

## CONSUMER PROTECTION CODE

Seven key areas of focus  
for all in scope firms

# Introduction

As Ireland continues to mature as a leading European hub for financial services and payments innovation, the Consumer Protection Code (CPC) remains a vital safeguard designed to ensure firms act in the best interests of consumers. Originally developed to promote transparency, fairness, and accountability across the financial sector, the CPC has become increasingly essential as digitalisation accelerates, new business models proliferate, and consumer expectations evolve. With the one-year implementation period for the updated CPC now officially concluded, the effective date 24 March 2026 is upon us, marking a significant regulatory milestone for all in scope firms.

While the foundational principles of the previous Code continue to apply, the enhanced framework introduces important updates across various areas of company's operations and also highlights **seven key areas of focus** (see figure 1 below), each reflecting the Central Bank of Ireland's focus on modern, evidence-based consumer protection. As mentioned above there are several additional refinements within the updated Code, however this publication will concentrate specifically on the key focus areas of change highlighting the *do's* and *don'ts* as well as providing insights into what companies should focus on in order to adopt these changes successfully.

It is equally important to note that the **scope of the CPC has also evolved** (see change in scope section), capturing a broader set of activities and firm types than before, and requiring organisations to reassess their obligations under this expanded regulatory perimeter.

**Figure 1: Seven key areas of focus**

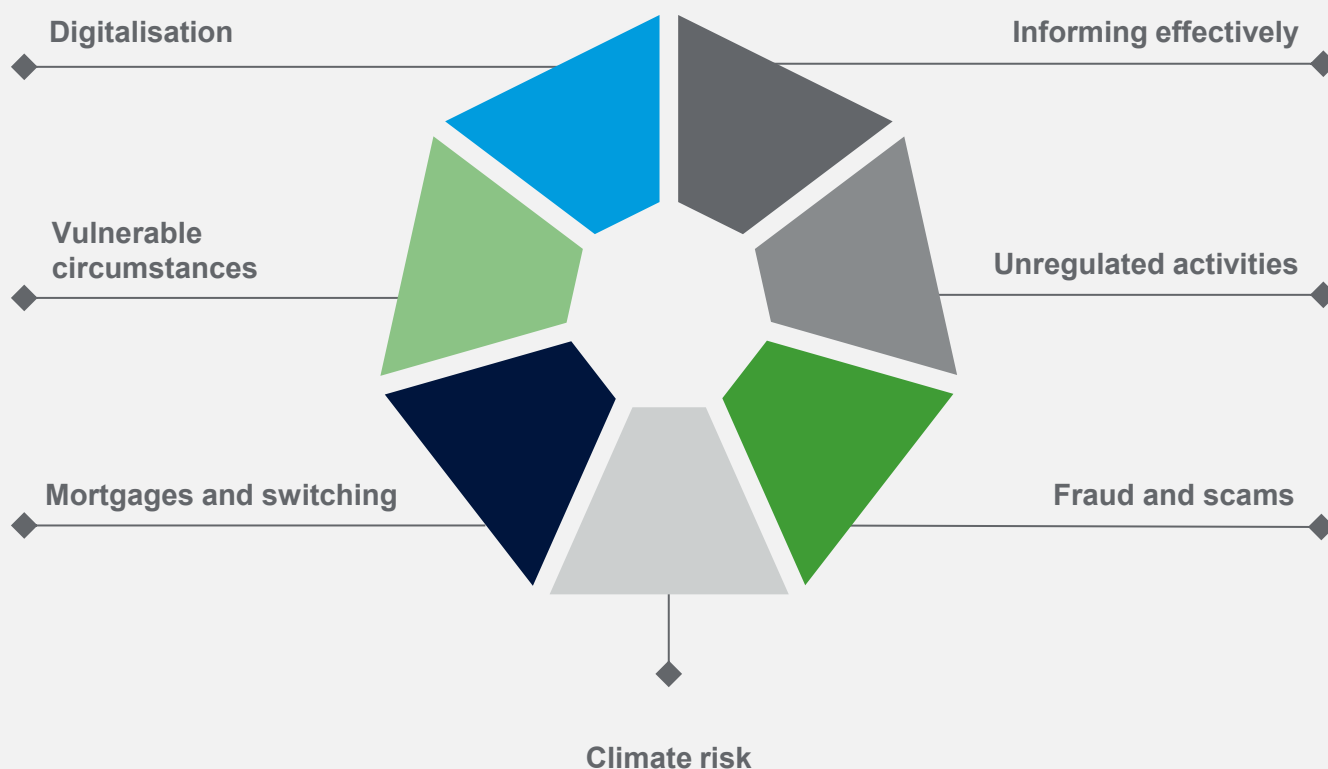


Figure 1 - watch overview video [here](#).

# Changes in scope

Area of scope	CPC 2012 (old code)	CPC 2025 (new code)
<b>1</b> Definition of 'Consumer'	Applied to individuals and small businesses with turnover ≤ €3m.	Turnover threshold for SMEs increased to ≤ €5m, significantly expanding the number of businesses protected.
<b>2</b> Application to Irish firms	Applied to <b>Irish regulated entities</b> providing regulated services.	Continues to apply to all <b>Irish financial service providers</b> authorised, licensed or registered by the CBI under updated regulations.
