



# Modern Slavery Statement

Forvis Mazars Melbourne Group

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# Our statement

**Forvis Mazars Melbourne does not tolerate modern slavery practices and we are committed to implementing and enforcing effective systems and controls to help ensure that modern slavery is not occurring anywhere in our own business or our supply chains.**

This voluntary statement covers Forvis Mazars Holdings (Vic) Pty Ltd (ABN 80 618 789 192) and its subsidiaries and related entities. It has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (the Act) for the reporting period from 1 September 2023 to 31 August 2024 (FY24).

## Our commitment

Modern slavery is a crime and a violation of fundamental human rights. In accordance with the Modern Slavery Act (Cth) 2018, it “describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is only used to describe serious exploitation”. 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 are committed to enhancing and reviewing our systems and controls to address modern slavery risks occurring directly or indirectly in our own business or our supply chains.

We are continuing to implement appropriate controls across a number of areas within our business, including our supplier policies, contractual processes, training and reporting to help ensure the intent of the Act is met within our own business and our supply chains.

## Principles, values and culture

Forvis Mazars is a multicultural and united partnership with shared goals, values and service standards across the world. We work together as a single, united and connected team, with aligned interests, consistent delivery models and a shared commitment to the highest standards of service delivery and ethics.

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 code of conduct](#)) 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 communicates our standards and values. Strong values have always 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 Forvis Mazars’ team members share and respect. Firm-wide mandatory training of our Code of Conduct was undertaken during the year, and this was mandatory for all existing partners and staff, with new joiners completing it as part of the induction process.

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.

## 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 work with companies and business leaders across the world to manage and address human rights issues in business. We 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.

# Message from our Managing Partner

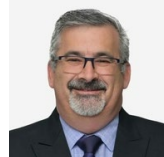
Forvis Mazars is committed to building the foundations of a fair and prosperous world. As such, preventing and acting on modern slavery risks is a critical aspect of the way we operate. While Forvis Mazars Melbourne has no mandatory requirement to comply with the Modern Slavery Act 2018, we are pleased to voluntarily prepare this modern slavery statement to formally demonstrate our human rights commitments.

At Forvis Mazars Melbourne, we act as trusted advisors for our clients. This trust, we earned it over time by consistently delivering on our promises and behaving ethically and with integrity in all our dealings. We expect to nurture similar relationships with our suppliers and our employees. This involves creating an environment in which concerns can be raised without fear of reprisals or adverse consequences. Our whistleblower policy plays a key role in providing those guarantees. But importantly, this policy is strongly supported by our leadership team to ensure that concerns are considered appropriately, issues are worked through collaboratively and ultimately addressed in a timely manner.

Forvis Mazars Melbourne's commitment extends beyond combatting modern slavery to include also implementing our Reconciliation Action Plan (RAP) and tackling environmental issues such as climate change. At Forvis Mazars, we have deployed a low carbon strategy to reduce our emissions and had our near-term and net-zero emissions reduction targets approved by the Science Based Target Initiative (SBTi).

After identifying that our office in St Kilda Rd was outdated and not environmentally friendly, Forvis Mazars Melbourne decided to move to a more sustainable building, at 600 Bourke Street. This move, effective 15 November 2023, enables us to support our sustainability commitments. While some works were undertaken, we have moved into a fitted space to reduce our climate impact. The central location, easily accessible through public transportations coupled with fewer car parks support our strategy of reducing carbon emissions associated with employee and client commute. Last, we acknowledge that our employees play a key role in helping us turn our sustainability commitments into actions and we encourage them to undertake four core foundational courses on sustainability and participate in a Climate Fresk workshop to deepen their understanding of climate change and sustainability issues.

