policies which are made available on our 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 FY25

## KPMG International Human Rights Statement

KPMG International's [Business and Human Rights Statement](#) commits to respecting human rights. It outlines that KPMG member firm policies and procedures must align with international standards and guidance, including the Universal Declaration of Human Rights, UNGPs, ILO Core Conventions, and OECD Guidelines for Multinational Enterprises.

## Anti-Slavery and Human Trafficking Policy

Our internal Anti-Slavery and Human Trafficking Policy applies to Our People and Our Subcontractors. Updated in FY25, it sets out our approach to reporting instances of modern slavery and our responsibilities under international human rights guidance.

## Our Code of Conduct

KPMG's [Code of Conduct](#) ('Our Code'), commits the firm to respecting and supporting the human rights of all Our People and other individuals with whom we deal. Our subcontractors and alliance partners may be required to sign up to Our Code if they do not have their own code of conduct, or if their code does not meet KPMG's standards.

## Supplier Code of Conduct

Our [Supplier Code of Conduct](#) ('SCoC') demonstrates our commitment to tackle modern slavery and human trafficking in our supply chain and sets out the values, commitments and standards our suppliers are expected to adhere to. The SCoC is reviewed annually, and updates are only made when required.

KPMG's suppliers are asked to agree to our SCoC during the procurement process, and adherence to the SCoC is included in our standard supplier contract terms. Should a supplier not agree to the SCoC, a risk review is 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, if available, against KPMG's standards.

If a supplier falls short of our standards, KPMG may require suppliers to undertake remediation activities. Failure to resolve the issue in an acceptable manner will lead us to consider terminating the supplier relationship.

Our SCoC outlines our expectations for our suppliers to operate speak-up mechanisms, provides details of KPMG's own Speak Up hotline, and incorporates clear provisions on freely chosen employment amongst other mechanisms that can be found in our SCoC.

## Speak Up Policy

Our internal Speak Up Policy outlines how Our People can raise suspicions or concerns about suspected wrongdoing, and encourages them to do so, including those related to modern slavery.

## Grievance Policy

Our Grievance Policy allows our people to raise concerns of wrongdoing or malpractice, or if they have been victimised for whistleblowing.

## Financial Crime Policies

Our internal policies, procedures, and controls concerning financial crime compliance support KPMG in identifying, assessing, managing, and mitigating financial crime risks, including modern slavery and human trafficking, given these can predicate financial crime.

# Our risk assessment, management, and due diligence processes

Our rolling commitments	Progress	
Undertake a biennial modern slavery self-assessment questionnaire ('SAQ') process for suppliers.	To be undertaken in FY26	
Our annual commitments	Year set	Progress
Assess the findings from our modern slavery risk assessment and create actions to drive improvements in our modern slavery programme.	FY25	Ongoing
Initiate subject matter expert ('SME') <sup>6</sup> review of our supplier risk assessment process.	FY25	Complete
Implement recommendations arising from our SME review of the risk assessment process for suppliers, where appropriate, during our refreshed supplier risk assessment process.	FY25	New
Implement recommendations arising from our SME review of the SAQ scoring methodology, where appropriate, when reviewing supplier responses to the SAQ.	FY25	New

In FY24, KPMG began formalising and refreshing its 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. This process involves continuous engagement with internal stakeholders to understand and prioritise these risks.

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

- High-risk sectors and products – for KPMG this includes procurement of IT hardware, catering, and vending services.
- High-risk jurisdictions – businesses with whom we deal may have operations or value chains in areas marked by conflict, corruption, or weak rule of law.
- Vulnerable worker populations – businesses with whom we deal may rely on base-skilled or unskilled labour, temporary, seasonal or migrant workers, workers from historically excluded groups, or children.
- Business models structured around high-risk work practices – business with whom we deal may rely on subcontracting and outsourcing or entities with complex ownership structures.

We are also mindful that our purchasing practices and performance indicators could inadvertently drive exploitative labour practices, and we are committed to assessing these potential risks within our value chain.

## Living Wage

We are proud to be an accredited Living Wage employer and continue to provide strategic support to the Living Wage Foundation as a principal partner. We expect our suppliers to pay at least the applicable minimum wage. Following the announcement of the 2024-2025 Living Wage rates in October 2024, our Responsible Supply Chain team pro-actively engaged with our suppliers providing on-site staff to ensure that payments were aligned with the increased rates.