<b>3</b> Application to European Economic Area (EEA) firms	Less explicit framework regarding cross border EEA firms.	Explicitly applies to <b>EEA firms providing regulated services in Ireland</b> , whether on a branch or cross border basis.
<b>4</b> Excluded firms / services	Exclusions existed but were less clearly delineated.	The CPC 2025 <b>does not apply</b> to: MiFID services (except limited cases), reinsurance businesses, credit unions, or services provided to persons outside Ireland.
<b>5</b> Consolidation of other regulations	Separate codes and rulebooks (e.g., CCMA, Licensed Moneylenders Regulations, Insurance Requirements).	CPC 2025 consolidates and incorporates updated versions of: Mortgage Arrears Code, Insurance Requirements, Moneylender Regulations - bringing them under one cross-sectoral framework.
<b>6</b> Regulatory structure	Single 'Code' document with general and sectoral provisions.	Two-part regulation structure: <b>Standards for Business Regulations</b> and <b>Consumer Protection Regulations</b> , expanding obligations and clarity across sectors.
<b>7</b> Unregulated activities interaction	Previous code warned against consumer confusion but did not set out detailed rules.	New explicit obligations requiring firms to ensure consumers <b>cannot misunderstand unregulated products as regulated</b> , especially in mixed activity firms.
<b>8</b> Sectoral coverage	Covered banking, credit, insurance, investment with limited digital era requirements.	Expanded cross sectoral requirements, including climate risk, digitalisation, fraud and scams, vulnerability, and improved mortgage switching disclosures.

## Deeper dive

What companies should already have in place with regards to the seven key areas of focus

# 1 Digitalisation

The updated Code still treats all technologies the same, but it now adds some basic rules for firms that use digital tools. In simple terms:

- If a company uses apps, websites, or other digital tech, it must make sure these tools are built with the customer's needs in mind - not just the company's.
- Any information given through digital channels must be clear, easy to understand, and genuinely helpful.
- Digital products or features cannot be designed in a way that takes advantage of customers' habits or weaknesses. Companies should not use clever design tricks to push people into choices that might harm them.
- Apps and platforms must be simple to use, properly tested, and designed so that they work fairly and consistently for everyone.

