



# MODERN SLAVERY STATEMENT

Financial Year 2020/2021

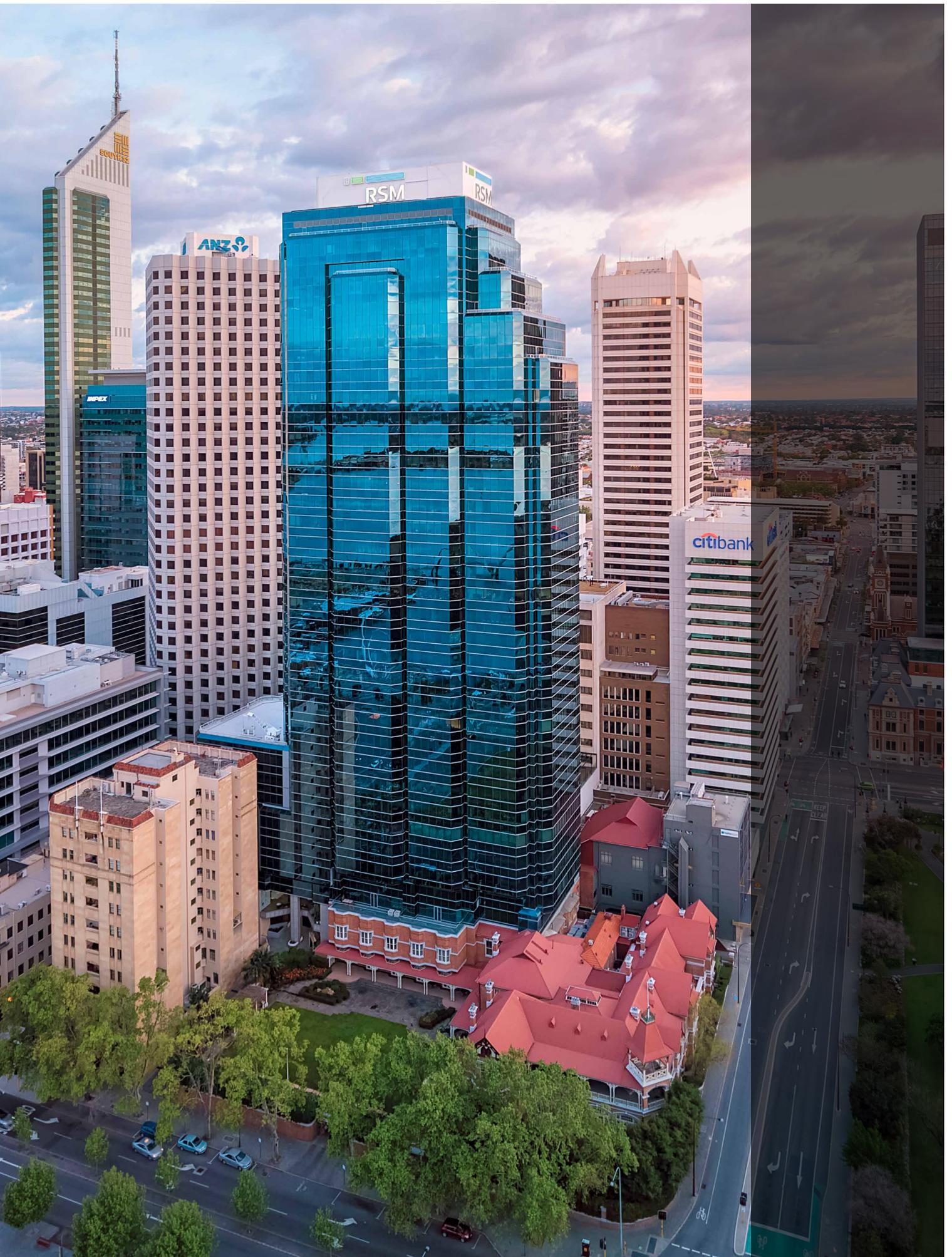


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## 2 RSM Australia

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

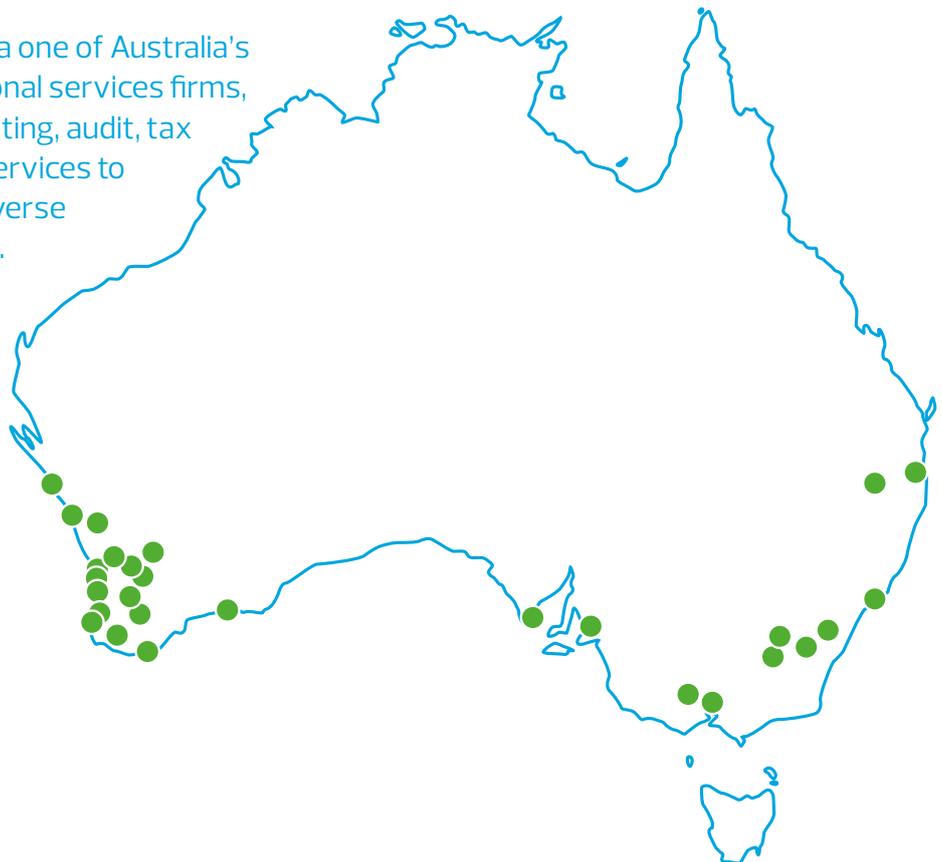
- RSM Australia Partners
- RSM Financial Services Australia Pty Ltd
- RSM Digital Australia Pty Ltd
- RSM Australia Tax Law Pty Ltd
- RSM Corporate Australia Pty Ltd

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 1,300 staff in Australia, 109 Partners, spread across 31 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 48,000 staff in 820 offices, represented in over 120 countries.

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





## 3 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 consisted of two parts: analysis of RSM Australia's own business and analysis of its supply chain.

During financial year 2020/2021, 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 continue to focus 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.

A recently emerging area is the use of a very 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 any 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.

Office leasing, information technology equipment and services, marketing supplies and services continue to form the majority of RSM Australia's supply chain. During the reporting period, we saw a significant reduction in travel costs due to the impact of COVID-19. However, it is expected that travel costs will increase during the next reporting period as local and international borders start to reopen. Training, subscriptions, insurance, consulting and recruitment also continue to be 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 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 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.