## How we approach modern slavery risk in our operations

Although the risk of labour related breaches is lower in our sector, we are mindful of the possible risks and undertake 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 and at a minimum covering right to work checks, criminal record checks, ethics and independence clearance, financial probity checks, fraud checks, and employment references for the last three years. 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. KPMG seeks to proactively monitor these evolving modern slavery risks to support and implement effective mitigation strategies. For example, we recognise the impact of 'reference housing'<sup>7</sup> on our exposure to modern slavery risk, particularly in relation to contingent and experienced hire recruitment. We mitigate these risks through enhanced screening by our screening provider, with whom we have initiated work to identify, track, and monitor suspected cases to strengthen our defences against such risks.

While our in-house team manages the recruitment of the firm's senior managers and associate directors, external providers handle the external recruitment of our managers, assistant managers and analysts/entry-level staff, and conduct all onboarding screening checks.

<sup>6</sup> 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.

<sup>7</sup> Reference housing refers to the use of falsified references, identity documentation and work history backgrounds to bypass screening controls. In these cases, there is a risk that prospective candidates could be at risk of exploitation.

# Our risk assessment, management, and due diligence processes

Continued

## 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, KPMG could inadvertently be linked to such activities.

### Our suppliers

We have an ESG-focused Responsible Supply Chain programme, which drives improvements on sustainability and social issues. For suppliers providing KPMG with products and services, modern slavery risk is managed through the following processes:

- **Risk assessment**

Every two years, suppliers with whom we have an annual spend over £50,000 are assigned a high, medium, or low modern slavery risk rating, based on their jurisdiction and our sector-based Modern Slavery Procurement Taxonomy.

- **Due diligence**

At tender stage, suppliers with estimated spend over £100,000 are requested to complete the Responsible Supply Chain Questionnaire, including modern slavery questions. Supplier responses are reviewed and scored to assess modern slavery risks and controls in place to mitigate them.

During onboarding, all suppliers undergo adverse media screening for human rights and modern slavery indicators. High-risk suppliers, based on sector, jurisdiction, and adverse media, are asked to complete a modern slavery SAQ aligned to the UK Government's Modern Slavery Assessment Tool ('MSAT'). We engage with suppliers with low scores against our priority focus areas to improve their programmes. Strategic suppliers are continuously monitored, including weekly adverse media screening for issues such as modern slavery.

### Our alliance partners

An alliance is a business relationship between KPMG and a third party to collaborate on multiple engagements or pursue a shared go-to-market approach. These partnerships are generally low risk for modern slavery, as most involve technology service providers, a sector typically considered lower risk. To mitigate any risks, we maintain an Alliances Policy with annual review and apply our Third-Party Risk

Assessment ('TPRA') process. TPRA evaluates potential Anti Money Laundering ('AML'), Know Your Client ('KYC'), and adverse media risks, including modern slavery, and checks alignment with KPMG standards. Any material risks must be reported to the accountable KPMG partner. Alliance partners rated as high-risk require final approval from the Country Risk Management Partner ('CRMP') and mitigation to be provided for each risk identified. If risks are unacceptable, the relationship may be suspended or terminated. TPRA must be completed before signing the contract and repeated annually, or more often if material changes occur.

### Our subcontractors

KPMG engages corporate subcontractors<sup>8</sup> and individual subcontractors to support client and audit services. Corporate subcontractors work under contracts focused on specific deliverables in connection with a KPMG engagement. Individual subcontractors provide individual employees or directors to advise or support on KPMG engagements.

All new and continuing subcontractors require TPRA approval. Onboarding includes reviewing their policies and processes for alignment with KPMG standards. If policies or a code of conduct are lacking, subcontractors are required to agree to KPMG's policies and Our Code, with necessary terms added to their agreements.

### Our contingent workers

Contingent workers are temporary staff engaged for a specific role or period, which may be extended. They must pass the same screening checks as permanent employees and comply with Our Values and Our Code while providing services.

### Our clients and audited entities

KPMG's primary focus is to provide professional services to clients and audited entities. KPMG has a comprehensive Client Risk Assessment ('CRA') and Engagement Risk Assessment ('ERA') process that screens each client and engagement. The CRA checks include adverse media checks using modern slavery specific terms.

### Speaking up

Our People have a responsibility to report any human rights failings they witness or experience. We provide multiple reporting channels, including a network of Ethics

Champions and the Speak Up hotline, along with access to our Speak Up Hotline FAQ Page.

