



# MODERN SLAVERY

## Transparency Statement



Mazars has a zero-tolerance approach to modern slavery and we are committed to implementing and enforcing effective systems and controls to help ensure that modern slavery is not taking place anywhere in our own business or our supply chains.

### Mazars LLP and its subsidiaries

#### Scope

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act"). It sets out the steps that Mazars LLP and its subsidiaries (the "firm") have taken to prevent modern slavery and human trafficking within its business and supply chains. The statement applies for the financial year ended 31 August 2018.

#### Organisational structure

Mazars is an international, integrated and independent organisation, specialising in Audit, Advisory, Accountancy, Tax and Legal services. We operate in 89 countries and territories. In each country in which we have a member of our integrated Partnership, one or more separate legal entities exist. In the UK, the member entity of the Mazars Group is Mazars LLP, a Limited Liability Partnership. Mazars LLP provides Audit, Advisory, Accountancy and Tax services.

For the purpose of the Act, the Mazars entities in our global organisation, and correspondent and representative offices, are part of our supply chain. For further details on our structure, and the governance of our UK firm, please refer to our published Transparency Report ([Mazars UK Transparency Report 2017-2018](#)).

#### Our Commitment

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to implementing and enforcing effective systems and controls to help ensure modern slavery is not taking place anywhere in our own business or our supply chains.

We are therefore continuing to implement appropriate controls across a number of areas within our business, including our supplier policies, contractual processes, training and reporting. Our Legal Counsel, and Quality and Risk Team, continue to work in conjunction with other areas of the firm (including HR and our subject matter specialists in Human Rights and Modern Slavery) to help ensure the intent of the Act is met within our own business and our supply chains.

We also believe in the importance of transparency: for our clients, our people and broader society. Our Code of Conduct is entitled "Our Commitment to Quality and Integrity" ([Our values culture](#)) and sets out the way we wish to operate both between ourselves, between the firm and our clients and, also, between the firm and society.

## Our Policies

### Anti-Slavery and Human Trafficking Policy

Our Modern Slavery Act Policy, approved by our UK Executive Board, applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. Mazars will be monitoring its use and effectiveness, dealing with any queries about it, and considering internal control systems and procedures to ensure they are effective in countering modern slavery.

The policy states that our zero-tolerance approach to modern slavery will be communicated to suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. In addition, we may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

### Suppliers

The supply chain that supports our business comprises a wide range of suppliers, from smaller businesses to global companies, across many jurisdictions, including those where there is a higher risk of forced labour. Our supply chain includes products and services from IT hardware and software, office design, fit-out and maintenance, recruitment agents, cleaning and catering services, through to outsourced services such as our IT service desk. Therefore we are undertaking an ongoing review of our existing supplier contracts / agreements and assessing the risk associated with those suppliers, based on sector and jurisdiction. This includes reviewing our procurement process from sourcing to contract award, to identify how we can reduce the potential for risk of modern slavery in our supply chain; this includes additional due diligence over our new supplier take-on process.

Our approved clause included in supplier contracts or other term specifies that “the Supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015; and comply with the Anti-slavery policy and maintain throughout the term of this agreement its own policies and procedures to ensure its compliance”. The clause is now included where appropriate in all newly entered into supplier contracts or other terms.

We expect our suppliers to implement due diligence procedures for their permitted direct subcontractors, and suppliers and other participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains. The clause enables the firm where appropriate to undertake audits of suppliers' records and any other information and to meet with suppliers' personnel to review their compliance with its obligations under this clause. The clause also gives the firm the right to terminate the agreement with immediate effect

if the supplier commits a breach of the anti-slavery policy or this clause or applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015.

### Mazars' Business.For Good®

As organisations adapt to the complexities of globalisation, a growing strain on natural resources and the environment, the influx of new technologies, use of social media and increased transparency, one thing is clear: a societal approach to business and ethical behaviour is more important than ever. Business.For Good is our global initiative that encourages business leaders to think and act long-term in order to enhance business performance and pursue profit responsibly for the benefit of companies and their stakeholders including the wider society.

We are driving companies and business leaders across the world to manage and address human rights issues in business. Our award-winning team of professionals help embed a genuine respect for human rights throughout an organisation, promoting and protecting the rights of all of the individuals directly engaged in the business.

### Employees

Within our firm we are committed to paying people fairly and properly for the work that they perform.

Our Code of Conduct applies to all staff and contains our standards and values. Strong values have been at the heart of our organisation since its creation. They guide us in our daily actions, providing a common base of values that all Mazars' team members share and respect.

