MAZARS FOR GOOD

Sustainability report 2019
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Dear reader,

We are pleased to introduce Mazars’ first global Sustainability Report. We hope it provides a fair reflection of our longstanding commitment to being an exemplary corporate citizen and serving the public interest in everything we do.

In this document, we take stock of our initiatives and commitment to helping build a better, fairer society. By focusing on four main areas - developing sustainable services, providing an inclusive and stimulating work environment for our people, reducing our environmental impact and contributing to our communities - we show what it means to us to be #MazarsforGood, an international partnership that creates shared value for all its stakeholders.

The UN Sustainable Development Goals are an internationally recognised blueprint to achieve a better and more sustainable future for all, and we believe that with our strategy we can actively contribute to them. Quality education, gender equality, decent work and economic growth, and responsible consumption and production, among others, are clear objectives for us as a firm.

Our own history has always been one of responsibility and stewardship. Since Mazars was founded, we have embraced a long-term perspective, with the ambition of achieving sustainable growth, striking the right balance between profit and consistency, and passing on the torch to future generations. We have long been active contributors to debates on the evolution of our profession and its impact on economies and societies. We have placed systematic emphasis on training our people and our teams, on providing them with lifelong learning opportunities, and on making our offices great places to work. We have regularly engaged in pro-bono activities for organisations that needed our expertise and our time. And, for almost a decade now, we have enriched our offering with a series of sustainability services, such as human rights and culture audits, as well as Corporate Social Responsibility (CSR) consulting.

As our partnership has developed and expanded, more and more of our offices around the world have become involved in initiatives aimed at giving back to communities, preserving the environment or helping charities. A few of them are featured and highlighted in this report.

As a leading international audit and advisory firm, we know we are expected to do more than just grow our business and maximise profit. Our people, our clients, our stakeholders and our entire ecosystem expect us to provide trust as well as the conditions for long-term growth, to contribute to healthier economies, better communities and overall fairer, more sustainable societies. This is at the top of our agenda.
MAZARS AT A GLANCE

Mazars is an internationally integrated partnership, specialising in audit, accountancy, advisory, tax and legal services\(^1\). Operating in 91 countries and territories around the world, we draw on the expertise of 40,400 professionals – 24,400 in the Mazars integrated partnership and 16,000 via the Mazars North America Alliance – to assist clients of all sizes at every stage of their development.

**KEY FIGURES**

<table>
<thead>
<tr>
<th>Key Figure</th>
<th>Details</th>
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<tbody>
<tr>
<td>Number of offices</td>
<td>318</td>
</tr>
<tr>
<td>Partners</td>
<td>1,100</td>
</tr>
<tr>
<td>Global fee income</td>
<td>€1.8BN</td>
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<tr>
<td>Global headcount</td>
<td>40,400 professionals</td>
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<tr>
<td>Global coverage</td>
<td>91 countries and territories</td>
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<tr>
<td>2018/2019 growth</td>
<td>10.4%</td>
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\(^1\) Where permitted under applicable country laws
OUR STAKEHOLDERS

Mapping out who our stakeholders are enables us to make sense of the complex ecosystem in which we operate. By assessing the impacts and influence that our staff, clients, business partners, regulators, and other relevant and interested parties have on our activities and corporate behaviour, we can better define and refine our strategy, while keeping our overarching objectives of creating shared value and serving the public interest.
Our materiality matrix highlights the issues that are of most importance to our stakeholders, to us as a company and that are most impactful in terms of our ability to create and redistribute value. It was built following a series of in-depth interviews with key stakeholders, to identify and highlight the main material issues for Mazars in the coming years.

Top material issues related to:
- Integrity and responsibility
- Doing business for good
- People at the heart of our development
- Reducing climate and environmental impacts
- Contributing to the community