Our Speak Up hotline is a secure and confidential channel for Our People, clients and audited entities, subcontractors, suppliers, and other third parties to report concerns about possible illegal, unethical, or improper conduct, including issues related to modern slavery. It is operated by Clearview, a third-party provider of hotline services and is available 24 hours a day, 7 days a week, in 27 languages. The hotline supports anonymous reporting, strictly prohibits retaliation, and is supported by proactive monitoring to detect and robustly address any retaliation. Additionally, KPMG has made efforts to enhance public accessibility to whistleblowing information through broader online FAQs that clarify reportable issues such as modern slavery.

Over 100 trained Ethics Champions across all KPMG offices and capabilities act as accessible contacts for ethical concerns. 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, annual Building Public Trust training, the KPMG Intranet and other communications.

During FY25, no complaints or concerns regarding modern slavery or human trafficking in our operations or value chains were raised via any of our Speak Up channels.



<sup>8</sup> Including Personal Services Companies (PSC's) and partnerships.

<sup>9</sup> 2025 Global People Survey Data is based on 10,362 responses. 2024 Global People Survey Data is based upon 10,805 responses.

# Our approach to training and capability building

**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.	Completed in FY24/ To be completed in FY26
Provide annual modern slavery training to Procurement and Supplier Managers.	Complete for FY25
Offer modern slavery training to high-risk suppliers, particularly those who scored lower on SAQs.	Complete for FY25
Continue to communicate with Our People to build a culture of awareness around modern slavery, including who is accountable at the firm.	Complete for FY25
Further enhance supplier training and engagement on modern slavery indicators.	New
Continue to refine our internal modern slavery training for Procurement and Supplier Managers to ensure it remains impactful.	New
Review Our Subcontractor checklist to ensure modern slavery risks are considered at the outset of engagements with Our Subcontractors.	New

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	Complete
Conduct annual awareness-raising activities for Anti-Modern Slavery Day.	FY25	New
In FY26, we will review the Modern Slavery Procurement Taxonomy and our high-risk jurisdiction list, using data from the 2023 Global Slavery Index and other sources.	FY25	New

## Building Public Trust training

Firmwide modern slavery training is provided to all Our People biennially and will be provided in FY26 as part of our wider annual Building Public Trust training. This is a mandatory requirement for all KPMG partners, employees, contingent workers, and in some instances failure to complete training may feed into employees' and partners' performance reviews. The training on modern slavery for FY26 will be developed with input from our internal modern slavery SMEs.

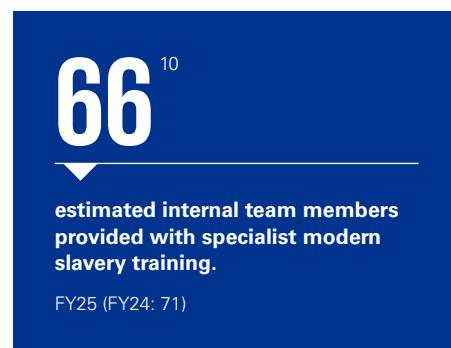
In addition, given modern slavery is a predicate offence for money laundering, mandatory training on Suspicious Activity Reporting ('SAR') was provided to client-facing colleagues and relevant functions as part of our Building Public Trust training in FY25. The training covered when and how to submit a SAR, with further SAR training planned for FY26.

Annual training on Our Code is incorporated in the firm's Building Public Trust module, for all employees. All new joiners to the firm are required to complete training on modern slavery as part of a broader financial crime training module, which was reviewed and updated this financial year with input from modern slavery SMEs. Contingent workers and any suppliers or subcontractors with IT access are required to complete an equivalent module within a set period of joining.

## Specialist modern slavery training

During FY25, our modern slavery SMEs delivered targeted training to key internal teams, including Procurement and Supplier Managers. This training provided an overview of modern slavery risks, the outcomes of our latest Supplier Assessment Questionnaire (SAQ) process, and guidance on engaging suppliers to address identified areas for improvement. Feedback suggested increased confidence in managing modern slavery risks.

In addition to our training modules, certain contingent workers and subcontractors are provided access to the Contractor Guidance Document, which includes a section on modern slavery and requires confirmation that they have read and understood the document.

