



Accenture Australia Pty Ltd
ABN 49 096 776 895
International House, 3 Sussex Street
Barangaroo NSW 2000
Australia

18 July 2023

Mr Patrick Hodder
Committee Secretary
Finance and Public Administration References Committee

Dear Mr Hodder,

Re: Senate Finance and Public Administration Inquiry into the management and assurance of integrity by consulting services – 18 July update

Thank you for your recent correspondence and invitation to give evidence at the Senate Finance and Public Administration Inquiry in the management and assurance of integrity by consulting services, on 18th July.

We refer to the questions on notice received on 29 June 2023 and the additional question received on 30 June and provide our answers below.

In responding to your questions, we have sought to provide clarity, whilst also balancing our obligations to employees, as well as appropriately navigating matters which are confidential and commercially sensitive.

In addition to the responses set out below, we have provided our responses to questions 7, 8, 10, 11, 12, 13 and 15-22 in a separate confidential document.

Questions - Governance, structure and ethics

- 1. Please provide a copy of your partnership deed or agreement and any amendments or related documents that establish the rules under which your partnership operates.*

Accenture Australia Pty Limited and Accenture Australia Holdings Proprietary Limited, are both private companies registered under the Australian Corporations Act, and as such, we comply with Australian laws and regulations. The ultimate parent of these Australian corporations is Accenture plc, incorporated in Ireland, a publicly traded company listed on the New York Stock Exchange under the symbol ACN. Throughout this response, we have provided information as it relates to our Australian employees of Accenture Australia Pty Limited (Accenture).

Accenture is not a partnership and as such, we do not have partners or partnership agreements. Our senior executives are Managing Directors who are salaried employees of Accenture.

- 2. Please detail the nature and number of partners and their various types at present: eg equited, salaried, other, etc.*

Accenture is not a partnership. As such, we do not have partners. Our senior executives are titled as Managing Directors who are salaried employees of Accenture and are compensated with base pay, bonus and equity. Within our Australian business we currently employ 288 Managing Directors.



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3. *How many, if any, ex-PwC partners or staff have joined your organisation? Please provide their names, position, years of work at your organisation over the past 5 years.*

Within our Australian business, we currently have 9 former PwC Partners who joined directly from PwC and 1 former PwC Partner who joined but is no longer employed by Accenture (Table 1). All of these individuals joined within the past 5 years. We also have 113 former PwC employees who have joined below Managing Director level in the same period.

Table 1. Ex-PwC partners who have joined Accenture as a Managing Director in the past 5 years.

Former PWC Partner	Years Since Joining	Accenture Position
[REDACTED]	1	[REDACTED]
[REDACTED]	1	[REDACTED]
[REDACTED]	2	[REDACTED]
[REDACTED]	2	[REDACTED]
[REDACTED]	2	[REDACTED]
[REDACTED]	2	[REDACTED]
[REDACTED]	2	[REDACTED]
[REDACTED]	1	[REDACTED]
[REDACTED]	1	[REDACTED]
[REDACTED]	1	[REDACTED]
[REDACTED]	2	[REDACTED]
[REDACTED]	1	[REDACTED]

4. *What protocol or agreement is in place between partners in relation to sharing investment opportunities?*

Accenture is not a partnership.

In relation to investment opportunities, all employees have obligations under our Conflict-of-Interest policy to disclose personal circumstances that may create a conflict of interest or the perception of a conflict of interest. A conflict of interest would include external business opportunities which could impact the duty an employee holds to Accenture as well as contractual obligations Accenture has to a client. We have an ethics and compliance team within the Accenture legal function that independently reviews such disclosures.

Further, our Managing Directors are all required under the terms of their employment agreements, to not undertake any activity (including paid or unpaid work, directorships, personal investments, etc.) which may either compromise or give rise to a potential or actual conflict with either their employment agreement or the business interests of Accenture. Our Managing Directors must also undertake Ethics & Compliance training on an annual basis and sign an annual compliance statement which covers our Conflict-of-Interest Policy.

