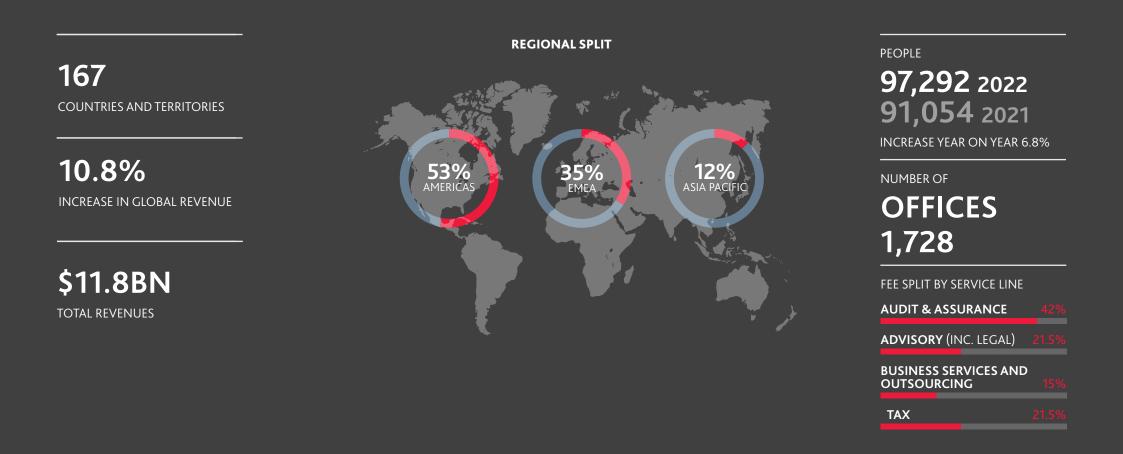
BDO IRELAND TRANSPARENCY REPORT 2022



BDO in Ireland is a key member of the BDO global network of audit, tax and advisory Firms. The Firms have representation in 167 territories, with 97,292 people working from 1,728 offices. The fee income of the member Firms in the BDO network, including the members of their exclusive alliances, was \$11.8 billion as of 30 September 2021. Being a member of the BDO global network allows us to meet the needs of clients who are growing and trading internationally.



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Appendix I – EU/EEA BDO Member Firms



INTRODUCTION FROM THE MANAGING PARTNER

Welcome to BDO's Transparency Report.

While the last year has been challenging for our clients and our people, it's with great pride and admiration that I look back on what we have achieved together.



Covid-19 created a unique set of circumstances and challenges, and we have each had to show resilience and agility to meet these head on. It's in times of such uncertainty that we must all pull together and rely upon our core purpose and values to help us through. While some of these challenges remain, and new ones emerge, I am confident that we have the resolve and commitment to continue to succeed.

Our business has faced these challenges and I am pleased to report that through the commitment and collaboration of our people and our clients we managed to achieve strong growth across all our service lines. Our performance is a reflection of our clients, and it comes from the determination of our teams and the value we bring to our clients.

We implemented our agile working framework "WORKABLE", offering our people choice and flexibility around how, when and where they work with a focus on health, wellbeing, and work/life balance. Good communication and trust are crucial to its success and our aim is to continue to improve the design of our working environment, so that it supports and enhances the abilities of our people as we mix working at the office, from home or at client sites. We operate in an environment where there are increasing regulatory standards and expectations from our clients and other stakeholders. This will continue to be a permanent and strategic focus for our firm, as will our ongoing investment in new systems; tools; and expertise. We are embracing digitalisation and we are well placed to support our people and our clients in navigating an increasingly complex risk environment. We are fully committed to diligently expanding and developing our policies, monitoring and reporting to further enhance the culture of quality throughout our firm.

AUDIT QUALITY

Our audit professionals continue to deliver high quality work in accordance with the standards set out in the International Standards on Auditing (ISAs). While we are satisfied with the results in IAASA's latest report (March 2022) for our audit file inspections, we acknowledge there were a number of findings in respect of our whole firm procedures, which we are in the process of addressing.

Audit quality remains a key cornerstone of our whole firm's system of quality management. We are confident that a thorough and robust implementation of ISQM1 this year will help us to maintain our high quality standards into the future.



B. Handhard

We are a people-powered business, and as such our people and culture are our backbone. Our teams, comprising of professionals from many different nationalities and backgrounds, are our biggest asset.

In addition to adopting new technologies and embracing innovation, we also continued to emphasise the personal wellbeing of our people and being proactive in looking out for each other. There has been a range of wellness initiatives to maintain our connection with colleagues while working remotely and we will continue this as we develop a greater appreciation for flexibility in the workplace.

We are mindful of the conflict in Ukraine and the devastation the war has brought to that country

and its people. I am #BDOproud of the way our firm globally has come together to show their solidarity and offer support, and how our firm have contributed to those initiatives.

We are seeing the signs of economic challenges ahead and the need for our firm and our clients to continue to evolve and adapt to the ever-changing business landscape. Our mantra of helping our people and our clients succeed will help guide and shape our current and future direction and the development of the unique skills of our people.

Michael Costello Managing Partner

REPORT FROM THE HEAD OF AUDIT

Our audit division has continued to show very positive growth levels over the last 12 months in a marketplace where there is a strong demand for audit services.

We have seen our investment in people grow to meet this demand. Investing in our people and our systems remains a top priority in accomplishing objectives for our stakeholders. We regularly assess our technology and processes to keep up to date with regulatory requirements and facilitate the needs of our clients.

One of the most significant challenges for the industry at present, is the demand for audit services being greater than the available resources in the marketplace. This has been something that we have been very conscious of and with this mind, we have had to make decisions as to whether to pursue certain opportunities and have put an emphasis on how we manage our growth. We want to ensure that we can continue to deliver for our audit clients and maintain and strengthen audit quality.

Delivering on audit quality continues to be our key area of focus together with all aspects that contributes towards this.

We are happy to see that IAASA's report, issued in March 2022 as part of their annual reporting on Audit Firms, reported that the audit files selected for review were deemed to be of good quality with limited improvements required. This reflects the investment made by our teams.

However, there were a number of findings noted with respect to the whole firm procedures, which BDO fully acknowledges and accepts the findings and recommendations from IAASA. While these findings are disappointing, we have taken the necessary steps to identify the root causes of the shortcomings identified, to improve our documentation, and implement the recommendations arising from IAASA's inspection. Our firm is focused on continuously improving our firm wide procedures and processes. As we noted in the prior year, the surge of the Covid-19 pandemic has had an impact on every aspect of our lives and the auditing profession was no exception. We have shown the ability to a adapt to a different operating model during this period and continue to show agility in how we work as we emerge from the pandemic and the resulting changes in how many companies now operate.

Audit market reform in the UK in particular, continues to be an area of focus. There continues to be ongoing consultation which we monitor closely in order to assess what impact if any it has on the Irish market, in order that we can respond appropriately if needed.

Through all these changes and challenges, we seek to respond in a positive way. We never forget the vital role that independent, high-quality audit plays.

Grea Rober

Teresa Morahan Head of Audit



LEGAL STRUCTURE AND OWNERSHIP

The Irish Firm of BDO ("the Firm") is an Irish registered partnership formed under the Partnership Act 1890 which is wholly owned by the partners in the Firm. At 4 March 2022 there were 34 partners.

BDO employs over 500 staff and operates from offices in Dublin, Limerick and Cork. The principal services provided by the Firm are Audit, Tax, Advisory and Consulting. These business streams have dedicated teams of partners and professional staff nationwide tailoring high quality business solutions for their clients.

The Firm has the following wholly owned subsidiaries:

- BDO Customs and International Trade Services Limited is a Company of International Trade and Customs advisors focusing on International and European Customs and Trade Law, Import/ Export Taxes (Customs, Anti-Dumping Duties, etc.), Excise Duties (both EU Directive and National implementation), Audits and Disclosures, Appeals (both national and to EU level), Export Licensing, AEO, together with project management for Set-Ups.
- BDO Eaton Square Limited provide management and technology consultancy services, demonstrating expertise in organisational design, strategy development & execution, and system integration with a specialism in HR system implementation.

- BDO Secretariat Limited provide Corporate Secretarial Services through every stage of a company's formation and winding up, ensuring companies fulfil their statutory obligations.
- BDO Talent Management Limited provide flexible staffing solutions from their pool of candidates qualified for roles in Finance, Accounting, Payroll, Technology, Project Management and HR. They also provide consultancy services to businesses' HR functions.
- BDO Serpentine Limited BDO provides ongoing Project Management and Advisory Services to a group of individuals who are in the process of disposing their investment asset.

The Firm also has the following joint venture entities:

- BES Management DAC which is a joint venture with Davy Stockbrokers and is regulated by the Central Bank of Ireland under the Investment Intermediaries Act 1995 as a manager of a designated investment fund within the meaning of the Designated Investment Funds Act, 1985.
- Development & Growth Funding DAC T/A Development Capital, which is registered as an Alternative Investment Fund Manager under Regulation 4 of the European Union (Alternative Investment Fund Managers) Regulations 2013, is owned 40% by BDO and 60% by Andrew Bourg and Sinead Heaney.



NETWORK

BDO in Ireland is a Member Firm of BDO International Limited.

The BDO network is an international network of independent public accounting, tax and advisory Firms which are members of BDO International Limited and perform professional services under the name and style of BDO (hereafter: "BDO Member Firms"). BDO is the brand name for the BDO network and all BDO Member Firms.

LEGAL AND STRUCTURAL ARRANGEMENTS IN THE NETWORK

Each BDO Member Firm is a member of BDO International Limited, a UK company limited by guarantee, as either a voting member (one per country) or a non-voting member. BDO International Limited is the governing entity of the BDO network and sets the membership obligations of the BDO Member Firms.

GOVERNANCE OF THE NETWORK

The BDO network is governed by the Council, the Global Board and the Executive of BDO International Limited.

Council

The Council comprises one representative from each voting BDO Member Firm – generally the managing partner – and represents the members of BDO International Limited in general meetings. In 2021 there were 113 Council members. The Council is chaired by the Council Chair, elected among the existing Council members by the



Council upon nomination by the Global Board. The current Council Chair is Wayne Berson, managing partner of BDO in the USA.

