

Transparency Report 2025

Building the future together



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For convenience purposes, this Transparency Report is an English translation from the original Dutch version. In case of differences in interpretation between the English and Dutch versions of the Transparency Report, the original Dutch version shall prevail.



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1. Report of the policymakers

Introduction

The year 2025 was all about further embedding our strategic refinement launched in 2024 'More impact with real value'. Our course remained focused on strengthening trust and maintaining social relevance by consistently putting into practice our mission 'We make people and organisations trust their true value'. We look back with pride on a year in which we managed to maintain a high level of service while further strengthening our quality agenda – and the quality culture inextricably linked to it. In terms of professionalism and development opportunities for our employees, we have also taken further steps as an organisation. It remains our ambition to maintain this momentum and stay the course in a fast-changing world and make a structurally positive impact.

We continued to implement our strategic direction in 2025, with quality as our firm compass. Further growth of our organisation remains necessary so we are able to continue to invest in quality in the broadest sense. Thus, we strengthened our multidisciplinary cooperation regarding quality, such as the deployment of audit experts, increased the use of new technologies and innovations in our services, and international cooperation was further intensified under the banner of BDO Global. In doing so, we stay close to our own signature, the foundations of which are professional connection and the human touch. Our strategic focus is on further growth in the midmarket and in sectors closely aligned with our international network. We are proud and grateful that we could count on the dedication and commitment of our colleagues this year as well. We believe that our personal approach made the difference again in 2025 to stay on track and make timely adjustments where necessary.

The valuable experiences of the past year and the undiminished willingness of our colleagues to change strengthen our confidence that we will continue to grow and develop our organisation in the coming years. We strive to be a learning organisation in all areas, an approach that offers many opportunities but at the same time demands a lot from our employees. We are constantly looking for ways in which we can do things even better, more effectively and with the same job satisfaction tomorrow. The world around us demands continuous agility and adaptability to respond in a timely manner to developments such as the ongoing digital transformation and applications of artificial intelligence (AI), but also to the growing focus on broadening our service portfolio and to the dynamics of the labour market. As a board, in the midst of these dynamics, we want to be an oasis for our colleagues, acknowledge the improvements achieved and offer confidence towards the future. We are still improving every day, but we are also careful not to get ahead of ourselves. That too is part of our people-oriented culture and our values.

In this report, we take you through the manner in which we met our goal of delivering 'More impact with real value' by 2025. The initiatives and results described in this report primarily relate to BDO Audit & Assurance B.V., the BDO Netherlands audit organisation within which we conduct statutory audits. BDO Audit & Assurance B.V. is part of the group with BDO Holding B.V. as group head. However, our ambition to deliver real value extends across all our activities within the BDO Group. Delivering real value and maintaining quality are crucial to our entire service delivery, making them an integral part of our quality focus across the full breadth of our organisation.

In this report, we provide insight into how we have concretised our quality cycle in 2025. This cycle is at the heart of our quality-oriented approach and contributes to the sustainable improvement of our organisation. Both at a detailed level and in broader organisational movements, we realise adjustments that contribute to strengthening our quality ambition. Smaller improvements, after careful evaluation, are implemented in practice as soon as possible and, where relevant, embedded within our system of quality management. As a part of this iterative cycle, we translate our strategic objectives, along with the envisioned major shifts, into annual plans. These plans form the foundation for the actions deployed annually aimed at achieving our quality objectives. In doing so, we explicitly take into account the insights, expectations and needs of our stakeholders, so that we can fine-tune our course where necessary in good time and continue to respond to the dynamics of our environment.

Investigation into inappropriate behaviour around exams

In our previous transparency reports, we reflected on the investigation into inappropriate behaviour around exams we launched during 2023. This study – which was commissioned by the Supervisory Board – was completed in 2025 in coordination with the Dutch Authority for the Financial Markets (AFM).

The investigation revealed that inappropriate behaviour in examinations occurred in respect of several hundred employees from all levels of our organisation during the period 2018-2023. The AFM concluded that BDO did not have sufficient specific policies and adequate procedures in place to ensure integrity in examinations during the relevant period. This has allowed these unwanted behaviours to take place unseen for a long time. Following this investigation, the AFM imposed an administrative fine on BDO. We accepted the fine.

We deeply regret the situation. Trust is at the heart of the accounting profession and is the basis of our reputation. Restoring trust and serving the public interest are central to us. We took steps already at the first indications of inappropriate behaviour. Thus, we have shaped a policy around exams and set out related guidelines. Disciplinary action was taken against concerned partners and staff. In addition, an initial Root Cause Analysis (RCA) was initiated in early 2025 in the course of the investigation, to get to the root causes of the observed inappropriate behaviour. In 2026, we will continue this journey in which we will further deepen the RCA and also conduct an oil spill analysis into the identified behaviours. These will form the basis of the broader follow-up to our findings from the examination survey.

We continue to invest in a culture where integrity, accountability and professional conduct are self-evident. Employees must feel safe to report abuses ('speak up') and managers must continuously set the right example in this respect.

System of quality management

All our efforts are dedicated to delivering quality to our stakeholders. To support its quality objectives, BDO has implemented a system of quality management designed in accordance with the requirements of the International Standard on Quality Management 1 (ISQM 1). Also in 2025, our system of quality management contributed significantly to achieving our quality objectives.

During the year, we further strengthened the system and embedded it in our organisation. Thus, improvement and remedial measures initiated in 2024 have been implemented based on previous findings. In addition, in 2025, the comprehensive risk assessment conducted previously was reviewed to determine, taking into account recent developments, whether our quality objectives, risks and measures and their interrelationships needed adjustment.

As part of the 2025 monitoring programme, we conducted several monitoring activities, including file reviews, to test the effective operation of our quality measures and evaluate the follow-up of previous improvement actions. We evaluated the system of quality management based on the results of this monitoring. On this basis, we have concluded that the system functions appropriately and it provides us with reasonable assurance that the objectives of the system of quality management are achieved. The monitoring also identified a number of findings and several non-severe deficiencies that are part of our improvement plans for 2026. The continuous strengthening of our quality management is an essential step to secure the quality of our services, processes and organisation in a sustained manner.

Robust governance is also a prerequisite for a system of quality management that functions effectively. In 2025, we further shaped the implementation of the 'Three Lines Model', which places responsibility for quality even more emphatically in the first line (the implementing organisation) and the second line focuses more strongly on monitoring and advising.