Questions - Income, Revenue

5. Please provide details of your partnership revenue for the past 5 years, by year, distinguishing its various main sources (e.g. tax advice, auditing, consultancy, etc).

Accenture is not a partnership. We do not provide tax advice or auditing services.

In Australia we report to ASIC around two core categories – Consulting and Outsourcing. Revenue is recognised differently for each of these under GAAP. Consulting represents both Strategy & Consulting and Technology Services. Technology services incorporate systems integration, cloud services, and platform services. The technology services portion of our business within Australia accounts for more than 70% of Consulting.

Table 2 shows revenues for Accenture plc, and Accenture Australia Holdings Proprietary Limited for the most recent 5 financial years (please note Accenture's financial year is from 1 September to 31 August).

Table 2. Accenture plc and Accenture Australia Holdings Proprietary Limited 5-year revenue data

Accenture plc - USD billions	FY18	FY19	FY20	FY21	FY22
Consulting	23.0	19.0	20.1	27.3	34.1
Outsourcing	18.0	24.2	24.2	23.2	27.5
Total Revenue	41.0	43.2	44.3	50.5	61.6
AAHPL Group - AUD billions	FY18	FY19	FY20	FY21	FY22
Consulting	1.17	1.15	1.20	1.34	1.80
Outsourcing	0.79	0.84	0.77	0.78	0.91
Other revenue	0.15	0.19	0.19	0.20	0.27
Total Revenue	2.11	2.18	2.16	2.32	2.99

6. Please provide details of partnership distributions in aggregate for the past 5 years, by year.

Accenture is not a partnership. We do not provide partnership distributions.

Accenture's ultimate parent Accenture plc., is publicly traded and listed on the New York Stock Exchange under the symbol ACN. Dividends to Accenture shareholders are publicly disclosed under the SEC 10K filings.

9. Please provide details of the basis for payments to partners (e.g. KPIs or formula) used to determine total payments and bonuses.

Accenture is not a partnership. Total compensation for Managing Directors can consist of the following components:

- Annual Salary
- Bonus
- Equity

Questions - People, management

14. Please provide a copy of the misconduct policy and procedures for personnel within the entity, differentiating those that apply to partners and to others.

Accenture has a publicly available Code of Business Ethics which applies to all our people regardless of their level or title. Third parties (e.g. contractors) are also required to comply with our code when acting on our behalf. Internally, the following policies in Table 3 contain aspects which relate to misconduct:

Policy Topic	Applies to
Speaking Up and Zero Tolerance for Retaliation	All Accenture people
Respecting the Individual	All Accenture people
Behaving Professionally	All Accenture people
Ensuring Meritocracy and Non-Discrimination	All Accenture people
Addressing Personal Conflicts of Interest	All Accenture people
Avoiding Conflicts of Interest with Clients	All Accenture people
Data Management	All Accenture people
Confidentiality	All Accenture people
Work on Behalf of Governments	All Accenture people

Should you require copies of the above policies these can be made available to you.

Questions - Appropriate use of government information, conflicts of interest

23. How does your organisation define conflict of interest?

Conflicts of interest are governed by Accenture's Code of Business Ethics. Specifically, Accenture manages conflicts of interest through multiple policies, training, monitoring, and controls.

Accenture recognises two overarching classes of conflicts: organisational and personal.

Organisational conflicts are those arising from activities of the company, and personal conflicts are those arising from the interests of an individual such that personal interests may interfere with the interests of Accenture or its clients. For both types of potential conflicts, Accenture policy requires review and approval by multiple layers of business leadership and legal counsel to ensure that no conflicts are created.