<table>
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<tr>
<th>Importance to Stakeholders</th>
<th>Impact on Creating Value</th>
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<tr>
<td>CSR strategy</td>
<td>Data security</td>
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<td>Environmental footprint</td>
<td>Transformation &amp; innovation</td>
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<td>Offering pro-bono services</td>
<td>Quality, integrity &amp; compliance</td>
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<td>Involvement with charities</td>
<td>Consistency of services</td>
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<td></td>
<td>Promoting a stewardship culture</td>
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<td>Talent acquisition</td>
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<td>Client satisfaction</td>
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<td>Promoting thought leadership</td>
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<td>Developing sustainability services</td>
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<td></td>
<td>Strengthening key markets</td>
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<tr>
<td></td>
<td>Diversity</td>
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<td></td>
<td>Partnership with universities</td>
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<td></td>
<td>Talent retention</td>
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</table>
Our value creation chain clearly maps out the resources we use to operate, which are integral to the proper functioning of our business. It also shows how our business model creates value for all our stakeholders, both internal and external to our firm, and society at large.
THE CAPITALS WE USE

**People**
- High potential young graduates
- Experienced specialists

**Intellectual**
- Methods and procedures linked to our professions
- Service offering
- Brand and company culture

**Social & relationship**
- Academic partnerships
- Personal networks

**Financial**
- Funding from partners
- Working capital
- Loans

**Manufactured**
- Real estate
- Computer systems

**Natural**
- Paper, energy and travel

OUR BUSINESS MODEL

- Audit and assurance
- Accounting and outsourcing services (AOS)
- Consulting
- Financial advisory services (FAS)
- Tax
- Legal services

HOW WE CREATE SHARED VALUE

**Doing business for good**
- Ensure quality, compliance and ethical behaviour
- Foster transparency in financial information
- Help organisations achieve sustainable growth
- Provide sustainability services
- Support executive decision making and good governance

**Reducing our environmental impact**
- Educate and inspire our staff through group-wide and local initiatives
- Minimise our own climate impact

**Putting people at the heart of our development**
- Ensure professional development through lifelong learning and education
- Promote gender equality, diversity and inclusiveness
- Provide flexible working schemes and work-life balance
- Provide fair compensation
- Foster innovation and transformation

**Contributing to the community**
- Provide thought leadership
- Provide pro-bono services by leveraging our expertise
- Help local communities
OUR CSR STRATEGY

Analysing our ecosystem of stakeholders, identifying our top material issues and looking at how we create value led us to identify a strategy based on four pillars.

We have chosen to place our focus on four major areas where we believe we can make a real difference: developing sustainable services to help organisations achieve responsible long-term growth; providing the best working conditions to our people in each and every one of our offices around the world; fighting climate change and reducing our carbon footprint; and engaging with our communities to create shared value. Our strategy is fully consistent with our purpose to help build the economic foundations of a fair and prosperous world.

Since 2015, the UN Sustainable Development Goals have been the blueprint to achieve a better and more sustainable future for all. They address the global challenges the world faces, including those related to poverty, inequality, climate, environmental degradation, prosperity, peace and justice. They are guidelines for governments, businesses and individuals to act and take tangible steps towards the preservation of our natural resources and the improvement of living standards all over the world.

As a global firm and a leading player in audit and advisory services, we see these goals as beacons that inspire us to turn today’s challenges into tomorrow’s opportunities: entering new markets; developing new products and services; and eventually transforming business and the world. In this respect, Mazars has been since 2012 an active member of the UN Global Compact – the largest voluntary corporate sustainability initiative to encourage businesses worldwide to adopt socially responsible policies, and to report on their implementation. While our direct impact as a professional services firm can be considered relatively small on some aspects, we see it as our duty to contribute to achieving the Sustainable Development Goals.

Our four strategic pillars

Doing business for good

Community involvement

People at the heart of our development

Reducing climate and environmental impacts

Integrity and responsibility at the core of our operating model
Actively supporting eight UN Sustainable Development Goals

- **Good health and well-being:** Ensure healthy lives and promote well-being for all at all ages
- **Quality education:** Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
- **Gender equality:** Achieve gender equality and empower all women and girls
- **Decent work and economic growth:** Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
- **Industry, innovation and infrastructure:** Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation
- **Responsible consumption and production:** Ensure sustainable consumption and production patterns
- **Climate action:** Take urgent action to combat climate change and its impacts
- **Peace, justice and strong institutions:** Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

Our fundamental values: integrity and responsibility

Our CSR strategy as presented above, as well as our commitments would mean nothing if they were not deeply rooted in our culture and fundamental values. At the heart of everything we do are integrity and responsibility.