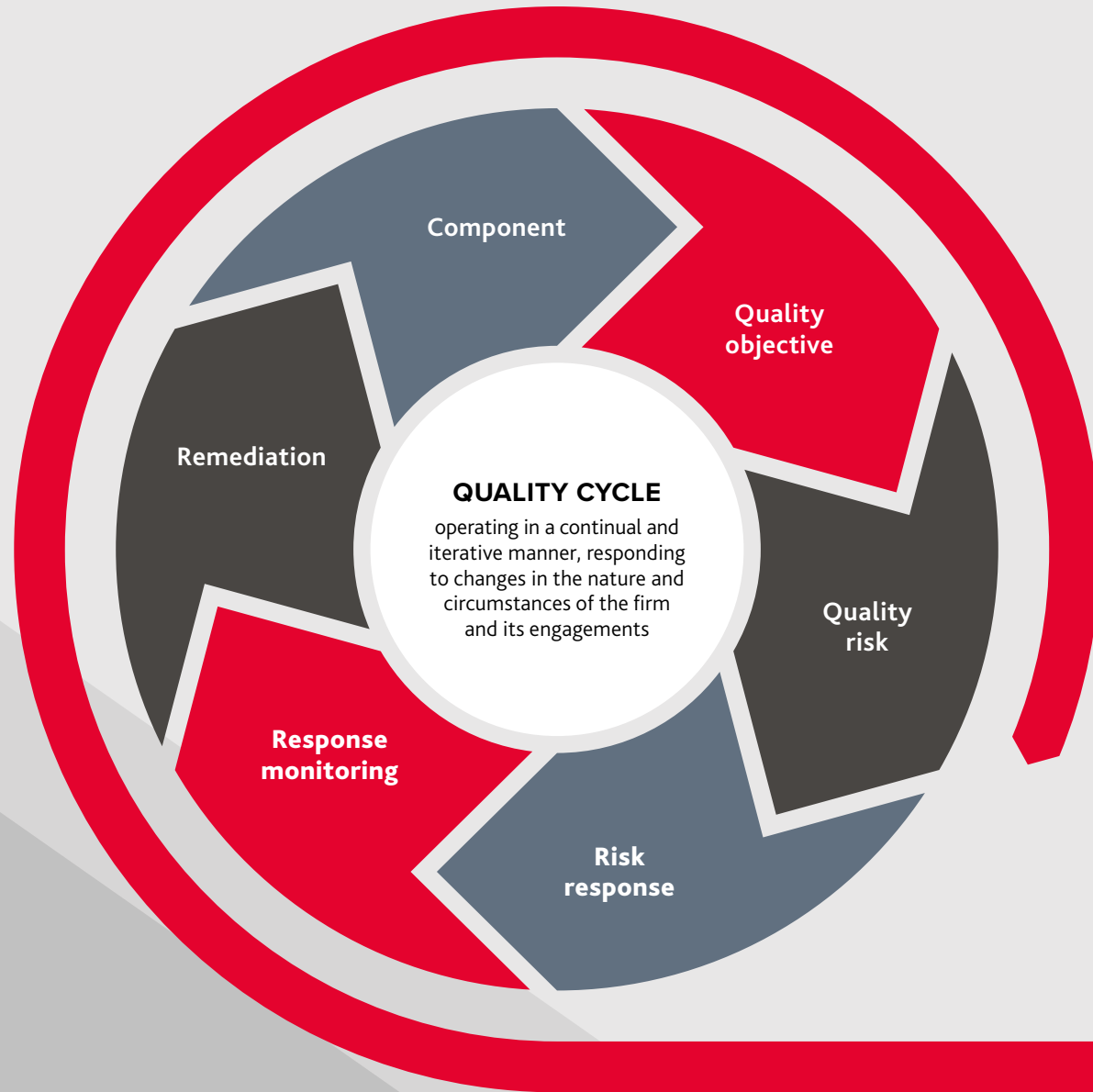
An important part of our quality-oriented governance is the Quality and Public Interest Committee established in 2022 (part of the Supervisory Board). There is an open dialogue within the Quality and Public Interest Committee about the quality-oriented approach and the opportunities and challenges involved. This critical interaction sharpens our insights and gives new qualitative impulses to our organisation and culture.

We also continued to have intensive discussions with our external regulators, including the AFM, in 2025. Where necessary, we have translated the findings and recommendations from their (sector-wide) investigations – such as in the area of fraud risk analysis and internal engagement inspections – into further refinements in our quality policy and audit practice. The AFM reported that in the accountancy sector public trust can still be fragile despite significant improvements. We feel a responsibility to further strengthen this trust. Therefore, this year too, we took additional steps to embed quality improvements even deeper in our organisation and communicate about them transparently. We have also further set up our IT systems so that our internal quality information matches the data points for the purpose of our internal data monitoring and the AFM's data-driven supervision.

Internal quality reviews confirm that the improvements made are having an effect; the quality of our audit files has improved and remaining findings concentrate on complex judgment issues rather than structural deficiencies. This demonstrates that our system of quality management is solid in design and operation and enables us to keep learning and improving in a continuous quality-conscious cycle. At the same time, we remain critical. We realise that quality assurance is never finished: it requires constant attention and adaptation to new circumstances. We therefore remain fully committed to further strengthening the system of quality management so that we continue to deliver quality and structurally meet our stakeholders' expectations in the future.

A culture that embraces quality and people

Delivering quality starts with the right culture. Within BDO, we have nurtured a people-centred approach for years. For us, a quality-oriented culture means a learning, agile and open culture, where mistakes are open for discussion and everyone feels responsible for improvement.



ANNUAL EVALUATION

In 2025, we have deepened this culture of quality. Our multi-year culture programme Horizon, which focuses inter alia on (psychological) safety, was also deployed across the full breadth of our practice this year. We changed the control line of this programme in 2025 to make implementation even more effective. This change brought the responsibility for the culture programme closer to the day-to-day practice, so that culture initiatives better match the needs of a practice. Periodic culture measurements in 2025 showed that results in areas such as engagement and psychological safety remained at a stable good level. Employees report that openness within practices has improved and that people feel safe to give feedback. At the same time, we realise that an open culture only exists sustainably if we give it sustained attention. That is why we took the next step in 2025: we translated the insights from our exploration of how leadership, team dynamics and psychological safety influence each other into concrete actions in the field of planning and coaching.

We continued to use our core values – Professionalism, Joy, Practical Relevance, People Focus and Social Responsibility – as a compass in decision-making and assessment in 2025. We make these values concrete through the behaviour we expect from all BDO employees. In 2025, we can proudly say: we are living our values. Whether it was the extra effort that colleagues made to complete a complex job in a high-quality manner (professionalism and social responsibility), the initiatives to share knowledge (fun and practical relevance), or the way teams accommodated each other during peak workloads (people-centricity) – our culture is the foundation on which we could build.

But here, too, we remain critical of ourselves. We have found that changes in ways of working – think new technology or tightened regulations – sometimes create tension. To remain truly agile, we also invested in involving our people in change in 2025. Thus, we again actively involved the Young MT A&A and sounding board groups set up for that purpose ('A&A Sounding Boards') in key projects and translated their feedback into adjustments that benefit everyone.

Furthermore, our culture programme has been reinvigorated in the area of leadership in 2025. We rolled out a leadership programme for starting partners, helping them grow in their role as culture carriers and leaders. A good example is worth following: the way managers deal with dilemmas, mistakes and successes sets the tone in our organisation. This is how we build a safe environment where people enjoy getting the best out of themselves – because ultimately, job satisfaction is a factor for quality that cannot be underestimated.

Innovation, AI and audit tooling

In 2024, we sharpened our innovation strategy and invested in new tools and techniques. The year 2025 focused expressly on implementation of the new technologies. Our Audit Innovation & Technology (AI&T) department, operating under the direct direction of the A&A management team, ensured that innovations were given an even more prominent place in our day-to-day audit practice in 2025.



PROFESSIONALISM



JOY

PRACTICAL
RELEVANCE

PEOPLE FOCUS

SOCIAL
RESPONSIBILITY

The use of advanced audit tooling and data analytics in auditing has increased substantially. This is partly due to the establishment of a network of key IT users: enthusiastic colleagues who serve as ambassadors and enquirers for tools and automated audit software. This allowed teams to remove barriers and share learning effects. The result: audit tooling and data analysis is becoming 'business as usual' in our audits resulting in increased quality, richer insights and often earlier identified areas of concern.

Artificial intelligence (AI) is a driver of innovation in our organisation. We have further enriched our electronic audit file with tooling and AI, allowing the auditor to focus even more on judgment. What is important here is that technology serves the professional and never the other way around, and data is reliable and reproducible. We see innovation as supporting to make our people's work more effective, efficient and interesting and to keep quality high in a complex environment. Yet we remain level-headed. The past year also offered us insights into the limits and challenges of digitisation. We find that while new tools help increase quality – standardised, data-driven, more objective – they do not automatically save time. Factors such as AI, cyber risks and applicable quality requirements have also increased the complexity of controls.

Our priority for 2026 is not only to develop new innovations, but above all to optimise the use of existing tooling. Many functionalities only offer returns when they are used consistently by all our teams. This requires training, guidance and adoption skills from our practice. We are confident that we can make great strides in this respect in the coming year: the willingness is there, the benefits are clear and, with the support of our AI&T team, we will further institutionalise the use of our innovative applications.

Growth focusing on quality

Our audit practice grew again in 2025. This is a sign of the market's confidence in BDO and our attractiveness as an employer. At the same time, we monitor that growth does not come at the expense of quality or culture. Every BDO employee must understand and endorse our quality standard and way of working.

New colleagues therefore go through an intensive onboarding programme that introduces them to our values, ways of working and expectations. Under the guidance of mentors and buddies, they find their way within our organisation. We are proud to see that they quickly feel at home and contribute to the further development of our practice with their fresh perspective.

In our growing organisation, the BDO Code acts as a moral and professional compass. This code is embedded in our daily actions and provides direction on integrity, professional quality and social responsibility. It reflects our core values – professionalism, fun, practical relevance, people focus and social responsibility – and provides guidance for making careful choices in an increasingly complex and changing environment.