The Council approves BDO's global budget, appoints the Global Board and approves any changes to the Articles of Association and the Regulations of BDO International Limited. The Council meets at least once a year, with additional meetings held if the Council Chair and/or the Secretary of BDO International Limited consider it necessary or appropriate, or upon the request of a minimum number of Council members.

Global Board

The Global Board, is the Board of Directors of BDO International Limited.

It comprises the managing partners of at least the three largest firms of the EMEA region, the two largest firms of the Americas region and the two largest firms of the Asia Pacific Region. The (re)appointment of the Global Board members, each for a three year term, is approved by the Council. The Global Board is currently chaired by Wayne Berson, managing partner of BDO in the USA. The Global Board Chair is elected by the Global Board members and serves for a period of three years. The Global Board sets priorities for the global organisation and oversees the work of the Executive.

Executive

The Executive comprises the Chief Executive Officer (CEO), who is appointed by the Global Board, and the members of the Global Leadership Team (GLT), who are appointed by the CEO.

The current global CEO is Keith Farlinger, previously CEO Americas and formerly managing partner of BDO in Canada. The CEO's powers and responsibilities are set out in the Regulations of BDO International Limited and as further determined by the Global Board. The CEO is tasked with the day-to-day management of the affairs of BDO globally, as well as the development and implementation of the global strategy for the organisation. He recommends quality standards, policies and strategies to the Global Board. The CEO also acts as spokesperson for BDO at international forums and organisations and represents the global organisation in discussions with international regulatory bodies.

Anders Heede is the Chief Operating Officer (COO). Working closely with the CEO, the overarching responsibilities of the COO are to ensure that the global BDO organisation is equipped to meet the challenges of today and is prepared for the future.

NETWORK

Martin van Roekel is the Vice Chair of BDO. Martin was previously global CEO and currently assists the CEO on a number of matters pertaining to the BDO organisation.

The CEO allocates and delegates responsibilities to the Global Leadership Team (GLT) as deemed appropriate.

The GLT comprises the regional CEOs, the Global Heads of service lines and of support services, as well as the Global Head of Risk, Quality & Governance and Secretary of BDO International Limited. All the members of the GLT are dedicated full-time to their role within BDO International Limited.

The coordination of the service provision within BDO is done by the Global Office, which includes the following departments:

- Accounting & Administration
- Audit & Assurance
- Business Development, Marketing
 & Communications
- EU Key Account Procurement
- People & Culture
- IT
- Regulatory & Public Policy
- Risk, Quality & Governance
- Tax.

REGIONAL STRUCTURE

To facilitate the communication and coordination of actions and the sharing of best practice, the BDO network is divided into three regions: EMEA (Europe, Middle East and Africa), Asia Pacific and Americas (Latin America, North America and Caribbean), each supported by a regional board.

Each region has its own regional CEO, who chairs the respective Regional Board and provides support and guidance regarding the strategic initiatives of firms in the region.

GLOBAL COMMITTEES

Within the BDO network there are a number of global committees, composed of professionals from the network's firms, who report to the respective member of the GLT and the CEO. These committees, which act in an advisory capacity for the benefit of the network's firms, are further supported by a number of sub-committees, task forces and working groups. The International Risk Management Committee and the Audit Steering Committee are key to the network's risk and quality management.

SIZE OF THE BDO NETWORK

The global aggregated turnover for BDO Member Firms (including their exclusive Alliances) in 167 countries for the year ended 30 September 2021 was in excess of \$11.8 billion. Partner and staff numbers at 30 September 2021 were just over 97,000 in more than 1,700 offices.

Appendix I of the Transparency Report discloses the list of (all EU/EEA) BDO Audit Member Firms together with the countries in which the above Member Firms are present.

The combined turnover from statutory audits of the BDO EU/EEA audit Firms is €605,172,068 (published 29 September 2021)*.

*Please note that this year the figures from the UK are not included due to Brexit.



THE GOVERNANCE STRUCTURE OF THE IRISH FIRM

The Firm is committed to the implementation and application of the highest standards of corporate governance. The audit function is an integrated part of the Firm and is subject to the same governance structure as all other business segments of the Firm.



THE IRISH AUDIT FIRM GOVERNANCE CODE

The Irish Audit Firm Governance Code ("the Code") was issue by the Chartered Accountants Regulatory Board ("CARB") in January 2013. The Code is applicable to audit Firms that audit public interest entities which are defined in the Code as entities registered in the Republic of Ireland which are within the scope of SI 277 of 2007: Transparency (Directive 2004/109/EC) Regulations 2007, as amended. The objective of the Code is to provide a template which boards and shareholders of public interest entities can use to assess a Firm's governance procedures. One of the key elements of the Code is the principle that audit Firms should appoint independent non-executives within their governance structures. This is consistent with best practice governance within many types of organisation and should in this instance provide a basis for enhanced dialogue between stakeholders and audit Firms.

The Firm is currently in the process of selecting and appointing a new Chairman to succeed Mr. Millar. The successful candidate will play an active role in overseeing the public interest aspects of the Firm's decision making, stakeholder dialogue and management of the reputational risks including those in the Firms businesses that are not otherwise effectively addressed by regulation.

FIRM GOVERNANCE STRUCTURE

The Firm is led by the Managing Partner who is elected by the partners and serves a three-year term. The Managing Partner is responsible for developing and implementing the policies and strategies of the Firm and for its direction and management. He is responsible to the partners of the Firm and provides regular business updates on strategy and development to all partners at monthly meetings.

Along with the Managing Partner there are a number of other bodies which deal with key aspects of governance within the Firm which are:

- the Leadership Team
- the Partnership Committee
- the Evaluation Committee
- the Quality and Risk Management Committee
- the Audit Committee.

LEADERSHIP TEAM

The Leadership Team is chosen by the Managing Partner and approved by the Partnership. It is currently comprised of:

- Michael Costello (Managing Partner)
- Teresa Morahan (Head of Audit)
- Derek Henry (Head of Tax)
- Aidan McHugh (Head of Clients & Markets)
- Denis Herlihy (Limerick Managing Partner).

The function of the Leadership Team is to assist the Managing Partner in developing and implementing the policies and strategies of the Firm and meets on a monthly basis. It is responsible for day-to-day management of the Firm and for:

- Quality and Risk Management, compliance and internal quality assurance matters
- Primary responsibility for setting and monitoring adherence to the Firm's financial budgets
- Ongoing financial management including partners' earnings, drawing and capital funding
- HR policy and procedures
- Business development initiatives
- Support other operational matters including issues arising within the support teams covering finance, HR, marketing, IT and facilities.

THE GOVERNANCE STRUCTURE OF THE IRISH FIRM

PARTNERSHIP COMMITTEE

The Partnership Committee comprises six partners: the Partnership Secretary and five partners elected by the Partnership. The members serve for a three year period.

The Partnership Committee meets on an ad-hoc basis and is responsible for partnership matters including the appointment and removal of partners, development of new business areas and cessation of existing business streams including any potential mergers or business acquisitions, appointment of the Managing Partner and matters pertaining to the Partnership Agreement.

Members of Partnership Committee:

- Peter Carroll
- Kevin Doyle
- Sinead Heaney
- Brian Hughes
- Ken Kilmartin
- David McCormick.

EVALUATION COMMITTEE

The Evaluation Committee comprises the Managing Partner together with four partners elected by the partnership and the members of this committee serve for a one year period.

The function of the Evaluation Committee is to review the partner's contribution to the Firm and against specific criteria including quality of client service, staff management and development and contributing towards the financial success of the Firm. The Evaluation Committee is also responsible for recommending, subject to a vote of the overall Partnership, the distribution of the Profit of the Firm in accordance with the Partnership agreement.

QUALITY AND RISK MANAGEMENT COMMITTEE

The Partnership has established a Quality and Risk Management Committee to ensure the development and implementation of the Firm's Quality and Risk Management Policy. The Committee is responsible for implementing appropriate procedures to identify, assess and manage risk from a strategic and operational perspective, monitoring the application of Quality and Risk Management procedures and reporting to the Partnership as necessary.

The membership of the Committee comprises four Partners and the Firm's Quality & Risk Management Director.

Ultimate responsibility for quality and risk management within the Firm rests with the individual partners. The Committee's role is one of oversight, recognising that the partners are responsible for executing the Firm's risk management and related policies. The Committee engages in appropriate communication with staff on risk, risk policy and controls and encourages a risk management culture throughout the Firm ensuring that attention to risk is embedded as part of the Firm's decision-making and operations.

All partners and staff are required to submit annual confirmations of regulatory compliance which include statements of independence.

Members of Risk Committee:

- Stewart Dunne (Chair)
- Paul Nestor
- Brían Gartlan
- Angela Fleming
- Philip Glynn.

AUDIT COMMITTEE

In keeping with corporate governance best practice the Partnership requires that its annual financial statements should be subject to external scrutiny through a formal audit process. As part of this process the Partnership has established an Audit Committee responsible for the oversight of the financial reporting process, the audit process, the Firm's system of internal controls and compliance with laws and regulations.

The Audit Committee is appointed by the Partnership and comprises a minimum of three Partners with appropriate audit and financial reporting qualifications. Each member of the Committee will be appointed for an initial period of three years which may be extended thereafter.

The Audit Committee is responsible for the Firm's annual financial statements and is charged with the review, and challenge where necessary, of the actions and judgements of the Finance Partner anvd representatives from the finance function in relation to the annual financial statements. The Committee is also responsible for appointing the external auditor and monitoring the effectiveness of the audit process.



Members of Audit Committee:

- Diarmuid Hendrick (Chair)
- Andrew Bourg
- Gavin Smyth.

The Partnership Committee, the Evaluation Committee, the Quality and Risk Management Committee and the Audit Committee report their activities to the Leadership Team, the Partnership Secretary and, on an annual basis, directly to the Partnership.

