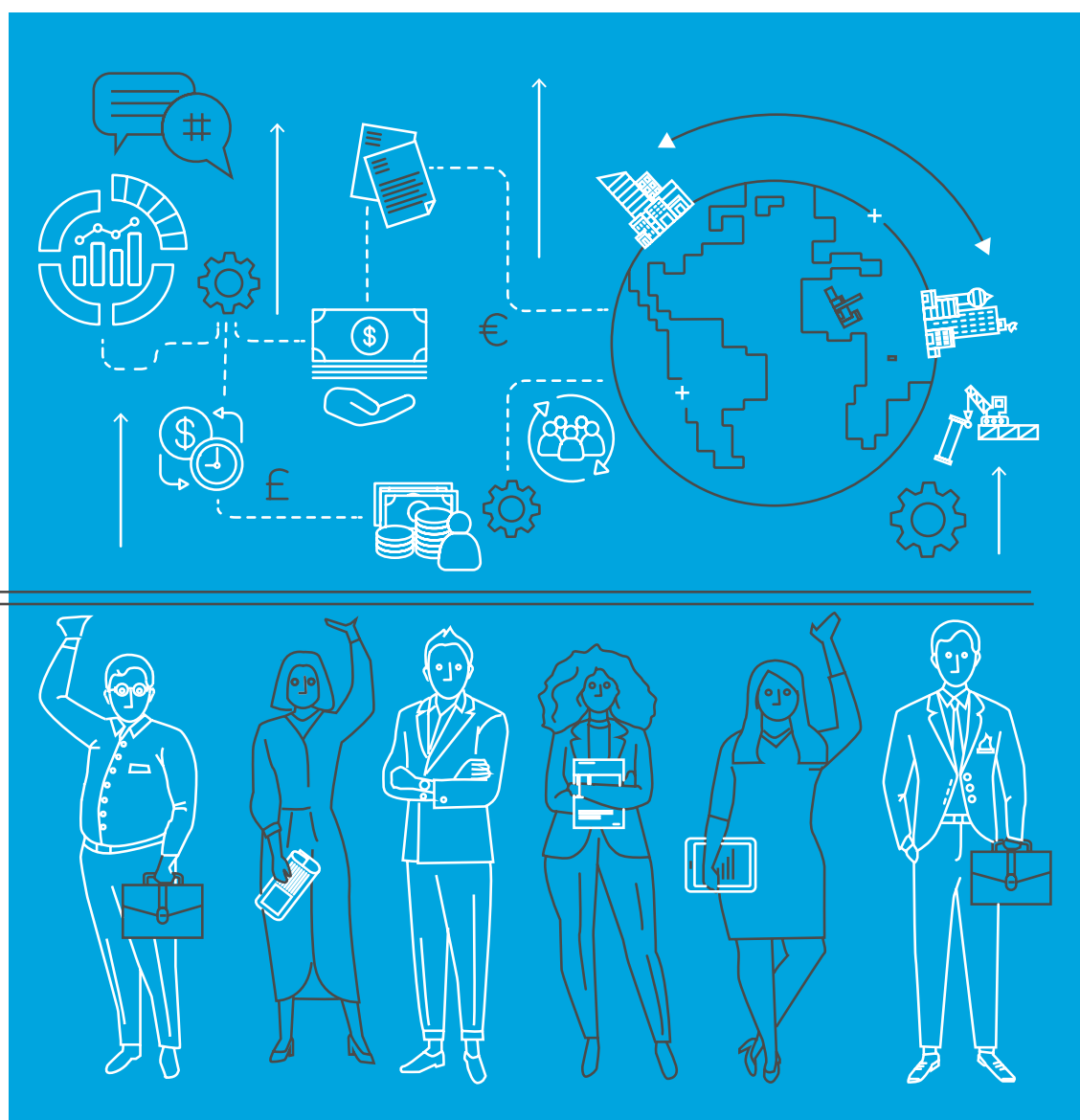


# MODERN SLAVERY STATEMENT

Financial Year 2022/2023





## CONTENTS

Introduction .....	3
RSM Australia .....	5
Risks of modern slavery practices in operations and supply chains .....	6
Actions taken to assess and address modern slavery risks .....	7
Assessing effectiveness of actions to assess and address risks .....	10
Consultation with RSM Australia's related entities.....	11
Future steps.....	11

For further information visit:  
[rsm.com.au](http://rsm.com.au)

# Introduction

RSM Australia continues to be subject to the Commonwealth Modern Slavery Act 2018 (Act), which commenced on 1 January 2019. In accordance with the Act, RSM Australia's annual Modern Slavery Statement is due 31 December 2023.

