



# TRANSPARENCY REPORT 2024

## BDO Gibraltar





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## INTRODUCTION

### FROM THE MANAGING DIRECTOR



**DESIREE MCHARD**  
MANAGING DIRECTOR

30 APRIL 2025

Welcome to the 2024 transparency report of BDO Gibraltar. This report sets out how we as a firm achieve our regulatory obligations in respect of governance as well as audit quality. Within BDO, we invest in people and our systems to ensure that quality and public trust is an integral part of everything that we do. Combined with this is our overriding commitment to exceptional client service. For more information on this, please visit our website.

The 2024 financial year was a stable year, with the firm recording revenue growth of five percent, mainly driven by an increase in audit services. As with previous years, this increased revenue was offset but higher operational costs, as we continued to invest in our people.

Our greatest asset will always be our people, and we are determined to attract, recruit, develop and retain the best talent in the market. However, there continue to be challenges in recruiting talented employees to grow our business. To this end we continue to seek to recruit individuals from the traditional overseas markets.

The provision of high quality audits is our main priority for our audit service line. In respect of this we continued to embed the principles set out in International Standard of Quality Management (ISQM1) in our processes, following the first implementation of the standard in late 2022.

We conducted an evaluation in accordance with ISQM 1 and concluded that the firm's SoQM provides the firm with reasonable assurance that the objectives of the SoQM are being achieved as of 31 August 2024. See page seven for more information.

At a global level, BDO has made a commitment to support the goal of net zero greenhouse gas emissions by 2050 (or sooner). At a local level, during 2024 we commenced our journey in respect of our net zero commitment, as we began calculating our emissions as a firm, and set out our objectives to reduce these.

Looking ahead, in today's rapidly evolving business landscape, adaptability is paramount. With the development of AI, our businesses will no doubt change in the coming years and we at BDO Gibraltar recognise the need to embrace that change.

We continue to be optimistic about the strength of BDO's position within the local audit and accounting market, and we look forward to continued growth and expansion in 2025.

I hope you enjoy reading our 2024 transparency report.

**DESIREE MCHARD**  
BDO LIMITED

## LEGAL STRUCTURE AND OWNERSHIP

### THE LEGAL ENTITY

BDO Limited (“the Firm”) is a limited company incorporated in Gibraltar on 22 July 1994 with registered number 52200. Before incorporation the business in Gibraltar traded as a partnership. At 31 December 2024 the Firm had two shareholders, who are also directors of the company.

### BUSINESS ADDRESS

The Firm operates from a single office in Gibraltar at 5.20 World Trade Center, 6 Bayside Road and its principal services are audit, accounting, tax and payroll services.



# NETWORK

The Firm is the Gibraltar Member Firm of BDO International Limited.

## DESCRIPTION OF THE NETWORK

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 ('BDO Member Firms'). BDO is the brand name for the BDO network and all BDO Member Firms.

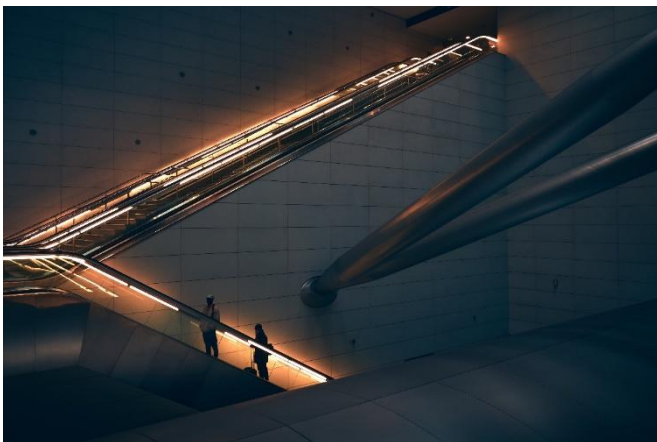
## LEGAL AND STRUCTURAL ARRANGEMENTS IN THE NETWORK

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 in the Regulations.

Each BDO Member Firm is an independent legal entity and profits are not shared between member firms. All BDO Member Firm client engagements – whether for domestic work, referred work from other firms in the network, or international work sourced from non-BDO sources – are conducted in the name of the local BDO Member Firm.