*This Modern Slavery Statement is approved by the Board of Forvis Mazars Holdings (Vic) Pty Ltd.*



**Richard DeBono**  
Managing Partner  
Forvis Mazars Melbourne, Australia

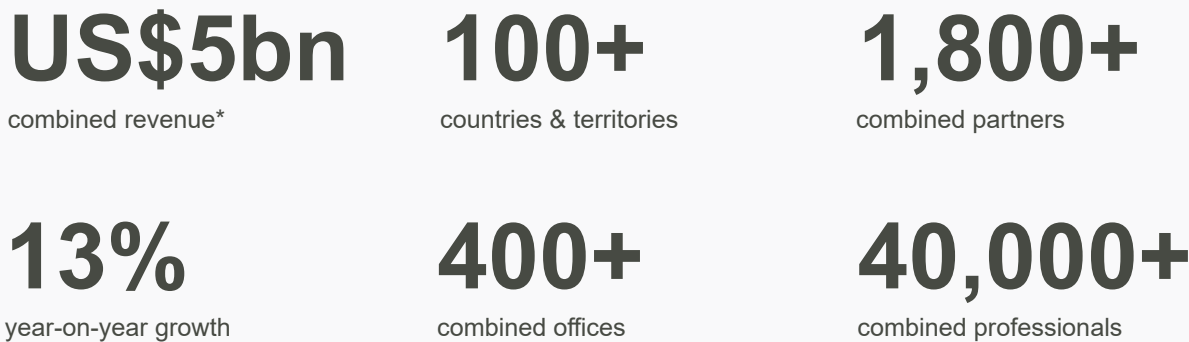
A handwritten signature in black ink, appearing to be 'R DeBono'.

# Our structure, operations & supply chain

## Organisational structure

Forvis Mazars is an international, integrated and independent organisation, specialising in audit, advisory, accountancy, tax, consulting, human resources and sustainability services. It has grown into an international group comprising over 40,000 professionals in more than 100 countries and territories.

### Who we are at a glance



Forvis Mazars is the brand name for the Forvis Mazars Global network (Forvis Mazars Global Limited) and its two independent members: Forvis Mazars LLP in the United States and Forvis Mazars Group SC, an internationally integrated partnership operating in over 100 countries and territories.

\*Forvis Mazars Group \$3,251m + Forvis Mazars, LLP \$1,939m as at 31 August 2024

We serve businesses of all sizes, from privately owned businesses and private individuals to large and listed companies, public bodies and non-governmental organisations (NGOs), across borders and sectors. We are convinced our diverse portfolio of services is essential to the relevance of the services we provide to clients, the attraction of the best talent and, ultimately, the public interest.

In each country in which we have a member of our integrated partnership, one or more separate legal entities exist. In Australia, Forvis Mazars has three member firms, including Forvis Mazars Holdings (Vic) Pty Ltd (ABN 80 618 789 192). As at our financial year end, we had 12 partners and over 100 staff.

For the purpose of the Act, the Forvis Mazars entities in our global organisation, and correspondent and representative offices, are part of our supply chain.



People

By establishing a gender-neutral workforce and looking at ways to encourage, retain and recruit talent, we want to foster a diverse and inclusive workplace, with equal opportunities for all to thrive and grow; a place where people have a sense of belonging and pride; and where talent can make meaningful contributions and be themselves.