As to organisational conflicts, Accenture's policy recognises the heightened focus when government clients and information are involved and notes that such rules are designed to maintain integrity and fairness in public contracting to ensure transparency of the process of awarding public contracts and avoid distorting competition improperly. The policy further instructs all persons to take a broad view of the personal and professional relationships and other interests that may trigger government conflict of interest rules. Even the perception that we may have access to non-public information through these

relationships, or the appearance that a tender is not being conducted fairly, can trigger government conflict of interest rules. To further illustrate this point, Accenture's policy includes examples of the types of scenarios that could create conflicts, including if providing our services at a government client exposes our teams to information that could be used improperly in the future.

24. What protections exist to ensure that there is no conflict in people's use of government information? What specific safeguards are in place?

Accenture takes seriously the protection of confidential information, including government information. Accenture's internal controls regarding appropriate handling and use of confidential information include policy, training, information technology tools, and monitoring. Accenture uses several methods to avoid a conflict of interest with government information. First, as described above, our policies set forth a global standard by which all employees are expected to adhere. This policy indicates that employees will face disciplinary consequences if they do not adhere to these standards. Second, Accenture trains its employees on commencement and annually on the importance of maintaining confidential information. Third, senior employees complete an annual certification where they pledge to uphold the confidentiality of all client information, including government information. Fourth, we have established alongside our global compliance programs focused on anticorruption, government contracting, competition law, data privacy, a separate global compliance program focused on confidentiality.

At a specific level, when dealing with Federal, State and Local Government clients in Australia, Accenture implements safeguards and controls for each engagement to mitigate the potential for conflict of interest, probity issues, or breach of confidentiality. These controls include:

- Conflict of interest declarations – it is commonplace for our people to provide formal declarations around confidentiality and probity as part of Government procurements as well as Accenture requirements, and to disclose any potential for conflict of interest when onboarding onto a project for a Government client.
- Employee screening – many of our people hold national security clearances and regularly undergo vetting procedures (e.g., criminal history checks) for their roles.
- Probity plans – we have on several occasions agreed a formal probity plan with individual departments that describe information boundaries that must be maintained between people or teams, confidentiality requirements, controls and escalation points for raising issues if they occur. In some cases, our people working on an engagement are then 'off limits' for participating in any subsequent tender activities or further work that may come out of that client area.
- Briefings and regular reinforcement training – these cover handling and secure storage of confidential information technically and paper based, anonymisation, need to know principles, avoiding conflicts of interest, segregation of teams, and other controls to protect confidentiality and probity.
- Roll-off processes – all Accenture staff leaving a client engagement are required to remove information about the client from their devices and ensure all records are properly archived.

25. What consequences are in place for the misuse of confidential government information?

Any misuse of confidential government information (or confidential information of any client for that matter) by Accenture employees would be handled in accordance with Accenture's standard approach to disciplinary action. Violations are handled in a manner consistent with local laws and may lead to various types of disciplinary action including termination of employment.

26. How many disciplinary actions have been taken in relation to conflicts of interest and/or the misuse of government information in the past 5 years? Past 1 year?

Any misuse of confidential government information by Accenture employees would be handled in accordance with Accenture's standard approach to disciplinary action. Accenture has not needed to take disciplinary action against any employee in relation to conflicts of interest or misuse of government data in the past five years as a result of a formal complaint or investigation relating to employee misconduct.

Accenture has separate and broader data security processes which are triggered in circumstances where there may be any mishandling of data (including confidential information) and/or a security breach. These processes may or may not result in a formal complaint or investigation relating to employee misconduct. We have not provided data as to these separate security processes. We would be happy to answer on notice any further questions from the Committee.

27. Have any conflicts of interest surfaced within your organisation in the past 5 years? If so, how were they dealt with and what were the consequences?

Accenture's processes and practices are designed to identify actual and potential conflicts of interest and make sure they are addressed appropriately through mitigation, disclosure, and/or avoidance. Potential conflicts of interest surface periodically and Accenture takes steps to handle them in accordance with its policy and relevant contractual requirements. By addressing even potential conflicts proactively, Accenture's compliance systems are intended to prevent the creation of actual conflicts of interest.

Accenture has not identified any material conflicts of interest in the past 5 years.

