



Pitcher Partners Melbourne
Modern Slavery Statement
2020/2021



Introduction

This statement sets out the actions taken by Pitcher Partners Melbourne (ABN 27 975 255 196) to address the risks of modern slavery in our operations and supply chains pursuant to section 13 of the *Modern Slavery Act 2018* for the financial year ending 30 June 2021.

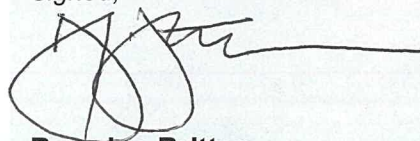
Pitcher Partners is guided by the principles of unity, integrity, and care, putting people and our community at the heart of everything we do. We recognise that modern slavery is a global challenge, occurring in any sector or industry, and at any point in a supply chain. As part of our commitment to our community, we take responsibility for the prevention and management of any risk of modern slavery within our business, and support efforts to mitigate these risks in the wider Australian market.

During this reporting period, we have continued to proactively identify and address the risks of modern slavery within our supply chains, building upon our foundation of responsible procurement practices and further developing our systems and controls to effectively manage these risks within our business. We also continue to build our presence in the community through our charity work and corporate social responsibility initiatives that address some of the root causes of Modern Slavery. We are pleased to report that we have not identified any instances of modern slavery within our supply chain and will continue to monitor our suppliers to ensure that this continues to be the case.

This statement will outline the steps that Pitcher Partners Melbourne has taken to identify, assess and address the risk of modern slavery within our supply chain, and marks our enduring commitment to conducting our business to the highest ethical standards of our profession.

This statement was approved by the Partners of Pitcher Partners Melbourne in their role as the principal governing body at a General Partners meeting on 17 November 2021, in accordance with Section 13 of the Modern Slavery Act 2018 (Cth).








Signed,



Brendan Britten
Managing Partner
Pitcher Partners Melbourne

24 November 2021

Statement Summary

Mandatory Criterion	Actions taken	Section
1. Identify the reporting entity	 <p>Identified the reporting entity as the Partnership at Pitcher Partners Melbourne (J.L BEAUMONT & Others, ABN 27 975 255 196)</p>	Introduction (pg. 2)
2. Describe our structure, operations, and supply chains	 <p>Outlined Pitcher Partners Melbourne's corporate structure, staff numbers, offices, services, and supply chains.</p>	Our network (pg. 4 – 6)
3. Describe the risks of modern slavery practices in our operations and supply chains	 <p>Modern slavery risk assessed against four key areas: geographical risk, sector and industry risk, products and services risk and entity risk.</p>	Risk assessment (pg. 7)
4. Describe the actions we have taken to assess risk, including due diligence and remediation processes	 <p>Implemented supply chain and client due diligence procedures, as well as complementary monitoring and compliance programs, such as Modern Slavery training, and a whistleblower policy.</p>	Our due diligence; Monitoring, compliance and remediation programs (pg. 8 – 9)
5. Describe how we assess the effectiveness of our actions	 <p>KPIs, yearly reviews and surveys utilised to assess effectiveness. Policies and procedures updated based on outcomes.</p>	Effectiveness of our actions (pg. 11)
6. Describe the process of consultation with any entities we own or control	 <p>Consulted with key stakeholders in each practice area/associated entity at Pitcher Partners Melbourne.</p>	Process of consultation (pg. 11)
7. Other relevant information	 <p>Established charitable initiatives and projects, including those that help address the root causes of Modern Slavery.</p>	In the community (pg. 12)

Our Network

Pitcher Partners Melbourne is a member of the Pitcher Partners National Association, an award-winning association of independent accounting firms. Each firm within the Association operates as a separate independent business and is responsible for its compliance with the *Modern Slavery Act 2018* (if applicable).

National Association

Pitcher Partners Melbourne is a member of the National Association of Pitcher Partners firms. The association of independent accounting firms includes Sydney, Perth, Adelaide, Brisbane, and Newcastle.

Pitcher Partners firms are separate legal entities. Membership to the National Association does not make any firm responsible for activities conducted by another member firm.



Pitcher Partners Melbourne

Overview

Pitcher Partners is an established and respected professional accounting practice based in Melbourne. It was formed in November 1991.

Today, the firm provides a traditional range of accounting services including, but not limited to, compliance accounting, general business advice, tax advisory, audit, internal audit, investment advisory, superannuation, insolvency, corporate finance, data analysis, credit and lending service and consulting.