Integrity and responsibility

**100%**  
of our countries and territories have launched programmes on our Group code of conduct

**18**  
countries with ESG ratings, certifications or memberships

People

**11,500+**  
hires (including interns)

**63**  
hours of training, on average, per auditor

Women represent

**53%**  
of our Group workforce

**57%**  
of our Group management team

**22%**  
of partners worldwide

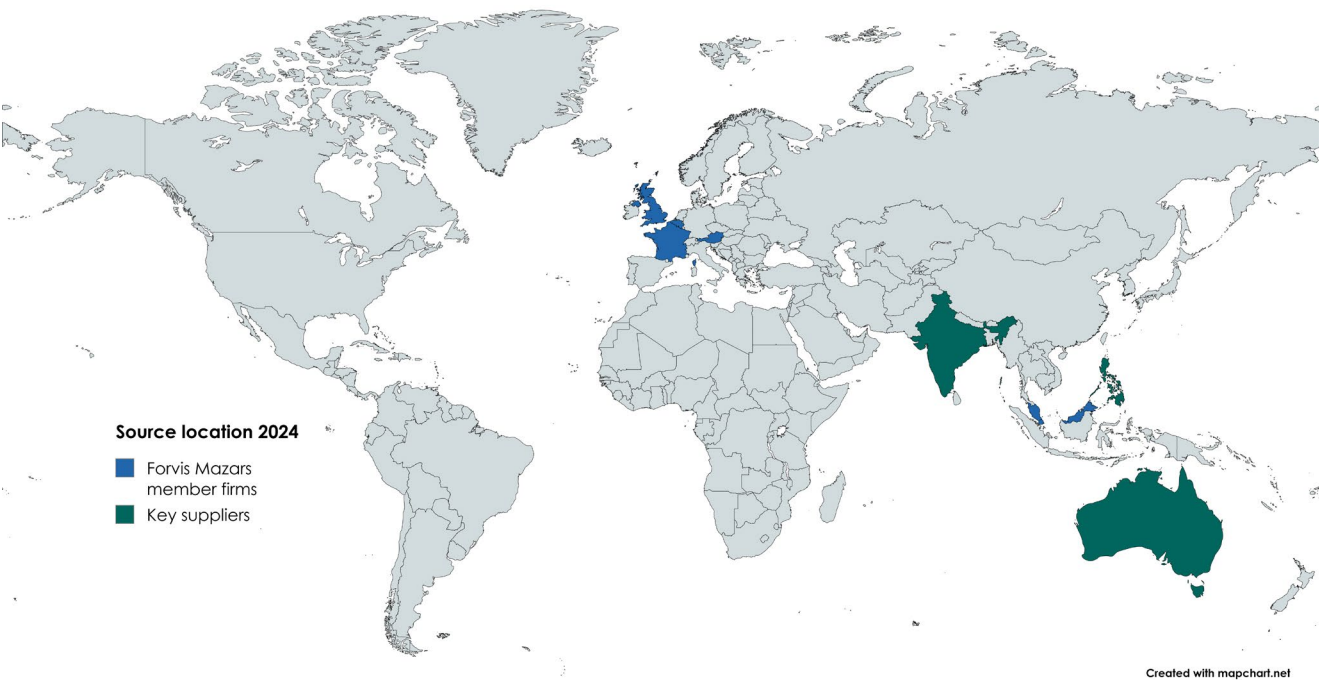
**43%**  
of our Group Executive Board and Group Governance council members

**46%**  
of our Group list of potential candidates for partner roles

**31%**  
of our Group leadership team

Supply chain

For professional service firms, modern slavery is usually considered a low risk but indirect exposure needs to be considered and addressed appropriately. Forvis Mazars Melbourne has limited procurement activities and sources its goods and services mostly from Australia-based suppliers. The map below depicts the location of our key suppliers and Forvis Mazars member firms with which Forvis Mazars Melbourne had business relations in 2023/2024.



## Our main spending categories are:

### » Human resources

This includes recruitment services, casual employment, learning and development support, professional memberships, health and well-being, social committee activities.

### » Professional services

This includes legal firms, recruitment agencies, offshore staff provided by external providers as well as services provided by other Forvis Mazars member firms.

### » Technology

This includes our IT hardware and software, telecommunications, cloud-based services, IT support services and e-waste disposal.

### » Business travel

This includes transport (air and ground), functions and conferences, meals, and accommodation.