The BDO Code encourages a culture of openness, accountability and reflection. In doing so, the code contributes to a working environment where quality and integrity are self-evident. This is how we continue to build sustainable relationships with society, our customers and each other.

External developments

Social trust in the accountancy sector was also a regular topic of debate in 2025. Industry-wide surveys and reports by regulators such as the AFM confirm that the technical quality of audits has improved in recent years. Nevertheless, further deepening and acceleration of improvements are needed to restore confidence on a sustainable basis. We therefore continue our quality-oriented course unabated. We continue to invest in a learning and agile culture in which psychological safety is central, allowing changes to take root faster and deeper in our organisation and achieving the desired quality improvements at all levels.

The internationalisation of the market and rapid technological developments, including the rise of AI and other digital innovations, offer opportunities while increasing complexity and requiring continuous adaptation. The sector was characterised by further consolidation in 2025. Private equity firms are further expanding their positions and offering capital-rich forms of cooperation in addition to the traditional partner model. Within this changing playing field, we closely monitor external developments and proactively translate them into our strategy and annual plans.

We maintain ongoing consultations with the AFM to respond to its supervisory agenda and focus topics in a timely manner. We have explicitly incorporated the learning points from recent supervision investigations into our operations and quality policy. In the recently published AFM Supervision Agenda 2026, the AFM emphasises its focus on promoting a sector culture in which quality and the public interest are central, strengthening fraud detection in audit practice and intensifying inspections for compliance with laws and regulations. These focal points align closely with our course.

Furthermore, the sector is facing significant changes in sustainability regulations. The European Commission presented the so-called 'Omnibus' reform package in early 2025, which limits the scope of the Corporate Sustainability Reporting Directive (CSRD), simplifies reporting obligations for companies and delays the first reporting deadlines. These developments have led us to critically reconsider the timing and scale of our investments in ESG services. Nevertheless, we continue to invest on an appropriate scale in this area in specialised knowledge and teams so that we can respond to the ultimate requirements in a timely manner and best support our clients in future sustainability assurance.

In short, 2025 was marked by continued change for Dutch accountancy. New investors are changing the landscape and accelerating office consolidation, while the bar for quality and public accountability remains as high as ever. At the same time, technological innovations such as AI, changing regulations and the tight labour market require continued agility and investment in people, innovation and, above all, the ability to adopt. As management of BDO Audit & Assurance, we continue to search for a point of calm for our colleagues in these dynamics, working confidently and in dialogue with all our stakeholders to further quality improvement, talent development and a resilient, future-proof organisation. We are fully committed to positivity, professionalism and connection to keep the profession attractive to new generations and ensure that our employees can be justifiably proud of their profession as accountants.

Vision 2029 – set course for the future

Partly in light of external developments, we have sharpened our strategic direction for the audit practice in 2025 to deliver on our quality ambition and provision of assurance on an ongoing basis. This renewed direction builds on our core values and our long-term vision in which quality, professionalism and social responsibility are central.

The strategic outlook for 2029 provides direction to an audit practice that provides assurance and adds value in an increasingly dynamic environment. Under the promise "Audit that takes you further", we are strengthening our position as a leading audit organisation that excels in quality, innovation and sector knowledge. We aim to provide direction on relevant social transitions, such as digitalisation, governance and sustainability, while remaining true to our role as financial conscience for organisations and society.

Quality remains the foundation of our services. We continue to invest in strengthening our professional technology, quality management and the development of our people. Our quality-oriented culture – in which professionalism, people-orientation and responsibility for the public interest come together – continues to guide our actions. Innovation plays an increasingly important role in this. In the coming years, we will continue to build a data- and AI-driven audit approach, in which technology supports us to identify risks earlier, deepen insights and create even more space for professional interpretation and dialogue. Our commitment to a fully-integrated digital audit suite contributes to this. We also deepen our sector knowledge, including through targeted customer dialogues, strategic sessions and thought leadership. This deepening strengthens both our substantive expertise and our social relevance.

In addition, our accountants are increasingly developing into trusted sparring partners for directors and supervisors. We therefore invest in boardroom communication but also in an empathetic and connecting way of working together.

With this strategic direction, we give substance to our vision of creating real value: an audit practice that goes beyond figures, that contributes to transparency, trust and future-proofing and that is meaningful for our clients, our professionals and society.

Outlook

We ended 2025 with pride in what has been achieved, but with a relentless ambition to grow further in quality, innovation and relevance. The challenges for our sector, from retaining talent, integrating innovations and continuing to meet high societal expectations, are considerable.

We have a strong foundation to meet the challenges of our time: a strong, values-driven culture, a clear vision of the future, committed and knowledgeable people and an innovative mindset. In the coming years, we will focus on qualitative growth: more impact per audit, further specialisation and targeted expansion of our services where this strengthens trust.

We continue to invest in our people – they are the bearers of our quality. Retention and development remain top priorities, as continuity in our teams is essential to keep quality high and give our colleagues the job satisfaction they deserve.

Looking back at 2025, we are aware that the world around us has changed rapidly. Topics such as AI and technology, sustainability and geopolitical turbulence influence the playing field of our clients and our stakeholders, and thus our work. We have shown in 2025 and previous years to be agile and proactive in responding to developments. We continue that line.

In this way, we create the best starting position to further fulfil our mission in the coming years: 'More impact with real value'. We look ahead with confidence and enthusiasm. In 2026, we will continue to search for ways in which tomorrow could be even better, without getting ahead of ourselves and our people. This continuous improvement drive, combined with calm, positivity and focus, will enable us to realise our ambitions.

We thank our colleagues for their efforts in 2025. Together with them, we continue to jointly build a sustainably healthy audit practice where quality and innovation are paramount. Shared trust is both our means and goal in this regard.

Eindhoven, 30 April 2026

Governing Board, BDO Audit & Assurance B.V.

- ▶ C.M. (Kirsten) Konst (Chair of the Governing Board, Chief Executive Officer (CEO))
- ▶ L.M. (Leon) Jansen RA (member of the Governing Board, Chief Financial Officer/Chief Operating Officer (CFO/COO))
- ▶ E.H.B. (Edwin) Schrijver RA (member of the Governing Board, Chief Quality Officer (CQO))
- ▶ M.M.G. (Marcel) Mans RA (member of the Governing Board, Head of Audit)

Audit & Assurance Management Team

- ▶ M.M.G. (Marcel) Mans RA (chair MT A&A, Head of Audit)
 - ▶ P.M. (Pascal) Belfroid RA (member MT A&A)
 - ▶ L.T.A. (Luc) Parren RA (member MT A&A)
-

Biographies of members of Governing Board

KIRSTEN KONST

1974, female

Role/portfolio as at 1 January 2026

CEO

Date of appointment

1 February 2025 (CTO)

1 January 2026 (CEO)

End of current term of service

31 January 2029

Eligible for reappointment

Yes

External position(s)

► N/A

LEON JANSEN

1969, male

Role/portfolio as at 1 January 2026

CFO/COO

Date of appointment

1 September 2020

End of current term of service

31 August 2028

Eligible for reappointment

No

External position(s)

► Member of the Post-Master Accountancy Board, Tilburg University

EDWIN SCHRIJVER

1968, male

Role/portfolio as at 1 January 2026

CQO

Date of appointment

16 May 2025

End of current term of service

15 May 2029

Eligible for reappointment

No

External position(s)

► N/A

MARCEL MANS

1970, male

Role/portfolio as at 1 January 2026

Head of Audit

Date of appointment

1 January 2026

End of current term of service

31 December 2029

Eligible for reappointment

No

External position(s)

► Member of the Public Interest Steering Group (NBA)
 ► Member of the Advisory Board of the Maastricht University Chartered Accountant programme (Mura)



Governing Board BDO, left to right:
Kirsten Konst (CEO), Marcel Mans (Head of Audit), Edwin Schrijver (CQO)
and Leon Jansen (CFO/COO)

2. Report of the Supervisory Board

Our role

The Supervisory Board performs a supervisory function on the management, policies pursued and general business operations of BDO. Our supervisory role covers all Lines of Service (LoS), practices and services as well as the central corporate services. We are well informed about the related developments, opportunities and challenges. More specifically, we monitor the performance of the Governing Board, the achievement of the company's objectives, the supervision of the strategic direction, the safeguarding of continuity, the achievement of quality objectives, the identification and control of risks, and the functioning of the internal risk management systems. Another core task relates to the audit of BDO's financial statements.

