

MODERN SLAVERY STATEMENT

Financial Year 2019/2020

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INTRODUCTION

RSM Australia is subject to the Commonwealth Modern Slavery Act 2018 ('Act'), which commenced on 1 January 2019. In accordance with the Act, our first annual modern slavery statement is due 31 March 2021.

This first statement covers the financial period from 1 July 2019 to 30 June 2020, and sets out the steps RSM Australia is taking to ensure modern slavery is not taking place in its business or in its supply chains.

RSM Australia is committed to social and environmental responsibility. We are committed to working ethically, lawfully and with integrity in all business relationships. This includes a commitment to ensuring that slavery is not occurring within our operations or supply chains. Our Partners and staff are expected to act with integrity and to respect others, as this forms part of our firm's core policies and key values which are set out below.

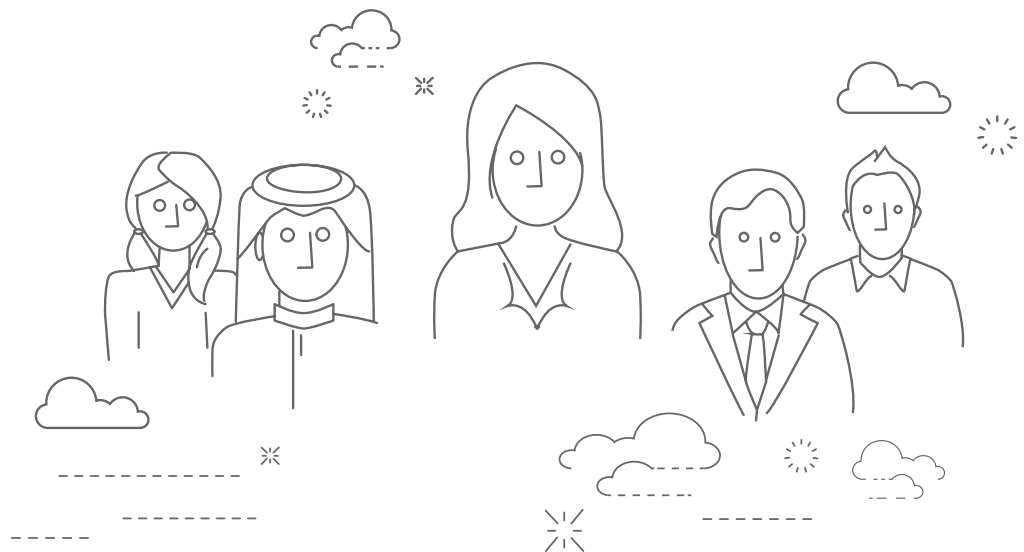
OUR VALUES

Our national values reflect what is important to us at RSM. As a firm we value:

INTEGRITY
in everything

SUPPORTING
clients everywhere

DEVELOPING
and valuing everyone



RSM AUSTRALIA

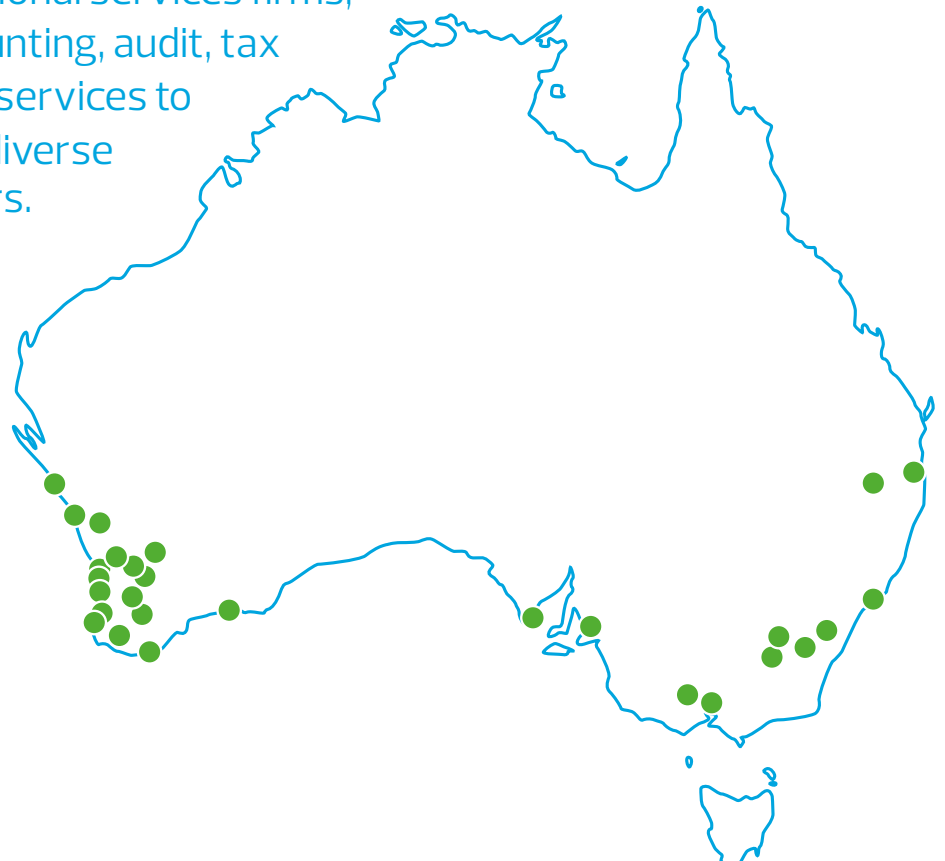
This statement covers RSM Australia Pty Ltd as trustee for Birdanco Practice Trust and the following related entities, collectively known as RSM Australia:

