

## Slavery and Human Trafficking Statement for the Financial Year Ending 30 September 2022.

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.

### 1 Firm Structure

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Buzzacott is a Top 25 UK accountancy firm in London with over 500 staff based at our single site office in London.

Our specialist 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 of 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 them through their work and relationships with clients, business partners and each other.

### 2 Provision of Services

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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.

### 3 Supply Chains and Due Diligence

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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, vet, train, manage and compensate members of staff and we conduct site visits. Our policy is to pay our cleaning and catering staff the London Living Wage or more.

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### 4 Our Policies and Procedures

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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 modern slavery does not incur in our business activities or supply chains which include:

**4.1 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.

**4.2 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 of retaliation and are clear of the processes to be used should they have any concerns.

**There were no reported incidents of slavery during our 2021/22 financial year.**

**4.3 Compliance**– The firm fully embraces and maintains high standards of compliance procedures relating to Investments, Anti-Money Laundering, Audit Compliance, Anti-Bribery, Corporate Criminal Offences and Professional Conduct in Relation to Taxation. These procedures are regularly reviewed and communicated internally and members of staff are provided with training on these procedures.

**4.4 Ethical Standards** – The firm and all our members of staff demonstrate high 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.

**4.5 Equality, Diversity and Inclusion** – The firm is committed to equality of opportunity for all and believes in using people’s talents to the full, ensuring that decisions are made based on people’s qualifications, skills and ability to do the job rather than any other irrelevant factors.

Innovative thinking and different ideas are critical to the firm’s success and its ability to develop new ways of adding value for its clients will be greatly enhanced by having a diverse workforce who can bring differing experiences and perspectives to the workplace.

The firm has a policy in place, provides appropriate training in support of this commitment, and holds regular open discussions on the subject of diversity and inclusion where all staff are encouraged to participate to share their thoughts.

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**4.6 Client On-boarding** – As part of our client on-boarding 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.

**4.7 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.

### 5 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 risk of slavery and human trafficking in relation to various aspects of the firm, including the resources and support available. 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.

During 2022, all members of staff have been asked to watch a training film created by ICAEW in collaboration with HMRC. The training explores the degree of trust placed in personal and professional relationships and the need for professional scepticism. The training is also now delivered as part of the firm's induction programme.

### 6 Looking Ahead

The firm is 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 2022/23 financial year, we will continue to assess the risk of slavery and human trafficking in our own business and supply chains by providing training to all members of staff and reviewing our processes and procedures to identify areas for improvement. A further statement will be published following the financial year ending 30 September 2023.



**Tony Hopson**  
Managing Partner