

RSM UK Slavery and Human Trafficking Statement – 2024

We¹ recognise as a firm that slavery and human trafficking (modern slavery) is a serious issue within our society. We are committed to acting ethically and with integrity in our business dealing and relationships and to the fair and humane treatment of people both in our business and in our supply chains.

We are a leading provider of audit, tax and consulting services throughout the United Kingdom and Ireland, and a member of the RSM network². Both countries in which we primarily operate are lower risk jurisdictions where slavery and human trafficking is prohibited and criminalised by law. Our services are provided via separate companies and limited liability partnerships within our group, most of which are externally regulated and subject to substantial independent oversight.

Our suppliers include office supplies and services, IT and software services, professional services such as recruitment, legal and insurance, and travel agents and hotels.

The majority of this statement covers our business in the United Kingdom. The section headed 'RSM Ireland' below separately covers our business in Ireland, which for context represents under 4% of our business by revenue and only joined our group in November 2023.

This statement sets out the steps that we have taken in respect of the financial year ended 31 March 2024 to contribute towards ensuring that modern slavery is not taking place in any of our supply chains or in any part of our own business.

1. **Values** - Our [Conduct and Culture Statement](#) aims to ensure that our people³ uphold our values and ethical standards and comply with professional regulations and applicable laws. We are a participant in the UN Global Compact, committing us to

¹ 'We' and 'our' in this statement refers to the UK group of companies and limited liability partnerships trading as RSM. RSM UK Holdings Limited, the ultimate operational holding company of this group of companies, makes this statement on behalf of itself and its (direct and indirect) subsidiaries (including RSM Ireland Business Advisory Limited, our Irish registered subsidiary).

² RSM is the trading name used by the members of the RSM network. Each member of the RSM network is an independent accounting and consulting firm which practises in its own right. The RSM network is not itself a separate legal entity of any description in any jurisdiction. The RSM network is administered by RSM International Limited, a company registered in England and Wales (company number 4040598) whose registered office is at 50 Cannon Street, London, EC4N 6JJ.

³ When we say 'our people' in this statement we generally mean our partners and consultants in the UK business as well as our employees in the UK. Note that a few consultants may not have access to RSM systems and so may not, for example, receive all the training the rest of our people receive. The section on RSM Ireland sets out to what extent this statement applies to that part of our business.

ensuring that our policies and values align with the ten principles of the UN Global Compact with respect to human rights, labour, environment and anti-corruption.

2. **Training** - We run a substantial training programme, covering how to recognise indicators of modern slavery (including the ILO indicators) in day-to-day work (especially when dealing with clients and suppliers), as well as how to report any concerns. This training is being incorporated as part of wider training on 'reporting suspicions' covering modern slavery, anti-bribery and anti-money laundering, to maximise effectiveness. It is given to all new joiners and is periodically made mandatory for all our people as refresher training (with the latest roll-out happening shortly after the date of this statement).
3. **Our workforce** - The majority of our people have professional qualifications and are members of professional bodies. All our employees have formal employment contracts (which they can terminate). We are accredited by the Real Living Wage Foundation in the UK as a 'Living Wage Employer'.⁴ We aim to provide a safe and supportive working environment, including through our network of over 150 wellbeing ambassadors and a variety of employee wellbeing initiatives.
4. **Recruitment** - We take a robust approach to recruitment, including conducting 'eligibility to work' checks for all employees. We only use reputable recruitment agencies, all of whom have had to confirm that they will not engage in any practice that would be considered modern slavery under UK law.
5. **Our suppliers** - We take a number of steps in relation to our suppliers:
 - a. As part of our 'Living Wage Employer' accreditation, we ensure that our suppliers who provide on-site services in our UK offices pay their employees the Real Living Wage.
 - b. Our people have responsibility to make sure that expenses are only incurred with reputable suppliers who engage in ethical business practices.
 - c. Following our annual supplier review, we can confirm that more than 90% of our major external suppliers either have a modern slavery statement or provided specific confirmation of their continuing commitment not to engage in practices that could amount to modern slavery.⁵

⁴ A recent development, we received this accreditation in August 2023.

⁵ By 'major external suppliers' we mean those suppliers outside the RSM UK group or RSM international network with whom the core UK group spent at least £100,000 during the financial year to 31 March 2024 (disregarding UK regulatory and other UK public bodies, and individuals), to the extent we continued to have a supply relationship with them at the time of the review. In addition, this year we added to this list suppliers with whom we spent between £50,000 and £100,000 who operate in a high risk sector (identified as being hotels, catering, office fitouts, cleaning and property maintenance).

- d. Our [Supplier Code of Conduct](#) sets out our expectations of our suppliers in several areas including modern slavery, and has been made available on our website. We have been conducting a separate process of engaging with our largest suppliers, asking each of them to either acknowledge our Code or provide alternative assurance that they comply with it, and as of the date of this statement 52 have done so.⁶
- 6. **Raising concerns** - We operate a Speak Up policy and platform (with an accompanying training programme), which enables our people to raise concerns in relation to unethical behaviour or improper conduct (and modern slavery is explicitly identified in this context).⁷ Our people are openly encouraged to report any concerns about modern slavery, including any involving clients or suppliers.

RSM Ireland

RSM Ireland has a separate [Values Statement](#), with which our people in Ireland must comply, which emphasises respect, integrity and acting responsibly.⁸ RSM Ireland is a separate participant in the UN Global Compact. The majority of our people in Ireland have professional qualifications and are members of professional bodies. They all have formal employment contracts (which they can terminate), and are all paid above the Irish minimum wage, as well as receiving other fixed and flexible benefits. RSM Ireland also operates a whistleblowing policy for our people in Ireland to raise concerns in relation to unethical behaviour or improper conduct.

⁶ This is a separate exercise which goes wider than modern slavery issues and so the triage of suppliers is done on a slightly different (and ongoing) basis compared with the annual 'snapshot' supplier review described in paragraph 5(c). We originally targeted our suppliers who together account for more than 50% of our total overhead spend, and recently have begun expanding this to suppliers who together account for more than 80% of our total overhead spend.

⁷ A recent development, this policy replaced a previously applicable whistleblowing policy in May 2024.

⁸ In this section, RSM Ireland refers to RSM Ireland Business Advisory Limited, and 'people' refers to the partners and other employees of this company.

We continue to assess the risk of slavery and human trafficking in our own business and our supply chain and will publish a further statement following the current financial year (ending 31 March 2025).

This group statement constitutes RSM UK's slavery and human trafficking statement in respect of the financial year ended 31 March 2024. It is made pursuant to s.54(1) of the Modern Slavery Act 2015 and covers RSM UK Holdings Limited and the following RSM UK entities which are required to publish statements under the Act:

Arrandco Investments Limited

RSM UK Audit LLP

RSM UK Corporate Finance LLP

RSM UK Group LLP

RSM UK Management Limited

RSM UK NLT Limited

RSM UK Risk Assurance Services LLP

RSM UK Tax and Accounting Limited

RSM UK Tax and Advisory Services LLP

This statement has been approved by the Board of RSM UK Holdings Limited on 21 August 2024 and the original has been signed by a director, Andrew Westbrook, on 23 September 2024.