Modern Slavery Statement

The Financial Reporting Council ("FRC") is making this statement in accordance with its commitment to meet section 54 of the Modern Slavery Act 2015 ("MSA"). It covers the steps taken for the financial year 1 April 2021 to 31 March 2022.

The FRC does not condone any activity which constitutes modern slavery or human trafficking under the MSA, and we expect our suppliers (and supply chain) to maintain the same approach and to have policies and procedures in place to minimise the risk of modern slavery occurring.

In the event of modern slavery practices being identified in (a) the provision of an FRC supplier contract or (b) the FRC business, the FRC will:

- Notify the appropriate law enforcement agency/ies.
- Work openly and proactively with key stakeholders to resolve issues and change working practices.
- Consider terminating the contract (if applicable)

The FRC does not undertake activities that are considered to be at high risk of slavery or human trafficking but takes very seriously the need to identify and respond to any such incidents.

The FRC

The FRC’s purpose is to serve the public interest by setting high standards of corporate governance, reporting and audit and by holding to account those responsible for delivering them. We monitor the application of the standards, holding parties to account and, where in the public interest, we enforce them. Companies that are run to the highest standards and whose reports are trusted for their accuracy and openness make a positive contribution to society by making sound decisions in their own long-term interest and that of all stakeholders.

The FRC is a public sector organisation upholding core standards of a public service, including but not limited to (a) in the spirit of, as well as to the letter of, the law and (b) high ethical standards. We continually aim to provide a professional, pro-active and positive response to our internal and external stakeholders. We are committed to continually improving our policies and practices to meet or surpass key stakeholder expectations.

Our Policies

We recognise our responsibility to operate our business with effective policies and procedures in order to be fair and ethical. Relevant policies:

Employee Handbook - The FRC has a robust Staff Handbook incorporating a Code of Conduct, Grievance Policy and Diversity & Inclusion Policy. This key information seeks to ensure all employees understand the work environment and the high standards that they must adhere to.

Whistleblowing - The FRC’s approach to Whistleblowing is two-fold. Firstly, we have raised awareness and understanding of how our staff and partners can report concerns without fear of retaliation. Secondly, the FRC provides information and the ability to external stakeholders to be able raise any concerns [https://www.frc.org.uk/about-the-frc/whistleblowing](https://www.frc.org.uk/about-the-frc/whistleblowing)

Procurement Policy - The FRC’s Procurement Policy sets out our approach to the fair and equal treatment of all suppliers. The Policy provides a framework of good practice and control mechanisms (alongside adherence to the Public Contracts Regulations 2015).
Recruitment Policy - The FRC operates robust recruitment practices including, but not limited to, adherence to the Civil Service Recruitment Principles. We ensure that the people we hire have the right to work in the UK and that their basic rights as workers are protected. We commit to providing fair wages and benefits and comply with all applicable minimum wage laws in the UK including the London Living Wage.

Our Procurement:

We are committed to the effective management of our third-party expenditure and supplier arrangements. The FRC has a dedicated Procurement team.

What have we done to support our commitment to the MSA:

- Dedicated Procurement team with qualified and experienced resource
- Raised awareness with our suppliers during contract due diligence and through information on our website:
- Introduced greater supplier due diligence to check adherence to their MSA statement and their general practice in this area.
- Standardised terms and conditions to incorporate MSA provisions.
- Reviewed and updated the Whistleblowing policy.
- Developed and delivered Modern Slavery awareness training
- Initiated the development of a framework for risk assessment (i.e., review of our methodology for identifying the impact of the MSA on our activities and our supply chain).
- Engaged with Department for Business, Energy and Industrial Strategy to share best practice.
- Carried out an annual review of this Modern Slavery Statement.
- Updated the FRC’s internal Whistleblowing Policy. There were no whistleblowing cases during the reporting period.

Next steps:

- Further Modern Slavery awareness and training for the FRC’s staff.
- Updates to the staff training pack. This will also be made available to key suppliers to support their awareness of this important issue.
- Work to progress the modern slavery assessment tool to identify and highlight contracts that may have high exposure to the risk of exploitation of workers in their supply chain.

This statement was approved on 15 September 2022 by the FRC’s Board of Directors who will review the statement annually.

Signed on behalf of the FRC

Sir Jon Thompson
Chief Executive Officer