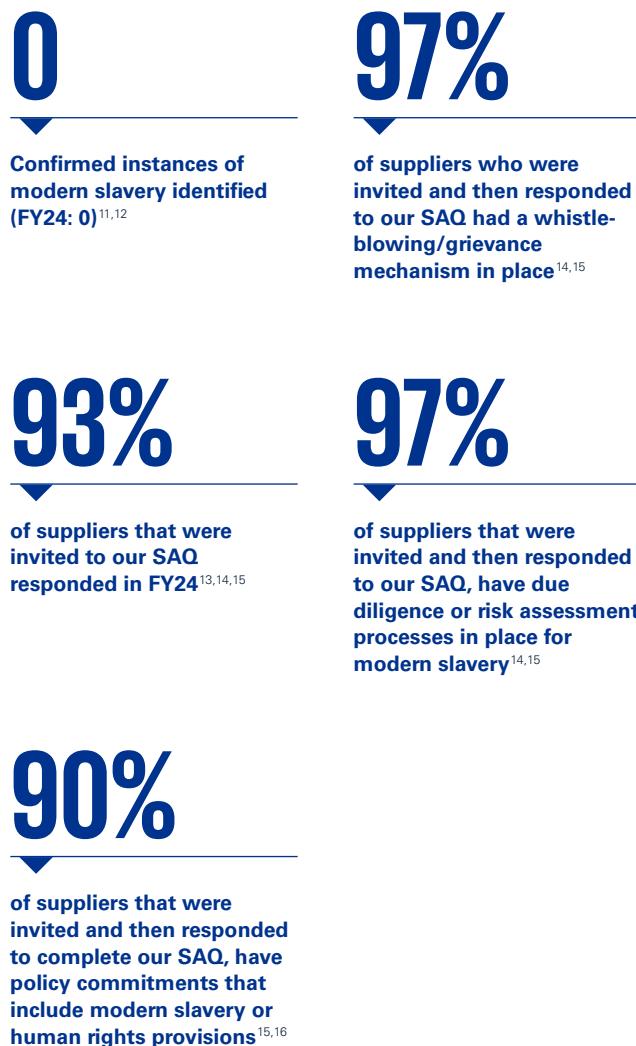


<sup>10</sup> Enables us to track and drive progress on our awareness raising activities with teams most likely to come across modern slavery risks or incidents.

# Our approach to monitoring effectiveness

## FY25 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.



## FY25 qualitative measures

KPMG also uses qualitative measures of effectiveness to enhance our approach to managing modern slavery risks; a table of examples is set out below:

Our FY25 qualitative measures	Status
Reporting mechanisms are in place and where concerns have been raised in relation to modern slavery throughout the year, these have been addressed and mitigated.	Continue measure
Training for our Client Assessment Team planned for FY26.	Continue measure
Reviewed our modern slavery KPIs to track and drive progress effectively.	Continue measure
Conduct peer benchmarking and analysis for good practice.	Continue measure
Undertook a modern slavery risk assessment to formalise and refresh our understanding of our risk exposure to modern slavery across our value chain.	Continue measure
Evaluated our forward-looking targets tracker to drive progress on our modern slavery programme.	Continue measure
Provide the Contractor Guidance Document to our subcontractors and contingent works with access to KPMG systems.	New measure
For continuous improvement we will set a forward looking target to conduct a more formalised review of KPIs in different risk areas, to assess if any KPIs could inadvertently drive exploitative labour practices.	New measure
Explore opportunities to incorporate modern slavery and social elements into future ESG or sustainability forums and engagements with third parties.	New measure

<sup>11</sup> 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). In FY24 and FY25 this captures number of confirmed instances of modern slavery that were identified through our key reporting mechanisms.

<sup>12</sup> Enables us to track the number of incidents and concerns arising, as well as the effectiveness of our mechanisms for reporting modern slavery risks.

<sup>13</sup> Figures reported reflect supplier's written responses to the SAQ.

<sup>14</sup> Enables us to track the number and percentage of medium- and high-risk suppliers that have undergone an enhanced due diligence process.

<sup>15</sup> Our SAQ questionnaires are completed biennially and therefore these are the latest figures.

<sup>16</sup> Allows us to identify potential gaps in our suppliers' modern slavery programmes.

# 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 processes. This includes the drafting of the annual Modern Slavery Statement.

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

This Statement was formally approved by the members of the Board of KPMG on behalf of KPMG, its partners, KPMG Crimsonwing Limited, and KPMG United Kingdom Limited on 15 January 2026.

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*

Jon Holt  
Group Chief Executive and UK Senior Partner

KPMG LLP  
28 January 2026



## Get in touch

If you have any concerns 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](http://kpmg.com/uk)

© 2026 KPMG LLP a UK limited liability partnership and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organisation.

Designed by CREATE | CRT163059 | January 2026