[Digitalisation | Guidance on Consumer Protection Code 2025 | Central Bank of Ireland.](#)

## Key changes introduced by the new Code include:

- **Pause' requirement simplified:** Instead of a mandatory pause statement on digital platforms, firms must now simply give consumers enough time to consider before entering a contract.
- **Flexibility in testing algorithms:** The strict rules on how often firms must test digital programmes and algorithms have been removed, giving firms more discretion.
- **Product filtering rule removed:** Firms no longer must offer product filtering when three or more products are shown; instead, the CBI has provided general guidance on digital filtering.
- **Digital consent allowed:** Consumers can now give consent digitally, not only in traditional written form.
- **Enhanced digital channel expectations:** Firms operating solely through digital channels must prioritise customer interests by designing user friendly platforms and offering quick support, especially when systems fail or fraud is suspected.

## 2 Informing effectively

The updated Consumer Protection Code now expects companies to do more than just hand over documents or meet minimum disclosure rules. Instead, firms must focus on making sure customers actually understand the information they receive. In practical terms, this means:

- Companies must explain things clearly and simply, without confusing jargon or technical terms.
- All information must be accurate, up to date, and easy for customers to read.
- Firms must share information at the right time, not too late for customers to act on it.
- Important details must be highlighted, not hidden in the fine print.

Overall, the goal is to move away from ‘tick the box’ disclosures and toward genuinely helping customers make informed decisions.

**General guidance:** [Informing Effectively | Guidance on Consumer Protection Code 2025 | Central Bank of Ireland](#)

### Key changes introduced by the new Code include:

- **Changes to terms of business:** Only customers who are actually affected by updates must be told - and firms must notify them at least five days before the changes take effect.
- **Clarification on unsolicited contact:** The limit of three unsolicited arrears contacts per month does not include unanswered phone calls.
- **Stronger support for borrowers in arrears:** Firms must clearly warn customers after three missed payments, as well as the consequences of arrears and the impact of non cooperation on insolvency agreements.

## 3 Regulated vs unregulated activities

If a company offers both regulated and unregulated services, it must put proper systems and processes in place to make it very clear to customers which services are regulated, and which are not:

Category	What it means	Why it matters under the CPC
Regulated activities	These are financial services that are officially supervised by the Central Bank of Ireland. Firms must follow strict consumer-protection rules.	These rules must follow all CPC 2025 rules on fairness, transparency, clear communication, digital standards, and protecting customers’ interests.
Unregulated activities	These are services the Central Bank does not supervise. They do not come with the same protections or oversight as regulated services.	Firms must clearly tell customers that these services are not covered by Central Bank rules, so customers aren’t misled into thinking they have protections they do not. Firms must take every possible measure to avoid confusion.  <a href="#">2.3 Unregulated Activities   Guidance on Consumer Protection Code 2025   Central Bank of Ireland</a>

Mandatory warning (must appear on any written communication about unregulated activities). The CPC requires that any written communication to a consumer about an unregulated activity must include this exact statement:

*“Warning: The provision of this service does not require licensing, registration or authorisation by the Central Bank of Ireland, and as a result is not covered by Central Bank of Ireland rules designed to protect consumers or by a statutory compensation scheme.”*

## 4 Frauds and scams

The CPC 2025 requires firms to actively protect customers from fraud, scams and financial abuse, notify them quickly if any digital fraud is linked to the firm, and offer fast support to affected consumers. Firms can notify customers through email, SMS, app alerts, secure messages, phone calls, or letters - as long as the method is effective and reaches the customer promptly

The CBI website provides assistance in this matter [Can you spot a scam artist | Central Bank of Ireland](#) and differentiates between: Investment scams, Loan scams, phishing, smishing, and vishing scams, fake comparison website scams, Deepfake scams and fraudulent recovery schemes. Companies can direct their customers to the link above to deepen their knowledge and provide a layer of safeguarding through awareness. The CBI also recommends providing training to staff members to raise awareness and prevent financial abuse.

