

*Monika*

One of the  
RSM team



# RSM Poland Code of Conduct



How we live our  
Purpose and Values

Applicable to all employees of RSM  
Poland and cooperating companies



RSM Poland Code of Conduct serves as an important framework to help our employees and cooperating companies to understand what is expected of them and how to embody our Purpose and Values in their professional lives. It is not merely a set of guidelines, but more like a compass that directs our actions and decisions.

# Introduction

As a company seeking to instill confidence in a world of change, we are proud to introduce the RSM Poland Code of Conduct, a document that encapsulates the principles that guide all members of our organisation in their daily work. This document is more than just a set of rules - it is a reflection of who we are as a global organisation, and what we stand for.

At RSM Poland, we are committed to delivering on our Brand Promise – **The Power of Being Understood**. This promise extends beyond our relationships with clients to include every member of our team. With more than 300 employees in Poland, we can only be successful if everyone in the team understands what is expected of them and why.

This Code of Conduct helps us to remain true to the core principles and values as we continue to grow and evolve. It reinforces the importance of focusing on how we do business within the framework of professional standards, regulations and laws. It provides clarity on the behaviours we expect from all of our employees and associates.

We have made this Code of Conduct publicly available, reflecting our commitment to transparency and accountability. We hope that it will serve as a valuable resource for all our stakeholders, including prospective clients, employees, suppliers, regulators, and the wider public, as they engage with RSM Poland.



**Marcin KAWKA**

Head of Ethics and Independence  
RSM Poland



# Our Purpose and the important role of our Code of Conduct

At RSM Poland, we exist to instill confidence in a world of change. This is our Purpose, and acts as a guiding principle for every aspect of our business – from strategy and solutions to governance and behaviours. Our Purpose defines our approach towards our people, clients, services, and communities, and shapes the very essence of who we are.

Our Code of Conduct is a key enabler for delivering on our Purpose. It is a principle-based framework designed to guide us in our everyday professional actions and decisions. It delineates expectations for everyone who works under the RSM Poland umbrella, so that these expectations serve as a common denominator that helps us act responsibly and ethically.

We use the Code of Conduct as a tool for leadership and management decision making and for setting expectations towards our teams and cooperating companies. It is designed to complement our documentation, policies, and procedures, ensuring every RSM Poland team member, wherever they work, is guided by common principles.

# Our Values

Foundational to delivering on our Purpose are our Values. These Values are the principles that guide every decision we make, every action we take, and every interaction we have. They form the bedrock of our conduct, shaping our culture, and defining us as a global organisation.

## Respect and uncompromising integrity

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*We do the right thing, ensuring our actions speak louder than our words.*

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We act honestly and openly in all we do. We treat everyone fairly. We protect our clients and stakeholders trust by adhering to our regulatory and professional standards which are designed to achieve our objectivity and independence, where necessary, in our work.

## Excellence in all we do

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*We continuously focus on quality and strive to be the best in all we do, as individuals and collectively.*

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We aim for the best outcome at all times. Quality is key in our work and our actions. We ensure our work complies with all relevant standards.

## Succeeding together

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*We embrace inclusivity and Individuality and collaborate effectively to build strong Relationships based on deep understanding.*

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We choose to work together, recognising that teamwork amplifies our achievements and collaboration makes us stronger.

## Impactful innovation

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*We welcome change and put insight and technology to work, making a real difference for our clients and our people.*

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We encourage inventive thinking and recognise this leads to meaningful change.

## Acting responsibly

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*We build a better future by demonstrating a responsibility to our people, clients, communities, and planet.*

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We consider the broader consequences of our decisions. We think of the long-term impact.