The primary goal of BDO is to provide the highest quality of service in accordance with the standards of the public accounting profession. The Firm recognises that ultimately such a goal is wholly dependent on the calibre of our professional staff. Quality within the Firm is the responsibility of all personnel and the Firm strives to ensure that it recruits, develops and retains motivated professional staff and provides them with appropriate leadership and direction to ensure that the work carried out is of consistently high quality.

Our commitment to quality, independence and ethics is an essential part of our strategic framework. This means we acknowledge:

- that our responsibility is not exclusively to satisfy the needs of an individual client and that we satisfy our public interest responsibilities
- that we are regulated by a significant number of regulators and the importance of ensuring we comply with all regulatory requirements
- the independence requirements of Ethical Standards and that they apply to the whole firm, not just our audit practice, and
- the importance of the principles and living by the spirit of regulations.

The implementation of the Firm's quality control policies and procedures are vital to preserving the Firm's reputation, fulfilling its position of public trust and maintaining the high standard of our performance.

Having policies and procedures, which ensure the delivery of quality audits, is as important as monitoring the adherence to those policies and procedures. Our internal control framework is designed to provide reasonable assurance that the firm, its partners and staff comply with professional standards in addition to regulatory and legal requirements. In doing so we ensure that work is performed to a consistently high standard and that reports issued by the firm are appropriate.



AUDIT QUALITY CORNERSTONES

Hand in hand with the challenge of deploying new technology, we are taking the opportunity to upskill our people, to equip them to utilise tools to gain real insights into the business of our clients; revisit the application of professional standards to our audits, enhance our understanding and the value of the procedures adopted and support Audit Committees and Boards in their governance of the company.



OUR CORE VALUES

As a business, we place a great importance in achieving a culture of quality, innovation and technical excellence to guide our people in their day-to-day work and long-term vision for the Firm. Our culture stems from the tone at the top and we invest in our people to commit to principles that represent what we stand for as a Firm. The core values which we uphold complement each other and are all equally prioritised.

- Passionate
- Empowering
- > Collaborative
- > Inclusive
- > Agile
- Caring
- > Independent

We advise and challenge because we are passionate about your success.

(A) LEADERSHIP RESPONSIBILITIES FOR QUALITY WITHIN THE FIRM

Quality is dependent upon an organisational structure which is inherently sound and which clearly defines the responsibilities of the various levels of management.

The Managing Partner, the Leadership Team and the whole Firm are committed to quality work, the public interest and the exercise and implementation of sound professional judgement and values. As a professional services Firm it is important to us that our Leadership Team draw on the talents and strengths of our entire business. Only by focusing on quality in everything we do can we secure the long-term viability of the Firm.

The Managing Partner has ultimate responsibility for the Firm's quality control systems across all disciplines within the Firm, including the quality of our audit work. He is assisted with this task by the Firm's Leadership Team who are committed to quality and have instilled within the Firm a culture based on integrity and professional and ethical values, where personnel are encouraged to raise concerns where they see behaviour which falls below or is inconsistent with our stated values.

The Firm has clearly established responsibilities for the Managing Partner, Senior Partners and other senior personnel. The Managing Partner and the Senior Partners are members of the Firm's Leadership Team which devises and implements the Firm's business strategy and manages operational issues.

Along with the Firm's Leadership Team, the Quality and Risk Committee reinforce the appropriate 'tone at the top' through a commitment to independence training for professionals on Firm policy and professional standards together with actions taken in cases of non-compliance with such policies.

Our Chair of the Quality & Risk Management Committee and Head of Audit & Assurance Quality Management (HAAQM) is responsible for the following:

- the Firm's system of quality management (SOQM), evaluating our quality control policies and procedures
- monitoring of independence
- monitoring the quality of our audit work.
- The HAAQM is accountable to the Firm's Managing Partner.

(B) ETHICAL REQUIREMENTS

The integrity and professionalism of all personnel within the Firm is paramount to the protection of the Firm's reputation and is a major contributing factor to the continued success of the Firm.

The Firm has established policies and procedures together with periodic internal training to ensure that personnel at all organisational levels understand the ethical environment in which the Firm operates.

The Firm's initial guidance on ethical and independence matters is included in the Employee Handbook which is provided to all new staff members on joining the Firm. The Firm is bound by the ethical requirements of CAI, which incorporates guidance on Integrity, Objectivity and Independence, together with IAASA's Ethical Standard for Auditors (Ireland) and, where relevant, the Ethical Standards of overseas regulators.

IAASA is responsible for supervising the accounting profession and for adopting the auditing, professional ethics and internal quality control standards to be applied by statutory auditors and audit Firms in carrying out statutory audits. International Standards on Auditing (Ireland) together with the Ethical Standard for Auditors (Ireland) are the effective standards to be applied for the audits of financial statements in the Republic of Ireland. The Firm has in place policies and procedures to ensure compliance with these standards.

Annual declarations are made by all partners and staff to confirm that they are familiar with the ethical environment and requirements to which the Firm is subject and to assist in monitoring compliance with these requirements.

The Firm's Managing Partner, Michael Costello, acts as the Firm's Ethics Partner and is responsible for providing guidance and support on the application of ethical standards to ensure that our professional objectivity and independence are maintained.

Further information in relation to the Firm's ethical requirements and procedures is set out in the Ethics and Independence section.

(C) ACCEPTANCE AND CONTINUANCE OF CLIENT RELATIONSHIPS AND SPECIFIC ENGAGEMENTS

Robust client and engagement acceptance procedures play a pivotal role in the Firm's ability to deliver a professional and quality service to clients.

Prior to accepting any new client and consideration of continuance with that current client certain procedures to assess the risks associated with that client must be carried out. These will include:

- consideration of the client's business including its geographical spread and the industry in which it operates
- evaluation of information concerning the client, its management and its owners including obtaining evidence of the identity of the beneficial owners of the business
- considering information regarding the character and reputation of the prospective client and key personnel
- assessing the risks of money laundering or economic crime concerning the potential client
- assessment of potential independence risks and potential conflicts of interest
- if relevant, inquiry of the previous auditor regarding the reasons for the change in auditor and if there is any reason why we should not accept the appointment
- assessment of our ability to serve the prospective client, and

• reviewing filings of the company, including prior year financial statements.

In accordance with professional standards and the Firm's policies, the Firm will decline to act for a potential client or engagement where conflict or independence issues are identified which cannot be resolved through the implementation of appropriate safeguards.

The acceptance of any entity or individual as a client of the Firm requires an approval process that is appropriate to the perceived risk. Where risks of accepting a prospective client are identified, the Quality and Risk Management Committee and/or the Ethics or Independence Partner, as appropriate, are consulted as to whether the prospective client should be accepted and if required, what safeguards should be put in place to minimise the threat of those risks.

All continuing relationships with clients are reviewed regularly and evaluated to identify those which may require additional evaluation procedures and to identify those instances where we should consider discontinuing our association with the client.

(D) HUMAN RESOURCES AND DEVELOPMENT

The quality of our work is directly dependent on the quality of the individuals recruited and retained by the Firm ensuring that we have the right people with the appropriate skills and training, together with the appropriate resources, to deliver the required services to our clients.

Human resources is a critical factor in our ability to provide professional services. In order to ensure that the Firm has sufficient personnel with the capabilities, competence and ethical standards necessary to provide quality audits in accordance with professional and legal requirements we have established clear policies and procedures addressing the following areas:

- > Clear job description
- > Recruitment
- > Career development and progression
- > Performance evaluation
- > Capabilities and competence
- > Forecasting of staff requirements
- > Development plan and training policy.

Clear job description

A clear job description is the basis for most personnel matters: recruitment, selection, coaching and mentoring, career development and mobility and performance evaluation.

A job description is a structured, written record

of all facets of a position; it provides clarity on the tasks, scope of the function responsibilities and authorities, what we expect of the person and the standard of performance required. The job description contains the following information:

- Purpose of a role and function in the firm, reporting line, position in the structure, workflow
- Core tasks and specific activities
- Responsibilities / authority and scope
- Expectations
- Job requirements (knowledge, skills and behavioural competencies)
- Qualifications required for the role.

Recruitment

The policies and procedures for recruitment are established to ensure that those employed possess the appropriate characteristics to enable them to deliver a high-quality service and perform their duties with professional competence. The Firm seeks people with high levels of intelligence, integrity and motivation to contribute to the continuing development of the Firm and the ongoing provision of high-quality service to our clients.

All candidates applying for professional positions are required to submit an application form and are subject to a variety of selection processes.

The Firm's policies and procedures are communicated to new recruits upon joining the Firm and they are reminded throughout their time with the Firm of the Firm's commitment to delivering consistent high-quality service to our clients and of the Firm's culture and values.

The hiring policies and procedures are regularly reviewed by the Partner in Charge of the HR department to determine if they are appropriate and are operating effectively. Changes, if necessary, to the quality control system are made based on the results of such reviews.

Career development and progression

The Firm is committed to providing individuals with the facilities to develop and maintain the highest possible standards of competence through its professional development program. Continuing professional education is the keystone of that effort and this commitment is carried out through a variety of formal training courses, emphasising appropriate policies and procedures, complemented by specialised training together with mentoring, on-the-job coaching and supervision.

Policies and procedures for the advancement of personnel are established to provide reasonable assurance that the individuals selected will have the qualifications, experience and technical competence necessary to fulfil the responsibilities they will be called on to assume.

Competency management concerns 'the right person, in the right place, at the right time'. But the influence goes further:

- It enables the 'matching' of a potential employee to the firm
- It strives to tie the individual's career needs and

aspirations to the needs of the firm

 It structures the HR processes and administration of new staff (recruitment and selection procedures), existing staff (remuneration, appraisals, training and development) and leaving staff (exit policy).

We provide a clear set of grades and levels with appropriate competencies explanation and timing guideline. Compensation matches the grade and the market benchmark. It is reviewed periodically to ensure market competitiveness. Generally, there is staff progression from a trainee level to director before a candidate will be considered for admission to partnership. Individuals are promoted to the next level only when they are prepared for the increased responsibilities that promotion entails.