[2.4 Financial Abuse | Guidance on Consumer Protection Code 2025 | Central Bank of Ireland.](#)

## 5 Climate risk

As firms prepare to meet the modernised expectations of the Consumer Protection Code 2025, the final key focus area focuses on strengthening how sustainability-related information and climate-linked product features are communicated to consumers. While the Code does not create a standalone climate-risk regime, it embeds powerful safeguards designed to prevent greenwashing, ensure sustainability claims are transparent and evidence-based, and make sure consumer preferences in this space are properly understood and reflected in suitability assessments. These measures collectively aim to support a more trustworthy, informed, and responsible approach to sustainability across financial services.

Read more here: [Central Bank updates consumer protection code.](#)

Sustainability	Advertising and Communications	Transparency and Understandability
Firms must gather consumers' <b>sustainability preferences</b> as part of knowing the consumer and suitability assessments	Firms must not make <b>misleading, exaggerated, or unsubstantiated sustainability claims</b> - including claims about a firm's sustainability reputation or a product's environmental impact	Sustainability information must be <b>clear, not disguised</b> , and presented in a way the average consumer can understand.
Suitability statements must show how the recommended product <b>aligns with sustainability preferences</b>	All sustainability-related statements must be <b>substantiated</b> , with sources, dates, and assumptions clearly referenced	Product materials must be <b>designed and tested</b> to enable consumer understanding, including sustainability-related content
Sustainability preferences must be incorporated into the firm's approach to <b>suitability, product recommendation, and customer outcomes.</b>	Firms must avoid ambiguity or omission when referring to <b>sustainability features</b> in ads or product promotions.	Digital platforms must ensure sustainability information is <b>accessible and easy to navigate</b> , without manipulative defaults

## 6 Mortgages and switching

The revised mortgage and switching requirements in the Consumer Protection Code 2025 call for firms to deliver clearer, more accessible information that makes it easier for consumers to understand their mortgage options, compare offers, and move between lenders without unnecessary delays. Organisations will need to streamline internal processes, particularly around providing key documents such as title deeds, and ensure that digital and offline customer journeys support effective decision making. Importantly, the updated Code places heightened emphasis on identifying and supporting customers in vulnerable circumstances, requiring firms to adopt more proactive, consistent safeguards. Together, these measures aim to create a more transparent, efficient, and equitable mortgage experience - with firms playing a central role in delivering better outcomes.

### A comparative view on mortgage and switching changes from 2012 to 2025:

Area	Before: CPC 2012	After: CPC 2025
<b>Mortgage switching requirements</b>	Basic switching disclosures were required, but processes were slower, and there was <b>no defined timeline for providing title deeds</b> , which often caused delays.	Firms must meet <b>new, detailed disclosure requirements</b> explaining switching options and the <b>impact of incentives on total cost of credit</b> . Mandatory <b>10-day title-deeds provision</b> to accelerate switching.
<b>Communication standards</b>	Firms could comply by simply <b>disclosing information</b> , even if customers didn't fully understand it. Requirements were technologically neutral.	Shift to <b>"informing effectively"</b> , ensuring customers genuinely understand mortgage terms, switching options, and costs - especially in digital environments.
<b>Regulation of mortgage conduct</b>	Mortgage conduct rules were spread across the CPC 2012 and separate documents like the Code of Conduct on Mortgage Arrears.	CPC 2025 <b>integrates updated versions</b> of mortgage-related regulations into a unified framework. Stronger obligation to <b>secure customers' interests</b> and proactively ensure good outcomes.
<b>Digitalisation of mortgage processes</b>	Digital delivery of mortgages was not explicitly addressed; the Code was written before widespread digital banking.	Mortgage providers must ensure <b>digital processes are customer-focused</b> , clear, and safe. Guidance covers digital communications, online journeys, and information clarity.
<b>Support for vulnerable borrowers</b>	Narrower definition of vulnerability with lighter expectations for firms.	Updated, broader definition of vulnerability. Firms must actively identify and support vulnerable mortgage customers and may need to involve a <b>trusted contact</b> .
<b>Transparency of product features and risks</b>	Firms had general obligations to explain product features but with less practical guidance.	Enhanced clarity requirements, including clear communication on risks, switching implications, and cost structure. Emphasises <b>effective informing</b> , not just disclosure.