Services may be provided to clients from across Australia or overseas, however services are predominantly provided to smaller listed public companies or unlisted public companies, privately owned businesses, high net wealth individuals and a range of government, semi-government and not for profit organisations from across Victoria.

Our Structure

Pitcher Partners Melbourne is an independent accounting firm, operating as a partnership. The services at Pitcher Partners Melbourne are provided through the partnership and its related or associated entities which may be trusts or trustee companies. Services such as general tax consulting, compliance and advisory services are provided through Pitcher Partners Advisors Proprietary Limited, while audit and insolvency work are provided under the partnership. Most practice areas at Pitcher Partners Melbourne, such as our Investment Services division, and our Corporate Finance division, provide services through a trustee company entity owned and controlled by Pitcher Partners Melbourne.

Other trustee company entities that we provide services through include Pitcher Partners Investment Services Pty Ltd, Pitcher Partners Corporate Pty Ltd, Pitcher Partners Finance Pty Ltd, Pitcher Partners Legal Pty Ltd and Pitcher Partners Consulting Pty Ltd. All of the aforementioned entities are wholly owned and controlled by Pitcher Partners Melbourne but for the purposes of the *Modern Slavery Act 2018*, are not reporting entities themselves.

Our Operations



Pitcher Partners Melbourne

703 Total Staff
including













- 50 Partners
- 81 Directors
- 153 Managers

2 Offices

- Docklands, VIC 3008
- Dandenong South, VIC 3175

All figures shown as at 30 June 2021

Pitcher Partners services

 <p>Audit and Assurance</p>	 <p>Business Advisory</p>	 <p>Business Recovery and Insolvency</p>	 <p>Consulting</p>	 <p>Corporate Finance</p>	 <p>Estate Planning</p>
 <p>Investment Advisory</p>	 <p>Private Business and Family Advisory</p>	 <p>Risk Services</p>	 <p>Superannuation</p>	 <p>Taxation</p>	 <p>Data Analytics</p>

Our Supply Chains

Over this reporting period, there were very few changes to our supply chain activities.

Our goods and services continue to be sourced primarily to support our back office and administrative functions. Some processes we outsource include tasks such as document storage, some bookkeeping and account preparation and elements of IT support. Pitcher Partners Melbourne is committed to supporting Australian businesses, and the services we procure are predominantly domestically operated and based.

All functions that are sourced non-domestically, are subject to our stringent ethical risk assessment and screening processes which are further described in this statement below.

Pitcher Partners Melbourne, in consultation with our clients, may also appoint another firm within the National Association as an independent contractor to provide services to a client.

In addition to contracted labour, Pitcher Partners Melbourne also engages with regulatory bodies, banks, credit providers, registries, fund managers, legal advisors, and brokers on behalf of our clients as part of our services.



Risk Assessment

Over this reporting period, we have not identified any major changes in the risk profile of Pitcher Partners Melbourne's supply chains.

In assessing the risks of Modern Slavery in our supply chains, we have referenced tools and resources such as the Global Slavery Index, Annual Trafficking in Persons Report and the UN Guiding Principles on Business and Human Rights to determine and analyse the key factors and indicators of modern slavery risk that may be present in our operations and supply chains.

In consideration of our services, operations and supply chains and the general risks involved in the Accounting industry, we have scoped the following as potential areas where vulnerability to modern slavery risk may exist:



Geographical Risks

With reference to the 2018 Global Slavery Index ("GSI"), we recognise the country-level prevalence of modern slavery and how specific countries are at a higher risk of being impacted by modern slavery activity than others. Though the suppliers we procure are predominantly domestically based, we do outsource some administrative functions to businesses whose operations are based in countries listed as at a medium-level vulnerability to modern slavery. The firm outsources certain functions to a global outsourcing company based in India. The outsourced firm is a recognised employer partner of CPA Australia. We recognise the inherent risks of outsourcing to certain countries and have reviewed and revised our procurement policies to take into consideration country-specific risks and have put in place a system to continue to assess, monitor, mitigate and remediate these risks. Pitcher Partners Melbourne has conducted several site visits of the Indian outsourced provider and consideration is given to working conditions and modern slavery risks. We believe that the suppliers that we source from both foreign and domestic regions are reputable, and compliant with International Human Rights standards as concluded from our findings from due diligence completed this financial year.