Performance evaluation

All staff members are subject to formal performance appraisal, review and counselling on a regular basis, in order to evaluate the level of competence, monitor training and to help them reach their full potential. Performance appraisal includes a review of each individual's contribution to the quality of service(s) provided by the Firm and the quality of their work.

The performance management process provides information on an individual's performance within the Firm and requires an annual evaluation of his/ her prior year's performance and goal setting for future year's performance. A substantial part of the process is completed through self-evaluation, followed by a discussion with the appropriate supervisor which will

include a review of the progress made on achieving the goals set at the previous evaluation together with identifying specific goals for the coming period.

Evaluations are completed on an assignment-byassignment basis at certain levels and also on an annual basis at all levels.

The core competencies evaluated (which may vary between levels) include technical expertise (including analytical and judgement skills), teamwork and cooperation, communication, client service, commercial and market focus and accountability for results.

Partners and managers involved in the appraisal process receive appropriate training and instruction to ensure that they are properly prepared to provide relevant guidance and direction to staff to assist them with their ongoing development within the Firm.

Our firm provides regular engagement surveys to monitor employee engagement to ensure the motivation to maximise the success of the Firm.

Capabilities and competence

All professional staff are required to comply with the applicable professional rules and regulations relevant to their qualification and area of expertise.

The Firm's policies and procedures for assigning personnel to engagements are designed such that only those persons having adequate technical proficiency and competence will perform the work, taking into account its size, nature and complexity.

Knowledge of an individual's technical proficiency and competency is obtained by personal knowledge of the relevant individual, reviewing evaluation forms completed by his/her superiors on previous engagements and, where necessary, discussions with his/her superiors in relation to his/her performance on previous engagements.

In staffing an engagement, consideration is given to ensure that partners and staff have the necessary technical knowledge and other skills appropriate to the size, complexity and nature of the planned work.

Forecasting of staff requirements

We recognise that ultimately it is the ability and commitment of the partners and staff that really makes a difference and enables us to deliver a quality audit. Given this, our ability to attract the right number of high-quality people is of utmost importance. We predict our requirements so as to continue to service the Firm's clients and provide sufficient capacity to enable our partners and staff to develop the business.

Succession management enables the Firm to:

- protect the Firm's present strengths and build for its future, ensuring sustainability and continuous strong leadership
- reduce the risk of having leadership gaps for critical positions (either because of lack of talent or unprepared key successors)
- engage the leadership in supporting the development of high-potential leaders and, in return, motivate, retain and engage key talents
- anticipate and align resources with future needs and strategies and create a flexible business by responding faster to new leadership needs

• counter the increasing difficulty and costs of recruiting employees externally.

For the employee, this means they:

- get opportunities to grow and develop skills necessary for future roles and meet career development expectations
- remain committed, motivated and engaged
- stay with the firm.

Development plan and training policy

Our learning and development strategy ensures the Firm's ability to remain competitive and to motivate our staff. It includes both the technical expertise and skills to meet the needs of the higher demands of the market; that is business advisers, financial analysts, communicators, negotiators and managers. At the same time, integrity, objectivity, professional scepticism, and willingness to take a firm stand are essential attributes of professionals.

Our ultimate aim is to (a) drive business performance in line with the Firm's growth strategy and (b) to make our Firm truly a learning organisation.

We provide our individuals a clear career path and complementary development plan.

Our staff's integrity, honesty and moral character must be above reproach. While attributes of individual applicants may differ because of technical specification and years of experience, there are four basic attributes that all our staff possess:

• Technical competence in a chosen field of expertise

- Strong sense of what it means to act in the public interest
- Pride in self, the firm and the profession, and
- Strong personal skills in managing and engaging staff and in leading engagements.

This is a mandatory requirement for partnership.

We partner with our stakeholders in the Firm to build the skills, capabilities and effectiveness of our people on a consistent basis across all offices. We do this by creating relevant training content internally, connecting with reputable external providers, ensuring skills transfer among our people, and drawing on the BDO International resources.

Our training programme aims to bring alive key technical challenges and their application in practice including the practical impact of COVID-19 and other economic factors, including rising costs and the impact of the conflict in Ukraine, to reporting and the challenges that arise in the course of auditing entities. We continue to make use of both BDO International's and our internal social media platform, Yammer, for knowledge sharing and hints and tips to get the most out of our technology and audit approach.

As a result of COVID-19 all training has been converted to online platforms enabling those delivering our training to interact with the attendees and engage them in high-quality training. Feedback received from partners and staff has been positive in respect of the new platforms, especially in that it provided greater flexibility.

(E) ENGAGEMENT PERFORMANCE IN THE AUDIT STREAM

Common approach

At BDO it is essential that we operate a global audit process, compliant with international and local regulation. Our clients should be assured of the quality of our work across their group. To achieve this, all member Firms sign up to one audit methodology and one quality control standard.

Notwithstanding our global approach, we are conscious that retaining our local knowledge and expertise is essential to delivering the best service for our clients.

The network's audit and assurance software, APT, encapsulates the key aspects of the methodology and is used worldwide to ensure consistent and scalable audit performance. Its many benefits include teamwork on a real-time basis and timely efficient multi-location and cross border audits. APT is regularly enhanced to ensure that it remains at the forefront of technological innovation and incorporates new and emerging audit practices.

Our policies and procedures are designed to ensure that the audits we perform meet all applicable professional standards and regulatory requirements and that the Firm issues reports that are appropriate in the circumstances. To achieve these objectives and to promote consistency with the BDO network's approach to auditing and application of professional scepticism, BDO International has developed the common BDO



Audit Methodology, related software tools and other standard forms of documentation. This methodology is fully compliant with International Standards on Auditing, which we supplement with additional requirements under professional standards and Regulations in Ireland.

APT, BDO International's in-house state of the art audit software, remains the single largest global project of its kind and its evolution continues. By designing APT to take advantage of recent technological advances, BDO Member firms will be able to:

- safeguard the structural integrity of the tool for the future
- provide us with a fully-integrated tool that reflects the latest interpretations of the auditing standards, and
- enable teams to work efficiently on both large and small engagements.

In addition, the Firm's policies and procedures require all professionals to refer to the Firm's literature, authoritative literature or other sources and consult, on a timely basis, with individuals within or outside of the Firm, when appropriate (for example, when dealing with complex or unusual accounting or auditing issues).

Supervision and review

The Firm's policies require all professional work to be supervised by staff members who have appropriate knowledge and experience. The personnel responsible for audit quality consist of the engagement partner and the engagement manager who are assigned responsibilities commensurate with their experience and expertise. It is the responsibility of the engagement partner to ensure that related risks are identified and that decisions are taken by those with an appropriate level of authority. The engagement partner must also ensure that professional work is carried out efficiently, with appropriate scepticism, and that it meets the Firm's standards in all respects.

Our review procedures are designed to ensure effective control of the audit as it progresses. These policies are designed to ensure that:

- the work is performed in accordance with applicable standards and regulations
- significant matters have been raised for further consideration and appropriately addressed
- appropriate consultations have taken place
- the planned work has, where necessary, been reviewed and that the objective of all planned work has been achieved

- the work performed and evidence obtained supports the conclusions reached, and
- the documentation present on the audit file enables an experienced auditor to understand the significant matters arising on the audit as well as the nature, timing and extent of the procedures undertaken, the results of those procedures and the evidence obtained.

The engagement partner is responsible for finalising and signing the auditor's report on behalf of the Firm and for applying the Firm's quality control policies and processes to individual audit engagements in an appropriate manner. The responsibilities of the engagement partner would include:

- Evaluating the acceptance and retention of client(s)
- Leading the performance of audit work and its documentation, ensuring that it has been carried out in accordance with the Firm's policies and procedures and the terms of engagement, including being satisfied that risks have been appropriately assessed and responded to
- Resolving technical accounting and auditing matters and identifying potential problems involving unusual risks for the Firm and undertaking appropriate consultation on such matters where necessary
- Ensuring compliance with the Firm's quality

control procedures, including being satisfied that the review and supervision procedures in place are adequate and effective

- Overall responsibility for ensuring that the work performed and evidence obtained supports the conclusions reached and that the documentation present on the audit file enables an experienced auditor to understand the significant matters arising on the audit as well as the nature, timing and extent of the procedures undertaken, the results of those procedures and the evidence obtained and approving the form and content of the audit report
- Ensuring continuous quality improvement through challenging individuals to be proactive in their approach to the audit and applying an appropriate level of professional scepticism, and
- Assisting with staff development through mentoring and coaching of individuals.

The engagement manager works closely with the engagement partner on all major matters concerning the audit. The engagement manager works with the engagement partner to ensure that work is planned, executed and reviewed in accordance with the Firm's policies and procedures and that matters or issues which might impact on the audit opinion to be given on a set of financial statements are appropriately identified and resolved. The engagement manager supports the engagement partner by promoting a culture of ongoing mentoring and on-the-job coaching,



contributing to improvements in audit quality and the development of personnel involved on the audit.

Engagement Quality Control Review

An Engagement Quality Control Review is performed for audits of Public Interest Entities (PIE) as defined by the Audit Governance Code, which are identified as being higher risk, and for listed entities, BDO International Referrals (where requested) and sensitive clients.

The Engagement Quality Control Reviewer ("EQCR") will be familiar with the auditing and reporting practices used during the engagement, and knowledgeable and familiar with the client's industry, but is not a part of the audit engagement team. They will be an experienced engagement partner not likely to be unduly influenced by the views of a particular engagement partner. The EQCR will not be actively involved in making ongoing decisions relating to the engagement and will not be involved in performing the engagement. EQCRs are selected from a list of approved reviewers, as determined by the Head of Audit.

Consultation and support

Consultation is a key element of quality control, and our culture encourages consultation with experienced partners and other specialists where appropriate. The Firm has a process in place for engagement partners and teams to follow when consulting and seeking a 'firm' opinion, or support on a client issue, judgement or risk.

Responsibility for audit quality

Our Leadership Team (LT) has overall responsibility for the quality of work across the firm, including the quality of our audit work. Within this it has responsibility for the design of a system of internal monitoring to ensure that audit quality is maintained and improved.