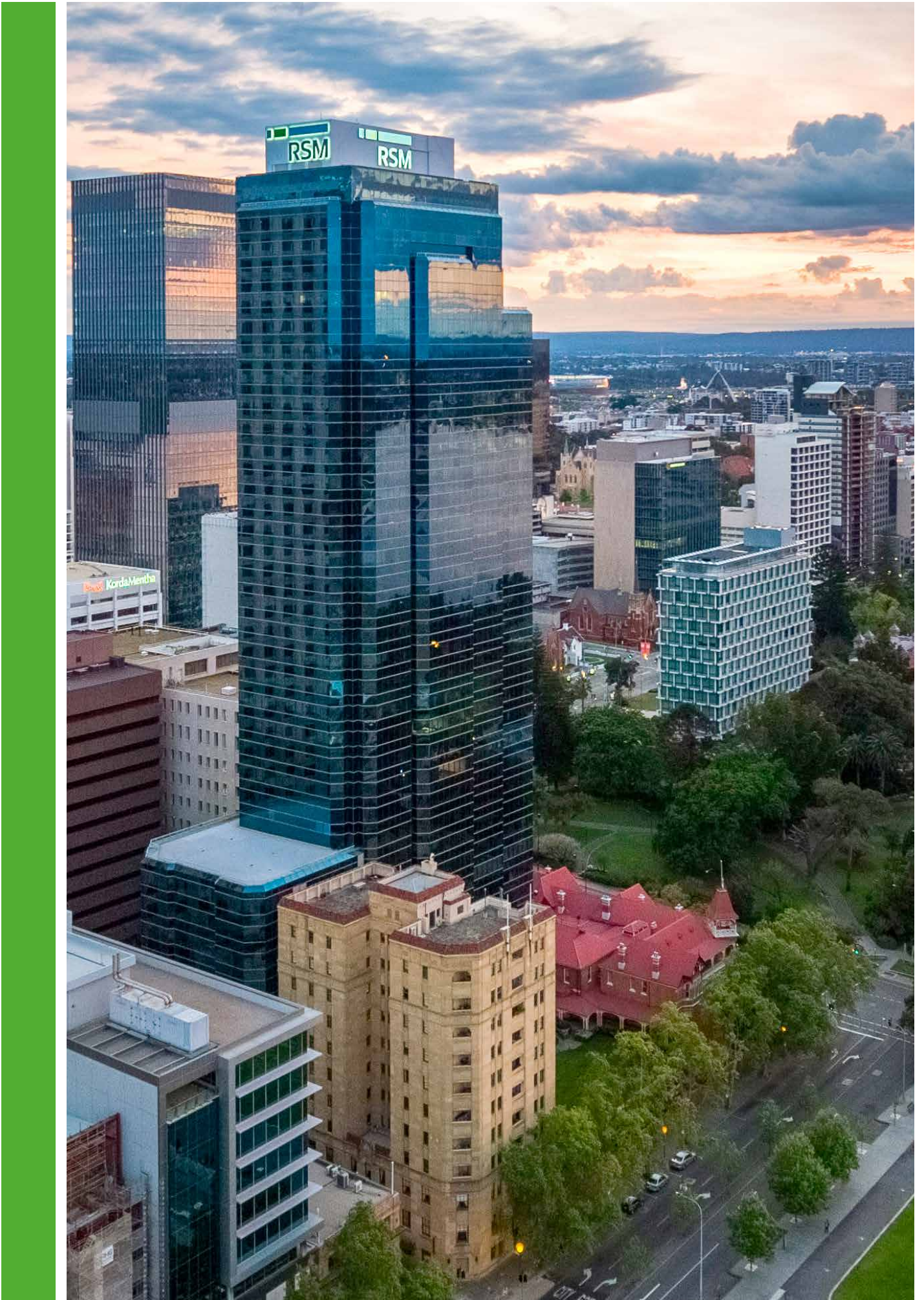
- RSM Australia Partners
- RSM Australia Tax Law Pty Ltd
- RSM Financial Services Australia Pty Ltd
- RSM Corporate Australia Pty Ltd.
- RSM Digital Australia Pty Ltd