Sector and Industry Risks

The business advisory and accounting profession are generally at low risk of Modern Slavery activity. Additionally, as our operations are situated within

Australia, our employees are protected by Australian workplace laws and have access to an array of grievance mechanisms, available both internally and externally. To support our main operations, however, we may procure services such as cleaning and building maintenance services. We recognise that these industries are at higher risk of unfair or unsafe working conditions. Labour rights are a key indicator of Modern Slavery and we have taken consideration of this when screening new suppliers and determining an appropriate due diligence approach. During this reporting period, we changed our primary cleaning supplier. As a result of the change, we had the opportunity to assess and engage with the new supplier whilst considering modern slavery risk as a core consideration. Through our due diligence procedures, we were satisfied that the provider had demonstrated extensive policies and practices to mitigate threats of modern slavery activity within their own supply chains, as well as a commitment to actively prevent and manage modern slavery risk within their own supply chains, as outlined in their own modern slavery statement submission.



Products and Services Risks

Pitcher Partner Melbourne's service offering includes the provision of investment advisory services. We recognise that these services have some inherent risk of being linked to modern slavery through the activities of other entities we may recommend clients invest in. As there is a limit to the oversight we have on these companies (both domestically and internationally), there is a potential risk of investments being placed in companies who engage in forced labour hire or other modern slavery activity. However, we establish approved product lists and constantly monitor the markets for factors which may negatively impact the performance of our client's portfolios, including reputational risk. Our investment services practice has established a Responsible Investment Charter and is a member of the Responsible Investment Association of Australasia (RIAA). Ethical, Social and Governance (ESG) factors are important considerations in our investment analysis.



Entity Risks

Some entities may be at higher risk of modern slavery due to poor governance structures, a record of treating workers poorly or a track record of human rights violations. We have not identified any entity risks at Pitcher Partners Melbourne.

Our Due Diligence

Supplier Due Diligence

Over this reporting period, Pitcher Partners Melbourne has conducted an internal review of our Modern Slavery due diligence processes, and as a result of the review, has identified a number of controls and procedures that we will continue to improve and enhance, including further modern slavery guidance for our procurement team, modern slavery training for the wider firm focussing on client risk, and a more structured program of supplier review and due diligence. Improvements to the engagement step in our due diligence program, including increased use of our supplier questionnaire to actively engage with our suppliers regarding modern slavery awareness. We look forward to reporting on the results of these improvements in our next statement for the 2022 financial year.



1. Screening

Our screening procedure involves a risk assessment by the procurement team taking into consideration key modern slavery

risk factors such as the types of goods purchased or services provided, the country of operations and the reputation of the supplier.

As a result of the check, all proposed suppliers are assigned a risk-level of low, medium, or high risk. Pitcher Partners Melbourne will not engage with any supplier that has been categorised as a high risk of modern slavery, nor any supplier which has a documented record of modern slavery breaches. Suppliers that are graded as medium risk may be subjected to an enhanced due diligence program. Pitcher Partners Melbourne may request a supplier to take remedial action to mitigate any modern slavery risk in their business before engaging.



2. Engaging

We have developed a standard contractual clause for inclusion in material third-party supplier

contracts. This clause will allow Pitcher Partners Melbourne the opportunity to hold suppliers legally responsible for ensuring compliance with Modern Slavery laws as well as establish a standard for how we want our suppliers to manage modern slavery risks in their own supply chains. New suppliers contracting with Pitcher Partners Melbourne are expected to agree with the standard contractual clause prior to engagement.



3. Monitoring

Pitcher Partners Melbourne maintains a register of material third-party suppliers which are subjected to enhanced due diligence by Pitcher Partners.

Where we are alerted of a potential modern slavery breach situation, we may, after further investigation and enquiry with the supplier:

- Recommend actions to remediate or mitigate the modern slavery risk and oversee that our recommendations have been implemented; or
- Terminate the engagement.

Investigation and enquiry procedures may include on-site inspection of a supplier's operations, self-assessment questionnaires and/or review of their policies and records as a result of risks identified during the screening or due diligence process.

Our Procurement Team

Pitcher Partners Melbourne has established a procurement team responsible for overseeing all new supplier engagements. A procurement policy has also been implemented which serves to guide our procurement team in assessing and managing modern slavery risks. The persons responsible for procurement have been provided with internal training to be able to effectively assess suppliers for modern slavery risk, as well as be able to recommend mitigation actions when these risks are detected.

