

Slavery and Human Trafficking Statement for the Financial Year Ending 30 September 2017

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps that Buzzacott (the firm) has taken to ensure that slavery and human trafficking is not taking place in any part of our business activities and supply chains.

FIRM STRUCTURE

Buzzacott is an independent financial services group with nearly 400 staff working under one roof across ten specialist teams, nine of which are client facing. Our client facing teams provide a broad range of audit, advisory and tax services as well as expert advice in HR consultancy, IT consultancy and financial planning. We have particular depth of experience in advising not-for-profits, financial services firms, expatriates, professional practices and tech and media companies.

Buzzacott is the largest single office accountancy firm in the UK and has a presence in Hong Kong where we provide expatriate tax services.

Our values of trust, approachability, specialism, a commitment to providing exceptional service and client focus are the foundation of the firm's culture and approach to business. Every member of staff is encouraged to apply our values through their work and relationships with clients, business partners and each other.

PROVISION OF SERVICES

In order to be able to provide services to clients, the firm relies on a stable workforce, the majority of whom hold professional qualifications and are members of professional bodies. Throughout the provision of our services the firm follows extensive sector-specific regulations and is subject to

regular independent reviews and audits by the professional bodies whose regulations we follow.

The firm is satisfied that the risk of slavery or human trafficking occurring in its own business activities is low.

SUPPLY CHAINS AND DUE DILIGENCE

The firm undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers and carries out independent audits. The firm uses suppliers selected by tender or by recommendation that are believed to be reputable and ethical, including in the way they recruit and manage their members of staff.

For suppliers in people-focused sectors such as cleaning or catering, we will always ask for specific details of how they source, screen, train, manage and compensate members of staff and we conduct on-site visits. Our policy is to pay our cleaning and catering staff the London Living Wage or more.

OUR POLICIES AND PROCEDURES

The firm strives to maintain the highest standards of conduct and ethical behaviour.

Members of staff are made aware of the actions and behaviours that are expected of them when representing the firm, and there are clear employment policies and procedures in place which they are expected to comply with. These policies and procedures are reviewed and updated accordingly twice a year and are clearly and regularly communicated to all members of staff.

The firm has a number of policies and procedures in place that either contribute directly or indirectly to ensuring slavery does not occur in our business activities or supply chains which include:

RECRUITMENT – The firm adopts robust recruitment processes in line with UK employment

legislation, including identity verification checks, right to work document checks, evidence of qualifications and reference checks. Our recruitment methods include direct advertising, direct referrals from the firm's members of staff and a preferred supplier list of reputable agencies.

WHISTLEBLOWING – The firm encourages all members of staff and other individuals, such as agency workers and subcontractors, to report any concerns they may have about the conduct of others in the business or the way in which the business is run. Members of staff can make disclosures without fear or retaliation and are clear of the processes to be used should they have any concerns.

There were no reported incidents of slavery during our 2016/17 financial year.

Buzzacott

COMPLIANCE – The firm fully embraces and maintains the highest standards of compliance procedures. These procedures are regularly reviewed and communicated internally and members of staff are provided with training on these procedures.

ETHICAL STANDARDS – The firm and all our members of staff demonstrate the highest standards of professional conduct by adopting and following the ICAEW Code of Ethics throughout all of our professional and business activity whether remunerated or voluntary, and the FRC Ethical Standard in respect of services for audit clients.

EQUAL OPPORTUNITIES AND DIVERSITY – The firm is committed to providing equal opportunities in employment and to avoiding unlawful discrimination against members of staff and job applicants. The firm has a policy in place and provides appropriate training in support of this commitment.

CLIENT ONBOARDING – As part of our client onboarding

and know your client processes we review whether a client is in conflict with our values and the values of our existing clients, and ensure that by accepting appointment there is no conflict of interest.

SHARED RESPONSIBILITY – The firm's commitment to the community and charitable activity is part of the firm's character as a business. Sustainability in the marketplace is important to us and is concerned with maintaining a high standard of integrity, mitigating risk, maintaining good relationships with clients and suppliers and considering the impact of activities on the environment and community wherever work is carried out.

TRAINING AND RAISING AWARENESS

To ensure our members of staff have an understanding of the risks of modern slavery and human trafficking, awareness is raised on day one of employment with the firm during the firm's induction programme.

Awareness is raised by explaining the basic principles of the Modern Slavery Act 2015 and how to assess the risks of slavery and human trafficking. New members of staff

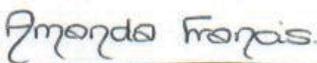
are taught how to identify the signs of slavery and human trafficking and what initial steps should be taken if slavery or human trafficking is suspected.

The firm has committed to ensuring this awareness is regularly reinforced through internal communications via the firm's intranet and Staff Handbook.

LOOKING AHEAD

The firm is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Throughout our 2017/18 financial year, we will continue to assess the risk of slavery and human trafficking in our own business and supply chains. A further statement will be published following the financial year ending 30 September 2018.



Amanda Francis

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Managing Partner