RSM Australia is a member of the RSM network and trades as RSM. Each member of the network is an independent accounting and consulting firm which practices in its own right. The RSM network is not itself a separate legal entity in any jurisdiction.

RSM Australia was established in 1922 in Western Australia providing audit, tax and consulting services. With over 1,200 staff in Australia, 109 Partners, spread across 30 offices around Australia's main cities and regional areas RSM Australia works to provide the high standard of services to its clients. RSM Australia is part of the RSM network and as the world's sixth largest audit, tax and consulting network maintains this status with 48,000 staff in 820 offices, represented in over 120 countries.

RSM Australia is a one of Australia's leading professional services firms, providing accounting, audit, tax and consulting services to clients across diverse industry sectors.





RISKS OF MODERN SLAVERY PRACTICES IN RSM AUSTRALIA'S OPERATIONS & SUPPLY CHAINS

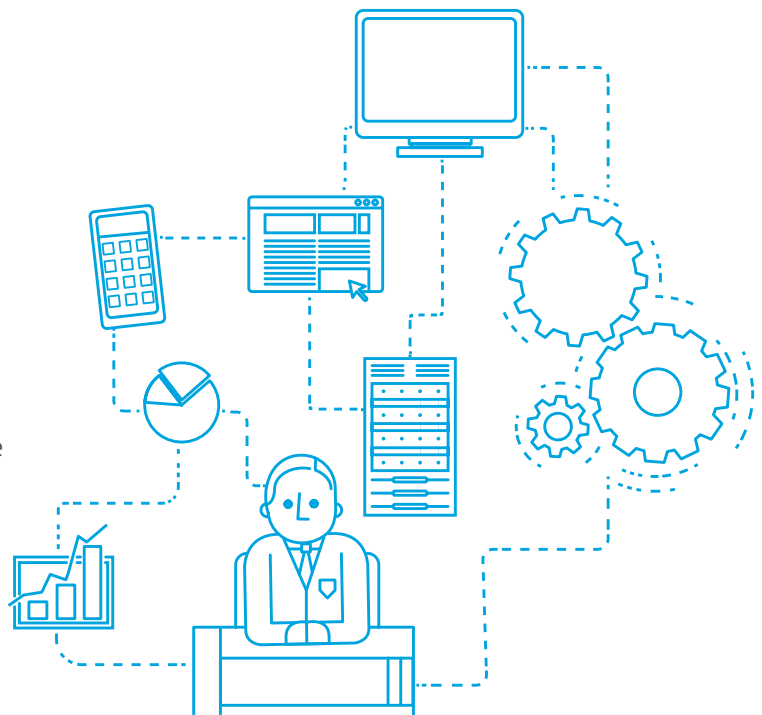
RSM Australia has conducted an assessment of Modern Slavery risks including industry risks, geographical risks, products / services, suppliers and entity risks. The risk assessment consisted of two parts: analysis of RSM Australia's own business and analysis of its supply chain.

RSM Australia's operations focuses on providing professional advice to individuals, government bodies and businesses primarily located within Australia, which is considered to be a low risk sector in relation to Modern Slavery.

RSM Australia relies on a primarily white-collar workforce which is well-educated with the majority possessing professional qualifications and having memberships with professional organisations. Its employees are based in Australia and are engaged with written terms (includes employment contracts) which are compliant with Australian laws. This includes, for example, compliance with any minimum wage requirements in line with the Fair Work Act NES requirements as well as other employee entitlements and benefits. RSM Australia is confident that there is a low risk of modern slavery occurring in its own business.

Office leasing, information technology equipment and services, marketing supplies and services, and travel form the majority of RSM Australia's supply chain. Training, subscriptions, insurance, consulting and recruitment are also significant components. The overwhelming majority of RSM Australia's supplies are sourced from within Australia from both national suppliers and suppliers in the local communities of its operations.