*Anna*

One of the  
RSM team



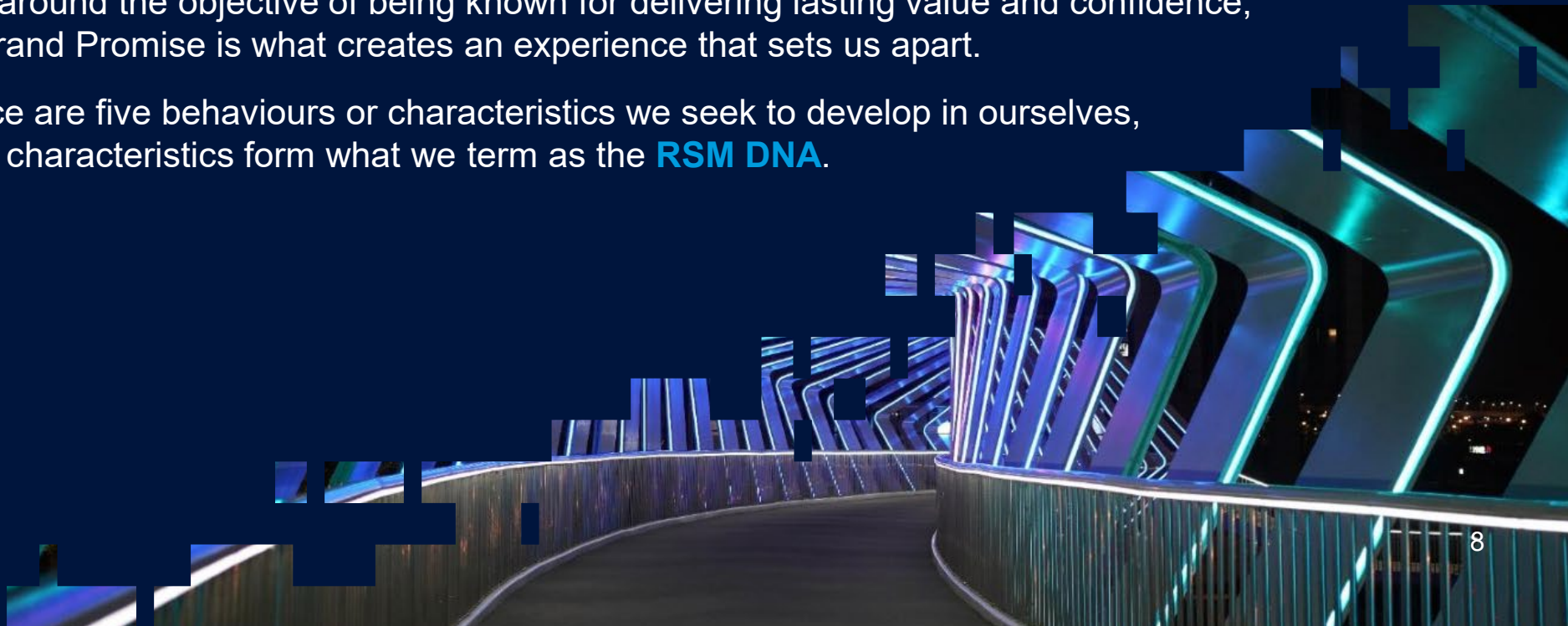
Our conduct is a reflection of the collective standards we uphold, with a personal commitment to act in a manner that aligns with our Values. This alignment helps us to adhere to and champion the integrity and reputation of RSM Poland in all our professional endeavours.

# How we deliver sets us apart

At RSM Poland, our Brand Promise, **The Power of Being Understood**, is a commitment to our clients and our people that when they work with RSM Poland, they are working with professionals who will take the time to truly understand them, bring tailored ideas and insights to their environment, and help them make confident decisions about their future.

With a strategic vision centred around the objective of being known for delivering lasting value and confidence, delivering on our Values and Brand Promise is what creates an experience that sets us apart.

Key to delivering this experience are five behaviours or characteristics we seek to develop in ourselves, and our colleagues. These five characteristics form what we term as the **RSM DNA**.





# The RSM DNA

## CARING

We build strong, long-term relationships by understanding others and their aspirations, and remaining empathetic to their unique challenges, needs and preferences.

## COURAGEOUS

We demonstrate strength and confidence in challenging traditional ways of thinking – having the courage to look forward and prepare for tomorrow.

## CURIOUS

We ask probing questions and seek diverse perspectives to gain understanding, challenge thinking and generate ideas.