### Key areas of note for mortgages and switching:

- **Clear € savings estimates:** Lenders must give customers a simple, personalised euro amount showing how much they could save with each refinancing option - making comparisons easier and more transparent.
- **Reminder of switching options:** Between four to eight weeks after first notifying a customer of refinancing options, lenders must send a reminder, so customers don't miss out on potential savings.
- **Direct access to independent mortgage calculators:** If firms use their own mortgage calculators, they must also point customers to the CCPC's independent mortgage calculator, helping people check repayments or borrowing capacity with unbiased tools.
- **Better guidance for lifetime mortgages:** Firms must clearly inform customers that they should seek both legal and financial advice before entering a lifetime mortgage, ensuring people fully understand long term impacts.
- **Stronger support for customers facing financial difficulty:** Before classifying a borrower as 'not co operating' firms must contact the customer and advise them about independent supports - now explicitly including a Personal Insolvency Practitioner (PIP) - and direct them to a PIP when completing a Standard financial statement.

[Mortgage Switching | What is the Consumer Protection Code 2025 and how can it protect me | Central Bank of Ireland.](#)

## 7 Vulnerable circumstances

The updated Consumer Protection Code places a much stronger focus on how firms identify, understand, and support consumers who may be in vulnerable circumstances. Vulnerability can arise from personal challenges, financial pressures, life events, or difficulties navigating complex information - and it may be temporary or long term. The Code expects firms to build this awareness into their culture, customer interactions, and internal processes so they can recognise signs of vulnerability early and respond with appropriate supports. By strengthening staff training, adapting communication and digital channels, and proactively safeguarding customers at higher risk of harm, firms should ensure that vulnerable consumers receive the clarity, protection, and assistance they need to make informed financial decisions.

### Key areas of note related to vulnerable circumstances included in the Code:

- **Vulnerability is common and can change:** People can become vulnerable at different times due to health, money worries, or life events. Firms need to recognise that anyone can be vulnerable at some point.
- **Build vulnerability awareness into your culture:** Supporting vulnerable customers shouldn't just happen at the front desk - it must be part of how the whole organisation thinks, designs, and delivers services.
- **Design products and processes that don't put people at risk:** Products, forms, digital journeys, and communications should be designed so they don't confuse, disadvantage, or overwhelm customers who may need extra help.
- **Give extra help when it's needed:** If a customer seems unsure, confused, or struggling - even if they're not formally 'labelled' vulnerable - firms must step in with additional support to help them make informed decisions.
- **Train all staff to spot and support vulnerability:** Everyone involved in product design, sales, marketing, service, and oversight must be trained to recognise vulnerability and know how to respond appropriately.
- **Protect customers from fraud & financial abuse:** Firms must have clear internal procedures so staff can quickly raise concerns if they suspect scams, manipulation, or financial abuse - especially important for vulnerable customers.
- **Record important information safely and sensitively:** When customers share information about their circumstances, firms should record it appropriately, keep it up to date, and use it only to help support them - always respecting privacy and data protection laws.
- **Offer a trusted contact option (\*):** Customers should be able to nominate someone the firm can reach out to if they are worried about communication issues or potential financial abuse. This person doesn't make decisions - they just help keep the customer safe.

(\*) The regulations for appointing a Trusted Contact Person have been updated to include a requirement that, if a firm is aware a decision-making representative has been appointed under the Assisted Decision Making (Capacity) Act ADMA, this representative takes precedence over the Trusted Contact Person.