Membership of the network confers certain rights on BDO Member Firms, as well as certain obligations. Rights include the use of the BDO brand, including the network name and logo, the ability to refer work to and from other BDO Member Firms and a wide range of resources. Obligations include the capability to offer the minimum core services, including accounting and auditing, taxation and specialist advisory services, and a high standard of professionalism and ethics.

The BDO network is the world's fifth largest accountancy network, with annual revenues of \$15bn for the year ended 30 September 2024. The network currently employs over 119,000 people working across 1,800 offices in 166 countries and territories.



# GOVERNANCE

## BDO NETWORK

The BDO network is governed by the Council, the Global Board and the Global Leadership Team of BDO International Limited. The Council comprises one representative from each voting member and comprises the members of BDO International Limited in general meeting. The Council approves the network's central budget, appoints the Global Board and approves any changes in the Articles and Regulations of BDO International Limited.

The Global Board, which is the Board of Directors of BDO International Limited, comprises a representative of the BDO network's seven largest member firms, whose appointment, each for a three year term, is approved by the Council. The Global Board sets priorities for the BDO network and oversees the work of the Global Leadership Team. The Global Board meets at least four times a year.

The Global Leadership Team is tasked with coordinating the activities of the BDO network. It is headed by the CEO and comprises the COO, 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 Global Leadership Team is supported by the Global Office at Brussels Worldwide Services BVBA. Brussels Worldwide Services BVBA, a Belgian limited liability company, provides services to assist in the coordination of the BDO network. BDO International Limited and Brussels Worldwide Services BVBA do not provide any professional services to clients. This is the sole preserve of the BDO Member Firms.

Each of BDO International Limited, Brussels Worldwide Services BVBA and the BDO Member Firms is a separate legal entity and has no liability for another such entity's acts or omissions. Nothing in the arrangements or rules of BDO shall constitute or imply an agency relationship or a partnership between BDO International Limited, Brussels Worldwide services BVBA and/or the BDO Member Firms.

Appendix C sets out the name and operating country of statutory auditors within the EU. The combined turnover of those firms is set out in Appendix A.

## BDO GIBRALTAR

The Board of Directors provides strategic and operational leadership to the Firm, and meets on a frequent basis. The Board retains overall responsibility for the functioning of the audit service line as well the other services that the Firm provides to its clients. The Board is also responsible for the monitoring of risk within the Firm.

## INTERNAL QUALITY CONTROL SYSTEM

### Overview of the SoQM

International Standards on Quality Management 1 ('ISQM 1') became effective on 15 December 2022 and required firms to establish a System of Quality Management ('SoQM') which takes a proactive and risk-based approach to managing quality.

The firm is responsible for designing, implementing, and operating a SoQM for audits or reviews of financial statements, or other assurance or related services engagements performed by the firm, to provide the firm with reasonable assurance that the objectives of the SoQM are being achieved.

The Firm has invested significant time and resources to establish and operate a SoQM that complies with ISQM 1 and achieves the objectives that that:

- The Firm and its personnel fulfil their responsibilities in accordance with professional standards and applicable legal and regulatory requirements, and conduct engagements in accordance with such standards and requirements; and
- Engagement reports issued by the Firm or engagement partners are appropriate in the circumstances.

The Firm has adopted all of the quality objectives and specified responses as set out in ISQM 1 for all of the eight components covered by our SoQM. The eight components are:

- The Firm's risk assessment process
- Governance and leadership
- Relevant ethical requirements
- Acceptance and continuance of client relationships and specific engagements
- Engagement performance
- Resources
- Information and communication
- The Firm's monitoring and remediation process

These components operate in the Firm's SoQM in an iterative and integrated manner. Other requirements of ISQM 1 comprise the roles and responsibilities for the SoQM, leadership's overall evaluation of the system, network requirements or network services and documentation.

To support the achievement of the Firm's overall quality objectives, in establishing and continuously improving the Firm's SoQM, the Firm has carried out the following for each of the components of its SoQM:



## MONITORING

The Firm monitors the design, implementation and operating effectiveness of the Firm's SoQM to identify areas for improvement. Root cause analysis is performed on deficiencies identified and remedial actions are implemented on a timely basis.