28. How many staff have been seconded or equivalent into the state or federal government in the past 5 years, past 1 year?

We have not seconded any Accenture employees into state or federal government within the past 5 years.

Questions - JobKeeper

29. How much, if any, JobKeeper payments in total did your organisation receive and retain?

Accenture did not receive or retain any JobKeeper payments.



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Questions - Political Donations

30. Where are political donations to the major parties sourced from within the entity?

Accenture does not make political donations in Australia.

31. Is an annual amount budgeted specifically for such political donations? If so, how much was budgeted for this in 2022/23?

Accenture does not make any political donations in Australia.

32. Political donations/expenditure may take the form of direct donations, memberships and sponsorship of related associations and conferences. Please provide details of all expenditure of this nature by category for 2022/23.

Accenture does not make any political donations in Australia.

33. Who and at what level are decisions made about political donations (as above), how they are directed and how much is donated?

Accenture does not make any political donations in Australia.

34. Provide details of the protocols (including formal and informal understandings) that guide the sharing of information and/or investment opportunities to partners for their personal investments?

Accenture is not a partnership. When faced with a potential conflict of interest (including, for example, one that might relate to an employee's personal investments), all Accenture employees are required to disclose the potential conflict of interest, obtain any required approvals and follow any restrictions. In addition, we prohibit our employees from trading on or disclosing inside information.

Yours sincerely,

Peter Burns
Market Unit Lead for Accenture Australia & New Zealand

18 July 2023

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Committee Secretary
Finance and Public Administration References Committee

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Re: Senate Finance and Public Administration Inquiry into the management and assurance of integrity by consulting services – 18 July update

We refer to our previous responses to the questions on notice received from the Committee on 29 June 2023, and the additional question received on 30 June 2023.

Questions - Income, Revenue

7. *Please indicate the percentage of revenue from public sector work compared to private sector.*

In our most recent full financial year to 31 August 2022, public sector and healthcare work accounted for 24.1% of our Australian business.

8. *Please provide details of the range of partnership payments/incomes (including base amounts, bonuses and payments in total) in \$50,000 bands and show the number of personnel in the partnership group in each band.*

Accenture is not a partnership. Our senior executives are Managing Directors who are salaried employees of Accenture. Total compensation/income for Managing Directors can consist of annual salary, bonus and equity.

In questions 10, 11 and 12, we have provided transparency on the number of Managing Directors who are compensated at certain levels. For privacy and confidentiality reasons we are unable to provide further details that are sensitive both internally and commercially.

10. *In the latest full year, how many partners earn more than \$1 million a year in total income from the entity?*

Accenture is not a partnership.

Within the last full year, we had 32 salaried Managing Directors who earned more than \$1 million a year in total income.

11. *In the latest full year, how many earn more than \$2 million a year?*

Accenture is not a partnership. In the last full year we had 3 salaried Managing Directors who earned more than \$2 million.

12. In the latest full year, how many earn more than \$3 million a year?

Accenture is not a partnership. In the last full year, no Managing Directors earned more than \$3 million.

13. In the latest full year, who was the highest earning partner within your firm and how much did they earn?

Accenture is not a partnership. For privacy reasons, we are not able to name the highest earning individual.

Questions - People, management

15. Have any, and if so, how many, misconduct matters related to a partner or partners have been lodged within the entity in the past year, and past 5 years?

Accenture is not a partnership and does not have partners.

During Accenture's FY23 year to date (1 September 2022 to 30 June 2023), there have been 4 matters lodged formally with Accenture alleging misconduct involving a Managing Director. During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, there have been 33 matters lodged formally with Accenture alleging misconduct involving a Managing Director.

16. Have any internal inquiries into misconduct, internal culture or human resource related/employee experience and outcomes been conducted over the past 5 years?

- a. How many?*
- b. If any, please provide their summaries and recommendations?*
- c. Please supply copies.*

During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, there have been 134 formal internal inquiries into alleged misconduct, internal culture, and human resource related outcomes. Where allegations of misconduct are substantiated, a range of disciplinary actions have been taken depending on the nature of the misconduct, from coaching up to formal warning and termination of employment.