One of our key responsibilities is to protect the public interest by closely monitoring the protection of independence, quality and integrity at BDO. We also assess the prevailing culture and the implementation of strategy, and compare behaviour within the organisation with these values. Protecting the public interest is essential given the societal function of an audit firm, and also contributes to a sustainable future for BDO.

In addition to our supervisory role, we are also a major discussion partner and adviser to the Governing Board. We actively participate in the development and implementation of strategy, policy, key projects and investments. In doing so, we draw on our managerial and supervisory experience and expertise. We encourage the Governing Board to approach issues from different perspectives and be open to new insights.

On 24 June 2025, we bade farewell to our chair Danny van der Eijk. At his own request, he declined to be reappointed for a second term as chair and member. We are very grateful to him for the major contribution he made to the further professionalisation and development of BDO's Supervisory Board. His successor, Engelhardt Robbe, was appointed chair on 24 June 2025. The vacancy that Danny van der Eijk's departure created was filled by Dave del Canho, who was appointed with effect from 26 January 2026. His professional background and extensive supervisory experience are a valuable addition in terms of the diversity within our Supervisory Board. Engelhardt Robbe and Heleen Kuijten-Koenen were reappointed with effect from 24 November 2025 to serve a second term. They, together with Kim Smit, Barbara Lamberts and Dave del Canho, form the Supervisory Board.

The roles and responsibilities of the Supervisory Board have been formalised in BDO's Articles of Association and the Rules of Procedure for the Supervisory Board, with due observance of the relevant provisions of the Dutch Audit Firms (Supervision) Act (Wta).

Key themes and developments in 2025

In the past year, in addition to maintaining our structural focus on continuity, strategic objectives and a sustainable future, we devoted a great deal of attention to the succession of René Nelis as chair of the Governing Board as well as the desired composition of the Governing Board in 2026. We also spent a great deal of time recruiting a new Supervisory Board member. Another important theme concerned the completion of the internal investigation into inappropriate behaviour around exams, which was launched in mid 2023, and the measures taken during that investigation aimed at preventing a recurrence and promoting a quality-oriented culture. We also invested in the further professionalisation of mutual collaboration and relationships within the triangle comprising the Supervisory Board, Governing Board and equity partners. We worked on these themes in close cooperation with the Governing Board and, where relevant, other stakeholders, such as the equity partners, the Works Council and external regulators.

Strategy and long-term value creation

We closely monitored the implementation of the strategy and the progress made on the strategic objectives, including long-term objectives. Among other things, we devoted attention to this in regular meetings and two extensive strategy sessions with the Governing Board. We also held discussions with equity partners about the role they play in implementing the strategy. We established that various projects had been launched and concrete measures had been taken to achieve the strategic objectives, and that a focus on the necessary changes and putting the most important themes into effect is difficult to combine with day-to-day work. The expansion of the Governing Board in 2025 to include a fourth member, in the role of Chief Transformation Officer, led to greater focus and a shift in gear. We welcome this development. Furthermore, we closely monitor external developments in the sector such as digitalisation, the role of private equity and mergers between firms. The opportunities and challenges arising from these developments require alertness and are frequent topics of discussion with the Governing Board.

Quality and public interest

Quality and the public interest are fixed items on the agenda of regular meetings with the Governing Board and are the key topics within the Quality and Public Interest Committee. This theme is also discussed during our meetings with the AFM. In 2025 we paid specific attention to the progress of the implementation of the system of quality management, in accordance with ISQM 1 (International Standard on Quality Management 1), which focuses in particular on quality management in the Audit & Assurance LoS and the audit practice in the Accountancy & Business Advisory LoS. Other topics that were discussed included the improvement measures put in place following the annual review, and the progress made on the transitioning of tasks and responsibilities from the second line to the first line, in accordance with the Three Lines Model. We also monitored the progress of the ongoing investigations by the AFM. We noted that intensive work had been done on these topics and positive results had been achieved, but this required considerable efforts on the part of the organisation. Consequently, implementing improvements swiftly is challenging. We continue to monitor these developments closely and support the Governing Board where possible.

Investigation into inappropriate behaviour around exams

The Supervisory Board commissioned the internal investigation into inappropriate behaviour in exams, which was launched in mid 2023. We rigorously monitored the diligence and independence of the investigation process. By deepening and broadening, the study was completed in the autumn. We have closely followed the initial results of the root cause analysis and the improvement measures taken subsequently and endorse the Board's approach and decisions in this area. We will closely monitor the rest of the follow-up to this investigation in 2026.

The investigation resulted in the AFM imposing a fine. We deeply regret that the results of the investigation damaged confidence in the audit profession and also the BDO organisation. Our role is to rigorously monitor the effectiveness of the internal control environment (which has been strengthened) and the improvement measures taken to prevent inappropriate behaviour and restore confidence.

Based on frequent consultations and reports, we have concluded that the Governing Board has adopted and implemented enforcement measures. The investigation was professionally conducted by BDO Forensics & Technology.

Culture and behaviour

We intensively monitor developments in culture and behaviour within the organisation. This is a frequent theme on the agenda of our meetings with the Governing Board. An inclusive culture, integrity and a learning organisation are essential prerequisites for delivering quality and achieving growth. Cooperation is necessary in this respect, and for this reason the triangle of the Supervisory Board, Governing Board and equity partners has invested in professionalising mutual cooperation and relations.

We monitor the progress of the culture programme, the outcomes of employee surveys, leadership programmes and the diversity and inclusion results achieved. In addition, we discussed the effectiveness of measures taken. We are pleased that the Governing Board has put this issue high on its agenda and noted positive results and room for further improvement.

Transformation and innovation

The accounting and consulting industry is in a state of flux. The changing role of the accountant, the tight labour market, the rise of artificial intelligence (AI) and changes in laws and regulations require an agile organisation that is innovative, has a professional staff organisation and properly deploys technology in its services and underlying processes. This topic comes up regularly in our meetings with the Governing Board. The progress of digitisation projects and the deployment of AI are key topics in this regard.

Composition of the Governing Board

From 1 February 2025, Kirsten Konst started as the fourth board member in the role of Chief Transformation Officer (CTO). On 16 May 2025, Edwin Schrijver joined the Governing Board as Chief Quality Officer (CQO) to fill the CQO position vacated by the departure of Maurice de Kleer from 1 January 2025. Edwin's background in quality control, risk management and his experience as an audit partner are a valuable strengthening of the board.

Following the departure of René Nelis as chair on 1 January 2026, we have looked at the optimal composition of the board in close coordination with the Governing Board and equity partners. This showed that Kirsten Konst's managerial experience, executive power and connecting style made her a good fit for the desired chair profile and we nominated her with full conviction as the new chair.

She was appointed with effect from 1 January 2026. The resulting vacancy was filled by Marcel Mans. He joined as a statutory member from 1 January 2026, in addition to his role as Head of Audit. His long-term collaboration with the Governing Board, partly through his role as temporary statutory member from mid-December 2024 to June 2025, and his extensive experience in quality management, risk management and change processes make him a strong filler for this vacancy.

With the composition consisting of chair Kirsten Konst and members Leon Jansen, Edwin Schrijver and Marcel Mans, this is a complementary management team that is well attuned to each other and works well together.

Finally, we would like to thank René Nelis for his commitment over more than 40 years. His drive and ambassadorship for BDO's core values and identity have been of great significance.

Overview of meetings, committees and attendance

To keep abreast of what is going on within the organisation, we participated in regular and committee meetings, strategy days and other consultations. This allows us to properly fulfil our supervisory and advisory role.

Regular Supervisory Board and Governing Board meetings

In 2025, we held five regular meetings. The first part took place with only the Supervisory Board, followed by a joint part with the Governing Board and the Head of Audit. Two strategy days were held as well. The attendance of the supervisory directors was 100%.

Committees

The Supervisory Board has three standing committees: the Audit Committee, the Remuneration and Nomination Committee and the Quality and Public Interest Committee. These committees focus on specific areas of interest, advise the Supervisory Board and prepare decision-making. The committees are composed of several members, selected on the basis of their expertise and experience. From the Governing Board, one or two members attend the meetings, together with relevant staff members. The issues discussed are explained at regular Supervisory Board meetings and our monthly online consultations.

