

## **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”). This is the FRC’s first statement relating to the MSA. It covers the steps taken for the financial year 1 April 2019 to 31 March 2020 and our current and ongoing activities.

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**

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 standard 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. 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 is going through a period of significant and sustained change. In the last two years three independent reviews have made far-reaching recommendations which impact on our purpose and objectives, our work programmes, and the roles and responsibilities of those we regulate amongst other key issues. 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>

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 [https://civilservicecommission.independent.gov.uk/wp-content/uploads/2019/03/02a\\_RECRUITMENT-PRINCIPLES-April-2018-FINAL-.pdf](https://civilservicecommission.independent.gov.uk/wp-content/uploads/2019/03/02a_RECRUITMENT-PRINCIPLES-April-2018-FINAL-.pdf)

### **Our Procurement**

We are committed to the effective management of our third-party expenditure and supplier arrangements. To reflect our commitment, the FRC has appointed dedicated Procurement resource.

### **Our ongoing activities and future plans**

Since March 2020 we continued our commitment to the MSA by: -

- Creating a 'Recruitment Services Framework Agreement' comprising of a panel of suppliers that align with the FRC's principles and protocols on modern slavery and human trafficking.
- Creating a dedicated Procurement team with qualified and experienced resource and investing to build additional capacity.
- Raising awareness with our suppliers through information on our website: <https://www.frc.org.uk/about-the-frc/procedures-and-policies/procurement>
- Introducing greater supplier due diligence on new and existing suppliers to check adherence to their MSA statement and their general practice in this area.
- Starting to move to standardised terms and conditions based on the Crown Commercial Services (CCS) Model Service Contract incorporating best practice and MSA provisions.

Additional planned activities include: -

- Developing Modern Slavery awareness and training for the FRC's staff.
- Making improvements to the ongoing supplier and contract management framework.
- Developing a framework for risk assessment (i.e. carrying out a full review of our methodology for identifying the impact of the MSA on our activities and our supply chain, and our potential exposure to modern slavery and human trafficking activity)
- Reviewing / updating the Whistleblowing policy.

This statement was approved on 18 November 2020 by the FRC's Board of Directors who will review the statement annually.

**Signed on behalf of the FRC**

A handwritten signature in blue ink, appearing to read 'Jon Thompson', is positioned below the text 'Signed on behalf of the FRC'.

**Sir Jon Thompson  
Chief Executive Officer**