This statement covers the financial period from 1 July 2022 to 30 June 2023, and sets out the steps RSM Australia is taking to continue to develop its modern slavery risk management framework to ensure modern slavery is not taking place within its business or its supply chains.

RSM Australia is committed to social and environmental responsibility. It continues to be committed to working ethically, lawfully and with integrity in all business relationships. This includes a commitment to ensuring that modern slavery is not occurring within its operations or supply chains. RSM Australia's Partners and staff are expected to act with integrity and to respect others, as this forms part of the 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**

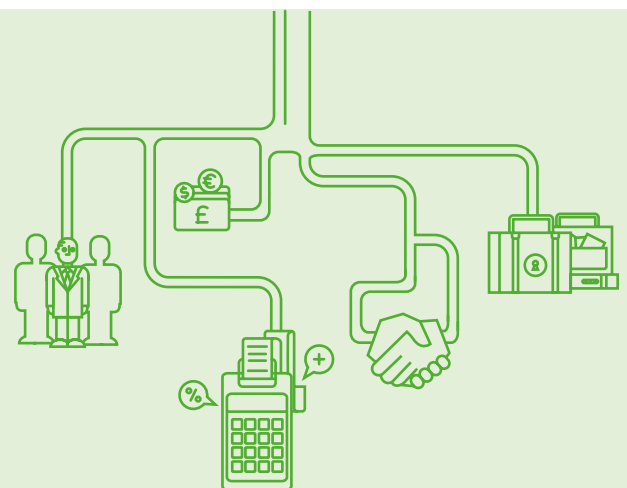
in everything

### **SUPPORTING**

clients everywhere

### **DEVELOPING**

and valuing everyone







# RSM Australia

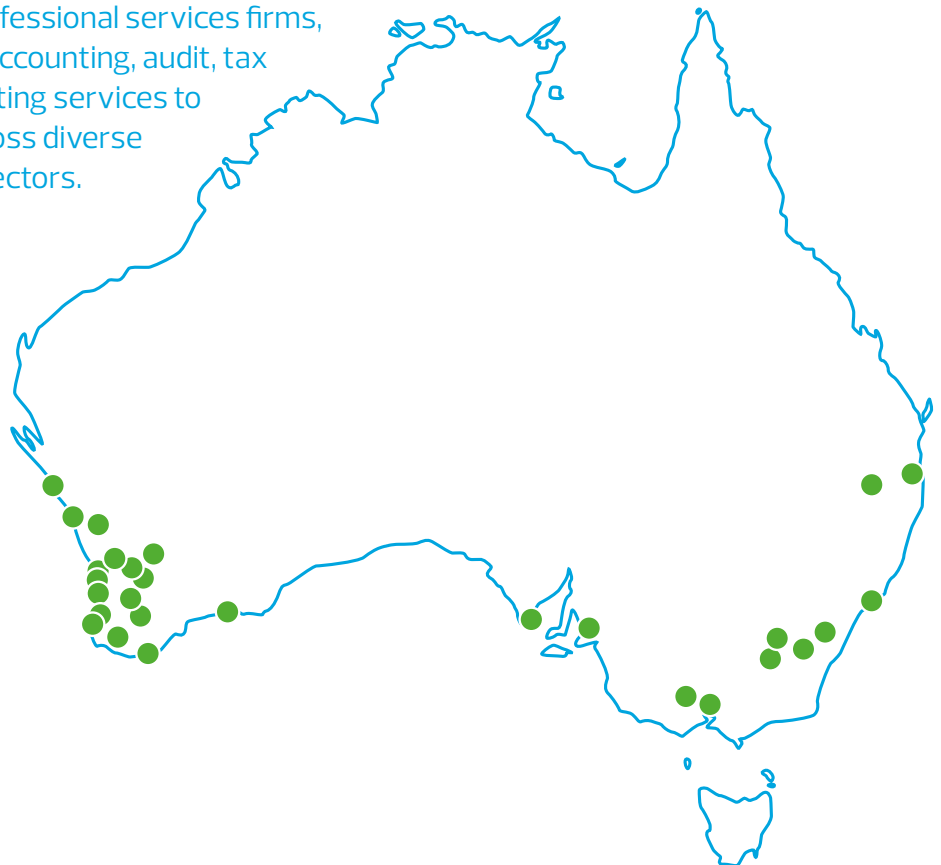
This statement covers RSM Australia Pty Ltd as trustee for Birdanco Practice Trust and the following related entities, collectively known as RSM Australia:

- 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 International network (the Network) and trades as RSM, which is the trading name used by the members of the Network. Members of the Network are independent professional services firms and separate legal entities practising in their own right. RSM International Limited is a private company limited by guarantee and is registered in England and Wales. RSM Australia is one of Australia's leading professional services firms, providing accounting, audit, tax and consulting services to clients across diverse industry sectors. RSM Australia was established in 1922 in Western Australia.

With over 1,700 staff in Australia, 131 Partners, spread across 32 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 which is a leading provider of audit, tax and consulting services. This network has over 57,000 staff across 830 offices, represented in 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 and supply chains

RSM Australia has continued to conduct assessments of modern slavery risks including industry risks, geographical risks, products / services, suppliers and entity risks. The most recent risk assessment has consisted of two parts: analysis of RSM Australia's own business and analysis of its supply chain.

During financial year 2022/2023, it was found there was not a significant change in RSM Australia's suppliers and the way it conducts its operations, in comparison to the previous financial year.

RSM Australia's operations focuses on providing professional advice to individuals, government bodies and businesses primarily located within Australia, which we consider to be a low-risk sector in relation to modern slavery.

RSM Australia relies on a primarily white-collar workforce which is tertiary 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 employees can terminate) that 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.

RSM Australia does engage a limited number of overseas staff who are well educated white-collar workers. They are engaged with written terms which are compliant with relevant employment laws, including compliance with minimum wage requirements and receive generally similar employment benefits and entitlements to staff members based within Australia. RSM Australia is confident that the risk of modern slavery occurring within these staff members' work environment remains low.

In addition, RSM Australia's secondment program has continued to be in place during the reporting period. All secondees who are brought in to work for RSM Australia are employed with written terms compliant with relevant employment laws, including compliance with minimum wage requirements and visa requirements. Secondees also receive similar employment benefits and entitlements to other RSM Australia staff. RSM Australia is confident that there is a low risk of modern slavery occurring within these staff members' work environment.

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

RSM Australia's assessment has focused 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 continues to remain low. Although RSM Australia has assessed that 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 during future reporting periods.



# ACTIONS

## taken by RSM Australia to assess and address modern slavery risks in its operations and supply chains

RSM Australia continues to undertake various forms of due diligence and remediation to identify, prevent and mitigate any risk of modern slavery, in order to assess and address risks of modern slavery in its operations and supply chains.

Within RSM Australia's operations, a project group which was formed during Financial Year 2019/2020 has remained active during the Financial Year 2022/2023. This group consists of senior RSM Australia staff from across the business tasked with taking the necessary steps to ensure RSM Australia's compliance with the Act. This group oversees the assessment, implementation, and ongoing review of processes and actions relating to Modern Slavery. During the reporting period, this group continued to review modern slavery emerging practices and refined RSM Australia's practices to help assess and address risks of modern slavery within RSM Australia's operations and supply chains.

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, together with other policies such as RSM Australia's EEO, Discrimination and Bullying and Harassment policy, Anti-Bribery and Corruption policy, Diversity, Equity and Inclusion policy, Recruitment and Selection policy and Workplace Health and Safety policy, help to maintain the firm's culture as responsible and ethical.

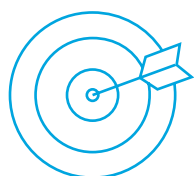
In addition, RSM Australia's Modern Slavery Policy affirms its commitment to ensuring that modern slavery is not occurring within its operations or supply chains and sets out its approach towards reducing the risk of modern slavery in its operations and supply chains. This policy also aims to ensure all parties understand and are aware of considerations, obligations, requirements and risks associated with modern slavery. This policy is available to the public, to suppliers and to staff, and is published on RSM Australia's website as well as its intranet.

RSM Australia's Whistleblowing and Complaints Mechanism Policy and its Grievance Handling 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.