# 4

## Actions taken by RSM Australia to assess and address modern slavery risks in its 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, 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 the previous reporting period has continued to be active during the Financial Year 2020/2021. This group consists of senior RSM Australia staff from across the business and focuses on taking the necessary steps to ensure RSM Australia'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, together with other policies such as RSM Australia's EEO, Discrimination and Bullying and Harassment policy, Anti-Bribery and Corruption policy, Diversity and Inclusion policy, Recruitment and Selection policy and Workplace Health and Safety policy, help to maintain the firm's culture as responsible and ethical. During the reporting period, a draft Modern Slavery Policy was prepared and is currently under review, with the view to publish and finalise this policy during the next reporting period.

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.

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 Australia 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. In addition, mandatory training on modern slavery was rolled out to all staff during the reporting period. The purpose of this training was 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, all new staff joining RSM Australia have been required to complete this modern slavery training upon commencement. Modern slavery training now forms a part of RSM Australia's standard onboarding process.

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 reporting period included a review of supply chains identified in the previous reporting period and a review of the risks of modern slavery occurring.

In addition, during the reporting period RSM Australia undertook a review of our cleaning suppliers, due to the higher risk nature of the industry. The cleaning suppliers are external companies who are responsible for cleaning the RSM Australia offices. The purpose of this review was to assess the risk of modern slavery occurring within each of our cleaning suppliers. No cleaning suppliers were flagged as having concerns of modern slavery occurring within their businesses.

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

If any instances of modern slavery were 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.