## INTERNAL QUALITY CONTROL SYSTEM (CONTINUED)

The Firm identifies emerging developments and changes in the circumstances of the Firm or its engagements and adapts its system of quality management to respond to such changes.

Robust monitoring and remediation are an important component of the Firm's SoQM to ensure that the Firm continuously seeks to improve its quality processes. The monitoring performed may identify deficiencies in the Firm's SoQM. Deficiencies may exist where:

- A quality objective required to achieve the objectives of the system of quality management is not established;
- A quality risk, or combination of quality risks is not identified or properly assessed;
- A response, or combination of responses, does not reduce to an acceptably low level the likelihood of a related quality risk occurring because the response is not properly designed, implemented, or operating effectively; or
- Another aspect of the SoQM is absent, or not properly designed, implemented, or operating effectively, such that a requirement of ISQM 1 has not been addressed.

A fundamental part of an effective monitoring and remediation process is to perform root cause analysis ('RCA') on the identified deficiencies to understand why deficiencies arose and to be able to design an effective remediation plan to prevent deficiencies from occurring again in the future. On at least an annual basis the Firm evaluates whether these deficiencies have a severe and/or pervasive impact on the achievement of the quality objectives in the Firm's SoQM.

### Evaluating the SoQM

The Firm's annual evaluation of the SoQM considers information gathered about the design, implementation, and operation of the system of quality management from monitoring activities performed over the period up to the evaluation date. The monitoring activities include testing the operating effectiveness of responses, reviewing findings from internal and external inspections of engagements, and considering other relevant information obtained about the SoQM.

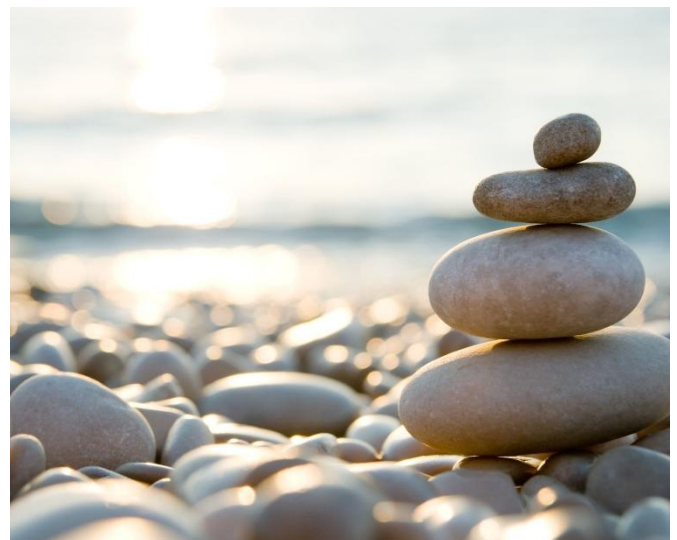
The Firm uses professional judgment to evaluate the results of these monitoring activities to determine whether findings, individually or in aggregate, are assessed to be deficiencies in the SoQM. For all deficiencies identified, the root cause is investigated and the severity and pervasiveness of the deficiency on the SoQM, individually and in aggregate with other identified deficiencies, is evaluated.

### Statement on the Firm's evaluation of the SoQM

We conducted our evaluation in accordance with ISQM 1 and concluded that the firm's SoQM provides the firm with reasonable assurance that the objectives of the SoQM are being achieved as of 31 August 2024.

Reasonable assurance is obtained when the SoQM reduces to an acceptably low level the risk that the objectives of the SoQM are not achieved. Reasonable assurance is not an absolute level of assurance, because there are inherent limitations of a SoQM.

For any identified deficiencies, the Firm designs and implements remedial actions to address identified deficiencies that are responsive to the results of the root cause analysis and remedial progress is monitored.