During the reporting period, RSM Australia again undertook a review of its policies including its Modern Slavery Policy. RSM Australia undertakes regular reviews of all its existing internal policies and procedures to 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 of RSM Australia's policies will continue in future reporting periods.

RSM Australia's policies are regularly referenced and communicated to its staff including new staff. RSM delivers regular training and education of policies through its online learning platforms as well as other channels.

During the reporting period, all new staff joining RSM Australia have been required to complete mandatory training on modern slavery upon their commencement. This mandatory training on modern slavery continues to form a part of RSM Australia's standard onboarding process for all new staff. Education of modern slavery risks and awareness for senior staff, including executives and directors, has also taken place during the reporting period. In addition, RSM Australia's regular training on modern slavery for existing staff has taken place during the reporting period. Training on modern slavery will also again take place during the next reporting period. The purpose of this modern slavery training is to educate all staff on modern slavery



and associated risks, including how to recognise indicators of modern slavery both in the workplace and when dealing with clients, and how to report concerns.

In addition, during the reporting period, training on modern slavery has also been included as part of the onboarding process for new starters who may commence with RSM Australia as part of any business acquisition.

RSM Australia contracts with suppliers at both a national level and in the local communities around its offices. RSM Australia is committed to working with its suppliers to minimise the risk of modern slavery in its supply chains. In forming supplier relationships, trust, reputation, service quality and risk mitigation are a key consideration.

RSM Australia has taken a risk-based approach to addressing modern slavery in its supply chain. Actions undertaken during the reporting period have included an updated review of its supply chains and a review of the risks of modern slavery occurring.

During the reporting period, RSM Australia undertook a review of its modern slavery supplier onboarding online questionnaire and online process. The purpose of the review was to ensure the process and content aligns with the requirement to effectively assess the risk of modern slavery occurring within RSM Australia's supply chain. The overall purpose of the online questionnaire and process is to assist with assessing the risk of modern slavery in the selection of new vendors as well as assessing the actions taken by existing suppliers.

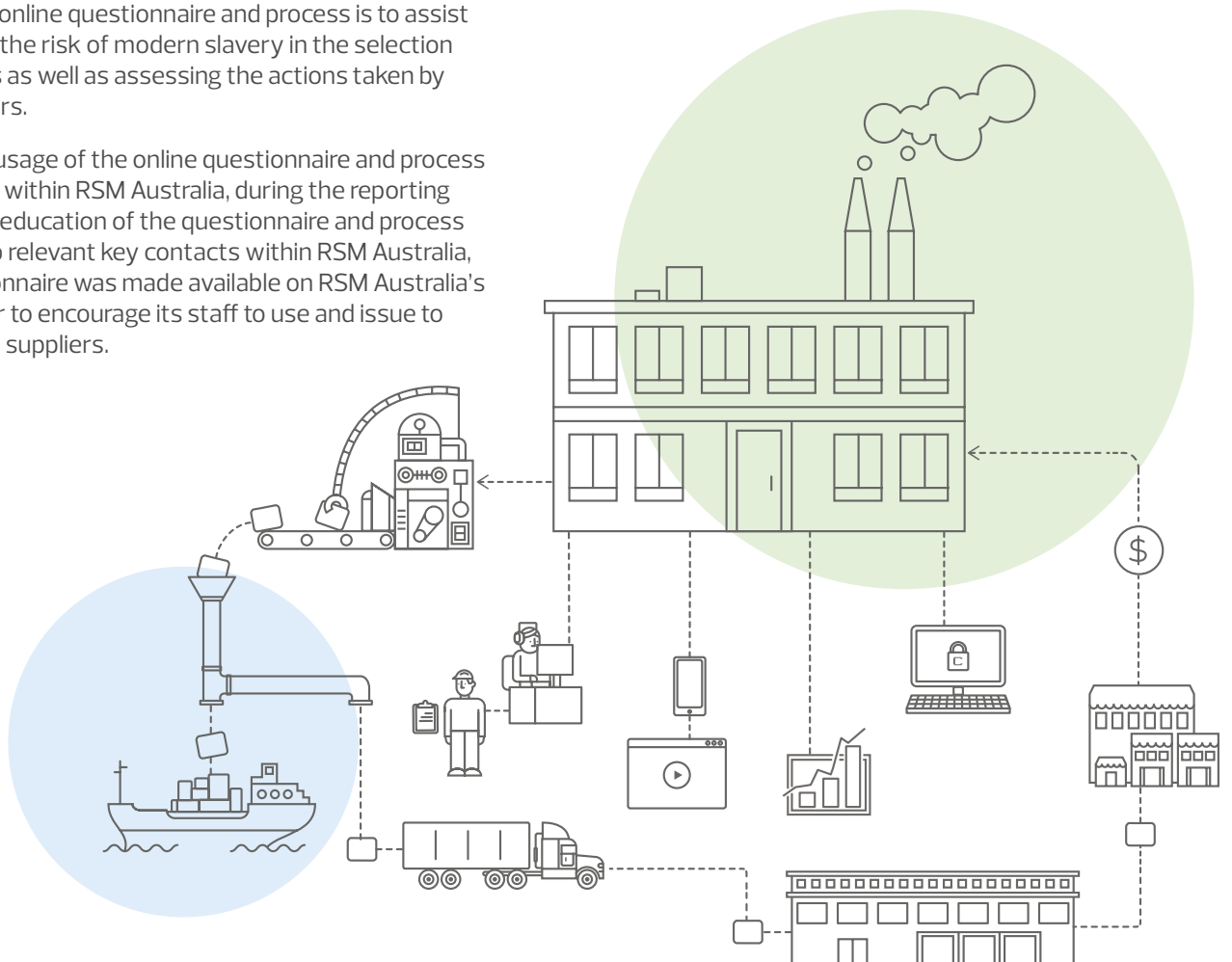
The scope and usage of the online questionnaire and process was broadened within RSM Australia, during the reporting period. Further education of the questionnaire and process was provided to relevant key contacts within RSM Australia, and the questionnaire was made available on RSM Australia's intranet in order to encourage its staff to use and issue to RSM Australia's suppliers.