The LT has delegated the design and implementation of this system to the Quality & Risk Committee (Q&RC), but the work of the Q&RC is subject to review and approval by the LT prior to implementation.

The Head of Audit and the HAAQM sit on the LT. Audit quality is a standing item on the agenda of LT meetings and the HAAQM provides a monthly update on audit quality issues to the LT.

The Head of Audit and the HAAQM have regular communications with engagement partners on audit quality issues.

(F) MONITORING OF THE AUDIT STREAM

Internal Monitoring

Quality monitoring is an integral part of the Firm's systems and procedures and is designed to give the Firm reasonable assurance that the Firm's internal quality control system is operating effectively and being complied with in practice.

Such ongoing monitoring is essential as the Firm seeks to continually improve its policies, procedures and the quality of its work. Instances of failure to meet required performance standards are treated seriously and appropriate corrective action is taken including necessary training as appropriate for the individuals concerned.

Quality Control Review Program

Our quality control system includes an annual internal quality control review of the Firm's assurance practice by appropriately qualified senior individuals within the Firm with relevant knowledge and experience reporting directly to the Quality & Risk Committee, Managing Partner and the Head of Audit.

The aim of these reviews is to monitor compliance with the Firm's policies, procedures and standards and to ensure that the audit work carried out to arrive at an opinion, is thoroughly documented and of high quality. Corrective action is taken to address any deficiencies encountered and, as part of the Firm's continuing drive towards excellence in performance, recommendations for improvements are identified and implemented. The review consists of assessing, on a sample basis, the work papers and reports of selected assurance engagements and documentation of compliance with our quality control policies and procedures in other areas. The sample is selected to ensure that at least one audit carried out by each audit partner (or the individual responsible for the audit), is selected for review each year.

Independence of the reviewers is ensured through having each partner reviewed by a team from an Office/Team other than the partner's own.

Where required, appropriate internal specialists are involved in the review and instructions are issued to the reviewers in advance of the review, setting out the objectives of the process, detailing procedures and tests to be performed, and providing appropriate guidance and reporting templates. A conclusion is drawn on each audit reviewed as to whether the audit work was

- Satisfactory
- Acceptable but with some areas to improve
- Major areas to improve, or
- Unsatisfactory.

At the conclusion of the annual program the results are discussed with the Head of Audit, the Quality & Risk Committee and Managing Partner. Detailed action plans are developed to address the findings from our internal and external reviews. Key findings and learnings are anonymised and played back to the audit management. This now



includes good practice findings from the AQR so reinforcing good behaviour. We continue with our programme of Root Cause Analysis (RCA), which we believe makes a valuable contribution to our drive to improve audit quality. We also note emerging themes and these are regularly fed back to the audit management.

Complaints and allegations

The Firm has established a channel for Firm personnel to raise any concerns that the work performed by the Firm fails to comply with professional standards and applicable legal and regulatory requirements or non-compliance with the Firm's system of quality control. The Firm has a "Protected Disclosure" policy in place and employees are encouraged to come forward with concerns they may have and report such matters directly to senior management within the Firm. The policy has been designed to ensure that our people deal responsibly and in the interest of all concerned in the event of any malpractice.

By disclosing any information, our people will not be treated any differently. We will make every effort to ensure that there is no victimisation or harassment as a result of any disclosure and any appropriate disciplinary action may be taken against another individual in breach of this.

Wherever possible, we will discuss in confidence the disclosure of information and protect the identity of anyone disclosing information and, wherever appropriate, investigate the matter thoroughly.

Any action taken as a result of whistleblowing will be dependent on the nature of the concern, and dealt with as we deem appropriate.

We would wish to deal with any disclosure internally by following our internal procedures. If, however, an individual remains concerned about an internal investigation, and reasonably believes that the appropriate action has not been taken, then he/she should report the matter to the proper authority.

The Head of Audit and the HAAQM are responsible for monitoring and documenting the implementation of, and compliance with, any corrective actions. The Head of Audit and the HAAQM are also responsible for ensuring appropriate documentation of the operation of each element of the Firm 's quality control system.

Clients are made aware of our complaints procedure through the Firm's General Terms of Business. We at all times seek to provide consistently excellent services to our clients.

However, where we fall short of this goal, we provide our clients with an opportunity to raise their concerns or complaints directly with the Firm's Managing Partner.

As part of our continuous efforts to improve the quality of our services to clients, client concerns or complaints are taken seriously, and where required, appropriate corrective action is taken and improvements made to the Firm's systems and procedures.

Leadership Team statement on effectiveness of functioning

These policies, procedures and monitoring activities have provided the Firm's Leadership Team with reasonable assurance that the Firm, its partners and staff have materially complied with applicable professional, regulatory and legal requirements, that work has been performed to a consistently high standard and that appropriate reports have been issued. The firm's Leadership Team have inter alia considered the results of the annual internal quality control reviews and the regulatory inspections by the Firm's regulatory bodies (i.e. IAASA and Chartered Accountants Ireland) in reaching this opinion.

BDO International Quality Assurance Review

BDO International operates a monitoring program of member Firms with every member Firm being subject to a Quality Assurance Review ("QAR") on a periodic basis. The primary objective of the QARs is to evaluate the quality of the policies and procedures of member Firms as well as the quality of the local and referred professional work carried out by them. The quality of work of all member Firms is continually assessed and improved to increase the quality threshold across the network.

The QAR is designed to assess compliance with BDO standards and requirements for its engagements, share best practice and experience and provide practical advice and ideas to the member Firm. This would include possible improvements to its practice, in the areas of quality assurance procedures and efficiency and to ascertain the overall quality of judgements and opinions exercised by the member Firm.

The Firm was subject to a BDO International QAR in 2018.

A report on the results of the reviews is made to the Head of Audit with formal reporting to the Firm's Leadership Team and the HAAQM. The Head of Audit is responsible for monitoring and documenting the implementation of and compliance with any corrective actions identified for audit.

(G) EVALUATION OF EFFECTIVENESS OF QUALITY CONTROL SYSTEMS

The Firm's Leadership Team has evaluated the results of the internal and external monitoring, as detailed in this report, undertaken of the Firm's quality control systems in 2021. We are pleased to see that the results from IAASA's 2021 review of our audit files have improved compared to the 2020 report and reflects the focus placed on compliance with the Firm's quality standards and procedures. We recognise the need to continuously learn from these reviews and the findings from other firms' reviews and to take appropriate action.



EXTERNAL MONITORING OF QUALITY CONTROL

The Firm is registered as a statutory audit Firm with Chartered Accountants Ireland (CAI). CAI is subject to oversight by the Irish Auditing and Accounting Supervisory Authority ('IAASA' or 'the Authority') which is the independent body in Ireland responsible for the:

- Examination and enforcement of certain listed entities' periodic financial reporting
- Supervision of the regulatory functions of the Prescribed Accountancy Bodies ('PABs'), and
- The inspection and promotion of improvements in the quality of auditing of Public Interest Entities ('PIEs').

IAASA is designated as the competent authority in Ireland responsible for quality assurance reviews of statutory auditors and audit firms that carry out statutory audits of public-interest entities (audits of PIEs).

IAASA carries out an audit inspection regime in respect of audit firms that perform statutory audits of PIEs, such as listed companies on regulated markets in the EU, and companies that operate in the banking and insurance sectors, under its role as set out in the EU Audit Regulation and EU Audit Directive as incorporated into the Companies Act 2014.

The quality assurance review:

- Assesses the design of the firm's system of quality control
- Performs compliance testing around the implementation of the firm's procedures

• Evaluates the quality of a sample of audits of PIEs.

The quality assurance review is not designed to identify all weaknesses which may exist in the Firm's policies and procedures or in the implementation of those policies and procedures.

The assessment of the Firm's system of quality control involves review of 13 areas over a three year period. The quality assurance review which took place in 2021 assessed the design of the system of quality control in the following five areas:

- Consultations
- Internal monitoring
- Methodology
- Other quality control reviews
- Training.

For each of the five areas reviewed, the Authority assessed the Firm's policies and procedures and obtained evidence of the implementation of the Firm's policies.

In 2021, the Authority selected a sample of two audits of PIEs. For the audits selected, the Authority evaluated the quality of the audit planning and the communications with those charged with governance:

The Authority also evaluated the quality of audit evidence across additional audit areas. The additional audit areas were selected at the discretion of the Authority, taking into consideration the specific risks pertaining to the audit and other areas of focus for the Authority and for the PIE audits selected included:

- Accounting estimates
- Audit planning
- Auditor's report
- Cash and cash equivalents
- Communications with those charged with governance
- Going concern.

The quality assurance review identified one significant deficiency in the Firm's system of quality control. The quality assurance review also identified four matters requiring improvement and one minor deficiency in the Firm's system of quality control.

The audit of both PIE audits selected by the Authority for review were assigned a grade of 2 (limited improvements required).

The sample selected was limited to two audits and we are pleased to see the improved grading of our audits compared with the results from IAASA's 2020 review. Whilst we acknowledge that there is still room for improvement we believe that the results of the current review more accurately reflects the quality of the work undertaken by the Firm. We have met with IAASA during the review to discuss their findings and the results have been discussed internally with the Leadership Team and provided to the audit management team. We take the results of internal and external QARs very seriously and these results are taken into account in the appraisals of the individual partners concerned.

We continue to learn from the results of these reviews and take appropriate action to address the individual findings and focus on the themes emerging from these QARs in training.

At the very core of our strategy is the view that a BDO audit is a quality product and whilst QAR grades are only one measure of audit quality they are an important one and we continue to work hard to ensure that our files and processes are a proper reflection of the quality of our work.

The Firm is subject to inspection by the Professional Standards Department of Chartered Accountants Ireland ("CARB") for non-PIE audits. The last quality review visit undertaken by CARB was finalised in 2019 and, whilst it was noted that audit work was generally of a good standard on the files reviewed, actions have been taken to address the small number of recommendations identified.

The Firm is also registered with the Public Company Accounting and Oversight Board ("PCAOB") in the US. To date the Firm has not been inspected by the PCAOB.