### » Promotion and office supplies

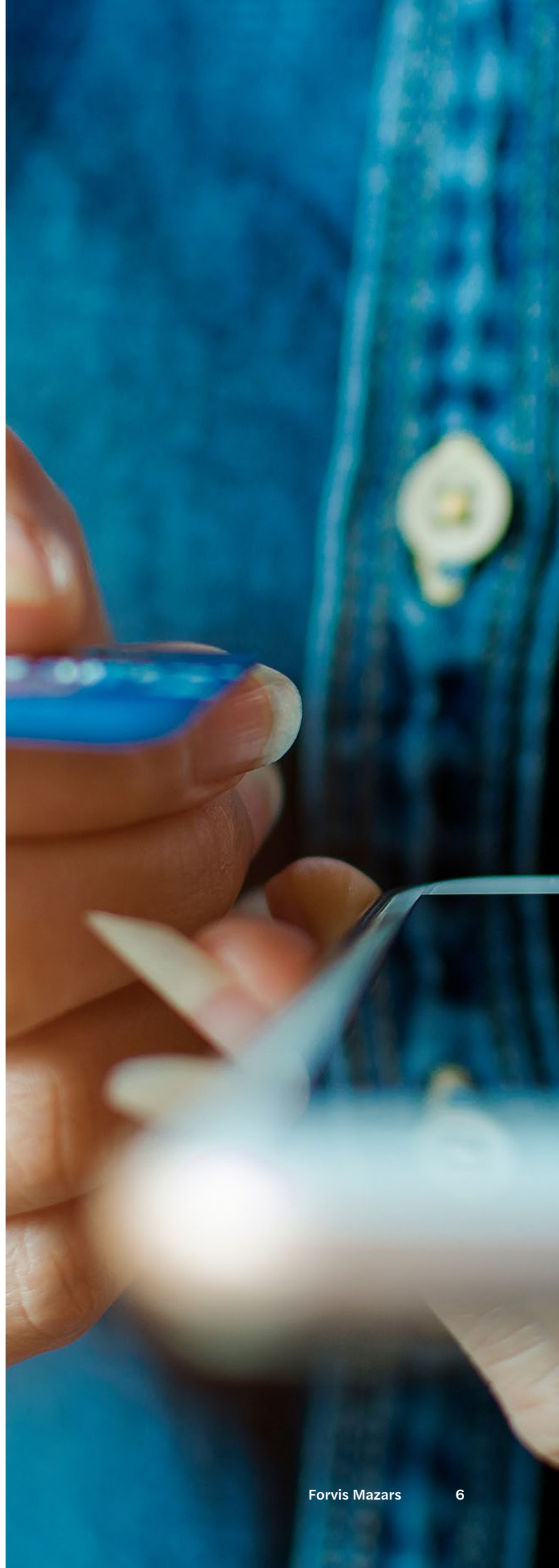
Promotion includes sponsorship, digital advertising, marketing services, and branded goods. Office supplies include office products and stationery, insurance, couriers, mails services.

### » Property and facilities management

This includes leases, construction and refurbishment products / services, general waste management.

### » Hospitality

This includes onsite and offsite catering and event management, cleaning services, security.





# Risks of exposure to modern slavery

Highest risk	Medium risk	Lowest risk
<p><b>Professional services</b> Offshore staff may often be located in countries where there are higher risks of labour rights abuses. For our offshore staff, the risk is higher. Forvis Mazars Melbourne uses offshore support staff based in India and the Philippines through to two external providers. These business relationships are ongoing, with offshore staff provided onboarding and regular interactions with Forvis Mazars Melbourne employees.</p> <p>Forvis Mazars Melbourne also uses offshore Forvis Mazars member firms to support its operations. Modern slavery risks are however mitigated by the fact that all Forvis Mazars member have to comply with the Forvis Mazars Global Code of Ethics.</p> <p>During our interactions with those offshore staff, we have not identified modern slavery concerns and we plan to strengthen our due diligence and monitoring procedures.</p>	<p><b>Technology</b> Technology is associated with specific modern slavery risks that may arise during the manufacturing process. As pointed out by the UN Global compact, forced labour allegations have been brought against large technology companies in the past and progress seems limited. Electronic components are often produced in countries with heightened risks for forced labour (debt bondage, under-payments, excessive work hours). Modern slavery risk also extends further to the critical mineral supply chains and specifically to the artisanal and small-scale mining industry.</p> <p>While Forvis Mazars Melbourne has sourced its IT hardware from reputable companies, we are yet to undertake further due diligence activities to monitor modern slavery risks and potential forced labour allegations that our technology providers may face.</p> <p><b>Promotion and office supplies</b> Forvis Mazars Melbourne occasionally purchases promotional goods (bags, pen, notepads, water bottles) and office supplies for its current operations. Those goods and supplies present specific modern slavery risks as they are often manufactured at low cost in countries with higher risk of labour rights abuses. Forvis Mazars Melbourne predominantly purchases those goods from large retailers such as Officeworks.</p>	<p><b>Employees</b> Some activities such as recruitment present heightened risks of modern slavery risks. Recruitment agencies might engage in excessive recruitment fees that may force employees into a debt bondage situation. For our onshore staff, we consider that the risk is low. Forvis Mazars Melbourne only relies occasionally on recruitment agencies based in Australia and Forvis Mazars Melbourne has strong internal HR policies.</p> <p><b>Property and facilities management</b> As pointed out by the UN Global compact, the construction industry presents heightened risk of modern slavery with multiple recruitment agencies involved, the use of migrant workers more vulnerable to abuses, unsafe working conditions, time pressure to deliver on time that may lead to excessive working hours and remote worksites which make external scrutiny more challenging. During the period 2023/2024, some construction work and refurbishment was undertaken as part of a move to a new office location and an assessment of modern slavery risks was performed.</p> <p><b>Hospitality</b> As pointed out by the UN Global compact, the hospitality sector often relies on subcontracting and employs workers that are more vulnerable to lack of social protections or wage discriminations. The cleaning of Forvis Mazars Melbourne's office is performed by staff employed by the building management company, Mirvac. Occasionally, Forvis Mazars Melbourne hold functions, with hospitality staff provided by the venue in charge of organising the event.</p>

