



RSM UK

Holdings Limited

**SLAVERY AND HUMAN
TRAFFICKING STATEMENT**

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.

This statement sets out the steps that we have taken in respect of the financial year ended 31 March 2022 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.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN

We are a leading provider of audit, tax and consulting services throughout the UK, and a member of the RSM network². Our services are provided via separate companies and limited liability partnerships within our group, most of which are externally regulated.

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

POLICIES

Our key values include respect for others and acting with integrity. We expect this of all our people³. More information about our values can be found on our website [here](#).

The RSM UK code of conduct provides the ethical framework for the decisions we make, both individually and collectively. It aims to ensure that our people uphold our values and ethical standards, and comply with professional regulations and applicable laws. The code reinforces our commitment to the fair and humane treatment of people in our business and our supply chains, and helps maintain our reputation as an ethical and responsible firm. In particular:

1. Recruitment – we take a robust approach to recruitment, including conducting 'eligibility to work in the UK' checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. 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.
2. Whistleblowing – our policies ensure that all our people know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal. Our people are openly encouraged to report any concerns about modern slavery, including any involving clients or suppliers.
3. Health and safety – we aim to ensure that we provide a safe working environment for those working on our premises. The health and wellbeing of our staff is important to us, and the firm supports this via a number of employee wellbeing initiatives.
4. Procurement – our policies impose personal responsibility on our people to make sure that expenses are only incurred with reputable suppliers who engage in ethical business practices.
5. Anti-Bribery – we have a zero tolerance stance on bribery and all our people receive training to recognise and avoid bribery. We also commit to take appropriate and firm action against any individual involved in bribery. This helps avoid poor procurement practices and the use of unethical suppliers.

TRAINING

In the financial year ending 31 March 2022, mandatory refresher training on modern slavery was rolled out to all our people. The training covered how to recognise indicators of modern slavery and human trafficking (including the ILO indicators) in day-to-day work, especially when dealing with clients and suppliers, as well as how to report any concerns. All new joiners are also required to complete this training.

¹ 'We' and 'our' in this statement refers to the UK group of companies and limited liability partnerships trading as RSM. This statement is made by RSM UK Holdings Limited, our ultimate holding company, on behalf of itself and its subsidiaries.

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 'people' in this statement we generally mean our partners and consultants as well as our employees. 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.

RISK ASSESSMENT AND DUE DILIGENCE PROCESS

We conduct business predominantly in the UK, a lower risk jurisdiction where slavery and human trafficking is prohibited and criminalised by law⁴.

Our business is providing professional advice, regarded as a low risk sector. In providing our services, we rely on a stable, well-trained workforce, the majority of whom have professional qualifications and are members of professional bodies. All our employees have formal employment contracts, which they can terminate. They are all paid at least the national living wage as well as receiving other fixed and flexible benefits. We are also a regulated business and are subject to substantial independent oversight. We are satisfied that the risk of slavery or human trafficking occurring in our own business is low.

We have again reviewed our major external suppliers⁵, with a view to obtaining confirmation as to their continuing commitment to compliance with tackling modern slavery. We reviewed the published slavery and human trafficking statements of those major suppliers that had produced one. We also wrote to those major suppliers for whom we had not identified such a published statement, seeking specific confirmation of their continuing commitment not to engage in practices that could amount to modern slavery. Over 90% of our major external suppliers either had such a statement or provided such confirmation. The 2022 major supplier review has provided a significant degree of comfort that the risk of modern slavery occurring in RSM UK's supply chain remains low.

RECENT DEVELOPMENTS AND FUTURE STEPS

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 2023).

We have had a renewed focus on modern slavery issues at meetings of our Environment Operations Group and Corporate Responsibility committees, both of which are chaired by our Executive Chairman.

Since the date of our previous statement we have had a new Supplier Code of Conduct approved by the National Leadership Team. This Supplier Code sets out our expectations of our suppliers in several areas including modern slavery, and has been made available on our website [here](#). In summary, its key requirements in relation to modern slavery are that our suppliers:

- engage their staff on written terms which comply with law, explicitly state their working hours and compensation and contain a right for them to terminate;
- pay all remuneration owed to their staff without delay and in accordance with law;
- take a robust and proactive approach to recruitment, and to only use reputable recruitment agencies;
- provide training to their staff on modern slavery issues;
- have policies to encourage their staff to raise concerns without fear of reprisal; and
- have policies to make sure that the suppliers they use are reputable and engage in ethical business practices.

Throughout the latter half of 2022, we will be engaging on the Supplier Code with our top 30 suppliers (who between them account for around half of our total spend on suppliers across the RSM UK group). We will be asking each of them to either acknowledge our Supplier Code or provide alternative assurance that they comply with it. Following this process, we will review the implementation of our Supplier Code to ensure it is meeting our requirements, and then consider expanding the scope to cover a wider range of our key suppliers.

⁴ <https://www.globallslaveryindex.org/2019/data/country-data/united-kingdom/>

⁵ This means those suppliers outside the RSM UK group or RSM international network with whom we spent at least £100,000 during the financial year to 31 March 2022 (disregarding UK regulatory and other UK public bodies), to the extent we continued to have a relationship with them at the time of the review.

This group statement constitutes RSM UK's slavery and human trafficking statement in respect of the financial year ended 31 March 2022. It is made pursuant to s.54(1) of the Modern Slavery Act 2015 and covers 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 Holdings Limited
RSM UK Management 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, the ultimate holding company of RSM UK, on 22 August 2022 and the original has been signed by a director, Andrew Westbrook, on 23 September 2022.



rsmuk.com

The UK group of companies and LLPs trading as RSM is a member of the RSM network. 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 each of 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. The brand and trademark RSM and other intellectual property rights used by members of the network are owned by RSM International Association, an association governed by article 60 et seq of the Civil Code of Switzerland whose seat is in Zug.

RSM UK Corporate Finance LLP, RSM UK Restructuring Advisory LLP, RSM UK Risk Assurance Services LLP, RSM UK Tax and Advisory Services LLP, RSM UK Audit LLP, RSM UK Consulting LLP, RSM Northern Ireland (UK) Limited and RSM UK Tax and Accounting Limited are not authorised under the Financial Services and Markets Act 2000 but we are able in certain circumstances to offer a limited range of investment services because we are licensed by the Institute of Chartered Accountants in England and Wales. We can provide these investment services if they are an incidental part of the professional services we have been engaged to provide. RSM UK Legal LLP is authorised and regulated by the Solicitors Regulation Authority, reference number 626317, to undertake reserved and non-reserved legal activities. It is not authorised under the Financial Services and Markets Act 2000 but is able in certain circumstances to offer a limited range of investment services because it is authorised and regulated by the Solicitors Regulation Authority and may provide investment services if they are an incidental part of the professional services that it has been engaged to provide. Whilst every effort has been made to ensure accuracy, information contained in this communication may not be comprehensive and recipients should not act upon it without seeking professional advice.