## INTERNAL QUALITY CONTROL SYSTEM (CONTINUED)

### LEADERSHIP RESPONSIBILITIES FOR QUALITY WITHIN THE FIRM

Quality control is dependent upon an organisational structure which is inherently sound and which clearly defines the responsibilities of the various levels of management. The Board of Directors assumes overall responsibility for quality within the Firm, and at least one of the directors will have an active involvement in every client engagement of the Firm. Focus on quality of work is communicated at all levels through formal communications to staff or informal audit team meetings.

The Board also ensures that:

- Audit work is carried out in accordance with relevant BDO audit methodology and international standards on auditing.
- Staff receive appropriate technical training.
- Technical queries are researched and resolved in a satisfactory manner.
- Quality also forms a component of the annual appraisal process of staff.

### ETHICAL REQUIREMENTS

The Firm's Board of Directors is responsible for providing guidance and support to staff in relation to the application of International Ethical Standards. Any potential issues with regard to the requirements are discussed amongst the audit team and Board when the issue is first raised. All partners and staff also sign an annual declaration confirming compliance with the relevant ethical requirements.

### 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.

Prior to the acceptance of any new client and consideration of continuance with that 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 it operates in;
- evaluation of information concerning the client, its management and its owners including obtaining evidence of the identity of the owners and officers of the business;
- considering information regarding the character and reputation of the prospective client and key personnel;
- 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.







The acceptance and continuation of all clients requires an approval process that is appropriate to the perceived risk.

The Firm's client acceptance procedures are also undertaken on existing clients.

## HUMAN RESOURCES

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 policies and procedures addressing the following areas:

- Clear and consistent policies and procedures
- Clear job descriptions: tasks, responsibilities and expectations
- Recruitment procedure
- Grades and levels: explanation and theoretical timeline, career path (specialism or upward)
- Workforce planning, succession management
- Continuous performance appraisal and engagement surveys
- Development plan and training policy

### *Clear and consistent policies and procedure*

Procedures, policies and personnel manuals provide clarity and coherence on goals, structures, vision and accepted behaviours of BDO Gibraltar employees. In short, they cover the rules of play within our organisation.

A personnel manual is available in order to support our management and staff with their need to have a clear and consistent set of rules within our organisation; what is acceptable and not and what is expected from all. The manual can easily be updated when new procedures are designed. Every employee must have access to a copy, so people can refer to the manual when needed.

Equally, every employee is expected to know the policies. Our manual is available on our shared folders, enabling easy access by all and with amendments allowed by the directors only.

Non-compliance with the Firm's policies and professional standards is reflected through additional training, delays in promotion or through dismissal for serious instances of non-compliance.

### *Clear job descriptions: tasks, responsibilities and expectations*

A good job description is the basis for most personnel matters in our firm: 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.

Within a job description you will find the following information:

- Purpose of a function
- Role of a 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 procedure*

Policies and procedures for recruitment are designed to provide reasonable assurance that those employed possess the appropriate characteristics to enable them to deliver a high quality service and perform their duties with professional competence.



We work actively to promote diversity within the Firm's culture, not just in principle but in practice. Inclusivity within the organisation, whether it is based on age, gender, ethnicity or physical capabilities, strengthens the Firm's values, makes the Firm more representative and more capable of providing a quality professional service.

We seek smart people with maturity, integrity, motivation, aptitude and leadership qualities appropriate to the role for which they are being hired.

*Grades and levels: explanation and theoretical timeline, career path (specialism or upward)*

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.

With regard to career development, generally there is staff progression from an introductory staff level to senior, to manager and then to senior manager. Staff are promoted to the next level only when they are prepared for the increased responsibilities that promotion entails.

*Workforce planning, succession management*

We recognise that ultimately it is the quality 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 and retain the right number of high quality people is of utmost importance. We predict personnel requirements so as to continue to service the firm's clients and provide sufficient capacity to enable its partners and staff to develop the business.

Policies and procedures for assigning personnel to engagements are designed to provide a reasonable assurance that only those persons having adequate technical training, proficiency and competence will perform the work.

A current profile of staff's technical proficiency is obtained by personal knowledge and by reviewing evaluation forms completed by his or her superiors on previous engagements. This profile is used to assess the suitability of the staff member for specific subsequent assignments.

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.