Audit Committee	
Responsibility/areas of focus	This committee focuses on finance and accountability, internal and external audits, and financial and other risks.
Number of meetings and attendance of members	4
	<ul style="list-style-type: none"> ▶ Barbara Lamberts, chair: 4/4 ▶ Engelhardt Robbe: 2/2 (member up to 24 June 2025) ▶ Kim Smit: 2/2, (member with effect from 24 June 2025)
Main issues in 2025	<ul style="list-style-type: none"> ▶ Budget ▶ Audit plan and audit report ▶ Financial performance ▶ Risk management, information security, and privacy ▶ Fraud risks ▶ Claims and financial risks ▶ Internal audit (plan, progress)

Remuneration & Nomination Committee	
Responsibility/areas of focus	This committee focuses on the remuneration of policymakers, recruitment process for members of the Governing Board and Supervisory Board, appointment of new partners at A&A LoS, and other HR-related matters.
Number of meetings and attendance of members	3
	<ul style="list-style-type: none"> ▶ Heleen Kuijten-Koenen, chair: 3/3 ▶ Danny van der Eijk: 2/2 (member until 24 June 2025) ▶ Engelhardt Robbe: 1/1 (member with effect from 24 June 2025)
Main issues in 2025	<ul style="list-style-type: none"> ▶ Recruitment of members of the Governing Board and the Supervisory Board ▶ Composition of Governing Board in 2026 ▶ Succession planning directors ▶ Remuneration policy Governing Board and Supervisory Board ▶ Strategic HR policies: including (strategic) workforce planning, employee cycle, diversity and inclusion ▶ Employee remuneration and pension scheme ▶ Outcomes employee survey and culture-related topics (Horizon culture programme) ▶ Performance management and remuneration of salary partners ▶ AFM remuneration survey ▶ Contacts with Works Council and themes discussed
Quality & Public Interest Committee	
Responsibility/areas of focus	This committee focuses on quality policies and management, the system of quality management, risk management, and policies on legal compliance, integrity and ethics, including codes of conduct and internal procedures.
Number of meetings and attendance of members	5
	<ul style="list-style-type: none"> ▶ Engelhardt Robbe, chair: 3/3 (chair until 24 June 2025) ▶ Kim Smit: 5/5 (chair from 24 June 2025) ▶ Barbara Lamberts: 2/2 (member from 24 June 2025)
Main issues in 2025	<ul style="list-style-type: none"> ▶ Investigation into inappropriate behaviour around exams ▶ ISQM 1/System of quality management ▶ QRM and A&A LoS policies and reports ▶ Internal and external quality checks ▶ Transformation tasks and responsibilities first and second line ▶ Reputation and integrity risks: incidents, complaints, claims, and disciplinary cases ▶ Matters regarding partners ▶ External regulators (contacts and ongoing investigations)

Supervisory Board



*Supervisory Board, left to right:
Barbara Lamberts, Engelhardt Robbe (chair), Heleen Kuijten-Koenen
(vice-chair), Dave del Canho, Kim Smit*

ENGELHARDT ROBBE

1955, male, chair

Date of appointment

24 November 2021

End of current term of service

23 November 2029

Eligible for reappointment

No

External position(s)

- ▶ Executive coach
- ▶ Supervisory Board member, Dutch Retail Fund, CBRE
- ▶ Advisory Board member, Dutch Residential Fund, CBRE (until 1 April 2026)
- ▶ Member, National Suicide Prevention Steering Group (up to 24 February 2026)
- ▶ Supervisory Board member, Dutch Open Air Museum (until 6 October 2025)

Committee member

- ▶ Remuneration & Nomination Committee member

HELEEN KUIJTEN-KOENEN

1966, female, vice-chair

Date of appointment

24 November 2021

End of current term of service

23 November 2029

Eligible for reappointment

No

External position(s)

- ▶ Executive Board member and Director of People & Change, APG

Committee member

- ▶ Chair of Remuneration & Nomination Committee

KIM SMIT

1970, female

Date of appointment

27 June 2024

End of current term of service

26 June 2028

Eligible for reappointment

Yes

External position(s)

- ▶ Deputy Justice, Enterprise Chamber of Amsterdam Court of Appeal (with effect from 19 January 2026)
- ▶ Supervisory Board member, Audit Committee chair and Remuneration Committee member, B&S Investments (up to 3 April 2026)
- ▶ Supervisory Board member, Audit Committee chair and Nomination and Remuneration Committee member, NRG Pallas BV (up to 9 March 2026)
- ▶ Supervisory Board member and Audit Committee member, Stichting Pantein
- ▶ Supervisory Board member and Financial Committee chair, Dutch Open Air Museum (with effect from 24 October 2025)

Committee member

- ▶ Chair of Quality & Public Interest Committee
- ▶ Member of Audit Committee

BARBARA LAMBERTS

1967, female

Date of appointment

27 June 2024

End of current term of service

26 June 2028

Eligible for reappointment

Yes

External position(s)

- ▶ Supervisory Board member, Cow Manager
- ▶ Supervisory Board member, Fast Focus

Committee member

- ▶ Chair of Audit Committee
- ▶ Member of Quality & Public Interest Committee

DAVE DEL CANHO

1966, male

Date of appointment

26 January 2026

End of current term of service

25 January 2030

Eligible for reappointment

Yes

External position(s)

- ▶ Managing Partner, Del Canho & Engelfriet B.V.
- ▶ Supervisory Board vice-chair, Audit Committee chair and Buildings Committee member, UMC Utrecht
- ▶ Supervisory Board member, Blue Sky Group
- ▶ Board chair and Investment Committee chair, Stichting WKZ-fonds
- ▶ Member of the Governing Board and secretary Cor van Zadelhoff fund

Committee member

- ▶ Member of Audit Committee
- ▶ Member of Quality & Public Interest Committee

Other meetings and activities

In addition to regular meetings, there are monthly online consultations in which current issues and developments are discussed. Additional consultations were also organised. This was frequent in 2025 due to issues such as the investigation into undesirable behaviour, composition and appointment of member of the Governing Board and changes within the Supervisory Board. Further progress meetings were held between the chairs of the Supervisory and Governing Board, between committee chairs and members of the Governing Board and with heads of staff. There were also three meetings with the Works Council, including a strategic session with the Governing Board. The Supervisory Board was represented at all Unitholders' Meetings. In 2025, several meetings were held with a representation of equity partners during which topical issues were discussed.

List of other topics discussed

In addition to the aforementioned topics, the following subjects among others were discussed:

- ▶ Management information and reporting, and non-financial KPIs
- ▶ Compliance with key policies and processes
- ▶ Financial interests policy
- ▶ Independence of the Governing Board
- ▶ Termination of management agreements with equity partners
- ▶ Exit monitoring of partners and staff in key positions
- ▶ BDO Global
- ▶ Developments regarding the accounting profession

Decision-making by Supervisory Board

During the meetings, the Supervisory Board adopted inter alia the following resolutions:

- ▶ Approval of annual report, including the financial statements for 2024
- ▶ Approval Transparency Report 2024
- ▶ Appointment accountant for the audit of the financial statements for 2025
- ▶ Approval of budget for 2026
- ▶ Approval of nomination Supervisory Board member
- ▶ Decision to nominate two members of the Governing Board
- ▶ Decision to nominate the chair of the Supervisory Board
- ▶ Decision to nominate chair of the Governing Board
- ▶ Decision proposal remuneration policy Governing Board
- ▶ Decision proposal remuneration policy Supervisory Board

- ▶ Determination level of remuneration for members of the Governing Board and the Head of Audit as of January 2026
- ▶ Approval of nomination of (external) auditors at Audit & Assurance Line of Service and appointments of salary and equity partners
- ▶ Approval adjustment quality policy
- ▶ Approval of Internal Audit Plan 2026
- ▶ Investment policy approval for equity partners
- ▶ Approval of performance assessment of Compliance Officer and Internal Auditor

Performance assessment and remuneration Governing Board

Assessment and progress meetings were held with members of the Governing Board and the Head of Audit in 2025. Based on an internal and external benchmark conducted in 2025, we proposed a new remuneration policy from January 2026. The Meeting of Participants endorsed our recommendation.

Self-assessment by Supervisory Board

A self-evaluation took place in the second quarter, including on the division of tasks and areas of attention, mutual cooperation and that with the Governing Board. The Governing Board was requested to evaluate our performance and mutual cooperation. Although the outcomes were mostly good, we identified and implemented several points for improvement. This was discussed with the Governing Board.