An online modern slavery supplier onboarding questionnaire and process was created during the reporting period. This questionnaire and online process is currently under review, with the view of being finalised and implemented as part of the next reporting period.



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



# 5 Assessing the effectiveness of actions to assess and address modern slavery risks

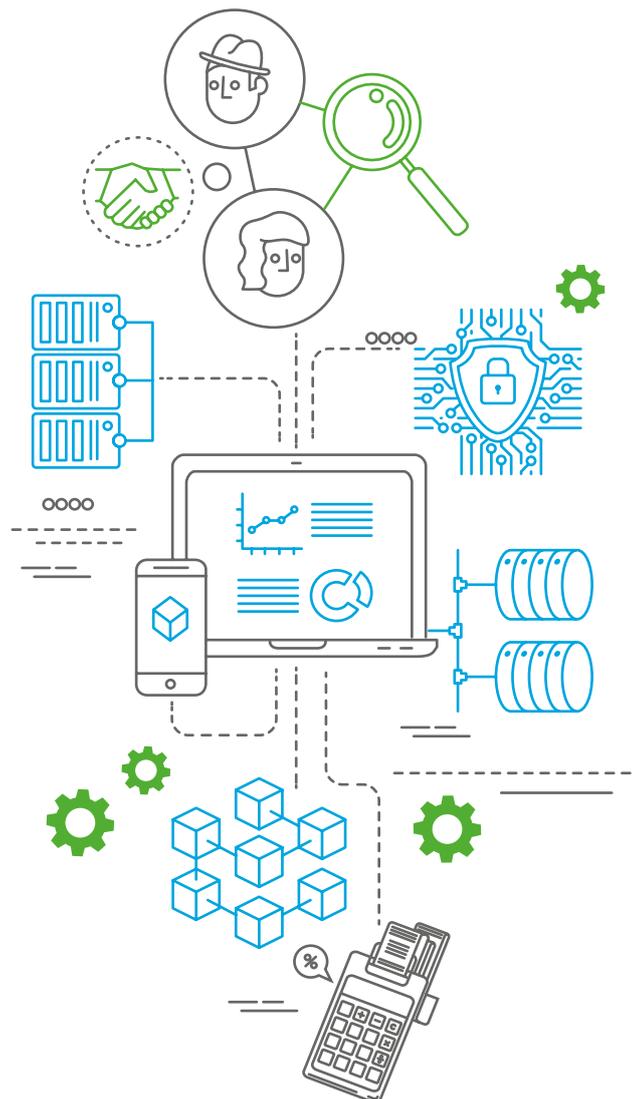
RSM Australia has controls and processes in place to assess the effectiveness of its actions in its operations and supply chains. For example, a modern slavery working group was established within the firm during financial year 2019/2020. During financial year 2020/2021, this group has continued to be active. This group reviews actions taken to assess and address modern slavery risks and also checks the firm's risk assessment processes on a regular basis. Any modern slavery related feedback from the firm is directed to this group, where any feedback is considered and a plan for relevant action items is determined. This group works with other areas of the firm and suppliers as relevant, to check they appropriately manage modern slavery risks.

Assessing risks of modern slavery within suppliers who may be considered as higher risk, including cleaning suppliers, has continued to be a focus of the 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.

Researching best 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.

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.

Number of employees completing behavioural training, including modern slavery training, has continued to be monitored and further refresher training will be planned, to help ensure compliance with the firm's behavioural expectations.





For questions relating to this statement please contact:

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## 6 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 are equally able to appropriately identify, assess and address modern slavery risks.

## 7 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 2021/2022, include:

- Ongoing monitoring of its suppliers, its suppliers' Modern Slavery Statements and the actions they are taking to reduce their own risks.
- Implement and complete the review of its online modern slavery supplier onboarding questionnaire and process.
- Plan future refresher training on the risks of modern slavery to its staff.
- Review and update internal policies to ensure they reflect emerging best practice.
- Finalise and publish the review of RSM Australia's Modern Slavery Policy.
- Continued communication with the RSM Australia senior leadership group to reinforce expectations and report any non-compliance issues.
- RSM Australia's modern slavery working group to continue its activities and meet on a regular basis to ensure RSM Australia's compliance with the Act.

RSM Australia will publish a further Modern Slavery Statement for the next reporting period, financial year ending 30 June 2022.

*Jamie O'Rourke*

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**Jamie O'Rourke**  
National Chairman  
RSM Australia  
10 December 2021

***This Modern Slavery Statement was approved on 8 December 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.***

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