*What does succession management mean to the BDO Gibraltar?*

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

- To counter the increasing difficulty and costs of recruiting employees externally

*What does this mean to the employee?*

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

#### *Continuous performance appraisal and engagement surveys*

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

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

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 specialisation and years of experience, there are three basic attributes that all our staff possess:

- Technical competence in a chosen field of expertise;
- Pride in self, the firm and the profession; and
- Strong personal skills in managing and engaging staff and in leading engagements.

#### **ENGAGEMENT PERFORMANCE**

Engagement performance is made up of three components, which are set out below:

##### *Common methodology*

Our policies and procedures are designed to ensure that audits meet all applicable professional standards, regulatory requirements and that the firm issues reports that are appropriate in the circumstances. To achieve this and to promote consistency in the approach to auditing and related fundamental application of professional scepticism throughout the BDO network, 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 Auditing Standards.

APT, BDO International's in-house state-of-the-art audit software, remains our single largest global project of its kind and its evolution continues. With further substantial audit methodology and IT investment, the next generation of APT (Release 4.2) was launched in December 2022. By designing APT to take advantage of recent technological advances, we 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.

BDO Advantage is our data analytics audit tool. It works by combining smart technology with our knowledge and understanding of our clients' business to deliver information for in-depth interpretation. These include graphics that aid the exploration and understanding of data and make it easier to spot patterns and trends and crucially to identify anomalies. BDO Advantage will improve our awareness, provide valuable insights and deliver improvements to audit quality. Journal Analyser is the first step in the BDO Advantage journey. Audit journal adjustments are a key part of the audit and are often difficult to cover. Advantage makes it easier for the audit team to identify the journals that are large or unusual and support the process of auditing them.

### *Supervision and review*

We require all professional work to be supervised by staff members who have appropriate knowledge and experience. It is the responsibility of the relevant partner, principal or director to ensure that related risks are identified and that decisions are taken by those with an appropriate level of authority. The relevant partner, principal or director must also ensure that professional work is carried out with appropriate professional 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.

An engagement quality control review is performed for audits of public interest entities and other high risk engagements. The engagement quality control reviewer will be familiar with the auditing and reporting practices used during the engagement, and be knowledgeable and familiar with the client's industry, but is not part of the audit engagement team. They will be an experienced audit partner and not likely to be unduly influenced by the views of a particular engagement partner. The engagement quality control reviewer will not be actively involved in making ongoing decisions relating to the engagement and will not be involved in performing the engagement.

In addition the Firm also has an internal monitoring program, where a selection of files for each of the audit partners of the Firm is reviewed by independent staff of the Firm who are not involved in those audits.

### *Consultation*

Given the nature and size of the Firm, there is free and regular communication between all staff members on any areas that may be of a contentious nature. Such decisions are documented where necessary.



## MONITORING AND DOCUMENTATION

The quality of the level of the professional work carried out by the Firm is evaluated through BDO's Quality Assurance Review Process. The review process aims to provide assurance that all member firms of the network are adhering both to applicable professional standards as well as to BDO's international standards. The reviews are carried out by a team of dedicated reviewers and cover the major services supplied by each member firm, as well as its overall quality and risk management framework.

Every member firm is also subject to an accreditation process, which has the overall objective of enhancing the network's focus on quality as well as supporting its strategic aims.



## MONITORING OF QUALITY CONTROL

The Gibraltar Financial Services Commission, as the appointed Competent Authority for the purposes of the Act, is responsible under part 24, section 506 of the Financial Services Act 2019 for ensuring that all audit firms and statutory auditors are subject to a system of quality assurance controls. The Gibraltar Financial Services Commission has conducted quality assurance reviews through focussed visits concentrating on high risk areas. It last conducted an on-site review on the Firm in November 2022. The next review of the Firm is scheduled to take place in June 2025.

The audit of the Firm was last subject to a quality assurance review by the BDO network in October 2020. Such reviews are undertaken on each Member Firm of the BDO network at least every three years. The next review is scheduled to take place in August 2025.