## CRITICAL THINKING

We simplify complex information and concepts providing clarity, objectivity, and depth, and bring our best thinking and advice to help others make confident decisions.

## COLLABORATIVE

We believe that collaboration leads to better outcomes, and we seek and share perspectives to encourage innovative thinking to solve problems and enable others to seize opportunities.

# How we instill confidence

## We commit to the following:

### Trust

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Fairness and transparency are core to the development of strong client relationships based on trust. We provide clear, concise information about our services throughout the process of negotiation, contract engagement and the delivery of services.

We take concerns or complaints very seriously and have a formal process for resolving any issues in a prompt, efficient and effective manner.

We are dedicated to pre-emptively identifying and resolving conflicts of interest, evaluating and taking action to protect the interests of our clients, other RSM Member Firms, our global organisation, and indeed any other relevant parties or stakeholders.

Our work with colleagues and clients is guided by a set of fundamental requirements.



We understand that maintaining client confidentiality and the security of client information is critical to that trusted relationship. We protect information and data through carefully devised policies and processes, and ensuring information is only used for the purpose for which it was collected.

Clients can rely on us because we base our guidance and services on thorough research, deep expertise, and an unbiased perspective. Our dedication to these principles ensures that clients receive not only the highest quality of service but also insights and solutions tailored to their unique needs, built on a foundation of trust and reliability.

## Ethics

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Our ethical culture and target behaviours are focused on delivering a high quality service at all times for our clients and the communities in which we operate. RSM's Ethics and Independence Policy helps us comply with the requirements of the International Code of Ethics for Professional Accountants, including Independence Standards.

We have a steadfast commitment to the principles of fair competition. We engage in the marketplace with integrity, ensuring that our practices contribute to a vibrant and fair economic environment. We have zero tolerance for collusion, price-fixing, or any other illegal restrictions on competition.

We do not tolerate bribery or others forms of corruption. We will not be inappropriately influenced in the performance of our duty through payments, gifts or any other forms of corruption and will not allow anything to compromise the objectivity and integrity of our work. This extends to our supply chain where we expect full compliance with all relevant laws and regulations from our suppliers.

We also ensure that we undertake appropriate evaluation procedures prior to or re-accepting clients to ensure we have established the identity of all individual or entities involved and we recognise the important role we play in helping authorities worldwide to combat money laundering and terrorist financing.

Furthermore, we only provide services to clients who share our core values and beliefs - only entering into relationships with clients who fit RSM's global client acceptance criteria.

Acting ethically is not just a cornerstone of our business, it is the foundation upon which great relationships are built. Whoever you are within RSM Poland, and whatever your job role, it means behaving honestly, professionally, fairly, legally and in compliance with all applicable regulations, internal policies and formal professional standards at all times.



## Quality

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Quality is a fundamental cornerstone of our work. We take a pride in ensuring ongoing compliance with the International Standard on Quality Management 1 (ISQM1) and we recognise the importance of understanding, applying and adhering to global internal policies and procedures and ensuring our people are all up to date with respect to necessary training and continuous professional development.

## Impact

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We believe businesses should take shared responsibility for achieving a better world. We demonstrate this through our global commitment to the UN Global Compact, a call for companies to align strategies and operations with a series of universal principles related to human rights, anti-corruption, and the environment.

We champion the Sustainable Development Goals from which we have selected five Foundational Goals for particular focus for RSM globally. These are: Good health and wellbeing; Quality education; Gender equality; Decent work and economic growth; Industry, innovation and infrastructure.

We prioritise the impact that we make on society, the economy, and the environment. We are committed to social responsibility and the humane treatment of people, opposing modern day slavery, compulsory labour, child labour, human trafficking, and the violation of any other internationally proclaimed human rights. We are committed to undertaking initiatives to promote greater environmental responsibility and to promote the development of environmentally friendly technologies and approaches to sustainability.

Third parties we work with must always comply with applicable local and international laws and regulations and we do not condone, and will not accept, illegal or unethical behaviour in our supply chain.

To instill confidence, we focus on the individual actions we can each make every day to live our Values and recognise the powerful, positive and lasting difference our behaviours can make to those we engage with.