RSM Australia's assessment has initially focussed on its primary and direct relationship with its suppliers. Following an assessment of supplier categories, the services provided and the location of suppliers, it was concluded that the inherent risks of modern slavery occurring in RSM Australia's supply chain is low. Although RSM Australia has assessed the risk of Modern Slavery occurring within its supply chain is low, it will continue to assess and monitor its supply chains to ensure the requirements of the Modern Slavery Act are adhered to.



ACTIONS TAKEN BY RSM AUSTRALIA TO ASSESS & ADDRESS MODERN SLAVERY RISKS IN ITS OPERATIONS & SUPPLY CHAINS

In order to assess and address risks of modern slavery in operations and supply chains, RSM Australia has been undertaking various forms of due diligence and remediation to identify, prevent and mitigate any risk of modern slavery.

Within RSM Australia's operations, a project group has been formed consisting of senior RSM Australia staff from across the business taking the necessary steps to ensure the firm's compliance with the Act. This group's focus relates to the assessment, implementation, and ongoing review of processes and actions.

RSM Australia's Code of Conduct and Ethics sets out its expectation of staff to behave lawfully and in a manner which is aligned to its values, organisational policies, professional regulations and ethical standards. This Code of Conduct and Ethics helps to maintain the firm's culture as responsible and ethical. Its Whistleblowing and Complaints Policy and its Grievance Policy outline the processes which are in place and are designed to encourage both internal and external complaints, concerns or disclosures to be made. They provide a way for staff to safely raise concerns. In addition, these policies outline dispute resolution provisions for both internal and external parties. Processes are in place internally to report on any such incidents and complaints.

RSM Australia's review of its existing internal policies and procedures throughout the reporting period help shape the governance agenda and ensure its staff and suppliers align with its commitment to working ethically, lawfully and with integrity. Through education and management of its staff and by aligning with ethical and lawful suppliers, RSM Australia seeks to ensure the Modern Slavery Act is adhered to within its supply chains and operations. Regular reviews on RSM Australia's policies is intended to continue through future reporting periods.

RSM Australia's policies are regularly referenced and communicated to its staff including new staff. RSM has delivered training and education of policies through its online learning platforms as well as other channels. Education of modern slavery risks and awareness for senior staff, including executives and directors, has taken place during the reporting period. A training plan has been developed to educate all staff on modern slavery and associated risks, with a view to ensure the execution of the training plan is completed in the next reporting period. In addition, this plan also includes education and awareness of modern slavery risks as part of the onboarding process for new staff.

RSM Australia contracts with suppliers at both a national level and in the local communities around its offices. In forming supplier relationships, trust, reputation, service quality and risk mitigation are a key consideration.

RSM Australia is committed to working with its suppliers to minimise the risk of Modern Slavery in its supply chains. This will include assessing the risk of Modern Slavery in the selection of new vendors as well as assessing the actions taken by existing suppliers.

RSM Australia has taken a risk-based approach to addressing Modern Slavery in its supply chain. Actions undertaken during the period were focussed upon an internal review of suppliers to identify supply chains and establish the risks of modern slavery occurring.

If any instances of modern slavery were to be found, RSM Australia would work with the supplier to identify and investigate the issues and develop a plan to remediate the harm and its recurrence.

No suppliers of significant or instances of modern slavery were identified following the internal review.