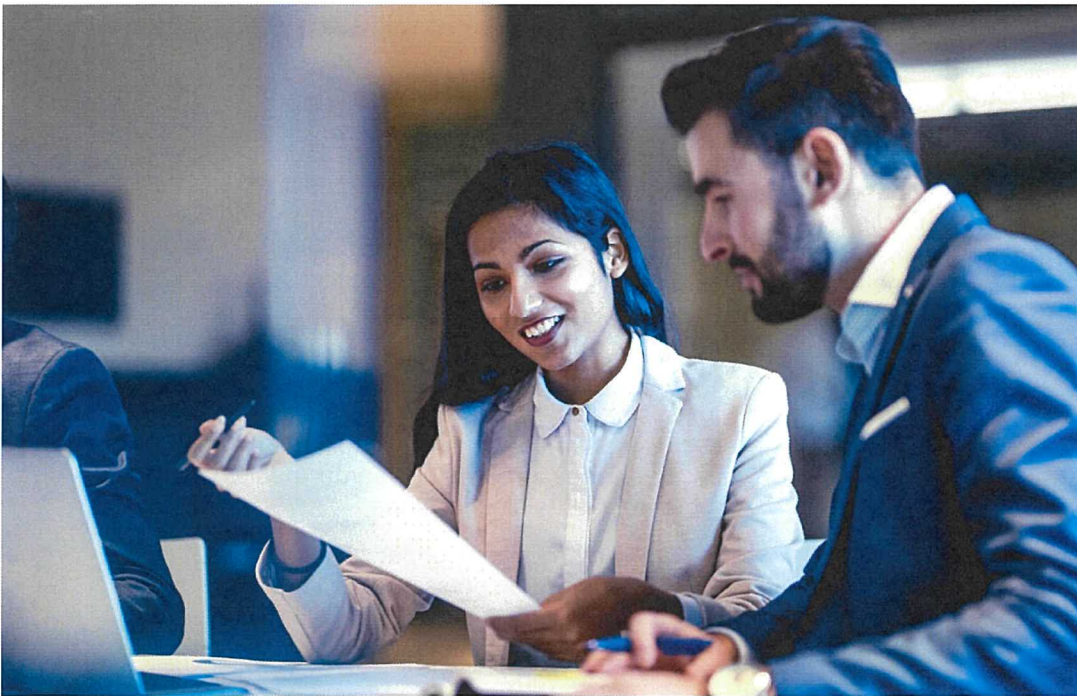
Client Due Diligence

The integrity of our client base is of high importance and therefore Pitcher Partners Melbourne mandates policies around the acceptance of new clients and the continuance of existing client relationships and engagements. Our client integrity policies are designed to provide Pitcher Partners Melbourne reasonable assurance that not only are we complying with our legal obligations as an accounting firm, but also not contributing to or being complicit in any modern slavery activity that may be conducted by a client.

All clients are subject to a preliminary assessment which considers a range of factors, including the legitimacy and purpose of the business and its transactions, their country of operations, the size of their operations, and the potential reputational, ethical or moral risks of engaging with the client. A

full analysis of client integrity is essential prior to acceptance or continuance of any client. Where the risk is deemed too high, Pitcher Partners Melbourne may not accept the engagement or may resign from an existing engagement.

Pitcher Partners Investment Services Pty Ltd provides 'designated services' in its capacity as Australian Financial Services Licence holder and as such is subject to obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. As per the licensee's AML/CTF policy, all clients receiving designated financial services are subject to source of funds analysis and ongoing due diligence, which enables the licensee to appropriately identify, mitigate and manage the risk of Pitcher Partners Investment Services facilitating money laundering or terrorism financing.



Monitoring, Compliance and Remediation Programs

Governance and Policies

Pitcher Partners Melbourne adheres to the policies and procedures outlined in the National Quality Control Manual ("NQCM") with the objective of maintaining the quality of work and the reputation and status of the firm. The NQCM includes policies and procedures that address some of the risks of Modern Slavery:

- Ethical requirements of Partners and employees;
- Acceptance and continuance of client relationships;
- Human Resources;
- Grievance mechanisms;
- Whistleblowing; and
- Monitoring programs.