Further details regarding these supervisory authorities can be found at the following websites:

N	> CAI w	ww.charteredaccountants.ie
en	> IAASA w	ww.iaasa.ie
Rs		ww.charteredaccountants. /Professional-Standards/
	> PCAOB w	ww.pcaobus.org
en Rs	 Professional w Standards ie 	ww.charteredaccountai /Professional-Standard

PUBLIC INTEREST ENTITIES

A list of public interest entities as at 28 February 2022 is set out below.
DeCare Dental Insurance Ireland Designated Activity Company
DVA Reinsurance Designated Activity Company
German Postal Pensions Securitisation 2 plc
Leverage Shares plc
Nautlius Indemnity (Europe) Designated Activity Company
Newell Insurance Designated Activity Company
Nokatus Insurance Company Designated Activity Company
Shannon Capital plc
The Baxendale Insurance Company Designated Activity Company
The Standard Club Ireland Designated Activity Company
Titanium Secured Obligations Designated Activity Company
Woodlands International Insurance Company Designated Activity Company

ETHICS AND INDEPENDENCE

Ethics and independence are central to restoring trust and confidence in the audit profession and are of fundamental importance to our culture and success. Integrity, objectivity and independence are at the core of our culture and our business. Our policies and procedures are in line with, or exceed, regulatory requirements including those relating to local public sector audits.

The Firm has established policies and procedures designed to meet these ethical and independence requirements. We know that our people face circumstances each day that test these values, and that is why we have the structures, mechanisms and tools to support our people as we all seek to uphold the highest standards of behaviour.

The Firm's initial guidance on independence is included in the Employee Handbook and is complemented by training programmes targeting the needs of the individual partners and staff.

Of course, our business is global and so is audit independence. Our BDO Global Independence team launched a new independence manual which was issued to every BDO member firm, updating mandatory policies and procedures and driving consistency of behaviour on a global level. It promotes consistent application of independence policies and procedures and enhances cross-border collaboration and communication between each firm.

This programme of investment in independence at an international level continues and includes

enhanced investment in conflicts-of-interest solutions and independence indicators.

Compliance with relevant independence, conflict of interest (COI) and ethics rules, regulations and standards are a priority for BDO at the local and global levels. These rules, regulations and standards, which vary widely across the world, are complex and increasing in number.

The Firm has in place a disciplinary structure to determine the appropriate sanction for any professional that violates the independence rules and Firm policies.

INTEGRITY, OBJECTIVITY AND INDEPENDENCE

Our partners and staff are not only required to apply the rules but also to adhere to our cultural values of integrity and honesty and the principles of ethics and independence. They are required to take into account the views of an objective, reasonable and informed third party in order to reach a judgement that meets the overarching requirement to behave ethically and with integrity.

Audit Engagement Partners are required to communicate to those charged with governance on a timely basis all significant facts and matters that bear upon the auditor's objectivity and independence. Internal guidance and templates are available detailing the matters which should be included in such communications. We monitor these communications with those charged with governance as part of our internal quality control reviews. Our policies and procedures relating to ethical conduct and auditor independence are set out in detailed internal guidance pages on our intranet. These are complemented by extensive advice; consultation and training programmes, designed to ensure compliance with International and Irish Ethical Standards. The Ethics Partner is responsible for providing guidance and support on the application of ethical standards to ensure that our professional objectivity and independence is maintained and our cultural values adhered to.

BDO International's social media group on Yammer, where the team engage with a mass audience and provide regular updates on a range of ethical and independence topics together with specific audit and assurance matters, has been very successful in ensuring that these topics are kept at the forefront of the minds of partners and staff and that timely guidance is provided regarding changes in these areas.

Our policies and procedures meet, and in some instances exceed, those that are promulgated by the International Ethics Standards Board of Accountants ("IESBA") Code of Ethics for Professional Accountants.

In addition to their own national code of ethics, all BDO Member Firms, as members of the Forum of Firms, are required to comply with, and annually report as to their compliance with, the IESBA Code of Ethics. As chartered accountants we are expected to demonstrate the highest standards of professionalism. Ethical behaviour plays a vital role in ensuring public trust and upholding the reputation of the accounting profession. The IAASA Code of Ethics assists us by providing relevant ethical guidance which forms a central part of our intake training programme whether that is through lateral hires or trainee recruitment.

FINANCIAL, BUSINESS, EMPLOYMENT AND PERSONAL RELATIONSHIPS

Each individual is responsible for determining his/ her compliance with the Firm's independence policies. In order to comply with relevant ethical standards, the policies which the Firm has in place prohibit partners, staff and persons closely associated with them holding a financial interest in an audit client or an affiliate of an audit client. Additionally, the firm, partners, staff and persons closely associated with them may only enter into business relationships with any of the firm's audited entities or their affiliates where they:

- Involve the purchase of goods and services from the client in the ordinary course of business and on an arm's-length basis and where the value involved is not material to either party
- Are clearly inconsequential to both parties.

ETHICS AND INDEPENDENCE

The Firm also has in place policies requiring individuals to report where any member of their immediate family or close family, or anyone with whom they have a personal relationship, has an involvement with an audit client which they consider might create a threat to the Firm's objectivity or a perceived loss of independence.

Employment-type relationships with an audited entity are relatively rare but in order to protect objectivity, approval procedures are in place before any such situation can be established.

The Firm maintains a list of clients, mainly assurance clients of which the Firm must be independent, and this list may be accessed by all partners and staff. Similarly in order to perform effective enquiries to ensure that our independence on a global basis is not compromised BDO International maintains a worldwide register, accessible by all BDO professionals, of BDO's clients that are restricted entities.

We monitor adherence to our policies through the annual declaration process which seeks confirmation from partners and staff that our policies surrounding financial, business, employment and personal relationships have been complied with. All exceptions are reviewed and investigated by the Quality and Risk Committee.

Where our monitoring procedures identify breaches, these are rectified as soon as possible, and the individual is subject to our sanctions policy. No instances where the firm's independence was judged to be compromised was identified this year.

LONG ASSOCIATION WITH THE AUDIT ENGAGEMENT

Audit engagement leaders and key partners, including the Engagement Quality Control Reviewer, involved in the audit are subject to periodic rotation of their involvement with audit clients under the independence rules of the Ethical Standards. The rotation period for key audit partners responsible for carrying out a statutory audit of a public interest entity is 5 years from the date of their appointment.

The Firm's policies with respect to rotation of key audit partners and staff (i.e. those other than the engagement partner and EQCR, who are specifically covered by statute/regulation) in relation to public interest entities and other listed entities is principles-based, depending on the facts and circumstances of the engagement. Typically, such 'key audit partners and staff' include audit partners and senior managers / mangers performing a significant portion of the work, as well as specialist partners and senior managers / managers (e.g. tax, valuation).

The engagement partner reviews the safeguards put in place to address the threats to the objectivity and independence of such persons involved in the engagement in senior positions for a continuous period longer than 7 years and shall discuss those situations with the engagement quality control reviewer.

For non-listed audit clients, the audit partner will

normally rotate off the audit after 10 years. Where rotation is extended beyond 10 years, careful consideration is given as to whether it is probable that an objective, reasonable and informed third party would conclude the integrity, objectivity or independence of the Firm or engagement partner are compromised.

The Firm has established policies and procedures to monitor the length of time that audit engagement partners, key partners involved in the audit (including the Engagement Quality Control Reviewer) and partners and staff in senior positions, including those from other disciplines, serve as members of the engagement team for each audit.

AUDIT FIRM ROTATION

In accordance with S.I. No. 312/2016 - European Union (Statutory Audits) (Directive 2006/43/ EC, as amended by Directive 2014/56/EU, and Regulation (EU) No 537/2014) Regulations 2016, public interest entities (PIES) are required to appoint new auditors at a minimum every 10 years. We are monitoring our length of service with all PIES to ensure that we do not accept any appointment which is beyond the maximum period of 10 years.

FEES, REMUNERATION AND EVALUATION POLICIES

It is recognised that where fees from an audit client represent a large proportion of the total fees of the Firm a self-interest or intimidation threat may arise. The Firm's policies require that where it is expected that the total fees receivable from a public interest entity will regularly exceed 10% of the annual fee income of the Firm, the Firm will not act as the auditor of that entity and will either resign or not stand for reappointment, as appropriate.

The Firm's policies prohibit an audit being undertaken on a contingent fee basis.

The Firm's appraisal, promotion and remuneration processes for audit staff specifically exclude objectives related to selling non-audit services to audit clients.

NON-AUDIT SERVICES PROVIDED TO AUDIT CLIENTS

The Firm has policies and procedures in place to restrict the scope of services that can be provided to audit clients which are consistent with the IESBA Code of Ethics and local applicable laws and standards. In respect of all non-audit services, the approval by the audit engagement partner is required before such services can be provided to ensure that the audit engagement partner is informed about any proposed engagement and has considered whether the relevant services are permitted and, if applicable, of the threats arising from the provision of the services and the safeguards to be implemented to address those threats.

ETHICS AND INDEPENDENCE

CONFIRMATIONS

All individuals within the Firm are required to confirm their compliance with the Firm's independence policies on commencement with the Firm and annually thereafter. The confirmation is used to evidence the individual's understanding of the Firm's policies in relation to independence matters and that they have complied with these policies.

The responses to the annual declaration process are reviewed to identify possible conflicts or independence issues.

MONITORING

The annual review of the Firm's quality control system, which is undertaken by appropriately qualified senior individuals within the Firm, includes:

- Review of the independence annual confirmations of selected individuals
- Review of compliance with the Firm's policies in relation to partner rotation
- Review of independence questionnaires completed on audit Engagements.

CONFLICTS OF INTERESTS

Conflicts of Interest may preclude the Firm from accepting a client or an engagement. The relevant partner is responsible for the identification of possible conflicts, ensuring that any such conflicts can be properly managed before an engagement is accepted and being alert to potential conflicts which may arise throughout the engagement.

We have a designated Ethics Partner who monitors compliance with the applicable independence policies and procedures, provides consultations regarding independence matters, and oversees independence training and maintenance of a restricted entity database.