<sup>1</sup> [Industry-specific Risk Factors - Business & Human Rights Navigator \(unglobalcompact.org\)](https://www.unglobalcompact.org/industry-specific-risk-factors)

# Actions taken to assess and address modern slavery risk, including due diligence and remediation processes

Forvis Mazars Melbourne has no requirement to comply with the Modern Slavery Act 2018 but is willing to take voluntary and proactive steps to comply with the requirements of the Act and formally demonstrates our human rights commitments. To date, Forvis Mazars Melbourne has managed modern slavery risks within its supply chain and operations formally and informally through the following actions:

During the period 2023/2024, we have formalised our sustainability strategy and drafted a revised risk management framework that covers ESG risks, including modern slavery risks.

## Employees

Within our firm we are committed to paying people fairly for the work they perform. 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, police checks, right to work, references and evidence of qualifications where appropriate. Existing and new staff must undertake our Global Code of Conduct training.

Benchmarking and market research is used to inform our remuneration review that is performed every six months for all roles as well as other assessments such as gender parity assessments. Partners are deeply involved in the annual and mid-year performance reviews of staff. Regarding overtime, regular reviews are performed to ensure overtime is not excessive. For support staff on an award, the review ensures that staff are not doing more hours than covered through their annualised remuneration. For other staff, prior approval from supervisor is required and an 'offset approach' is often used where overtime performed can be offset later in the week or month.

Forvis Mazars Melbourne has a range of human resources policies in place to minimise risks of modern slavery:

- Whistleblower Policy
- Forvis Mazars Employee Handbook that covers:
  - » Equal opportunity, equality, non-discrimination
  - » Written payslip received by employees
  - » Remuneration based on market trends and performance
  - » National leave in accordance with National Employment Standards
  - » Bullying or harassment
  - » Equal opportunities policy
- Employee Referral Program guidelines
- Family Domestic Violence Leave Policy
- Staff Short Term Incentive Plan
- OHS-Checklist\_Work-from-home
- Competency framework for client-facing employees
- OH&S is part of the induction process of new employees and covers physical OH&S, anti-harassment & bullying, and ergonomics
- Workplace Harassment and Bullying Policy
- Equal Employment Opportunity and Anti-Discrimination Policy

During the period 2023/2024, we have completed the following actions:

- Develop an online modern slavery training for our staff
- Engaged in the need for a psychosocial hazard risk assessment
- Develop and implement a Diversity and Inclusion Policy
- Update job description of our Finance manager and HR manager in relation to procurement activities to include modern slavery
- Approve and implement our draft OHS Policy and Procedure
- Approve and implement our draft Remote Work 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. A majority of our suppliers are based in Australia though, with purchases often made at retail price. As part of the due diligence process, all non-recurring expenses above \$300 are approved by the Managing Partner. The Whistleblower Policy covers suppliers and business relations, thereby ensuring protections if modern slavery concerns are raised by individuals working within our supply chain. Forvis Mazars also performed a review of key suppliers and business relations for the period 1 September 2023 to 31 August 2024 to assess modern slavery risks. Our review did not uncover any major issues in relation to modern slavery.

Regarding offshore staff from external providers, Forvis Mazars has regular communication with its offshore staff and members of our Melbourne-based staff made an onsite visit in the Philippines during 2023/2024. No specific cause for concerns regarding modern slavery risks were identified. A clause regarding compliance with the Modern Slavery Act 2018 was included in the agreement with one of our two providers of offshore staff. We will look to increase oversight over the organisations providing offshore staff.