**Link to guidance:** [Vulnerable Circumstances | Guidance on Consumer Protection Code 2025 | Central Bank of Ireland.](#)

# Comparing the Irish Consumer Protection Code against the UK Consumer Duty

The Central Bank of Ireland's CPC 2025 represents a clear shift to an outcomes focused regime that closely mirrors the FCA's Consumer Duty. Both frameworks move firms beyond disclosure based compliance toward evidencing real consumer understanding, fair value, and good outcomes across the customer journey. They share common themes: stronger expectations around vulnerability, scrutiny of digital and behavioural design, enhanced governance and Board accountability, and MI that genuinely supports oversight. As Irish firms operationalize, the UK experience shows that this shift is more than a regulatory update—it is a cultural transformation that requires embedding consumer centric thinking into product design, communications, monitoring, and strategic decision making from the outset.

# Early implementation challenges in the UK

When the UK Consumer Duty went live, many firms discovered they had focused too heavily on policies and frameworks rather than on evidence of customer outcomes. The FCA quickly increased expectations, requiring firms to prove customer understanding through communications testing, behavioural analytics, and journey level outcomes assessments. Early MI was often too generic, prompting regulators to demand decision useful data that clearly answered: “Are customers getting good outcomes?” Boards were expected to play a far more active role—challenging MI, seeking deeper insights, and documenting follow up actions. Firms that performed well embedded the Duty into culture, aligned accountability across the three lines of defence, and built strong evidence frameworks using both qualitative and quantitative insights. The lesson for Irish firms is clear: avoid treating CPC 2025 as a compliance exercise; prioritise evidence early, and ensure governance, MI, communications testing, and journey oversight are firmly embedded from the outset.

## How can Irish firms use this to their advantage?

<p><b>Prepare your board to confidently answer</b></p>	<ul style="list-style-type: none"> <li>▪ How you evidence that customers understand your products and communications?</li> <li>▪ What MI you use to monitor customer outcomes, and how often is it reviewed?</li> <li>▪ Where you are seeing early indicators of poor outcomes, and what actions you have taken?</li> <li>▪ How you identify and support customers in vulnerable circumstances?</li> <li>▪ How you ensure digital journeys are fair, transparent, and not misleading?</li> <li>▪ What governance structures oversees CPC compliance and customer outcomes?</li> <li>▪ How CPC risks are escalated, monitored, and tracked across the organisation?</li> <li>▪ How confident you are that your communications would stand up to regulatory scrutiny?</li> <li>▪ What independent assurance you have obtained over your CPC framework?</li> </ul>
<p><b>Assess your evidence frameworks</b></p>	<ul style="list-style-type: none"> <li>▪ Test customer communications to prove understanding (comprehension scores, readability, behavioural testing).</li> <li>▪ Analyse customer journeys – drop-off points, friction areas, error rates, time-to-complete steps, and behavioural patterns.</li> <li>▪ Use qualitative and quantitative MI answering: “Are customers achieving good outcomes?”</li> <li>▪ Monitor outcomes by customer cohort, including vulnerability, to identify where groups may be disadvantaged.</li> <li>▪ Ensure evidence is <b>decision-useful</b>, granular, and discussed at governance forums – not buried in activity-based reporting.</li> </ul>
<p><b>Avoid the following common pitfalls</b></p>	<ul style="list-style-type: none"> <li>▪ Treating the regime as a documentation or compliance update, rather than a cultural shift.</li> <li>▪ Overreliance on frameworks without supporting evidence of outcomes.</li> <li>▪ MI that is too broad, high level or backwards looking – not helpful for decision making.</li> <li>▪ Unclear ownership across the three lines of defence.</li> <li>▪ Inconsistent approaches to identifying and supporting customers in vulnerable circumstances.</li> <li>▪ Overlooking digital journey fairness, such as behavioural nudges or friction points.</li> <li>▪ Leaving Board involvement too late, resulting in weak challenge and weaker attestations.</li> </ul>
<p><b>Do the following immediately</b></p>	<ul style="list-style-type: none"> <li>▪ Conduct a CPC gap assessment against customer journeys and business model risks.</li> <li>▪ Review and test key customer communications, focusing on understanding than disclosure.</li> <li>▪ Evaluate MI frameworks and confirm they demonstrate outcomes, not activity.</li> <li>▪ Identify and map vulnerability touchpoints e.g. digital journeys and frontline interactions.</li> <li>▪ Review behavioural design (default options, click paths, prompts) to ensure fairness and avoid customer harm.</li> <li>▪ Strengthen governance and accountability, including Consumer Duty style oversight forums.</li> <li>▪ Start evidencing early – build a library of insights, testing results, and decisions that can support Board attestations.</li> </ul>