## Transparency

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We believe in open and honest communication and encourage everyone to be transparent in their work and the decisions they take every day. Every year we publish a Global Annual Review, highlighting transparently a summary of RSM's global growth and activities, impact initiatives, approach to governance, and our overall framework for quality, risk and ethics.

## Inclusivity

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As a global organisation, we operate in many different regions, each with their own diverse cultures and belief systems. We recognise that differing perspectives should be embraced, provided such beliefs do not give rise to unfair discrimination against others. We aim to ensure that no-one is treated differently or less favourably because of characteristics that are not related to the inherent requirements of the job. We are committed to promoting diversity and inclusion across all aspects of our business, across all our teams, our leadership and with third parties with whom we choose to partner. We believe that by embracing diversity and creating an inclusive culture, we can better serve our people, our clients, our communities, and all our stakeholders.

## Communication

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We maintain a professional tone in all communications, reflecting respect, understanding and courtesy towards others, regardless of the platform used for interaction.

Whilst we recognise the importance of social media to share valuable business insights with clients, we always clearly distinguish our views as RSM Member Firm with those of our employees and ensure our people do not speak on behalf of our Firm, unless they have the authority to do so.

# Decision-making

## – determining the right course of action

The framework for achieving our objective is rooted in our core Values, which drive all our decisions, actions, and interactions. These Values are the foundation of our behaviour, shape our culture, and characterise us as a global organisation.

01

### Understand the situation:

Evaluate the context, stakeholders, and potential outcomes.

#### Consider:

- Is the action we are being asked to take in line with the principles of our Global Code?
- Would we be comfortable if our colleagues, clients, or the wider public were aware of our actions?
- Are we - through our own actions, omission of action, or awareness of the action of others - facilitating or enabling illegal or unethical behaviour?

02

### Consider:

Think about the guiding principles of the Code, and consider requirements and guidance from supporting RSM policies.

#### Consider ways to:

- Identify and evaluate the available options.
- Reflect on any alternatives which may require further investigation.
- Assess the implications of our decisions.

03

### Seek advice:

If in doubt about a particular decision, consult with colleagues, supervisors, or your Head of Ethics and Independence for guidance.

#### We ask ourselves:

- Are there any internal stakeholders who could/should be consulted around specific impacts?
- Do we need to communicate any concerns to relevant stakeholders?



04

### Take action:

Implement the decision.

We proceed when we are confident we are acting thoughtfully, responsibly and with sincere intentions, and have kept RSM Poland's core Values in mind.

05

### Review and learn:

Assess the impact and effectiveness of the action taken, and integrate any lessons learned for future decisions.

We always evaluate the effectiveness of our decision making, are open to feedback and accept the need for continuous improvement and learning.

Through this framework, we align our decisions with RSM Poland's Values and commitments, ensuring we deliver ethically, responsibly and in line with our Brand Promise.

# Empowering our people to 'Speak Up'

Speaking up with confidence is foundational to our Code of Conduct. Speaking up has a crucial function at RSM to encourage everyone to do the right thing. It also establishes shared anticipations and expectations for the communication of concerns or issues. Any behaviour which is not aligned to the Global Code should be highlighted. We have a collective responsibility to help each other to deliver on the Values of RSM. We should also support and guide each other to make the right decisions – escalating where we feel necessary and where an issue requires wider attention.

We recognise that speaking up is part of a transparent culture that encourages reporting of unethical or inappropriate practices. This not only reinforces our Values, but also underpins the trust and respect integral to our success. It is not merely about calling attention to what is wrong; it is an active commitment to the stewardship of RSM and the safeguarding of our workplace environment.

Speaking up is an activity we should always feel comfortable and confident in undertaking if we witness behaviour or practices that are not in alignment with our Code of Conduct. Naturally, we must first ensure we grasp the facts or problem at hand, confirm our understanding and seek perspective to form a complete picture. But where our concerns remain, we must feel empowered to speak up. We can build trust and confidence through creating a culture where everyone is curious but considerate, respectfully highlighting behaviour that may appear to be sub-optimal, raising any ethical concerns and being empathetic to unique challenges.