In addition, during the reporting period the online questionnaire and process was issued to a broader group of key suppliers as well as some suppliers where there is potentially higher risk of modern slavery occurring due to, for example, nature of their industry, geography, products / services, or entity. Therefore, the online questionnaire and process was issued to additional cleaning suppliers as well as key information technology and marketing suppliers, and external suppliers who provide RSM Australia with its offshore staff, to name a few.

RSM Australia has also continued to issue this online questionnaire and process to new suppliers during the reporting period, in order to help assess the risk of modern slavery. During the next reporting period, RSM Australia aims to further embed the onboarding process of its vendors, and issue the online questionnaire to a further group of suppliers.

No suppliers of significant concern or instances of modern slavery were identified during the reporting period.

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





RSM Australia is committed to working with its suppliers to **minimise the risk** of modern slavery in its supply chains.



# ASSESSING

## the effectiveness of actions to assess and 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 was established within RSM Australia during financial year 2019/2020. During the reporting period, this group has continued to be active. This group reviews actions taken to assess and address modern slavery risks and also checks RSM Australia's risk assessment processes on a regular basis. Any modern slavery related feedback received through RSM Australia and its suppliers is directed to this group, where feedback is considered and a plan for relevant action items is determined. This group works with any areas of RSM Australia and its suppliers as relevant, in order to check and help ensure that there is appropriate management of modern slavery risks.

Assessing risks of modern slavery within suppliers who may be considered as higher risk due to their industry, geography, products / services, or entity, has continued to be a focus of RSM Australia's modern slavery working group. This includes, for example, having a feedback loop at the end of each review to assess whether actions had the effect they were intended to have.