## INDEPENDENCE AND PARTNER ROTATION

Our independence and objectivity on assurance clients is achieved through policies and procedures designed to ensure compliance with the independence standards. The Firm adheres to the Code of Ethics for Professional Accountants published by the International Ethics Standards Board for Accountants, which are the ethical standards that are applicable to Gibraltar audit firms, as set out in part 24, section 493(1) of the Financial Services Act 2019. The relevant ethics and independence rules are saved on our shared folders, which is accessible by all partners and professionals.

We have a designated Independence Champion, an experienced 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 also maintain a database of all our Firm's restricted entities, including listed companies and other public interest entities. This is available 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. Procedures include a custom-made web-based tool to facilitate international conflict of interest and independence checks throughout the BDO network.

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.

Independence practices are subject to a continuous process of internal review as part of a series of monitoring and review activities, including:

- an annual declaration undertaken by all partners and staff;
- audit file quality control reviews examining a selection of audit files covering all Responsible Individuals on an annual basis; and
- other monitoring activities targeting specific aspects of audit independence.

All of these monitoring and review activities were operational during the past financial year.

The Firm's policies with respect to rotation of key audit partners and staff (i.e. those other than the engagement partner and EQR, who are specifically covered by statute/regulation) 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/managers performing a significant portion of the work, as well as specialist partners and senior managers/managers (e.g., tax, valuation).

The policy of the Firm in respect of the rotation of these professionals is to comply with the long association requirements of the Code of Ethics for professional accountants as set out by the International Ethics Standards Board for Accountants, as well as Article 17(7) of the EU Regulation 537/2014. For audit clients that are public interest entities, the key audit partner can continue in that role for a maximum period of seven years.





## CONTINUING PROFESSIONAL EDUCATION

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 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 CPE requirements for professional auditors in Gibraltar are also factored in to 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.

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.



## PARTNER REMUNERATION AND EVALUATION

The Firm's two shareholders are paid a fixed salary for their duties as directors during the year. The level of these salaries is reviewed on an annual basis. The profits of the Firm in any financial year, after all expenses (including directors' salaries), are attributable but not necessarily distributed, to the shareholders in proportion to their shareholding in the Firm.

Partner evaluations take the following factors into account: technical expertise (including findings from internal and external inspections of audit engagements), independence, integrity, professionalism, and entrepreneurship.



## APPENDIX A

### FINANCIAL INFORMATION

|  | YEAR ENDED<br>31 DECEMBER 2024<br>£000s | YEAR ENDED<br>31 DECEMBER 2023<br>£000s |
|--|---|---|
| Statutory audits of PIEs and entities within a PIE group | 373                                     | 321                                     |
| Statutory audits of other entities                       | 1,123                                   | 1,068                                   |
| Permitted non-audit services to audit clients            | 85                                      | 86                                      |
| Non-audit services to other clients                      | 867                                     | 850                                     |
| <b>Total</b>   | <b>2,448</b>                            | <b>2,325</b>                            |

The figures in the above table are unaudited.

The combined turnover from statutory audits of the BDO EU/EEA audit firms for the period 2023/24 was €731,071,742 (2022/23: €630,045,047). Please note that BDO Member Firms have different year ends and therefore the total provided is a combination of the statutory audit turnovers of the EU/EEA Member Firms for their latest financial year. For those Member Firms that report their revenues in a currency other than EUR, the average exchange rate for the period reported has been used.

## APPENDIX B

### PUBLIC INTEREST ENTITIES

The public interest entities for which the Firm has carried out statutory audits during the preceding financial year are set out below:

EVOLUTION INSURANCE COMPANY LIMITED

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FORTUNA INSURANCE PCC LIMITED

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MONEYCORP BANK LIMITED

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SOUTHERN ROCK INSURANCE COMPANY LIMITED