As for business relations with other Forvis Mazars member firms, Forvis Mazars' integrated partnership is designed to ensure the delivery of consistent, high-quality services to all clients every single day. We do so by setting and maintaining global service standards while giving our local professionals the freedom to remain agile and personal in their approach. We preserve our ability to deliver consistent quality by only integrating partners around the globe who share our values, our commitment to quality, and our vision for the future of our industry. Our global code of conduct serves as a moral compass in all of our daily activities. Beyond complying to local laws and regulation, which apply to our professional practices, Forvis Mazars wishes to enforce the right ethical principles and appropriate professional behaviours that we need to consistently implement and respect wherever we are, whoever we serve, whenever we act. This code helps every Forvis Mazars employee navigate dilemmas by drawing a clear line between acceptable behaviours and behaviours that would put our reputation and the

trust of our stakeholders at risk.

During the period 2023/2024, we have completed the following actions:

- Onsite visit at one of our offshore staff providers in the Philippines
- Develop and approve a Supplier Code of Conduct
- Develop and approve a Procurement / Purchasing Policy that requires to include compliance with Australian Modern Slavery Act 2018 in any future contract or addendum
- Update our Whistleblower Policy to cover modern slavery concerns

Overall, no instances of modern slavery were identified and Forvis Mazars Melbourne is committed to remain vigilant and continuously improve its procedures and policies to address modern slavery risks.



## Clients

At Forvis Mazars Melbourne, we help our clients make the most of opportunities, operate with transparency and grow confidently and responsibly.

Our group-wide independence check tool, WeCheck, assists us with conflict checks on both potential and existing clients, offering protection for the independence of Forvis Mazars Group. All countries within our partnership are required to register on WeCheck and regularly upload and update client data into the tool's data management system. Currently, 86 countries are live on WeCheck.

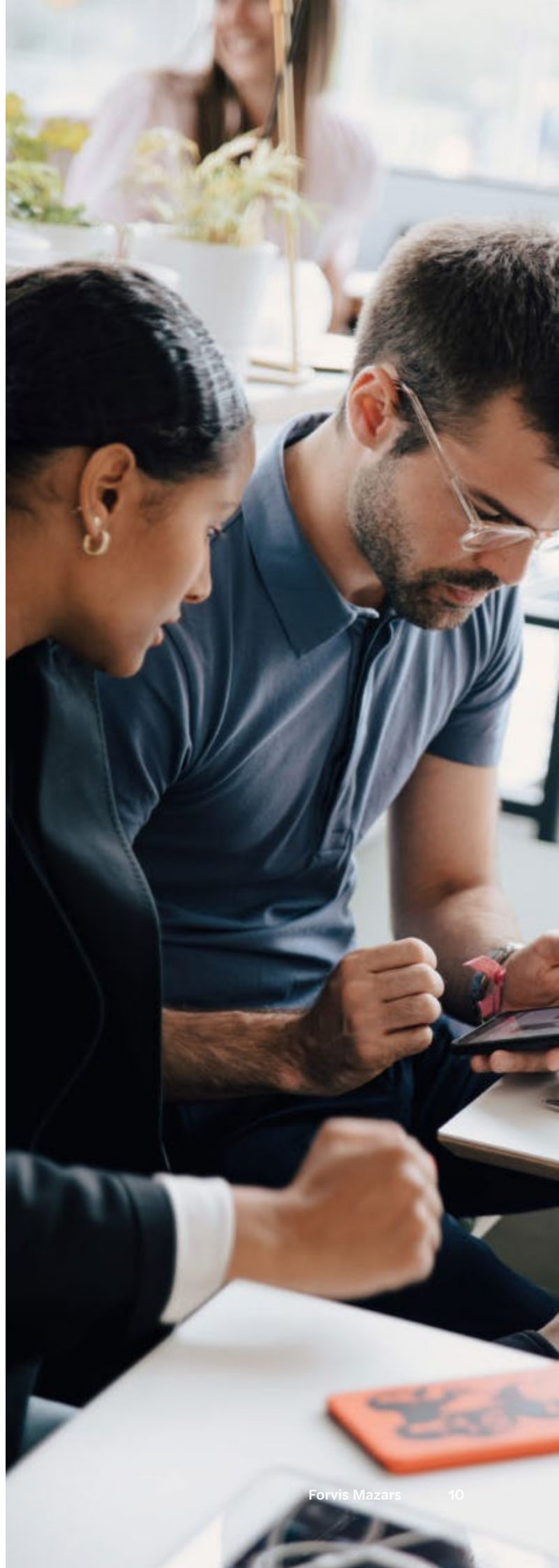
We are committed to ensuring we only associate with third parties and clients who share our values. Before accepting or continuing a relationship with a client, a mandatory evaluation of the client's related risks is performed. Client due diligence (CDD) and Know Your Client (KYC) tools and processes have been implemented across the Group, including Australia. These cover a variety of topics, including anti-money laundering (AML), fraud, corruption, economic and trade sanctions, and tax offences, as well as independence checks and the identification of beneficial owners.

