



# *Pitcher Partners Melbourne Modern Slavery Statement*

*2019/2020*



# Introduction

This statement sets out the actions taken by Pitcher Partners Melbourne 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 2020.

At Pitcher Partners we continually focus on improving upon and maintaining our ethical and professional standards across all areas of our practice. We recognise that Modern Slavery can occur in any sector or industry, and at any point in a supply chain and support efforts to mitigate these risks in the wider Australian market.

As a part of our commitment to proactively address the risks of Modern Slavery, Pitcher Partners Melbourne have made significant changes to resourcing and procurement practices in the past year with the introduction of revised and new policies and procedures. 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, such as poverty and education.

This inaugural statement is presented by Pitcher Partners Melbourne and reinforces our commitment to transparency, human rights and responsible sourcing.

*This statement was approved by the Partners of Pitcher Partners Melbourne in their role as principal governing body, at a General Partners meeting on 21 April 2021, in accordance with Section 13 of the Modern Slavery Act 2018 (Cth).*

Signed,



**Brendan Britten**  
*Managing Partner*  
Pitcher Partners Melbourne

30 June 2021

# Our Network

Pitcher Partners Melbourne is member of the Pitcher Partners National Association, an award-winning association of independent accounting firms. The association is represented by Pitcher Partners Melbourne, Pitcher Partners Sydney, Pitcher Partners Newcastle, Pitcher Partners Brisbane, Pitcher Partners Adelaide and Pitcher Partners Perth. Each firm 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. Pitcher Partners firms are separate legal entities.

Membership of the National Association does not make any firm responsible for activities conducted by another member firm.

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## 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 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.

These services are provided through the partnership and its related or associated entities which may be trusts or companies.

## Melbourne Operations



Pitcher Partners	
Melbourne	
2 Offices	
49	Partners
68	Directors
178	Managers
779	Total staff



## Our Services



**Audit and Assurance**



**Business Advisory**



**Investment Advisory**



**Private Business and Family Advisory**



**Business Recovery and Insolvency**



**Consulting**



**Risk Services**



**Superannuation**



**Corporate Finance**



**Taxation**



**Estate Planning**

## Our Supply Chains

The goods and services we source are primarily to support our back office and administrative functions. Some processes we outsource including tasks such as document storage, bookkeeping, account preparation and 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 banks, fund managers, legal advisors and brokers on behalf of our clients as part of our services.

# Our Due Diligence

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.

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, risks associated with supply chain activities. With reference to these Risk Registers and in consultation with key stakeholders across all service divisions at Pitcher Partners Melbourne, we have broadly assessed our businesses and supply chain activities against recognised indicators of modern slavery risk as a whole. In doing so, we will continue to assess and adapt due diligence and remediation procedures and controls to combat these risks.

The following describes the results of our assessment and the actions Pitchers Partners have taken to address the risk of Modern Slavery in our operations and supply chains.

## Risk Assessment

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 and audit policies to take into consideration country-specific risks and have put in place a system to better 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.



### 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. Ethical, Social and Governance (ESG) factors may also be considered in our investment analysis.

## 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*

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## Supply Chain Due Diligence

Pitcher Partners Melbourne has established a procurement function and a procurement policy has been implemented which guides our procurement team in assessing and managing modern slavery risks. The persons responsible for procurements 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.

When conducting due diligence on suppliers, the procurement team oversees a range of compliance procedures including pre-qualification checks, contractual arrangements and ongoing monitoring. This standardised process has been designed to guide the procurement team in identifying the potential legal, ethical and reputational risks of engaging or renewing with a supplier who, directly or indirectly, participates in Modern Slavery. This process is described further below:

### 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 or services, the country of operations and the reputation of the supplier. Suppliers may be subjected to business background checks which may include analysis of global news sources, sanction lists, company information, legal history, and public records. Suppliers may also be expected

to complete Modern Slavery self-assessments at selected intervals.

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 new standard contractual clause for inclusion in 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.

The contractual clause incorporates the following elements:

- (a) Suppliers must ensure compliance with all applicable modern slavery laws and international standards around modern slavery and human rights.
- (b) Suppliers must take reasonable steps to ensure it, its subcontractors, and others in its supply chain have adequate procedures to prevent and address modern slavery.
- (c) Suppliers must grant Pitcher Partners Melbourne the right to audit it and its subcontractors for compliance against the above requirements on request.



## 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 procedure.

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## 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 Partner 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 our products and services being used for money laundering or terrorism financing purposes.



## **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 specialist 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

## **Monitoring Program**

Pitcher Partners Melbourne assesses the effectiveness of our actions addressing modern slavery risk through the following ways:

1. The policies outlined in the National Quality Control Manual, including policies in relation to addressing modern slavery risks, are reviewed and evaluated at least biennially. The Melbourne Risk and Compliance team and the National Risk and Quality Committee monitors policies so they remain current and effective.
2. The procurement procedures are reviewed internally to check compliance with established procedures.
3. The number of supplier contracts entered into with our modern slavery contractual clause are monitored and tracked under registers established by Pitcher Partners Melbourne. Where reasonable, we seek to have all pre-existing engagement with suppliers to include the modern slavery clause at renewal of contract.
4. Attendance at specialist modern slavery training is tracked and monitored
5. Employees are surveyed on their opinions on Pitcher Partners' workplace culture and conditions. We monitor our areas of development and remediate areas of decline.

## **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](#)



The *Pitcher Partners Charitable Fund* was established in 2014, as the 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.

The Fund is an initiative that reflects Pitcher Partners' passion for people, fairness and achieving excellence.

The graphic features a teal header with a white desk lamp icon and the text 'Pitcher Partners Melbourne Pitcher Partners Charitable Fund'. Below the header is a photograph of a bookshelf filled with colorful books.

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.

A full report of Pitcher Partner Melbourne's activities and achievements during the 2019-2020 financial year can be found on the national Pitcher Partners [website](#).



# Making business *personal*

Pitcher Partners has the resources and depth of expertise of a major firm, but with a personal approach. We give our clients the highest level of personal service and attention.

Pitcher Partners is an association of independent 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 providing services to family controlled, privately owned and small public businesses as well as high net worth individuals, the public sector and not-for-profit organisations. Our clients require high technical standards, matched with a personal understanding and involvement in their affairs.

Pitcher Partners 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.

Adelaide Brisbane Melbourne Newcastle Perth Sydney

**Pitcher Partners is an association of independent firms.** Liability limited by a scheme approved under Professional Standards Legislation. Pitcher Partners is a member of the global network of Baker Tilly International Limited, the members of which are separate and independent legal entities.