

June 2022



# Modern Slavery and Human Trafficking Statement



**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that FTI Consulting LLP (“FTI”) has taken during the financial year ending 31 December 2021 to ensure that slavery and human trafficking are not taking place in any part of FTI’s supply chain or business.**

## About FTI Consulting

FTI is part of the FTI Consulting group, ultimately owned and controlled by FTI Consulting, Inc., a Maryland corporation listed on the New York Stock Exchange.

FTI is a global business advisory firm dedicated to helping organisations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. The FTI Consulting group has more than 7,000 employees located in 30 countries. In the United Kingdom, FTI operates primarily through FTI Consulting LLP (a limited liability partnership in incorporated in England and Wales with company number OC372614).

## Our Values

Since its establishment, FTI has dedicated itself to providing its clients with market-leading management consulting advisory services, performed in accordance with the highest ethical standards. By consistently delivering sophisticated and innovative solutions to the challenging and complex issues that impact enterprise value, FTI has earned its reputation as a premier consulting firm. FTI’s institutional reputation relates

directly to its individual commitment to professional responsibility, as well as to professional excellence. FTI’s continued status as a trusted and respected advisor to the business community and the law firms that serve it, as well as to institutions in the public sector, depends in large measure on its adherence to the highest standards of professionalism, independent judgment, expert advice and accountability. These bedrocks of FTI’s corporate culture are reflected in its corporate values:

- Integrity: I act with integrity
- Creativity: I am committed to continuous improvement
- Achievement: I am committed to quality and accountable for results
- Respect: I welcome diversity and differences of opinion
- Empathy: I support others

## Policies

The Act defines modern slavery as “slavery, servitude and forced or compulsory labour” as well as human trafficking. FTI uses the same definition of “modern slavery” in this statement.

As part of its commitment to the global community, FTI upholds individual human rights in all its operations.

This means, in part, that FTI provides reasonable working hours and fair wages for those who work on its behalf. FTI opposes the use of modern slavery in all forms and has a zero-tolerance policy for the use of child or forced labour, or human trafficking practices, whether within its business or its supply chains. Further, FTI will not knowingly do

FTI Consulting is an independent global business advisory firm dedicated to helping organisations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. FTI Consulting professionals, located in all major business centres throughout the world, work closely with clients to anticipate, illuminate and overcome complex business challenges and opportunities. ©2022 FTI Consulting, Inc. All rights reserved.

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business with sub-contractors, business partners or suppliers who violate these practices.

FTI adopts and adheres to the principles of the United Nations Global Compact (“UNGC”). Principle one is “the protection of internationally proclaimed human rights”, principle four is “the elimination of all forms of forced and compulsory labour” and principle five is “the effective abolition of child labour”.

The principles of the UNGC are enshrined in FTI’s Code of Ethics and Business Conduct (the “Code of Conduct”), which also includes its policies on, among other things, equality and diversity, anti-corruption and whistleblowing). This Code of Conduct provides other information about how FTI conducts its day-to-day activities. New FTI staff are provided training on the Code of Conduct as part of their induction upon joining the firm. There is also regular refresher training for all staff to remind them of their obligations and FTI’s expectations with regards to their conduct. The standards set out in the Code of Conduct are reflected in the firm’s other policies and procedures and FTI aims to enshrine them in whatever it and its employees do. The Code of Conduct was amended to make specific reference to modern slavery.

FTI also has a standalone whistleblowing policy which encourages employees and third parties, including suppliers, to raise concerns of any improper conduct or violation of applicable laws or internal policies and procedures (including the Code of Conduct).

FTI’s employment and labour practices reinforce its approach to combatting modern

slavery. FTI has created a safe, healthy and inclusive workplace with a strong culture of collaboration and respect for others. This is underpinned by a number of policies relating to diversity, dignity and inclusiveness which reflect a business environment in which the firm’s ethical values are promoted.