Pitcher Partners are also bound by standards issued by the Accounting Professional & Ethical Standards Board (APESB) and the NOCLAR (Responding to non-compliance with laws and regulations) framework. Under the NOCLAR framework, we are obligated to report any observed instances of non-compliance with laws and regulations by our clients, including the prevalence of any modern slavery activity, to the relevant client stakeholders or authorities. Other laws and regulations that Pitcher Partners Melbourne is bound by that assist in mitigating Modern Slavery risk includes:

- *The Fair Work Act 2009*;
- *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*;
- Whistleblowing protections under the Part 9.4AAA of the *Corporations Act 2001*;
- *APES 110 Code of Ethics for Professional Accountants*;
- Financial Planners and Advisers Code of Ethics 2019.

Whistleblower Policy

In addition to the firm's general policies, under Pitcher Partners Melbourne's Whistleblower Policy, Partners, Executive Directors, employees, associates, suppliers and family members of the aforementioned are encouraged to report any instances of unlawful, unethical or undesirable conduct, including conduct amounting to modern slavery. All Partners and employees are provided full training on the protections they are entitled to in making a protected disclosure.

To enable Partners and employees to confidently and freely report any observed instances of misconduct, including concerns of modern slavery and human rights abuses, Pitcher Partners Melbourne has also engaged the services of an external and independent reporting Whistleblowing hotline provider. Pitcher Partners Melbourne's Whistleblower Policy requires that every disclosure is investigated and treated with strict confidence.

Training

Pitcher Partners Melbourne has implemented a procurement function with training and tools to be able to effectively assess supply chains and the workplace for modern slavery and human rights risks.

All existing Partners and employees have also been trained on our National Quality Control Manual policies so that they are aware of the Firm's legal, ethical, and moral obligations as an accounting firm. This training is extended to all new employees through the internal induction program. This training includes:

- Our obligations under APES 110 *Code of Ethics for Professional Accountants*
- Our obligations under the NOCLAR (non-compliance with laws and regulations) framework
- Our client acceptance and continuance policies
- Our whistleblowing policy

Effectiveness of our actions

Pitcher Partners Melbourne monitors the effectiveness of our actions, addressing modern slavery risk through the following key performance indicators and reviews:

1. The number of supplier contracts entered into with our modern slavery contractual clause (or similar) are recorded.
2. Attendance at specialist modern slavery training is tracked and monitored
3. Employees are surveyed on their opinions on Pitcher Partners' workplace culture and conditions. We monitor our areas of development and remediate areas of decline.
4. A yearly compliance review is conducted on the procurement team to check compliance with established policies and procedures addressing modern slavery risk including compliance with the firm's review/due diligence program.

We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes. Based on the results of the abovementioned processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

During the reporting period this statement covers, several policies outlined in the National Quality Control Manual, including policies that address elements of modern slavery risks, have been reviewed, evaluated and updated. The Risk and Compliance team and the firm's Risk Committee will continue to monitor outcomes to our policies addressing modern slavery risk, so they remain current and effective.