For us, this means first and foremost making sure that our quality management processes and tools are robust and exemplary. This is precisely what Mazars’ Quality and Risk Management Board is responsible for, with the aim of fostering the sustainable growth of all our services and making sure all staff and partners receive the training they need to achieve technical and ethical excellence for maximum client benefit.

In 2018 we refreshed our global code of conduct and made training mandatory for all staff worldwide. Our global code of conduct is a practical guide to help our people, regardless of age, position or country, navigate difficult choices and make the right decisions, in line with our values. We handle any breaches seriously and take appropriate action to uphold this code whenever necessary. By doing so, we will be a trusted firm, working for the collective interest, committed to our clients, our people and wider society.

We also pay attention to assignment acceptance. To this effect, we have built our own global hub for independence checks, to ensure we avoid conflicts of interests and other potentially damaging situations. Finally, we have stepped up our investment in our IT tools, particularly data security, as respecting our clients’ and people’s privacy is our top priority.
Since our creation, our purpose has always been to work towards our clients’ success while serving the public interest. Additionally, increasingly stringent regulations, increased public scrutiny and the emergence of new and potentially harmful threats are leading organisations of all sizes to recognise the benefits of understanding and assessing the broader impacts of their non-financial outcomes, and integrating key Environmental, Societal and Governance (ESG) risks into their strategy.

Serving the public interest
Beyond ensuring the highest standards of quality and ethics in how we work, Mazars’ fundamental mission is to foster transparency and increase the stability of businesses and financial markets. This is essential to drive and safeguard trust in our economies and societies.

Services to embed sustainability within business practices
Uncertainty about the future, building a thriving corporate culture, new compliance requirements, brand reputation and attractiveness are some of the challenges top management teams have to face and meet, in order to achieve responsible and long-term growth.

As auditors, consultants and entrepreneurs, we consider it our duty to help our clients become ever more sustainable and responsible. This is why we have built and developed a wide range of sustainability services, designed to focus on non-financial and sustainability challenges. Our goal is to help reengineer trust in business, empower people and nurture collective responsibility. We strongly believe those companies that factor sustainability into their strategic mid and long-term value creation plans will be the ones that are best equipped to become future-proof.

Our sustainability services include:
• Non-financial assurance: We provide assurance on non-financial information and key areas of impact that businesses have on society and help them understand, improve and live up to their promise to society including both environmental and social impacts. Through our knowledge of best practice reporting and performance we help our clients improve and live up to their societal commitments.

• GDPR: Our proven experience and competence in the field of data protection and information security in Forensic and Litigation Services, led by an accredited Data Protection Officer, means we can provide you with the comfort that your GDPR processes are not only appropriate but effective.

• Anti-bribery and anti-corruption: For over 15 years, our Anti-Bribery and Anti-Corruption Services team has been helping companies to design, assess and continuously improve their anti-corruption programmes. Since 2017, Mazars has been formally accredited as an approved certifier of anti-corruption programmes.

• Cyber security: Mazars’ experts help organisations assess their cyber risk and develop and strengthen their cyber security and resilience including, but not limited to, penetration testing and ISO27001 readiness assessments and support.

• Business and human rights: Our award winning services help companies identify the risks of where their activities are most likely to cause harm to people. We help our clients engage with stakeholders, implement a robust human rights due diligence system and provide assurance on their reporting.

• CSR and ethics in business consulting: We help clients address and manage all issues relating to governance, risk management, compliance and sustainability. We help them implement effective CSR strategies, incorporate ethics as a value driver, and offer them a range of sustainable services, adapted to their specific needs and attuned to the local cultural and legal setting.
Partnering with the Responsible Jewellery Council (RJC) in Switzerland

Mazars in Switzerland is an accredited RJC auditor. The RJC is an international non-profit organisation, which gathers more than 600 member companies of the jewellery industry. The RJC has established a code of ethics to promote responsible practices, both ethical and environmental, and ensure the respect of human rights along the entire supply chain of gold, diamond and platinum metal jewellery, from mining to retail. As an RJC partner, Mazars performs business ethics, human rights as well as social and environmental audits to make sure industry players comply with the RJC’s Code of Practice.
At Mazars, we are resource-driven and talent-intensive, so we put a lot of thought and energy into developing a modern talent acquisition strategy. We want to make sure we provide the best possible conditions for our people to learn, grow and become tomorrow’s problem solvers for our clients.

