



Modern slavery transparency in supply chains statement

Year ended 31 August 2022

Mazars¹ 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.

This statement sets out the steps that Mazars have taken to prevent modern slavery and human trafficking within its business and supply chains during the financial year ended 31 August 2022 and has been published in accordance with section 54(1) of the Modern Slavery Act 2015 (the “Act”).

Organisational structure

Mazars is an international, integrated and independent organisation, specialising in Audit, Advisory, Accountancy, Tax and Legal services. We operate in over 90 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. As at our financial year end, we had 157 partners and 2,993 professionals across 15 offices.

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](#)).

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 continuing to implement appropriate controls across a number of areas within our

¹ Mazars in this statement refers to Mazars LLP and its UK subsidiaries.

business, including our supplier policies, contractual processes, training and reporting. Our Quality and Risk Team continues to work in conjunction with other areas of the firm to help ensure the intent of the Act is met within our own business and our supply chains.

In September 2017, Mazars and Shift, the leading centre of expertise on the UN Guiding Principles on Business and Human Rights, published 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 Guidance 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.

Principles, values and culture

We believe in the importance of transparency: for our clients, our people and broader society. Our Global Code of Conduct is entitled “Living our values in a changing world: creating positive change” ([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 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. Firm-wide mandatory training of our Code of Conduct was rolled out during the year, and this was mandatory for all existing partners and staff, with new joiners completing it as part of the induction process. All our partners, staff and contractors are required to confirm they have read and understood our Global Code of Conduct as part of the annual compliance exercise.

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.

Our Policies

Anti-Slavery and Human Trafficking Policy

Our Modern Slavery Act Policy reflects latest guidance. This policy 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.

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. 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 and the introduction of a Supplier Code of Conduct.

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.

Clients

In addition to our supply chain, there are potential modern slavery risks associated with our client services. As part of our client acceptance process, we have procedures in place that require an evaluation of the client’s risk including where the client is incorporated and operates.

Doing 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. Through our sustainability services, we encourage 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. We are accredited by the Living Wage Foundation as a Living Wage employer.

The majority of our workforce are employed on a permanent or contract basis. Our recruitment processes include direct advertising on our website, 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

A firm-wide mandatory awareness course was updated in June 2022 and all existing partners and staff were required to complete this, with new starters completing it as part of their induction programme. This mandatory training is refreshed annually to ensure an up to date knowledge of the subject. The introduction of focussed training for those in the firm involved in contracts and procurement activities will be a focus of the upcoming year.

Risk Management

As a professional services firm we consider that we are low risk for modern slavery, our most significant risks relate to our supply chain. 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, regulatory 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 Commitments

In the next year we will continue to develop our policies in this area by:

- Carrying out a full review and update of our existing procurement policy to strengthen our modern slavery commitment.
- Rolling out a Supplier Code of Conduct which will set out clear standards of conduct and ethics.
- Implementing a risk-based approach to assessing and monitoring suppliers within our supply chain.
- Focusing on additional training and support for appropriate staff involved in the procurement process.

Responsibility and approval

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

30 November 2022

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 or our Whistleblowing hotline ([Whistleblowing Policy](#)).

Mazars is an internationally integrated partnership, specialising in audit, accountancy, advisory, tax and legal services*. Operating in over 90 countries and territories around the world, we draw on the expertise of more than 44,000 professionals – 28,000+ in Mazars' integrated partnership and 16,000+ via the Mazars North America Alliance – to assist clients of all sizes at every stage in their development.

*Where permitted under applicable country laws

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, 30 Old Bailey, London EC4M 7AU. 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 under reference number C001139861.

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