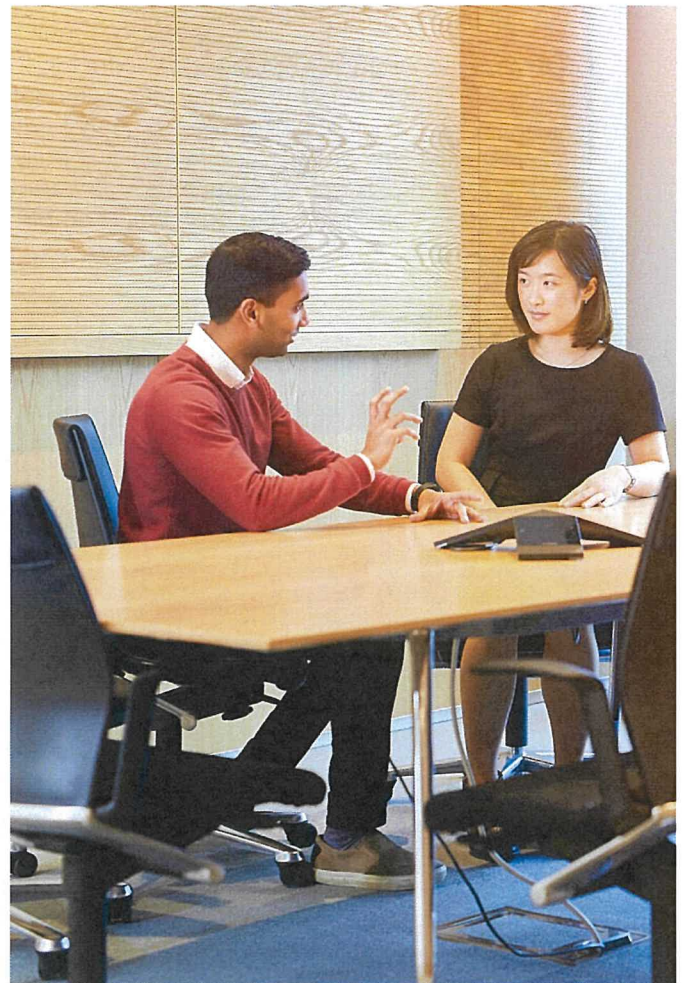
Process of consultation

In the development of this statement, we actively engaged and consulted with key stakeholders in all practice areas at Pitcher Partners Melbourne (entity structure outlined under 'Our Structure' - pg. 4). Each practice area at Pitcher Partners Melbourne maintains its own Risk Register and is required to consider a broad range of risks, including, where relevant, modern slavery risks associated with supply chain activities. With reference to these Risk Registers, and in consultation with key stakeholders across all service entities at Pitcher Partners Melbourne, we have assessed the risk of modern slavery within our businesses and supply chains and have adapted due diligence and remediation procedures and controls to combat these risks. These assessments, procedures and controls have been outlined in this statement.

COVID-19

Pitcher Partners Melbourne has continued to actively engage with our clients throughout the COVID-19 pandemic using a combination of online technologies. Partners and employees have predominantly worked from home and the firm has closely monitored and complied with the Victorian Department of Health and Human Services government advice and guidance throughout the pandemic.

Internal training of key personnel was completed pre-COVID-19 and procurement processes have been largely unaffected. Some supplier engagements ceased or reduced during the period that the office was closed. Supplier monitoring for modern slavery has remained in place and is largely unchanged.



In the Community

The Pitcher Partners Charitable Committee was established to provide the governance structure to the Melbourne firm's community-based projects and initiatives on behalf of the Pitcher Partners Melbourne firm.

Pitcher Partners people are empowered to donate both their time and expertise through a range of initiatives including pro bono and low bono work.

At Pitcher Partners Melbourne, we also take Corporate Social Responsibility seriously by providing financial support to a range of social causes. Our vision is to earn and maintain a legacy of meaningful impact in all the communities in which we operate, and we are proud of our efforts in raising funds to achieve this.

Some of the organisations and initiatives that we support are:

- Foodbank Australia
- Fareshare
- Pollinate Group

We recognise that exploitation is structural and systemic, and we seek to effectively contribute to tackling this by driving and investing in project and enterprise initiatives, undertaking fundraising activities, and donating money and resources to worthwhile organisations, including those that help combat and address the root causes of Modern Slavery.



Pitcher Partners Charitable Fund

The *Pitcher Partners Charitable Fund* was established by Pitcher Partners Melbourne in 2014 as a vehicle to build capital to provide the funds to support aspiring individuals in obtaining qualifications in accounting and related professions. The Fund assists talented members of our community who were at risk of dropping out of their tertiary education studies due to financial hardship. Up to three scholarships are made available each year.



Volunteering time

Lending a helping hand



Fund raising

Raising much-needed funds for positive causes



Pro bono work

Extending our expertise



Awareness and engagement

Driving the conversation and inspiring action



Donating goods

Delivering supplies and essentials to those in need



Financial support

Sharing our valuable resources



Making business *personal*

Pitcher Partners has the resources and depth of expertise of a major firm, but with a boutique firm feel. We give our clients the highest level of personal service and attention. That's the difference.

Pitcher Partners is an association of accounting and business advisory firms located in Adelaide, Brisbane, Melbourne, Newcastle, Perth and Sydney. We have a strong reputation for providing personal service and quality commercial advice to our clients across a broad range of industries.

We specialise in working with middle market businesses in Australia, including privately owned, foreign controlled, government owned and not-for-profits. Our clients require high technical standards, matched with a personal understanding and involvement in their affairs.

Each Pitcher Partners firm is also an independent member of Baker Tilly International, one of the world's leading networks of independently owned and managed accountancy and business advisory firms. Our strong relationship with other Baker Tilly International member firms has allowed us to open many doors across borders for our clients.