When assessing the suitability of prospective clients, our decision-making framework goes beyond evaluating risks related to independence and conflicts of interest. We also consider any external and internal factors that may increase our exposure to ethical, compliance, reputational and ESG risks.

Our client engagement teams assess external factors, including any industry-specific risks that could generate negative externalities. Our client acceptance policy restricts Forvis Mazars Group from entering into business relationships with organisations that operate in industries that are incompatible with our values and may pose a threat to the public interest; for example, entities that engage in illegal activities in their jurisdictions or entities held guilty of violating human rights.

During the period 2023/2024, we have completed the following actions:

- Update Client and Acceptance Procedure to specifically include modern slavery risk assessment
- Update engagement letters
- Make progress on the implementation of ISQM1 across audit clients and testing of the effectiveness of ISQM 1 controls.





## Assessing effectiveness of modern slavery risk management

Forvis Mazars Melbourne is committed to continuously improving its identification, assessment, monitoring and mitigation of modern slavery risks in its supply chain and operations. To assess the effectiveness of its actions, Forvis Mazars Melbourne has developed a dashboard of ten key performance indicators across three main groups: a) Suppliers and business partners; b) Forvis Mazars member firms; c) Forvis Mazars employees. For example, one indicator for Forvis Mazars Melbourne employees is the percentage of employees who have completed the Global Code of Conduct training modules.

Modern slavery risks will also be integrated into the Forvis Mazars Melbourne risk management framework, with the partners group being informed of any instance or suspicion of modern slavery issues.

## Consultation on preparing a joint statement

This statement was prepared in consultation with Forvis Mazars Melbourne's partners, finance team, HR team, HR consulting services, and sustainability services. The discussions held enabled us to gather insights on the current policies in place and assess modern slavery risks associated with different suppliers and business relationships. Those discussions also contributed to raising awareness on modern slavery risks and paved the way for the deployment of a formal online modern slavery training module within Forvis Mazars Melbourne and within the service offering to clients.



# Our plan of actions for the future



1

## General

- Approve our draft risk management framework
- Develop and implement a modern slavery policy



2

## Employees

- Requires all Forvis Mazars Melbourne employees to complete our online modern slavery training
- Perform a psychosocial hazard risk assessment



3

## Suppliers

- Implement our Supplier Code of Conduct
- Implement our Procurement / Purchasing Policy
- Onboard new suppliers using our supplier assessment questionnaire
- Update our whistleblower information on our website
- Consider giving our high-risk suppliers access to our online modern slavery training
- Develop an ad hoc screening procedure for recruitment agencies



4

## Clients

- Continue the implementation of ISQM1 across audit and consulting clients and testing of the effectiveness of ISQM 1 controls



# Contacts

## **Forvis Mazars Melbourne**

Level 5, 600 Bourke Street  
Melbourne VIC 3000  
Australia

Forvis Mazars Group SC is an independent member of Forvis Mazars Global, a leading professional services network. Operating as an internationally integrated partnership in over 100 countries and territories, Forvis Mazars Group specialises in audit, tax and advisory services. The partnership draws on the expertise and cultural understanding of over 40,000 professionals across the globe to assist clients of all sizes at every stage in their development.

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