



# People & Culture



## MODERN SLAVERY POLICY

POLICY OWNER  
LAST UPDATED

People & Culture & Group Finance  
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### POLICY HIGHLIGHTS

#### Modern Slavery

RSM Australia is subject to the Commonwealth Modern Slavery Act 2018 ('Act'), which commenced on 1 January 2019. In accordance with the Act, RSM Australia produces an annual Modern Slavery Statement to ensure measures are being put in place to help mitigate risks of modern slavery within its operations and supply chains.

This is the policy of RSM Australia and its associated Australian entities.



## 1. PURPOSE

The objective of the Modern Slavery Policy is to affirm our commitment to ensuring that modern slavery is not occurring within our operations or supply chains. In addition, this policy outlines our approach towards reducing the risk of modern slavery in our operations and supply chains, and aims to ensure all parties understand and are aware of considerations, obligations, requirements and risks associated with modern slavery.

## 2. SCOPE

This policy applies to all Partners, Principals, employees and contractors of the Firm as well as other representatives of our business or of any business in our supply chain.

This policy 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 Financial Services Australia Pty Ltd
- RSM Digital Australia Pty Ltd
- RSM Australia Tax Law Pty Ltd
- RSM Corporate Australia Pty Ltd

## 3. DEFINITIONS

- **'Firm' or 'RSM'** – Refers to RSM Australia.
- **Employee** – refers to an RSM employee, RSM Partner or RSM Principal.
- **Supplier** - an organisation or person who supplies the Firm with goods or services.

## 4. WHAT IS MODERN SLAVERY?

Modern slavery describes a situation where offenders use coercion, threats or deception to exploit victims and undermine or deprive them of their freedom.

Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, deceptive recruiting for labour or services; and/or the worst forms of child labour. All these practices deprive individuals of their liberty in order to exploit them for personal or commercial gain.

Whilst not an exhaustive list, see below some items which may indicate modern slavery practice.

- Use of foreign workers or temporary unskilled labour to undertake functions which are not easily visible because the work occurs during the night or in remote locations.
- Use of child labour in hazardous conditions, for example underground, handling dangerous machinery or tools, in unhealthy environments including where they are exposed to physical or sexual abuse, or for long hours.

- The services are provided in countries where there is a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations.
- The suspected victim(s) are:
  - living at the workplace or another place controlled by their employer;
  - underpaid or not paid at all;
  - restricted from contacting or interacting with people outside the workplace, for example their phones are confiscated, or they are supervised when in public;
  - managed by a third party who ‘holds’ or ‘invests’ their money for them;
  - subjected to, or threatened with, violence, emotional, sexual, verbal or physical abuse;
  - subjected to intimidation, such as threats to their family or close relations in connection with their employment; and/or
  - have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party.

These indicators do not necessarily mean there are modern slavery practices occurring. There may sometimes be other reasons or circumstances that indicate something may not be right.

## 5. RSM'S APPROACH TO REDUCING THE RISK OF MODERN SLAVERY PRACTICES

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 continues to be subject to the Commonwealth Modern Slavery Act 2018 ('Act'). RSM's annual Modern Slavery Statement sets out the steps it is taking to ensure modern slavery is not taking place within its business or its supply chains.

Link to RSM Australia's Modern Slavery Statement can be found [here](#) on the Firm's internet site.

## 6. STANDARDS OF BEHAVIOUR FOR RSM EMPLOYEES

The Firm's commitment to addressing modern slavery means that all employees in performing their work duties and functions must comply with this policy and with the following expectations:

- Avoid participating in unethical modern slavery activity and any activity that might lead to, or suggest, a breach of this policy or any other relevant policy;
- Exercise professional and ethical judgement at all times;
- Carry out duties and functions with integrity and objectivity;
- Treat concerns or issues raised in relation to modern slavery with respect, sensitivity and integrity;
- Respond to and/or investigate allegations of modern slavery when required, with fairness and with due regard to procedural fairness; and

- Adhere to any Firm requirements for addressing modern slavery as set out in this policy. This includes appropriately escalating and reporting any issues of concern, as outlined in the Firm's [Whistleblowing and Complaints Policy](#).

## 7. STANDARDS OF BEHAVIOUR FOR SUPPLIERS

The Firm expects that its suppliers and partners will comply with modern slavery legislation and will demonstrate their commitment to identifying, assessing and addressing the risks of modern slavery in their operations and supply chains, by demonstrating measures to comply with the following:

- Identify and mitigate modern slavery risks;
- Require their own suppliers to undertake risk based modern slavery due diligence of their own operations and supply chains; and
- Evaluate the effectiveness of these actions.

The Firm also expects its suppliers to work collaboratively with the Firm to prevent, mitigate and remedy (where appropriate) modern slavery within their operations and supply chains.

Suppliers are required to notify the Firm of known or suspected modern slavery within its operations or supply chain as soon as practicable.

## 8. REPORTING CONCERNs OF MODERN SLAVERY

RSM Employees are to report and appropriately escalate concerns about possible modern slavery to their Partner/Manager or their P&C Representative, in line with the Firm's [Whistleblowing and Complaints Policy](#) as soon as practicable.

Suppliers and parties external to the Firm are to raise modern slavery concerns to their RSM staff contact.

## 9. BREACH OF POLICY

Breach of this policy may result in the following:

- For RSM Employees: disciplinary action up to and including termination of employment may be taken.
- For suppliers: breach of this policy may prejudice the relationship with the Firm.