



## Corporate Social Responsibility

# Modern slavery and human trafficking statement

### Introduction

This statement sets out MHA MacIntyre Hudson's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and its supply chains. As a responsible business, we're committed to upholding the internationally recognised human rights through the way we operate. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

MHA MacIntyre Hudson developed this statement to comply with the UK Modern Slavery Act 2015. It outlines our commitment to preventing modern slavery across our firm and supply chain. Section 54 of the Act requires companies to be more transparent about how they tackle modern slavery in their supply chain. This includes detailed information on structures and relevant policies and systems. The firm recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery, human trafficking, exploitation and discrimination.

### Firm's structure and supply chains

This statement covers the activities of MHA MacIntyre Hudson. We are a top 20 UK accounting firm, offering a full range of compliance and advisory services to entrepreneurial businesses, groups and multinationals with operations in the UK and to offshore investment funds. The firm has 89 Partners and over 580 staff in fifteen offices in London, the South East, East Anglia, the Midlands and in the Cayman Islands. MHA MacIntyre Hudson is the UK member of Baker Tilly International, one of the world's largest leading networks of independently owned and managed accountancy and business advisory firms.

The Firm in the United Kingdom currently operates in 14 different offices: Bedford, Birmingham, Canterbury, Chelmsford, Folkestone, High Wycombe, Leicester, London City, Maidstone, Milton Keynes, North London, Northampton, Peterborough and Reading. The firm doesn't operate in high risk areas and we don't consider any of our activities to be at high risk of slavery or human trafficking.

### Risk assessments

Risk assessments for all our suppliers are carried out by individual offices on an ad-hoc basis as and when new suppliers need to be engaged or a service is to be re-tendered. The majority of our suppliers have a long-standing relationship with the firm, forming trust and confidence in their practices backed by their reputation in the marketplace.

Risk assessments of recruitment agencies we work with are undertaken by the Recruitment team. We have long-standing relationships with the majority of the agencies we work with and we are assured of their practices from previous experience and their reputation in the marketplace. We are planning to obtain written reassurance from all recruitment agencies we are working with that they are compliant with the Act.

Documents proving the right to work in the UK documents are always checked by the firm for all new employees when they start working for the firm. Temporary staff from agencies are always thoroughly checked prior to appointment. All employees are given an employment contract and are made aware of all internal policies and procedures as well as their statutory entitlements and other benefits.

### Due diligence

The Firm undertakes due diligence when considering taking on new clients and suppliers and regularly reviews its existing clients and suppliers.

### Relevant policies

The Firm has a complete suite of policies in place which include Whistleblowing policy, Code of Ethics, Equal Opportunities policy, Diversity policy and Recruitment policy, all of which deal with the anti-slavery initiatives either directly or indirectly. We are also introducing a Corporate Social Responsibility policy. A revision of all the policies will be undertaken in the following year to ensure that references to modern slavery and human trafficking are clear. The overall responsibility for the policies lies with the HR Director.



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- **Whistleblowing policy**

The firm encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the firm. This includes any circumstances that may give rise to risk of slavery or human trafficking.

The firm's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. The Firm also has in place an open and transparent grievance process for all staff including agency workers.

- **Code of conduct**

The firm's code makes clear to employees the actions and behaviour expected of them when representing the firm. We strive to maintain the highest standards of employee conduct and ethical behaviour at all times including when operating abroad and managing our supply chain.

- **Equal Opportunities and Diversity policies**

The firm is committed to providing equal opportunities in employment and to abolishing discrimination in employment and against customers. We are also fully committed to the elimination of unlawful and unfair discrimination and value the differences that a diverse workforce brings to the organisation.

- **Recruitment policy**

The firm uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

- **Corporate Social Responsibility policy**

The firm's Corporate Social Responsibility policy has now been approved and is due to be launched shortly. This sets out the core principles and guidelines for the firm's social responsibility activities.

### **Training**

In the financial year 2016-2017 the firm introduced an online training portal iLearn. As part of the mandatory training courses the firm required all staff to undertake Modern Slavery training.

Going forward this training will also form a mandatory part of the firm's induction process alongside Health and Safety and Anti Money Laundering training.

### **Awareness-raising programme**

In light of the Modern Slavery Act, we are assessing the awareness of these issues among our staff and clients. As well as training staff, the firm will raise awareness of modern slavery issues by addressing the below issues in the firm's internal newsletter.

The newsletter article is scheduled for the August 2017 edition and will explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Firm; and
- what external help is available.

### **Board approval**

This statement has been approved by the Firm's Management Board, who will review and update it annually.

**Managing Partner's signature:**

**Managing Partner's name:**

Rakesh Shaanak

**Date:** 31 July 2017



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