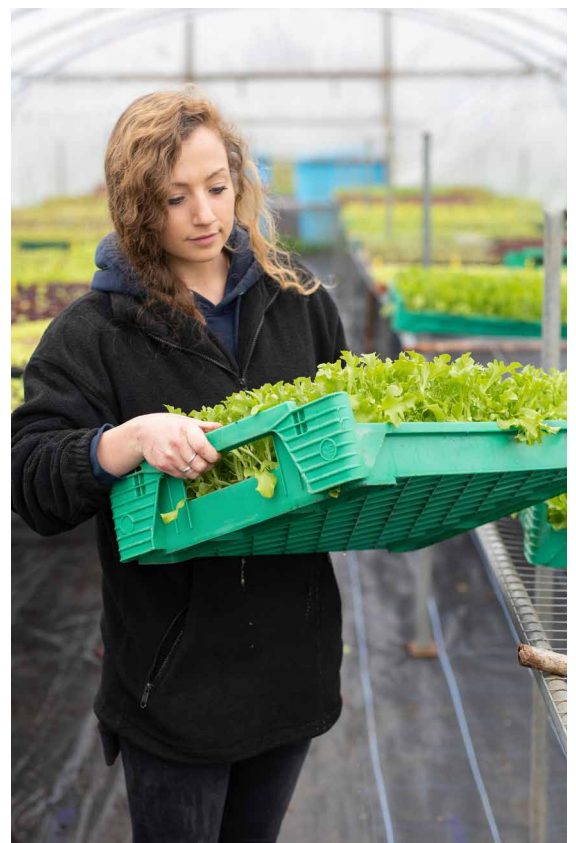
In addition, RSM Australia's modern slavery working group has continued to focus on the assessment of risks of modern slavery within new suppliers. During the next reporting period this group aims to further develop and embed the onboarding process of its vendors in order to help assess the risk of modern slavery. This group also plans to continue to issue the online questionnaire to broader groups of suppliers as well as further analyse any trends to help assess whether further proactive action can be taken to mitigate modern slavery risks.

Researching best practices and researching emerging practices to appropriately assess modern slavery risks was undertaken during the reporting period. This research will continue to be a focus of RSM Australia's modern slavery working group during the next reporting period,

which will help determine the practices that are put in place to help assess and address risks of modern slavery.

RSM Australia conducts 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 works to identify trends in any cases reported through its grievance mechanisms.

The completion of behavioural training by staff, including modern slavery training, has continued to be monitored and further refresher training will occur during the next reporting period, to help ensure compliance with the firm's behavioural expectations. RSM Australia's regular review of its existing internal policies and procedures also helps to ensure best practices are implemented and staff are working ethically, lawfully and with integrity.



# CONSULTATION

## with RSM Australia's related entities

The level of consultation across RSM Australia's entities has remained consistent. This process has included, for example, consistent communication between groups at key senior staff meetings. In addition, RSM Australia's modern slavery working 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 have access to similar policies and processes and all entities of RSM Australia are equally able to appropriately identify, assess and address modern slavery risks.

## FUTURE STEPS

RSM Australia is committed to minimising the risk of modern slavery in its operations and supply chains and will continue to take appropriate actions in future reporting periods. Actions which RSM Australia will take in the next reporting period, financial year 2023/2024, include:

- Maintain ongoing reviews of RSM Australia's suppliers, their Modern Slavery Statements and the actions that they are taking to reduce their own risks.
- Explore options which may assist RSM Australia to broaden the scope of its supplier risk assessment.
- Further embed the online modern slavery onboarding questionnaire within the process for new suppliers. This also includes issuing this questionnaire to a broader group of RSM Australia's suppliers.
- Review RSM Australia's online modern slavery supplier onboarding questionnaire and process, to ensure it remains both relevant and effective.
- Review and update internal policies to ensure they reflect emerging best practice.
- Implement refresher training to all RSM Australia staff on the risks of modern slavery.
- Ensure staff continue to be made aware of RSM Australia's policies, including its Modern Slavery Policy, through formal completion of a Policy Acknowledgement.
- Continue to research best practice and other emerging practices to appropriately assess modern slavery risks.
- Modern slavery working group to continue to assess its activities and meet on a regular basis to ensure RSM Australia's compliance with the Act.
- Ongoing communication with the RSM senior leadership group to reinforce expectations and report any non-compliance issues.
- Review the incorporation of modern slavery considerations as part of other national strategies within RSM Australia.

RSM Australia will publish a further Modern Slavery Statement for the next reporting period, financial year ending 30 June 2024.

*Jamie O'Rourke*

**Jamie O'Rourke**  
Chief Executive Partner  
RSM Australia  
5 December 2023

***This Modern Slavery Statement was approved on 5 December 2023 by RSM Australia's principal governing body. This Modern Slavery Statement has been signed by RSM Australia's Chief Executive Partner, Jamie O'Rourke, who is a responsible member of the principal governing body.***



**For questions relating to this statement please contact:**

**Andrew Bourne**

Group Financial Controller

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## **THE POWER OF BEING UNDERSTOOD**

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