# How we can help

As firms work to meet the enhanced requirements of the Consumer Protection Code 2025 - including new obligations across digitalisation, informing effectively, vulnerability, sustainability, regulated-unregulated activity boundaries, mortgages, and fraud/scams - many will need practical support, clear interpretation, and independent assurance that their frameworks meet regulatory expectations. RSM Ireland supports organisations by providing targeted, high value services that help firms understand, implement, evidence, and maintain compliance with the updated Code.



## CPC gap analysis and readiness assessment

We help firms understand precisely where they stand and what actions are required.

### Our support includes:

- Mapping updated CPC 2025 requirements to your business model, product lines, customer journeys and operating structure.
- Identifying gaps in policies, controls, processes, training, digital interactions, and governance
- Prioritised action plans to guide firms through the results of efforts post implementation.



## Controls testing and process walkthroughs

We conduct independent testing to confirm whether CPC-related controls are designed appropriately and operating effectively.

### Our services include:

- Testing of operational, conduct, and customer-facing controls across the seven key focus areas
- Walkthroughs of customer journeys (digital and non-digital)
- Assessing governance, escalation processes, and decision-making documentation
- Evaluating the effectiveness of procedures put in place to address compliance.



## Digital platform walkthroughs and consumer-understanding reviews

While we do not provide IT development services, we do evaluate how digital platforms support CPC compliance.

This includes:

- Independent walkthroughs of websites, apps, onboarding flows, and key journeys
- Testing whether information is easy to find, understand, and act upon
- Assessing user friendliness, clarity, accessibility, and absence of manipulative design
- Reviewing how digital channels support vulnerable consumers and fraud prevention obligations
- Checking whether sustainability disclosures are presented transparently and without bias (no greenwashing)

# How we can help



## Process development and documentation support

Where firms require assistance building or strengthening CPC aligned processes, we can help design:

- Customer outcome focused workflows
- Digital and offline communication pathways
- Vulnerability escalation and support frameworks
- Fraud response and customer notification processes
- Process documentation, risk identification and control design/evaluation for processes relevant to the 2025 CPC updated regulations



## Advisory support on implementing the Code

We provide tailored advice on how your specific business model should adopt and embed the updated CPC 2025 requirements.

This includes:

- Practical interpretation of CPC rules and CBI guidance in the context of your firm's operations and products.
- Advice on designing fair, simple, and robust customer facing processes.
- Advise on compliance with requirements related to:
  - Digitalisation & customer understanding
  - Fraud and scam prevention obligations
  - Vulnerability identification & support models
  - Product understandability and clarity.



## Policy, procedure and website content review

The updated CPC places significant emphasis on clarity, transparency, accuracy and avoiding customer confusion - especially in digital channels and mixed regulated/unregulated environments.

We can support by:

- Reviewing internal and customer-facing policies for alignment with CPC 2025
- Assessing all written communications (Terms of Business, disclosures, arrears letters, warnings, sustainability claims, switching information, etc.)
- Reviewing digital content and website materials to ensure:
  - Plain-English clarity and effective informing
  - Compliance with mandatory warnings
  - Prevention of misleading or confusing content
  - Appropriate treatment of vulnerable consumers



## Staff and board training

RSM Ireland provides training tailored to different audiences:

- Board and Executive briefings on CPC changes and regulatory expectations.
- Staff training on: vulnerability awareness, clear communication and effective informing, distinguishing regulated vs unregulated services and fraud, scams, and financial abuse.

# The RSM team



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