## Supply Chain

FTI’s supply chain is extensive and includes a large number of suppliers providing a broad range of goods and services. In 2021, the top 10 suppliers accounted for just under 31% of its total annual supplier spend (and with the top 20 suppliers accounting for under 41% of total annual supplier spend). The majority of these suppliers are based in the UK. As in previous reporting periods, these key suppliers are the businesses which help the firm to run its office premises (e.g. catering, utilities) or who supply the firm with the technology, infrastructure and other support needed to run its business and serve its clients (e.g. IT, telecoms, travel, recruitment, stationery, supplies and professional services). A number of these first-tier suppliers have been working with the firm for a number of years.

FTI has one preferred supplier which provides all of its catering, hospitality, switchboard and reception services and another preferred supplier which provides all of its mail, print, courier and associated document management services as well as on site cleaning services and specialist advice and guidance on security issues.

Each of these suppliers has published its annual UK Modern Slavery Act Statement for the most recent reporting period, which sets out the steps they have taken to ensure that slavery and human trafficking are not taking place in any part of their business or supply chain.

## Risk assessment and due diligence

FTI's suppliers vary both in the nature of the services they provide as well as in the frequency with which FTI works with them - some are one-off or infrequent; others represent a substantial proportion of our annual supplier spend and/or are day-to-day suppliers.

As a professional services firm, FTI continues to consider that the risk of modern slavery existing within its business is low, when compared to other industries. FTI is of the view that there is a risk of modern slavery within its supply chain (including suppliers of personnel, goods and services), although considers the risk overall as low, given the nature of our business and the types of goods and services provided by our suppliers. FTI is committed to continue improving its practices and sets out below steps FTI has taken and proposes to take to investigate and ensure that modern slavery does not take place in any part of its business or supply chain:

- FTI updated the Code of Conduct (as well as the associated training on that code) to make more express reference to modern slavery and will continue to review the Code of Conduct;
- FTI published and will continue to publish this statement internally to raise awareness within its workforce; and
- FTI continues to explore on an ongoing basis what additional steps it can take in respect of our existing supply chain, in order to ensure that our suppliers (particularly first-tier suppliers and those suppliers who, by the nature of the goods and services they provide and/or the geographic location from which such goods and services are provided, are at a higher risk of modern slavery) adhere to the highest moral and ethical standards in their business activities and dealings.

If FTI becomes aware of an incident of modern slavery within its supply chain, FTI will work with the relevant supplier to implement swift remedial action (which may include termination of the underlying contract).

In determining the appropriate remedial action, consideration will naturally be given to the action(s) which will deliver the safest and best outcome for the potential victims of modern slavery. FTI expects its suppliers to engage with FTI constructively and responsibly and to show their determination and willingness to rectify issues promptly and effectively.

## Effectiveness and Performance Review

Any instance of modern slavery would constitute non-compliance with, and a breach of, applicable employment laws, policies and practices and/or the Code of Conduct. FTI meets at least annually with a number of its key / first-tier suppliers (for example, catering, cleaning, mail/print room

service providers) to discuss performance issues.

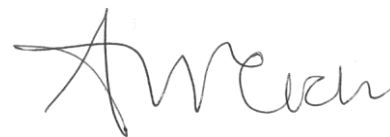
FTI also continues to risk assess our existing supply chain in order to be vigilant to new or evolving areas of risk. FTI will continue to investigate whether there are any other steps we should be putting into place to reduce the risk of modern slavery in our supply chain or ways in which we can increase awareness among our staff.

### **Training and awareness**

Upon joining FTI, all staff are given training on the Code of Conduct, which makes clear the firm's zero-tolerance policy for the use of modern slavery in FTI's business and supply chain. As mentioned above, FTI publishes this statement internally in order to raise awareness.

**This statement is made pursuant to section 54(1) of the Act and constitutes FTI Consulting LLP's slavery and human trafficking statement for the financial year ended 31 December 2021.**

**This statement has been approved by the Managing Member of FTI Consulting LLP. Alex Welch, FTI's EMEA Chief Operating Officer, has been authorised to sign this statement on behalf of FTI Consulting LLP.**



Alex Welch  
Chief Operating Officer, EMEA  
For and on behalf of FTI Consulting LLP

June 2022