Our six values include the following three specific values relating to our work and ethos, and how it affects the wider global environment:

- **Integrity** – Ethical and moral rigour guide how we work and assist our clients;
- **Responsibility** – We treat the challenges of our clients as our own and we care about how our work may affect our communities; and
- **Diversity and respect for individuals** – Looking beyond borders and cultural differences, we make respect for the individual the cornerstone of all human relations.

Our standards include the following:

- We act with integrity and comply with the law, professional standards and the firm's policies and procedures applicable to our work;
- We consult when questions of ethics arise;
- We speak up when we see or hear of behaviour that causes us concern on ethical grounds or fails to uphold our values. Team members who speak up in good faith are assured that they will not suffer any adverse consequences as a result of their doing so; and

- We develop and promote thought leadership on issues of importance to the business, financial communities and wider society, including in the area of human rights.

## Recruitment

The majority of our workforce is employed on a permanent or contract basis. Our recruitment processes include direct advertising on our web-site, using reputable agencies, and also direct referrals from staff members. All employees who join the firm are subject to checks, including the verification of identity, right to work, references and evidence of qualifications where appropriate. Similar checks are also undertaken for contractors.

## Whistleblowing

We encourage all our staff, clients and other parties to report any concerns they may have in relation to a risk, malpractice or wrongdoing that affects others such as clients, staff, the firm, suppliers or the public. Our whistleblowing procedure is designed to ensure that people can make disclosures without fear of retaliation. Our confidential hotline ([Whistleblowing Policy](#)) is run by an external and independent company to support this initiative. There were no reported incidents of slavery through this mechanism during the year.

## Our Training and Awareness

During the financial year we continued to hold awareness sessions with clients as relevant, with attendance by members of our staff, to provide a high level understanding of the risks of modern slavery in business and supply chains. This was supported by information on our internal intranet.

A firm-wide mandatory awareness course was released in January 2017, which all existing partners and staff were required to pass to gain accreditation. All new starters are required to complete this course as part of their induction programme. The introduction of focussed training for those in the firm involved in contracts and procurement activities will also be considered.

## Further Activities

In connection with the Act we continue to consider our procedures to identify, and manage, risk from internal

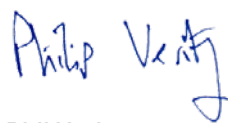
and external factors, including modern slavery and human trafficking. Our Enterprise Risk Management Framework and categories of risk include, for example, governance and legal risks, reflecting the emphasis and importance of risks in these areas and the potential impact they have on the success of the firm, and society as a whole.

## Our Work with Shift

In September 2017, Mazars and Shift, the leading centre of expertise on the UN Guiding Principles on Business and Human Rights, published new guidance to help companies strengthen and accurately report on their human rights performance. The Guidance is the second – and complementary – part of the UN Guiding Principles Reporting Framework, also developed by Mazars and Shift in 2015. This Guidance assists with the effective monitoring and assuring of the reporting of human rights performance. The Guidance builds on the existing assurance frameworks currently used by professional providers (internal audit and external assurers) and identifies specific areas where these providers will need to amend or deepen their work. It also provides benchmark indicators of what appropriate and effective performance could look like, comprising a useful tool for most management areas within a business. Annex D of the UK Government's guidance to S54 of the Act specifically says that the "UNGP Reporting Framework sets out the ways in which businesses can choose to meet their responsibilities with regard to human rights."

Our creation of, and direct involvement in, the development of the Assurance has advanced the awareness for businesses to understand what appropriate and effective evidence looks like for internal procedures to combat all forms of Modern Slavery.

This statement has been approved by the UK Executive Board on behalf of Mazars LLP. It will be reviewed and updated annually.



Phil Verity

UK Senior Partner, Mazars LLP  
26 February 2019

If you have any further questions in relation to our statement on Modern Slavery, contact us on 0207 063 4000 or via our on-line Enquiry Form [Enquiry Form](#). Alternatively, if you have any concerns about modern slavery or human trafficking taking place in our business (or supply chain) contact our Ethics Partner at [greg.hall@mazars.co.uk](mailto:greg.hall@mazars.co.uk) or our Whistleblowing hotline [Whistleblowing hotline](#).

[www.mazars.co.uk](http://www.mazars.co.uk)

Mazars LLP is the UK firm of Mazars, an international advisory and accountancy organisation, and is a limited liability partnership registered in England with registered number OC308299. A list of partners' names is available for inspection at the firm's registered office, Tower Bridge House, St Katharine's Way, London E1W 1DD.

Registered to carry on audit work in the UK by the Institute of Chartered Accountants in England and Wales. Details about our audit registration can be viewed at [www.auditregister.org.uk](http://www.auditregister.org.uk) under reference number C001139861.

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