This is why we regularly survey our staff to make sure our talent management processes are more than up to par and respond to our people’s evolving aspirations. In 2018, we conducted our own global Generation Z survey, asking our younger people worldwide what their major expectations were. Two items stood out as extremely important to them: continuous learning and the quality of their work environment.

**Our commitment to lifelong learning**

Our commitment to lifelong learning goes back a long way. In 2008, we created Mazars University to harmonise training practices across all Mazars offices. In 2014, we received the top accreditation for corporate universities, awarded by the European Foundation for Management Development, the same body that awards the EQUIS accreditation to top business schools. Our modern learning experience includes professional training and high-end seminars on leadership, management and personal development, which take place at different stages of one’s career.

We devised our online platform MazarsU as the go-to hub for all learning materials and best practices across the Group, both in the areas of technical expertise as well as the other skills now required to perform the profession: soft skills, digital skills and leadership skills. We aim to train top-notch technicians, as well as professionals who can abide by the strictest ethics and independence requirements.

Thanks to the partnership we established with LinkedIn Learning two years ago, our global teams also have access to a premium digital skills training path, including certifications in coding and data science, which are becoming an integral part of our profession, as well as courses on other core competencies, including public speaking and language skills.
Creating a modern work environment

We promote a strong organisational culture of wellness and health which ensures Mazars remains an employer of choice. Even though our model is, in essence, decentralised, we encourage all our offices to put in place local actions that increase employee satisfaction. We place great emphasis on our office environment and flexible working schemes.

We do not want to simply follow trends. We strongly believe this enhances our collective intelligence and performance. From Singapore to Rotterdam, Gabarone to Milan, and London to Paris, our offices are revolutionising their workplaces with more collaborative workspace combined with digital tools. We favour these human designs and believe this allows our talented professionals to speak up and contribute to the transformation of our organisation.

At the same time, a growing number of Mazars offices around the world are offering flexible working schemes, such as flexible working hours or the possibility to work from home.
Building a diverse talent pool

Mazars is strongly committed to accelerating gender diversity in its organisation as, not only is the topic a subject of concern for modern societies, it is also a proven condition for business and organisational performance. We are a truly multicultural partnership and we celebrate what makes us different. We do not tolerate discrimination in any form.

Since 2014, a Gender Diversity steering committee has been set-up and championed by Antonio Bover, member of the Group Executive Board and Managing Partner of Mazars in Spain. Our top priority is to focus on a better representation of women in the organisation at leadership level. For this purpose, Mazars Group has set global specific targets to increase the number of female partners and executives in our firm by 2025. We believe accelerating diversity in the workplace is a shared responsibility; therefore, each member entity of our partnership is also in charge of and accountable for setting its own objectives.

Our involvement is carried out through various actions such as continuously promoting our offices’ best practices - notably on the topics of mentoring and networking, promoting with fairness and creating a great place to work. We also regularly conduct group-wide internal staff surveys to take into account our people’s views, in which we always pay particular attention to diversity and make sure to listen to women’s perspectives.

We make sure to build and cultivate a female talent pipeline. In this respect, we hold an annual Women Leaders Seminar since 2016 to cover a wide variety of topics, all essential for the empowerment, visibility and development of high potentials: such as coaching, shared leadership, innovation and business development.

Finally, ambassadors are being identified in each country to support progress on these initiatives and to become positive role models.
Banking on innovation

Under the leadership of our Group Chief Technology and Innovation Officer, Claire Cizaire, we invest in harnessing technology, to make the most of new and emerging business and societal trends.

In all our offices worldwide, we seek to develop a culture of innovation. A third of our new hires now have engineering backgrounds. This year, we launched our global idea crowdsourcing application “BIM” allowing our people to speak up and contribute to our transformation. We also rely on local Innovation Ambassadors in 40 countries to act as catalysts and help bolster creativity.

In our Mazars Labs, in Paris, Moscow and Berlin, we work with clients and start-ups to co-design and build innovative solutions that will help meet the challenges of tomorrow’s audit and advisory services.

Through our recently launched “Innovators at Mazars” campaign, we highlight the talent and diversity of those who lead innovation within our organisation, and explain pragmatically how some concepts and technologies are being applied concretely in companies to solve real life issues.

