Response from Deloitte to the House of Commons Foreign Affairs Select Committee (RSC0013)

Thank you for the opportunity to respond to the comments about Deloitte in your oral evidence session of 29 March 2018.

While noting that there was not a specific example cited in this session relating to any client work undertaken by Deloitte, we wanted to outline some of the controls that Deloitte LLP – the UK affiliate of Deloitte North West Europe - has in place.

Deloitte is wholly committed to both preventing and detecting economic crime. We perform rigorous internal measures prior to taking on new clients, and through the duration of the relationship, in order to facilitate this. This includes monitoring and complying with relevant sanctions and trade restrictions.

Our procedures include anti-money laundering (AML) checks and processes, which follow the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (Money Laundering Regulations 2017), The Consultative Committee of Accounting Bodies (CCAB) HM Treasury approved industry guidance, industry best practice and Deloitte’s own internal policies. Our processes are subject to review and oversight by the Institute of Chartered Accountants in England and Wales (ICAEW).

Financial crime and money laundering prevention, public interest, and integrity are at heart of this process, as is the application of the spirit, not just the letter of the law – in short – we focus on doing the right thing.

Our business regularly declines opportunities that do not meet these criteria. If we become aware of a client operating in contravention of the law, under The Proceeds of Crime Act 2002 we will take steps to notify law enforcement, and other relevant parties as required. We will also consider the termination of the relationship where appropriate.

We hope that this information is useful to the Committee’s inquiry.

Deloitte LLP

April 2018