## APPENDIX C

### EU/EEA MEMBER FIRMS

| COUNTRY        | TERRITORY      | NAME OF THE AUDIT FIRMS IN YOUR TERRITORY                           |
|----------------|----------------|---|
| AUSTRIA        | Austria        | BDO Audit GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft |
|                | Austria        | BDO Austria GmbH  |
| BELGIUM        | Belgium        | BDO Bedrijfsrevisoren BV / Réviseurs d'Entreprises SRL              |
| BULGARIA       | Bulgaria       | BDO AFA   |
| CROATIA        | Croatia        | BDO Croatia D.O.O.  |
|                | Sarajevo       | BDO BH d.o.o. Sarajevo  |
| CYPRUS         | Cyprus         | BDO Limited   |
| CZECH REPUBLIC | Czech Republic | BDO Audit s.r.o   |
|                | Czech Republic | BDO Group s.r.o.  |
|                | Czech Republic | BDO Czech Republic s.r.o.   |
| DENMARK        | Denmark        | BDO Statsautoriseret Revisionsaktieselskab                          |
|                | Denmark        | BDO Holding V Statsautoriseret Revisionsaktieselskab                |
| ESTONIA        | Estonia        | Aktsiaselts BDO Eesti   |
| FINLAND        | Finland        | BDO Oy  |
|                | Finland        | BDO Audiator Oy   |
| FRANCE         | France         | BDO PARIS   |
|                | France         | BDO Atlantique  |
|                | France         | BDO Lyon Audit  |
|                | France         | BDO IDF   |
|                | France         | BDO Rhone-Alps  |
|                | France         | BDO Méditerranée  |

| COUNTRY       | TERRITORY     | NAME OF THE AUDIT FIRMS IN YOUR TERRITORY                   |
|---------------|---------------|---|
| GERMANY       | Germany       | BDO AG Wirtschaftsprüfungsgesellschaft                      |
|               | Germany       | BDO Oldenburg GmbH & Co KG Wirtschaftsprüfungsgesellschaft  |
|               | Germany       | BDO DPI AG Wirtschaftsprüfungsgesellschaft                  |
|               | Germany       | BDO DPI Mentoring GmbH & Co. KG                             |
|               | Germany       | BDO Concunia GmbH Wirtschaftsprüfungsgesellschaft           |
| GREECE        | Greece        | BDO Certified Public Accountants S.A.                       |
| HUNGARY       | Hungary       | BDO Magyarország Könyvvizsgáló Kft. (BDO Hungary Audit Ltd) |
| IRELAND       | Ireland       | BDO   |
| ITALY         | Italy         | BDO Italia S.p.A.   |
| LATVIA        | Latvia        | BDO Assurance, LLC  |
| LIECHTENSTEIN | Liechtenstein | BDO (Liechtenstein) AG                                      |
| LITHUANIA     | Lithuania     | BDO Auditas ir Apskaita, UAB                                |
| LUXEMBOURG    | Luxembourg    | BDO Audit   |
| MALTA         | Malta         | BDO Malta CPAs  |
|               | Malta         | BDO Technology Advisory Limited                             |
| NETHERLANDS   | Netherlands   | BDO Audit & Assurance B.V.                                  |
| NORWAY        | Norway        | BDO AS  |
| POLAND        | Poland        | BDO Spółka z ograniczoną odpowiedzialnością Sp. K.          |
| PORTUGAL      | Portugal      | BDO & Associados, SROC, Lda                                 |
| ROMANIA       | Romania       | BDO Audit SRL   |
|               | Romania       | BDO Audit & Consulting SRL                                  |
|               | Romania       | BDO Auditors & Accountants SRL                              |
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| COUNTRY         | TERRITORY       | NAME OF THE AUDIT FIRMS IN YOUR TERRITORY |
|-----------------|-----------------|---|
| SLOVAK REPUBLIC | Slovak Republic | BDO Audit, spol. s r.o.                   |
| SLOVENIA        | Slovenia        | BDO Revizija d.o.o.                       |
| SPAIN           | Spain           | BDO Auditores, S.L.P.                     |
| SWEDEN          | Sweden          | BDO AB                                    |
|                 | Sweden          | BDO Göteborg AB                           |
|                 | Sweden          | BDO Göteborg KB                           |
|                 | Sweden          | BDO Mälardalen AB                         |
|                 | Sweden          | BDO Norr AB                               |
|                 | Sweden          | BDO Sweden AB                             |
|                 | Sweden          | BDO Syd AB                                |
|                 | Sweden          | BDO Syd KB                                |

## FOR MORE INFORMATION:

DESIREE McHARD

+350 20047300  
desiree.mchard@bdo.gi

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