In the UK, promoting diversity goes beyond words

In the UK, Mazars has set gender goals for grades Manager to Partner out to 2023. These are published externally (Senior Manager to Partner) on www.mazars.co.uk, as is the progress made against targets on an annual basis.

The UK team also runs a returner programme, which brings senior professional women who have previously pressed pause on their careers (typically for more than two years) back into the workplace through an initial 16 week internship with a view to offering permanent roles at the end of the programme. By doing this, Mazars can access a relatively untapped talent pool and improve gender, age and cognitive diversity.

Transition coaching is also available for mothers and fathers, before, during and after their parental leave. To better disseminate a global culture of inclusion, unconscious bias training is offered to all team members. All new joiners to the firm must complete this too.

Flexible working schemes on all continents

From Algeria to Chile, Hungary to China, flexible working schemes have been implemented in Mazars offices all over the world. Though specifics vary from one country to another, all these schemes are based upon the idea that output matters more than hours worked, and that both staff and managers can be trusted to manage their time and work to deliver in our clients’ best interests.

Some examples of our agile working schemes include working in a different location, such as home, a different office or adopting a flexible work pattern where appropriate to help manage work life balance and international time differences.

“I have a part-time job, meaning I work four hours per day as a Tax Director, and one day from home. My home office creates a more efficient environment, enabling me to focus better on my tasks with the added benefit of saving on my commuting time.”

HELÉNA CSIZMADIA
Tax Director, Mazars Hungary
REDDUCING OUR ENVIRONMENTAL IMPACT

Corporations produce just about everything we buy, use, and throw away and play a huge role in driving global climate change. While the carbon footprint of companies heavily depends on the type of industry in which they operate, and we as a professional service firm rely mainly on human resources to deliver our services, we are nonetheless conscious that we can and should reduce our environmental impact.

Large corporations are expected to step up action in the fight to limit the rise in temperature to 2°C, as set up in the 2015 Paris agreement.

Some are actually really doing it. So far, according to the Climate Group, 300 major organisations with combined revenues exceeding $5.5 trillion have made the pledge to only use renewable energy to produce their electricity by 2030. Also, 20 of Japan’s largest companies have vowed to source at least 50% of their electricity from renewables by 2030.

While we, as a professional services firm, do not conduct activities or manage industrial processes that have a major negative impact on the environment, we want to play our full part in the global and necessary effort to ward-off climate change.

We especially pay attention to our travel induced carbon footprint. We encourage the use of public transportation for our people, favour traveling by train instead of flying whenever possible, and have invested in video-conferencing equipment for international meetings.

Moreover, we are aware that one of the areas where we can have an impact is in improving the energy consumption of our buildings. Some of our buildings are actually certified in the matter, such as the Headquarters in France or the Rotterdam office in The Netherlands. Many of our offices have also implemented voluntary recycling policies and initiatives to limit paper consumption, or avoid food waste.
ZOOMS

Committed to fighting food waste in France
Each year in France, 10 million tons of food are thrown away in schools and corporate restaurants. On average, that is between 20 and 30 kilograms per person. So when the “La Défense des Aliments” project came to life in the La Défense business district in Paris, Mazars was one of the original five companies to commit to the initiative, aimed at developing mutualised solutions to reduce waste in collective catering.

Four main objectives had been set: limit waste, redistribute unsold items to charities, develop a “best-in-class” model that could be rolled out to other business districts and mobilise all La Défense players in the process.

Mazars has now been part of the project for over three years, with tangible results: a 20% reduction in food waste and an overall decrease in lunch prices.

Recycling cell phones and laptops in Turkey
Cell phones, laptops and other electronic devices contain hazardous materials such as lead and mercury, which, if not disposed of correctly can contaminate air, soil, and groundwater. In Turkey, Mazars donated 67 unused cell phones and 47 laptops to the “I have a wish” association, aimed at helping children make their dream come true, and in the process, recycling their unused electronics. Tax Director Özden Kancı runs this project.
CONTRIBUTING TO THE COMMUNITY

Societal involvement can no longer be regarded as an ancillary activity. It must be ingrained in the fabric of an organisation’s purpose, processes, and profitability. Businesses across industries and regions need to re-assess their impact on society and their roles in creating healthy, sustainable communities. This type of involvement also enhances employee engagement and younger generations expect it.