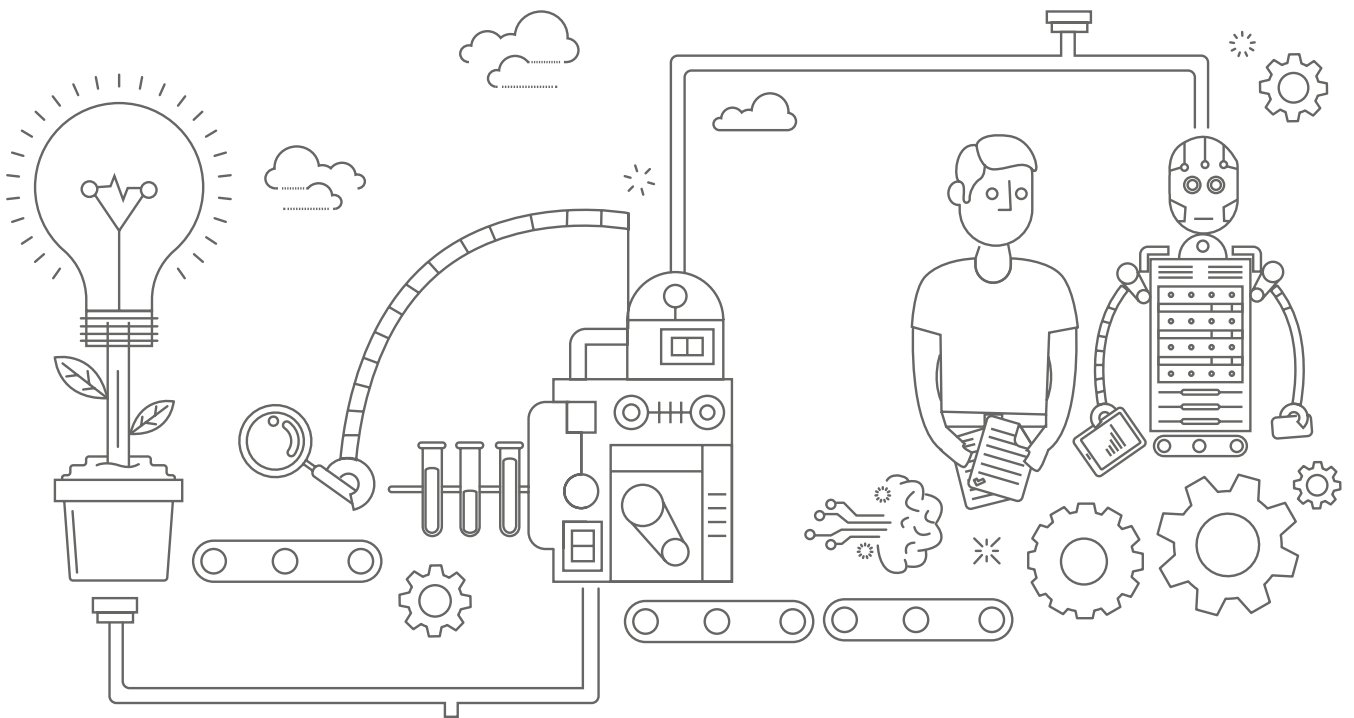
RSM Australia has taken a risk based approach to addressing Modern Slavery in its supply chain.

ASSESSING THE EFFECTIVENESS OF ACTIONS TO ASSESS & ADDRESS MODERN SLAVERY RISKS

RSM Australia has controls and processes in place to assess the effectiveness of its actions in its operations and supply chains. For example, a Modern Slavery working group has been established within the firm and this group will continue to review actions taken to assess and address modern slavery risks. This group will also check the firm's risk assessment processes on a regular basis. Any modern slavery related feedback from the firm is directed to this group, where feedback will be considered and a plan for relevant action items will be determined. This group will work with other areas of the firm as relevant.

RSM Australia will conduct internal supplier reviews on a regular basis to track, measure, assess and address any modern slavery risks. As part of this internal review, RSM Australia work to identify trends in any cases reported through its grievance mechanisms.

Number of employees completing behavioural training will continue to be monitored, to help ensure compliance with the firm's behavioural expectations.



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CONSULTATION

WITH RSM AUSTRALIA'S RELATED ENTITIES

The level of consultation across RSM entities has remained consistent. This process has included, for example, consistent communication between groups at key senior staff meetings. In addition, the project group which focusses on working towards the firm's compliance with the Act consists of senior RSM Australia staff from across the business and covers RSM Australia's related entities. All entities of RSM Australia are equally able to appropriately identify, assess and address modern slavery risks.

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FUTURE STEPS

RSM Australia is committed to minimising the risk of Modern Slavery in its supply chains and will continue to take appropriate actions in future reporting periods. Actions RSM Australia will take in the next reporting period, financial year 2020/21 include:

- Continuous monitoring of its suppliers, its suppliers' modern slavery statements and the actions they are taking to reduce their own risks.
- Revising the onboarding process for new suppliers to incorporate consideration of modern slavery risks.
- Provision of training to RSM Australia staff on the risks of modern slavery.
- Continued communication with the RSM senior leadership group to reinforce expectations and report any non compliance issues.

RSM Australia will publish a further modern slavery statement for the next reporting period, financial year ending 30 June 2021.

Jamie O'Rourke

Jamie O'Rourke
National Chairman
RSM Australia
30 March 2021

This Modern Slavery Statement was approved on 18 March 2021 by RSM Australia's principal governing body. This Modern Slavery Statement has been signed by RSM Australia's National Chairman, Jamie O'Rourke, who is a responsible member of the principal governing body.



For questions relating to this statement please contact:

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