Due to data privacy and confidentiality concerns, we are not able to provide copies of these inquiries.

17. Have any independent external inquiries into misconduct, internal culture or human resource related/employee experience and outcomes been conducted over the past 5 years?

- a. How many?*
- b. If any, please provide their summaries and recommendations?*
- c. Please supply copies*

There has been 1 independent external inquiry, as described below, conducted in relation to Accenture Australia during Accenture's FY19, FY20, FY21, FY22 and FY23 year to date.

In 2019 the Fair Work Ombudsman (FWO) undertook a compliance activity into Accenture Australia Holdings Pty Ltd concerning visa holders engaged under the former Temporary Work (Skilled) visa (subclass 457 visa), and the Temporary Skill Shortage visa programme (the IT Workers). That enquiry was part of a general review of the industry use of IT Workers and not specifically targeting Accenture. As a

result of the activity, the FWO did not take any compliance or enforcement action against Accenture. The findings of the review were not published.

18. How many formal complaints of bullying, if any, have been made in the past year, and in the past five years?

During Accenture's FY23 year to date, there have been 3 formal complaints of alleged bullying made to Accenture. During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, there have been 44 formal complaints of alleged bullying made to Accenture.

19. How many formal complaints of sexual harassment, if any, have been made in the past year, and in the past five years?

During Accenture's FY23 year to date, there have been 5 formal complaints of alleged sexual harassment made to Accenture. During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, there have been 35 formal complaints of alleged sexual harassment made to Accenture.

20. How many formal complaints of discrimination, if any, have been made in the past year, and in the past five years?

During Accenture's FY23 year to date, there have been 2 formal complaints of alleged unlawful discrimination made to Accenture. During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, there have been 5 formal complaints of alleged unlawful discrimination made to Accenture.

21. Over the last 5 years, how many complaints about bullying, sexual harassment, discrimination or employment related issues have been heard by external bodies e.g. Fair Work Commission, Human Rights Commission or Employee Ombudsman?

During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, there have been no formal complaints about alleged bullying, sexual harassment, unlawful discrimination or employment related issues heard by external bodies. Any claims lodged as part of an unfair dismissal or adverse action claim have either been withdrawn or settled at conciliation.

22. How many nondisclosure agreements and/or separation arrangements have been finalised by the entity in the past year, and in the past five years? Please distinguish NDAs from other arrangements.

- a. How many have involved:*
 - i. Sexual harassment*
 - ii. Bullying, and/or*
 - iii. Discrimination*
- b. How many have resulted in the involved party or parties exiting the entity?*
- c. Please provide details of the amount of any payments made by individual case.*
- d. How many have involved:*
 - i. Sexual harassment*
 - ii. Bullying, and/or*
 - iii. Discrimination*



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- e. How many have resulted in the involved party or parties exiting the entity?*
- f. Please provide details of the amount of any payments made by individual case.*

Allegations of sexual harassment, bullying and/or unlawful discrimination are investigated, and appropriate disciplinary action is taken when allegations are substantiated. During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, as a result of internal investigations, 13 employees of Accenture have exited employment for sexual harassment (including resignations) and 3 have exited employment for bullying. None have exited employment for unlawful discrimination.

During Accenture's FY19, FY20, FY21, FY22 and FY23 year to date, Accenture has not entered into nondisclosure or separation agreements with the reporting party or the subject of a complaint of the kind referred to above.

Separately, former employees have at times filed unfair dismissal claims with the Fair Work Commission seeking to challenge a dismissal from employment usually for alleged misconduct, performance, or redundancy. Such claims may allege unlawful discrimination or bullying as part of an overall challenge to such dismissal and if settled at conciliation will involve a separation agreement.

Yours sincerely,

Peter Burns
Market Unit Lead for Accenture Australia & New Zealand