When we articulate our concerns clearly and openly, we foster an environment built on trust and fairness. This openness is essential to identifying issues and acting on them in a timely manner.



# How to 'Speak Up'

Everyone at RSM should feel empowered and supported to raise a query or concern at any point in time, and using any communication channel they feel comfortable with.

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We commit to ensure our people have a clear and well-known route to raise a concern which includes the following:

- the establishment of a dedicated support channel,
- assurance that any matters disclosed via this route will be confidential and kept secure,
- assurance that matters can be raised without fear of exposure or reprisal and that legitimate concerns will always be given attention and action.

We ensure that the identity of those that choose to Speak Up will be safeguarded and reasonable measures will be put in place to maintain this protection should an investigation ensue. In cases where the identity of the individual who has made a disclosure may become known, that the individual will be consulted and their agreement sought to the proposed course of action or approach.

RSM Poland fosters a culture of collaboration. It takes confidence to raise a concern and to know when to do so. We ensure everyone is supported if they choose to speak up.



# Information security

At RSM, we take the security and protection of RSM data and client data and information very seriously to ensure that confidential information is protected.

We follow generally accepted standards and procedures to deal with Cybersecurity threats and risks. We are required to have in place commercially accepted standards of physical and IT technology security to prevent information / data loss, damage to data, alteration of data or its destruction. Access to data is only available to authorised individuals and is controlled and monitored to maintain safety and confidentiality. RSM Poland's people are educated to limit the potential of them inadvertently compromising information security.

We have IT security policies, procedures and systems in place designed to ensure compliance with Network-wide standards in relation to the following: Access control; Virus control; Personal computer operating systems; Server and network maintenance; Employee training; Backup processes; Disaster recovery planning; Incident response; and System hardening.

We are periodically surveyed against the core IT security areas and are fully compliant with applicable obligations under statutory requirements, including the General Data Protection Regulation (GDPR).

**RSM Poland has also adopted ISO 27001.**

Managing the integrity and security of data within RSM Poland is of paramount importance. We take our commitments and responsibilities in this area very seriously. Maintaining client confidentiality and the security of their information is critical to a trusted client relationship. We protect all information and data through carefully devised processes, universally applied policies, and ensuring information is only used for the purpose for which it was collected.

# Ethics and independence

Our Ethics and Independence Policy articulates RSM Poland's approach to managing conflicts of interest. By adhering to this policy, we undertake to ensure that all RSM Poland's people comply with the requirements of the International Ethics Standards Board for Accountants' (IESBA) International Code of Ethics for Professional Accountants. We utilise the mandated global independence, entity management and service authorisation systems as critical support tools in this process to ensure the appropriate actions are taken to comply with the Global Ethics and Independence Policy.

At RSM Poland, we foster a culture that values ethical decision-making and promotes a high standard of professionalism. Our Ethics and Independence Policy and associated procedures encapsulate a holistic approach to promoting and maintaining ethical conduct within the workplace, drawn from ethical and independence requirements from the following:

- International Ethics Standard Board for Accountants (IESBA) Code of Ethics for Professional Accountants;
- local professional organisations (The Polish Chamber of Auditors - PIBR);
- local security exchange regulators (Polish KNF); and
- other relevant regulatory authorities.

# Striving to be better

The Global Code is a critical part of our RSM's organisational framework. It is a key enabler for delivering on our Purpose and much more. It guides us in our everyday professional actions and decisions and delineates expectations for Member Firms and all RSM people who work under the RSM umbrella, serving as a common denominator that helps us act responsibly, ethically, and in line with RSM's Values.

Like everything else we do, we naturally want to ensure our Global Code stays relevant and appropriate and representative of how we bring our Values to life. As such, the Global Code will be regularly reviewed and, where necessary, enhanced, as we foster an environment of continuous improvement and gather regular feedback on our approach and champion ways we can better live our Purpose and Values.

**Through our Code of Conduct, we empower RSM Poland's people to live our Values, make the right decisions and instill confidence in a world of change.**





## THE POWER OF BEING UNDERSTOOD

ASSURANCE | TAX | CONSULTING

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