Remuneration of Supervisory Board members

Based on an internal and external benchmark, we proposed a new remuneration policy from January 2026. This was approved by the Meeting of Participants. As members of the Supervisory Board, we receive remuneration determined by the Meeting of Participants. The relevant details are included in the financial statements.

Independence

The duties and powers of the Supervisory Board are carried out within the applicable regulations on independence. The Ethics & Independence Leader oversees the personal and financial independence of the members. In 2025, all members qualified as independent.

Training

The Supervisory Board attended a knowledge session on the ISQM 1 system of quality management. It has given us more insight into the design and operation of this system. In addition, several supervisory directors spent a day with an A&A audit team to gain more knowledge about the audit process.

Financial statements

The annual report and financial statements for 2025 have been prepared by the Governing Board and audited by the external auditor Baker Tilly (Netherlands) B.V. The findings were discussed with the Audit Committee and the Governing Board. On 30 April 2026, the Supervisory Board approved the annual report and the financial statements.

Transparency report

We discussed the Transparency Report 2025 with the policymakers. The content matches our image of this year. It gives a good overview of the progress of the relevant issues and state of play as presented and explained to us and on which monitoring by us has taken place.

Conclusion

The Supervisory Board notes the progress made on the various themes and projects in 2025 and thanks all employees, partners and the Governing Board for their efforts. We are confident that the Governing Board, together with the partners and employees, will continue the growth strategy well, ensuring that BDO remains future-proof and can grow sustainably in quality, financially and in terms of added value. We will continue to monitor this closely and monitor the organisation's learning ability and further measures to ensure quality and reliability. On existing and new issues, the Governing Board will be (pro)actively supported and advised by us.

Eindhoven, 30 April 2026

Supervisory Board

- ▶ E.M. (Engelhardt) Robbe (chair)
 - ▶ H.L. (Heleen) Kuijten-Koenen (vice-chair)
 - ▶ B. (Barbara) Lamberts
 - ▶ K. (Kim) Smit
 - ▶ D. (Dave) del Canho
-



3. Quality in 2025

In this chapter, we will describe the most relevant status and developments for the 2025 financial year that pertain to our vision of quality and our system of quality management, partly based on quality indicators. This chapter also sets out the external supervision of our organisation in 2025 by external supervisory bodies such as the Dutch Authority for the Financial Markets (AFM). Lastly, this chapter includes the required statement by the policymakers regarding the effectiveness of the internal system of quality management, the internal assessment of compliance with the independence requirements and compliance with the policy on the continuing professional education (CPE) of our partners and other employees.

A full description of the system of quality management in place at BDO Audit & Assurance B.V. in 2025 is available [here](#).



Quality and quality management

BDO's Quality Policy focuses on what we define as quality (see next page) and our ambition to deliver quality anywhere and at any time. The BDO Quality Policy sets out the main principles of the BDO system of quality management. The quality policy and the system of quality management that is in place at BDO Audit & Assurance (A&A) align with, and flesh out, the overarching BDO Quality Policy and the BDO system of quality management.

BDO's system of quality management has been designed and implemented in such a manner as to meet the requirements of the *International Standard on Quality Management 1 (ISQM 1)* and the related BDO ISQM Policies issued by BDO Global. The system of quality management applies to audit and review engagements related to financial statements, and other assurance and assurance-related engagements performed by BDO. The purpose of the system of quality management is to provide reasonable assurance that:

- ▶ the organisation and the professionals fulfil their responsibilities in accordance with professional standards and applicable requirements under laws and regulations and perform engagements in accordance with such standards and requirements; and
- ▶ the reports and statements we provide are accurate under the given circumstances.

BDO adopts a risk-based approach in its system of quality management, defining quality objectives, identifying and analysing quality risks, and taking appropriate measures to mitigate those risks. A robust monitoring and remediation process contributes to continuous improvement of the organisation's quality processes, partly based on root cause analysis.

Below, we describe the most relevant developments in our system of quality management in 2025 based on the following subjects:

BDO's ambition is to deliver quality anywhere and at any time. This means ensuring the continuity of all types of services, within the parameters of the law and applicable rules, to meet the expectations of our key stakeholders with regard to a specific service, the service provision process and our organisation, and exceeding those expectations wherever possible.

... continuity

Delivering quality is part of our vision on long-term value creation. The world around us is constantly changing and with it the expectations of our stakeholders. That is why we always stay connected to the environment in which we operate. As a learning organisation, we continuously improve ourselves and our services.

... of all types of services

We deliver quality in all our services. The ambition to deliver quality always and everywhere applies to the whole of BDO. All BDO professionals contribute to that quality, either directly (by being involved in engagements) or indirectly (through their quality-related activities or other forms of support).

... within the applicable rules and regulations

Delivering quality means that, irrespective of the expectations of our stakeholders, our services will always be in compliance with the relevant statutory provisions, rules issued by professional associations and internal regulations. We also demand regulatory compliance from our clients and we want them to operate ethically and transparently in line with BDO's risk appetite. But in our compliance effort, we do not lose sight of the purpose of the rules. We will not reach the quality we aim for by blindly following the letter of the law ('is it permitted?') and ignoring the spirit of the law ('is it right?') in the process.

... to meet the expectations

Delivering quality means meeting our stakeholders' expectations as a minimum. To be able to do so, we ask our clients, prior to an engagement, what their expectations are and we document them. We can only meet *legitimate* expectations, i.e. expectations are within the law and realistic. In this process, we also manage our clients' expectations so that we do not promise anything we cannot deliver.

... of our key stakeholders

In order to deliver quality, we want to meet at least the expectations of our key stakeholders. Stakeholders are individuals, groups or organisations that have an interest in our services or are affected by their results. Our audit clients are our most direct stakeholders, but not our key stakeholders per se. They are our paying clients. We deliver quality by meeting their legitimate expectations. In weighing up quality considerations, we will let the

public interest prevail over a client's interest, if they happen to contradict each other. Besides our clients, there are other stakeholders that have legitimate expectations of our services: our clients' key stakeholders, society (e.g. citizens, the government, politicians and the media), BDO professionals and professional colleagues.

... the specific service, the service provision process and our organisation

Our stakeholders' expectations can typically be broken down into three levels:

- ▶ Expectations of the *specific service* relate to the extent to which the service provides a solution to a particular issue, answers a question or otherwise meets a particular need, and is therefore sufficiently tailored to the specific facts and circumstances of the client and the engagement. The correctness, completeness, timeliness, understandability, relevance and reliability of our advisory service or opinion are key factors in that respect, as is the service's compliance with what has been agreed, the applicable rules and regulations, and quality and other requirements.
- ▶ Expectations of the *service provision process* relate to the process steps that are followed, such as the acceptance of the client and the engagement, the engagement letter, the allocation of skilled professionals to the engagement, scheduling, engagement performance and wrap-up with a report or statement. Stakeholders also expect the service process to comply with the relevant rules and regulations. These expectations also relate specifically to the 'client service' we offer and that our clients can expect from us.
- ▶ Lastly, our stakeholders' expectations increasingly relate to *our organisation* as a whole. Stakeholders expect the services they engage to be provided by an ethical organisation that complies with the rules and regulations by which it is governed and that manages and improves its service quality on a continuous basis.

... exceeding those expectations wherever possible

In our mind, quality is when we go the extra mile to exceed our key stakeholders' expectations. For instance by providing added value through new perspectives on the issues and questions of our stakeholders, coming up with innovative ideas and instruments, offering a new take on the social debate, increasing the efficiency of our services or providing service excellence.

Our actions and conduct are always informed by our core values: Professionalism, Joy, Practical Relevance, People Focus, and Social Responsibility. Our core values show how we transpose our ambition to deliver quality anywhere and at any time into concrete action. They inform our day-to-day interactions. We hold each other accountable for our actions and we expect our stakeholders to do the same. To this end, we create an environment where attention to quality is central and everyone feels safe and responsible to discuss quality issues and dilemmas.

ORGANISATIONAL STRUCTURE

Meeting of Participants

As at 31 December 2025, BDO had 68 holders of depositary receipts (2024: 71) 23 of whom are external auditors (2024: 23) working on behalf of BDO Audit & Assurance B.V.