We maintain a database of all our Firm's restricted entities, including listed companies and other public interest entities. This is available to all staff on our intranet and its objective is to prevent the performance of prohibited non-assurance services or investment in these entities. The database is continuously updated.

Prior to accepting any new client or assurance engagement, our engagement teams must perform specific procedures to identify potential conflicts of interest and threats to our independence.

There is also an independence declaration per audit engagement signed by all partners and staff members that have been involved in the performance of the audit engagement.

BDO GLOBAL INDEPENDENCE PRACTICES

BDO Member firms' independence and objectivity on assurance clients is achieved through policies and procedures designed to ensure compliance with the independence standards of the International Federation of Accountants



(IFAC) Code of Ethics and the respective national regulatory organisations. The relevant ethics and independence rules for each member firm are posted on BDO's global intranet, which is accessible by all BDO partners and professionals. As noted above, the BDO Global Independence manual further promotes consistent application of ethical policies and procedures and enhance crossborder collaboration and communication between each firm.

All member firms have a designated Ethics & Independence Champion who monitors compliance with the applicable independence policies and procedures, provides consultations regarding independence matters, and oversees independence training. This monitoring process is supported by the Independence Steering Group who conduct their own monitoring procedures and follow up on non-adherence.

BDO also maintains a worldwide database of all our major firms' restricted entities, including listed companies and public interest entities. This is situated on the global intranet and its objective is to prevent the performance of prohibited nonassurance services or investment in restricted entities.

Prior to accepting any new client or assurance engagement, member firms must perform specific procedures to identify potential conflicts of interest and threats to their independence including, where necessary, international conflict of interest and independence checks throughout the BDO network.

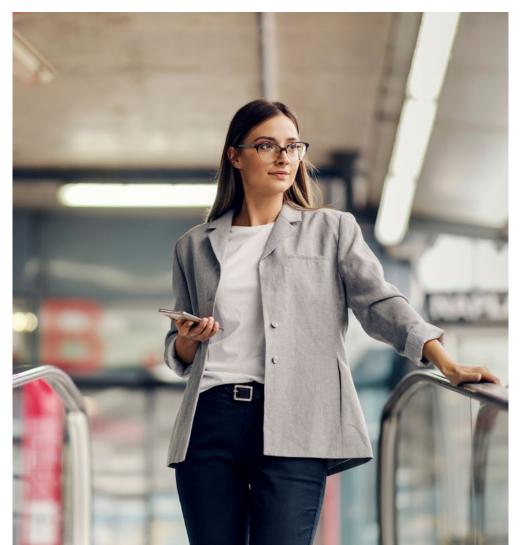
CONTINUING PROFESSIONAL DEVELOPMENT

The Firm has a policy of facilitating and encouraging continuing education as an important means of developing knowledge and maintaining and improving the quality of its services and of motivating and retaining its personnel.

For audit partners and professional staff, the Firm requires partners and staff members to participate in appropriate continuing professional development programmes and monitors the fulfilment of programme obligations.

The continuing education program is comprised of training sessions organised by the Firm specifically designed to meet its needs, with such training provided by the Firm as well as external training by relevant professional bodies or other training organisations that are accredited by the local professional body. Certain courses are mandatory and others are optional. The CPD requirements for professional auditors are also factored into the programme.

Extensive training is given to all new recruits on the BDO audit methodologies, tools and processes. More experienced personnel and partners are encouraged to update and deepen their technical knowledge.



Developing management and interpersonal skills are also very important for this group.

Continuing professional education is a factor taken into account for the yearly evaluation of audit staff and the assessment of their career potential within the Firm. We are committed to developing and maintaining the highest possible standards of technical competence through our own development programmes. As part of an individual's performance appraisal, professional development needs are assessed and courses or other training opportunities are identified.

We have developed a curriculum providing technical training for our professionals throughout their careers. For all new audit professionals, there is an orientation programme covering the Firm's audit approach and procedures and its organisational structure. All audit staff, including managers and partners, attend regular technical update courses. These courses are complemented by on the job coaching which provides a significant aspect of their professional development. All audit staff are personally responsible for keeping up to date with the requisite knowledge, skills and professional competence which they will need to successfully carry out the roles to which they are assigned.

CORPORATE SOCIAL RESPONSIBILITY

At BDO we are committed to being a responsible business, both in how we work with our clients and in terms of how we contribute to the wider community and the world around us. It is important to our employees to work for a socially responsible organisation and our approach therefore reflects our people. We recognise that our activities as a Firm have an impact on our communities. We are committed to not only managing that impact but also using the resources we have in making a real and sustainable difference.

Our commitment to Corporate Social Responsibility (CSR) focuses on the following pillars:

- **Community** We are actively involved in supporting and developing the local community to make a lasting positive impact.
- People We provide the tools to enable personal growth and fulfilment for individuals and for the Firm to work together to make a difference as a team.
- Environment We work hard to ensure that the negative impact our business has on the environment is minimised.
- Marketplace We ensure that we buy and sell responsibly helping drive positive change within industry.

During the year we supported a number of fantastic causes and initiatives. Due to the ongoing impact of the Covid-19 pandemic, many of our initiatives have remained as online or virtual events.

Some of our causes which we have supported include supporting the *Irish Cancer Society for Daffodil Day* with a coffee morning, and supporting our staff nominated charity the *Children's Health Foundation* via fundraising on Pancake Tuesday.

Our staff and partners were also delighted to support *Pregnancy and Infant Loss Awareness Month* in October 2021. We were very grateful to our colleagues who shared their stories and raised awareness, and also participated in fundraising to support three fantastic charities being *NMH Foundation, Féileacáin* and *Little Lifetime Foundation.* In addition, we helped Santa with his annual visit to *St Audeon's school* and were in the fortunate position of ensuring that not only did every child in the school receive a present, but were able to donate a number of Samsung tablets to the school.

We continue to also support *Inner City Enterprise* by hosting workshops for their members on financial management, branding, and tax affairs.

All of our CSR firm wide events are led by our staff, and we are extremely grateful for their initiative and enthusiasm in helping to support our local community.















DIVERSITY & INCLUSION PROGRAMME

In 2020, we established our Diversity & Inclusion (D&I) Programme. This initiative is an extension of our core values and is central to the success of our Firm. Our mission is to ensure that D&I becomes embedded within our firm's culture and is evident in our day-to-day interactions both internally and externally in the market. As an employee-led initiative, the programme is built to reflect the insights of our own diversity within the firm. Our key objective for our D&I programme is to ensure that BDO is an open, respectful and inclusive environment for everyone. This will ensure that our strategic objectives are also achieved which include:

- Attracting, retaining and empowering diverse talent
- Building diverse and dynamic teams to optimise client delivery, and
- Enhancing employer recruitment and retention.

The committee works across four key pillars including – Cultural, LGBTQ+, Gender Balance, and Abilities and Access. Through the programme's various activities, the D&I committee aims to promote an environment that recognises, respects and values all of our differences that we each bring to work.

Over the last year we hosted a number of events and activities which focused on our four key pillars. Events included guest speakers for International Women's Day, Pride Month, and a celebration for World Culture Day. In addition,







DIVERSITY & INCLUSION PROGRAMME

the committee also supports a number of external initiatives in order to advance its D&I objectives, including:

30% Club PSG Guiding Framework

BDO has been a member and supporter of the Irish chapter of the 30% Club for many years. Over the last year, the Professional Services Group ("PSG") of the 30% Club have been developing a guiding framework – Flourishing Equally in the Future Workplace. As a member of the PSG group, BDO was actively involved in the development of the framework, as well as now being a fully signed up firm to the framework.

The vision of the group was to establish a guiding framework for the future of work in Professional Services firms in Ireland that is actionable and creates a sustained cultural step change that removes existing barriers to progression for women and enables both women and men to flourish equally in the workplace.

BDO's commitment to the framework is a key priority for the firm, and we are committed to the full implementation of the framework in our firm as part of our Gender Balance pillar.

DCU Access to the Workplace Programme

During the year, we became a supporter of the DCU Access to the Workplace Programme.

DCU Access to the Workplace provides DCU Access students with a high-quality internship during their summer break, hosted by leading Irish companies participating in the programme.

Using their summer break to gain professional experience related to their degree can significantly enhance a student's future career prospects and social mobility. However, not all student possess the social and professional networks that can help to secure paid, professional summer work experience. This is particularly true for DCU Access students from socioeconomically disadvantaged backgrounds.

In response, DCU's Access Service and DCU Education Trust launched DCU Access to the Workplace in 2019, to enable Access students to find high-quality summer employment in established workplaces and to generate a modest income during their summer break.

Access students are a part of DCU's Access Programme, the largest programme of its kind in Ireland, supporting nearly 1,200 student in the 2020/2021 academic year. It makes third level education attainable to talented students from socio-economic disadvantaged backgrounds and provides a range of personal, financial and academic support to enable students to thrive and excel in their studies in DCU.

Our participation in and support of the DCU Access to the Workplace programme is a key initiative in our Abilities and Access pillar, which focusses on enabling access to the workplace for all, including those from nontraditional backgrounds.

Diversity and inclusiveness are key priorities for our Firm and we recognise that our D&I strategy is a journey. We're proud of the progress we have made to date, but we still have much more we need and want to do to foster an even more diverse and inclusive workplace culture. We are committed to the journey and we are committed to achieving our objectives.

SOCIAL WELLNESS ACTIVE GROUP

Our Social Wellness Active Group (SWAG), consisting of staff members from various departments throughout the organisation, was set up in 2016 with the aim of improving the social environment of the workplace and creating strong working relationships amongst employees. Now more than ever, nurturing connections between employees is essential to boosting morale and bringing our people together while working remotely.

At BDO, we are committed to promoting the wellbeing of our staff.

Over the past number of years, the SWAG committee has built a track record of organising many successful events that continue to bring a high level of engagement from staff of all levels.

During 2021 and into 2022 as we began to exit restrictions the committee have been able to reignite the very important aspect of social interaction and integration among our people many who hadn't seen each other for over 18 months and many who had met in person for the first time.