Helping build a fairer world through thought leadership

We have always contributed to the public debate. We see thought leadership not only as a way to provide insights on the future of our profession and on its role in tomorrow’s business community, but also as a means to have a positive impact on society as a whole. Through our publications, which come in many languages, we intend to bring our perspective on the major changes that will impact our lives as well as on the megatrends that will reshape our world. We believe that this is what is expected of a leading player. Read our latest thought leadership at: www.insightsforgood.mazars.com

Providing pro-bono services

As a professional services firm, we have experts who believe it is their responsibility to provide pro-bono services to those who need it the most. We do so by using our skills and expertise to help associations or NGOs secure their own financial stability and sustainable development. Every year, our professionals around the world dedicate time to advise and train associative leaders, employees and volunteers in the areas of bookkeeping, tax or legal matters.

Contributing to charities

In our offices around the world, ‘Mazarians’ participate in projects or donate to charities. They cover a wide range of causes, from supporting medical research, to helping underprivileged people and communities or raising environmental awareness. Each of these local initiatives is in line with our global spirit of solidarity and provides a fair reflection of what we collectively stand for. Our global team contributed to more than 400 projects and associations last year.
Securing access to education in China

For over 10 years now, our Guangzhou office, in mainland China, has been providing pro-bono accounting services to Couleurs de Chine, an association that helps and promotes the Miao, Dong and Yao Chinese ethnic minorities living in the Guangxi province. Couleurs de Chine’s main mission is to give young children – with a specific focus on girls - the opportunity to attend school and receive a proper education.

The support provided includes overall reviews of the locally prepared financial information and recommendations to help secure the future of the association.

With the support of Mazars and other contributors, Couleurs de Chine has been able to help more than 4,000 children attend school in 2018 (primary, middle school, high school and college). In total, more than 12,000 students have been helped by the association since 1998. Audit Director Joanna Ye is responsible for managing this project.

Helping those who help refugees in Germany and the Netherlands

Since 2015, Mazars in Germany has provided legal and tax-related assistance to a wide range of organisations which are helping refugees settle in the country. The initiative, labelled “Help for Helpers”, aims to bring tangible support to associative leaders and volunteers who dedicate time and resources to enable refugees to gain access to healthcare, deal with ID issues, learn German, get acquainted with German culture, and generally be better equipped to start their new life in the country.

Within the framework of “Help for Helpers”, the Mazars team in Berlin also provides legal advisory services to companies that want to hire refugees. Mazars’ legal experts even produced a small guide book containing practical advice for organisations willing to bring in refugees, which several of Mazars’ clients in Germany decided to do. Mazars itself soon followed through, offering apprenticeship schemes for refugees in their Berlin office, which resulted in one tax assistant being hired full-time.

Helping refugees get a new start is also on the agenda in the Netherlands, with sessions on communications and leadership as well as workshops on Dutch tax law being made available to newly arrived would-be entrepreneurs.

Raising funds to fight cancer in Canada

In 2019, for the fourth time, Mazars participated in the Enbridge® Ride to Conquer Cancer® in Canada. Twelve Mazars team members took part in this two-day event, aimed at raising funds to support vital cancer research, treatment, care and prevention programmes at the Jewish General Hospital’s Segal Cancer Centre and other healthcare partners across Quebec. Together, they collected $34,363 CDN.

Since 2009, The Ride has raised over $56 million and is currently Quebec’s largest cycling fundraiser. The Ride to Conquer Cancer series is Canada’s largest peer-to-peer fundraising event. Funds raised through The Ride are put to immediate use in order to attract and retain recognised doctors, scientists and researchers and implement transformational cancer research, treatment and care.
METHODOLOGY

• The data collected for this report covers 73 countries, which represents 19,415 professionals and accounts for 88% of our global international partnership.

• The data was collected from each country via a questionnaire sent to Managing Partners, Heads of Human Resources and Heads of Marketing and Communication.

• The reporting period covers our latest financial year, from 1 September 2018 to 31 August 2019.

• The results were consolidated, sorted and analysed at Group level by our corporate communication team, with the help of our auditors.
CONCLUSION

CORRESPONDENCE TABLE

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1 Where permitted under applicable country laws

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