Governing Board

On 31 December 2025, the members of the Governing Board were:

- ▶ R.C.M. (René) Nelis (chair of the Governing Board)
- ▶ L.M. (Leon) Jansen RA (member of the Governing Board, CFO/COO)
- ▶ E.H.B. (Edwin) Schrijver RA (member of the Governing Board, CQO)
- ▶ C.M. (Kirsten) Konst (member of the Governing Board, CTO)
- ▶ M.M.G. (Marcel) Mans (titular member of the Governing Board, Head of Audit)

In 2025, several changes took place in the composition of the Governing Board:

- ▶ Maurice de Kleer retired from BDO on 1 January 2025; he did not stand for reappointment. Marcel Mans temporarily filled the role of CQO until June 2025 and Edwin Schrijver joined as CQO on 16 May 2025.
- ▶ On 1 February 2025, Kirsten Konst was appointed Chief Transformation Officer (CTO).

René Nelis retired from BDO on 1 January 2026 after a 40-year career. Kirsten Konst succeeded him as CEO and chair of the Governing Board as of that date. Marcel Mans was been appointed as a member of the Governing Board (under the articles of association) with effect from 1 January 2026.

Supervisory Board

The Supervisory Board had the following members on 31 December 2025:

- ▶ E.M. (Engelhardt) Robbe (chair)
- ▶ H.L. (Heleen) Kuijten-Koenen (vice-chair)
- ▶ B. (Barbara) Lamberts
- ▶ K. (Kim) Smit

Danny van der Eijk's (chair) first term of office ended on 24 June 2025. He did not stand for reappointment for a second term. Engelhardt Robbe succeeded him as chair with effect from 24 June 2025. The vacancy created by the departure of Danny van der Eijk was filled from 26 January 2026 by Dave del Canho who joined as a member of the Supervisory Board.

Audit & Assurance Management Team

On 31 December 2025, the Audit & Assurance Management Team (A&A MT) consisted of the following persons:

- ▶ M.M.G. (Marcel) Mans
- ▶ P.M. (Pascal) Belfroid
- ▶ L.T.A. (Luc) Parren

There were no changes in the composition of the MT A&A in 2025.

In line with the principles of the 'Three Lines Model', the MT A&A has appointed a Director of Quality Management in 2025 to give direction to the newly established Team Quality Management (TQM), to jointly ensure structural quality management in the first line. TQM has taken over several tasks and some staff from the QRM department to make a clearer distinction between the first-line responsibility of the business, under the direction of the MT A&A and with the support of TQM, for policy compliance and the second-line responsibility of the Quality & Risk Management (QRM) department for policy development and monitoring compliance with it.

Quality Council

The Quality Council is a consultative body that serves as a sounding board to the Governing Board and supports it in fulfilling its responsibilities for planning, implementing, evaluating and making adjustments to quality management procedures. The Quality Council's role was expanded so that it now also serves as a consultative body where the quality and risk management portfolio holders of the four LoS MTs, the QRM staff department and the CQO periodically discuss quality and risk management matters.

In 2025, the Quality Council met eight times (2024: 8) and discussed, among other things, (changes in) the BDO Quality Policy, the approach to quality management in 2025 (including the further implementation of the 'Three Lines Model' for quality and risk management and the required design of the first line and strengthening of the second line for that purpose, the filling of functional roles with regard to the system of quality management, the approach to monitoring and evaluation and the progress of improvement and remedial measures in response to identified findings and deficiencies), the progress of the investigation into undesirable conduct in examinations the training policy and examination regulations, publications and reports of the AFM (including on fraud risk analysis, (dis) continuity, private equity) and other external regulators (including the Financial Reporting Council (FRC),

the Public Company Accounting Oversight Board (PCAOB), International Forum of Independent Audit Regulators (IFIAR)), the outcomes of internal (quality) culture measurements, how quality has been considered in the annual financial budget process, the gatekeeper role and other responsibilities under the Money Laundering and Terrorist Financing Act (Wwft) and other impactful signals and developments.

Young A&A MT

The Young A&A MT is an advisory body to the A&A MT, consisting of young BDO employees from the A&A practice. The aim is for the Young MT to have a balanced male/female membership composition, spread across job levels and locations. In 2025, the MT A&A discussed in several meetings with the Young MT A&A, including:

- ▶ the composition and advancement of members of the Young MT A&A,
- ▶ input from the Young MT A&A on strategic plans,
- ▶ inflow, planning and capacity management,
- ▶ training, feedback culture and retention,
- ▶ traineeships and mentoring starters,
- ▶ study expenses scheme and study leave,
- ▶ rates, efficiency and workload,
- ▶ cooperation with IT auditors, and
- ▶ ESG developments.

Key figures – BDO Global

Key figures – BDO Global *	2025	2024
Turnover (in € million)	10,000	9,800
Country presence	169	166
▶ Number of offices	870	1,800
▶ Number of partners and employees	94,900	92,100

* Figures are presented excluding allied offices as of 2025. The comparative figures have been adjusted accordingly (except for the number of offices, which is presented inclusive in 2024 and exclusive of allied offices in 2025).

The BDO network's total fee income from statutory audits of separate and consolidated financial statements in the EU/EEA was approximately EUR 803 million in 2025 (2024: EUR 731 million). We would note that the different member firms have different financial years. The amount provided is based on the most recently closed financial year. The average exchange rate for the reporting period was used for countries with a currency other than the euro. The EU/EEA countries where BDO has a presence and the location of the offices are listed in [Annex B](#).



■ BDO countries

BDO IN THE NETHERLANDS		BDO GLOBAL		TOP 5 AUDIT & ADVISORY FIRM IN THE WORLD
15 OFFICES	403 mln REVENUE 2025	870 OFFICES	169 COUNTRIES	
3,100+ PROFESSIONALS	1:13 PARTNER : STAFF	94,900+ PROFESSIONALS	10 bln REVENUE 2024-2025	

* Alliance firms are no longer included in the figures starting from this year.

CULTURE AND LEADERSHIP

In 2025, BDO took further steps in strengthening an agile, safe and people-centred quality culture, supported by strong and exemplary leadership. The culture and leadership policy contains three pillars: (1) the BDO Horizon programme, (2) periodic culture measurements including the Horizon measurement, including BDO Global's annual Quality Survey, and (3) leadership development in the context of an agile, learning organisation. This provides BDO with a robust foundation to continue working in a focused way on quality-oriented behaviour, continuous learning and strengthening psychological safety.

Since 2016, BDO Horizon has been the organisation-wide culture programme that helps BDO move towards an agile, people- and quality-oriented culture where employees feel safe, belong and can develop. The programme has adapted to current events over the years and in the current period focuses on creating a climate in which quality is optimally supported and feedback, psychological safety and continuous development are central. In 2024–2025, Horizon has taken on a more decentralised focus, with follow-up cultural measurements increasingly taking place at the local level within practices. Earlier sub-programmes such as Diversity & Inclusion, Leadership, Vitality and Learning & Development have been embedded in the regular HR organisation, making Horizon's main focus in 2025 on monitoring and stimulating the cultural movement in the various regions.

Four Horizon measurements were carried out in 2025 to monitor the cultural movement more sharply. These measurements include a consistent base and different topics per quarter. Themes that were part of the 2025 Horizon Measurement include:

- ▶ employee engagement
- ▶ psychological security
- ▶ diversity and inclusion
- ▶ leadership
- ▶ commitment to organisational and brand strategy
- ▶ own role within BDO
- ▶ undesirable behaviour
- ▶ artificial intelligence (AI)
- ▶ culture of quality

The response rate ranged from around 62 to 71%, giving the results valuable insights into both challenges and successes at the departmental level. This enables managers, partners and (regional) Horizon teams to initiate targeted improvement actions. From 2025, the LoS MTs and Regional Practice Leaders will be the point of contact for culture-related questions and will be responsible for following up on the outcomes of the Horizon measurements.

The annual quality measurement, as part of the Horizon measurement in the fourth quarter of 2025, was conducted using ten statements from BDO Global. The results show a positive trend: almost all questions are answered more positively than last year. We see that almost every BDO employee is convinced of the personal responsibility for delivering quality and experiences that quality is appreciated in the organisation and that leaders set a good example in this. This highlights that our joint efforts have resulted in a robust quality environment that we can be proud of. At the same time, it is important to continue to pay attention to appropriate learning and development activities and acceptable workloads.