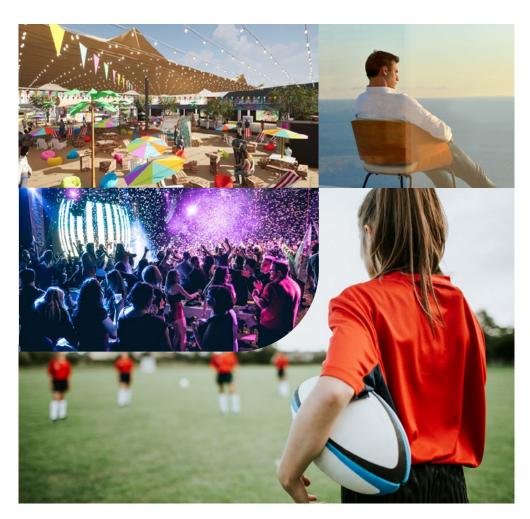
In recent months we have arranged informal gatherings in the firm to promote renewed team interaction as we continue our phased return to the office. For the Summer months ahead, we have kicked off our tag rugby competition which has been oversubscribed and have booked our *Summer BBQ* which is always a fantastic event enjoyed at every level in the firm.

In May we also attended *Connectopia* in the RDS. This event involved games, food trucks and a very exciting game of *Bingo Loco*.

Over the last few months there have been a number of Wellbeing events such as coffee mornings, yoga and the *BDO Mystery Walking Tour*.

The events have been very well-received by attendees and it has been fantastic to socialise with colleagues as well as meet new and familiar faces.

We are taking a proactive approach in gathering feedback from our staff and creating events that interest them. We look forward to the year ahead with renewed optimism and plenty of creative ideas to bring our people together.

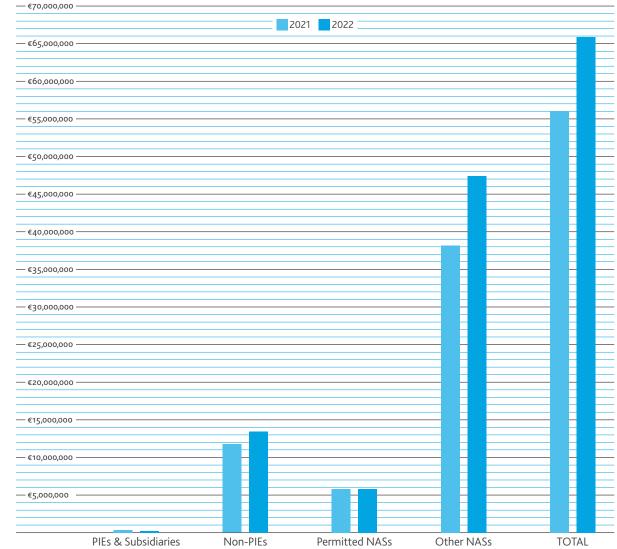


FINANCIAL INFORMATION

The following turnover information, excluding Valued Added Tax, for the year ended 28 February 2022 has been extracted from the Firm's books and records:

REVENUE	2021	2022
Statutory Audit: PIEs and their Subsidiaries. Entities other than PIEs.	€350,000 €11,750,000	€248,000 €13,442.000
Permitted NASs: Entities audited by the Firm.	€5,800,000	€5,792,000
NASs: Other entities.	€38,150,000	€47,405,000
Total	€56,050,000	€65,887,000

The combined turnover from statutory audits of the BDO EU/EEA audit Firms for the period as of 29 September 2021 is €605,172,068^{*}.



*Please note that this year the figures from the UK are not included due to Brexit.

PARTNER REMUNERATION

Partners are remunerated solely out of profits of the Firm in accordance with the partnership agreement. The determination of profits of the Firm is based on the results of the Firm as a whole and is not dependent on the performance of any particular line of business or function. The final allocation of profit is made after a Partner's performance has been appraised by the Partner Evaluation Committee.

Partner compensation is reviewed regularly which includes consideration of the partner's role, and the quality of the work, but is not directly related to the individual's financial performance. The appraisal and compensation of partners includes consideration of the findings from internal and external inspections of audit engagements.

The Partner Evaluation Committee assesses each partner's performance based on a number of specific criteria including technical expertise (taking account of findings from internal and external inspections of audit engagements), independence, integrity, professionalism, and entrepreneurship. Depending on the outcome of the evaluation, their respective share in the Firm may increase or decrease.

There is provision to make payments for exceptional performance or severance payments. Audit partners are not remunerated by reference to the sale of non-audit services to audit clients.



ROTATION OF ROLES

The Firm's policies with respect to rotation of key audit partners and staff (i.e., those other than the engagement partner and EQCR, who are specifically covered by statute/regulation) are principles-based, depending on the facts and circumstances of the engagement.

Typically, such 'key audit partners and staff' include audit partners and senior managers/ managers performing a significant portion of the work, as well as specialist partners and senior managers/managers (e.g., tax, valuation). The rotation period for these professionals is 10 years.

APPENDIX I – EU/EEA BDO MEMBER FIRMS

COUNTRY	TERRITORY	AUDIT FIRM NAME	COUNTRY	TERRITORY	AUDIT FIRM NAME
	Austria	BDO Salzburg GmbH Wirtschaftsprüfungs - und	FINLAND	Finland	BDO Oy
		Steuerberatungsgesellschaft		Finland	BDO Audiator Oy
	Austria	BDO Austria GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft		Finland	Finnpartners BDO Oy
	Austria	BDO Steiermark GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft	FRANCE	France	BDO France
				France	BDO AUDIT DES ACTIVITES SOCIALES
	Austria	BDO Oberösterreich GmbH Wirtschaftsprüfungs - und Steuerberatungsgesellschaft		France	BDO PARIS ENTREPRISES
				France	BDO PARIS AUDIT PME
	Austria	BDO Audit GmbH, Vienna		France	BDO ATLANTIQUE
BELGIUM	Belgium	BDO Bedrijfsrevisoren BV / Réviseurs d'Entreprises SRL		France	BDO RENNES
BULGARIA	Bulgaria	BDO Bulgaria OOD		France	BDO LYON AUDIT
CROATIA	Croatia	BDO Croatia D.O.O.		France	BDO IDF
CROATIA		BDO ALBANIA LLC		France	BDO LES HERBIERS
	Albania			France	BDO FONTENAY LE COMTE
	Kosovo	BDO KOSOVO		France	BDO NANTES
	Sarajevo	BDO BH d.o.o. Sarajevo		France	BDO LES ULIS
CYPRUS	Cyprus	BDO Limited		France	BDO Paris Audit & Advisory
CZECH REPUBLIC	Czech Republic	BDO Audit s.r.o		France	BDO Méditerranée
	Czech Republic	BDO Group s.r.o.	GERMANY	Germany	BDO AG Wirtschaftsprüfungsgesellschaft
	Czech Republic	BDO Czech Republic s.r.o.	0210 0 0 0 0	Connany	BDO Oldenburg GmbH & Co KG Wirtschaftsprü-
DENMARK	Denmark	k BDO Statsautoriseret revisionsaktieselskab BDO Holding V, Statsautoriseret Revisionsaktie- selskab		Germany	fungsgesellschaft
				Germany	BDO DPI AG Wirtschaftsprüfungsgesellschaft
ESTONIA	Estonia	Aktsiaselts BDO Eesti		Germany	BDO Dr. Daiber Audit GmbH Wirtschaftsprü- fungsgesellschaft

APPENDIX I – EU/EEA BDO MEMBER FIRMS

COUNTRY	TERRITORY	AUDIT FIRM NAME
GIBRALTAR	Gibraltar	BDO Limited
GREECE	Greece	BDO CERTIFIED PUBLIC ACCOUNTANTS S.A.
	Greece	BDO Services SA
HUNGARY	Hungary	BDO Hungary Audit Ltd
ICELAND	Iceland	BDO ehf.
IRELAND	Ireland	BDO
ITALY	Italy	BDO Italia S.p.A.
LATVIA	Latvia	SIA BDO ASSURANCE
LIECHTENSTEIN	Liechtenstein	BDO (Liechtenstein) AG
LITHUANIA	Lithuania	BDO Auditas ir Apskaita, UAB
LUXEMBOURG	Luxembourg	BDO Audit
MALTA	Malta	BDO Malta CPAs
NETHERLANDS	Netherlands	BDO Audit & Assurance B.V.
NORWAY	Norway	BDO AS
POLAND	Poland	BDO Spółka z ograniczoną odpowiedzialnością Sp. K.
	Poland	BDO Legal Latala is Wspólnicy Sp.K. (non-voting Firm)
PORTUGAL	Portugal	BDO & Associados, SROC, Lda
Romania	Romania	BDO Audit SRL
	Romania	BDO Auditors & Accountants SRL
	Romania	BDO Auditors and Business Advisors SRL
SLOVAK REPUBLIC	Slovak Republic	BDO Audit, spol. s r.o.
SLOVENIA	Slovenia	BDO Revizija d.o.o.

COUNTRY	TERRITORY	AUDIT FIRM NAME
SPAIN	Spain	BDO Auditores, S.L.P.
	Spain	BDO Audiberia Abogados y Asesores Tributarios, S.L.P.
SWEDEN	Sweden	BDO AB
	Sweden	BDO Göteborg AB
	Sweden	BDO Göteborg Intressenter AB
	Sweden	BDO Göteborg KB
	Sweden	BDO Mälardalen AB
	Sweden	BDO Mälardalen Intressenter AB
	Sweden	BDO Norr AB
	Sweden	BDO Norr Intressenter AB
	Sweden	BDO Stockholm AB
	Sweden	BDO Sweden AB
	Sweden	BDO Syd AB
	Sweden	BDO Syd Intressenter AB
	Sweden	BDO Syd KB

EUROPEAN NON-EU/EEA BDO MEMBER FIRMS

COUNTRY	TERRITORY	AUDIT FIRM NAME
SWITZERLAND	Switzerland	BDO Ltd/AG/SA
United Kingdom of Great Britain and	United Kingdom	BDO LLP
Northern Ireland/Isle of Man	Northern Ireland	BDO Northern Ireland

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