BDO sees leadership as a crucial factor for culture and quality development. Leadership is also explicitly linked to psychological safety and exemplary behaviour. Within the Horizon programme, it is emphasised that leaders play an important role in encouraging openness, feedback and learning. BDO continues to invest in leadership programmes, including training on coaching leadership, feedback culture and inclusion, embedded within HR programmes and Horizon regional activities.

In 2025, focused efforts have been made within the Audit & Assurance practice to further professionalise leadership. For example, the role of lead partner was evaluated, with a special focus on the recognisability, predictability and uniformity of this role within the different regions. This evaluation showed that employees needed more clarity and visibility in leadership. The findings were used to more sharply define the mission, behavioural expectations and communication style of lead partners and to better support them as role models. In parallel, the Audit Partner Refreshment Programme (APRP) has been broadened. Besides professional development, 2025 explicitly focused on behavioural development, effective communication and situational leadership. Audit partners participated in additional sessions around balancing trust and control, having critical conversations and strengthening professional behaviour. This broadening contributes to a culture where leadership and quality go hand in hand and partners contribute actively to a consistently high quality of statutory audits.

OUR PEOPLE

Staffing

In 2025, the average number of partners, (senior) managers and other team members at, or affiliated with, BDO A&A increased by 2.7% to 1040 (2024: 1013). The increase in 2025 is smaller than in 2024 (5.8%). Due to changes in European regulations related to sustainability reporting (CSRD), the target inflow into the new ESG practice ceased in 2025. In 2025, collaboration between our recruiters, educational institutions and BDO practices was again successful, with the recruitment of graduates and effective internal career advancement.

Average number and ratio of partners, senior managers, managers and other team members

2025*	Partners	(Sr.) managers	Other team members	Total
Quantity	76	235	730	1,040
Ratio (% of total)	7%	23%	70%	100%
2024*	Partners	(Sr.) managers	Other team members	Total
Quantity	73	225	715	1,013
Ratio (% of total)	7%	22%	71%	100%

* Totals/percentages may deviate due to rounding differences.

The average number of years of experience at BDO increased by 3.8% to 5.4 years (2024: 5.2). Although partners and other employees worked within BDO for slightly shorter or the same amount of time respectively in 2025 than in 2024, the average number of years of experience within BDO of (senior) managers is higher in 2025 than in 2024.

Average years of experience at BDO broken down by partners, (senior) managers and other team members

	2025	2024
Partners	16.6	16.7
(Senior) managers	10.0	9.7
Other team members	2.7	2.7
Average	5.4	5.2

Overall staff turnover increased to 16.2% in 2025 (2024: 15.8%). Turnover increased mainly among (senior) managers and partners and actually decreased among (senior) managers and partners. Retaining relatively experienced young professionals continues to be a challenge.

Turnover rate among partners, senior managers, managers and other team members

	2025	2024
Partners	4.1%	6.9%
(Senior) managers	13.2%	16.0%
Other team members	18.7%	16.7%
Total	16.2%	15.8%

In 2025, BDO continued the deployment of extension staff from South Africa to responsibly handle peak loads within the audit practice. These employees are integrated into the regular audit teams and supported through a structured onboarding and training programme aimed at applying BDO working methodology, file quality and reporting requirements. To strengthen quality assurance, additional control measures have been implemented, including a local coordination and review structure. This involves continued attention to clear task demarcation, communication and ensuring that work is carried out under the responsibility and supervision of the Dutch engagement teams. The use of extension staff contributed to achieving sufficient capacity within the audit practice by 2025. At the same time, BDO continues to monitor whether the measures taken are adequate and improvements are made where necessary to ensure the quality of the work carried out.

Development and continuing professional education (CPE)

We continuously invest in the knowledge and skills of our professionals. The average number of hours our professionals spent on training and education rose by 1.5% in 2025, landing at 223.7 (2024: 220.3).

Average number of hours spent on internal and external training and education, by role (per FTE)

	2025	2024
Partners	95.8	88.1
(Senior) managers	100.2	114.7
Other team members	278.6	268.4
Total	223.7	220.3

In 2025, BDO has taken further steps in further developing the Learning & Development programme within the Audit & Assurance practice. This focused on updating the curricula, strengthening the connection to changing professional requirements and increasing the effectiveness of learning in practice. For the lower function groups, traditional professional technical meetings have been replaced by Peer Group Learning, a form of learning that focuses on small-scale, structured knowledge sharing and joint reflection. This aims to bring learning closer to daily practice and strengthen the mutual cooperation and learning curve of starters and junior staff. In addition, new training modules around continuity issues were developed and introduced in 2025, aligning with legislative and regulatory developments and the increased societal emphasis on future-proofing organisations.

In 2025, the Summer School (for assistants) and Summer Course (for managers and partners) within the Audit & Assurance practice have again been important pillars in the structural development programme for employees. Both programmes combined professional deepening with skills and behavioural development and connected to current themes in the auditing process. The programmes consisted of expert sessions on risk approach, IT and data processing, ISA 600 and fraud indicators, among others, complemented by skills modules focused on personal growth and professional-critical action. With the Summer School and Summer Course 2025, BDO has taken further steps in further developing an integrated and hands-on learning programme that prepares employees for an IT-driven, future-proof audit approach.

The internal central monitoring of PE portfolios, for the purpose of compliance with the Further Regulations on Continuing Education (NV PE) by chartered accountants and accountant-administration consultants registered with the NBA, showed that almost all accountants completed their 2024 PE portfolio on time (with exceptions due to prolonged absence or deregistration from the register) and all accountants recorded their plan of action in their 2025 PE portfolio on time.

Performance assessment and remuneration of partners and other employees

In 2025, several steps were taken within the Audit & Assurance practice to further professionalise the process of assessment, remuneration and advancement. The assessment system (TOP procedure) was evaluated, focusing on uniformity in the method of assessment, the quality of justifications and the application of study and development requirements. This review has led to tightening that should contribute to greater consistency between regions and teams.

In 2025, the promotion policy for advancement from manager to senior manager was tightened. This tightening aims to strengthen the uniformity, transparency and diligence of the promotion policy and ensure that employees are promoted on the basis of a nationally consistent quality and performance profile. A tighter process has been applied since 2025 in which:

- ▶ regional practice leaders provide a reasoned rationale for each proposed promotion;
- ▶ the MT A&A reviews these reasons to ensure that promotions take place on the basis of uniform, practice-wide criteria; and
- ▶ differences in perception or substantiation in the MT meeting are provided as feedback as a learning opportunity, so that the process is continuously improved.

Furthermore, steps were taken in 2025 to better align working conditions with the labour market. For instance, salaries in the lower job grades were brought more in line with market comparisons and entry and promotion routes were reviewed as part of strategic human resources planning. These measures contribute to a future-proof personnel structure and a more balanced development of talent within the organisation.

A new remuneration policy for salary partners was adopted in 2025 and will take effect from 1 January 2026. The renewed policy focuses on transparency, market conformity and rewarding performance and responsibility. Fixed remuneration is based on an objective job evaluation and annual benchmarking within the general Dutch market. Salary growth follows from a Merit Matrix, in which both relative salary position and performance rating are leading. In addition to fixed remuneration, the system for

variable remuneration will be tightened up and composed of three incentive KPIs: quality, revenue growth and profitability improvement. Variable remuneration is only awarded for at least a satisfactory final assessment and a heavier weighting of quality (60%) applies for Audit & Assurance. The policy further includes an explicit procedure for differentiated grading for heavier responsibilities, clear quality criteria and alignment with regional and national targets. This has created a future-proof remuneration framework that encourages performance, safeguards quality and is in line with BDO's strategic development. In 2026, the remuneration policy for equity partners will be reviewed based on corresponding principles.

ETHICAL STANDARDS

Integrity and independence

Sound and ethical operations

Money laundering, terrorist financing, fraud and corruption, as well our gatekeeping role, continued to be topics of public debate in 2025. Biweekly knowledge updates and broad internal awareness-raising activities have contributed to increasing alertness to Wwft, sanction and integrity risks within BDO. In 2025, several (policy) documents were further improved and updated, such as the policy around Financial and Economic Crime (FEC policy), guidance on increased FEC risks and unambiguous quick reference cards on the identification and verification process for customer files. These updates provide employees with clearer guides, reinforcing quality and uniformity.

BDO A&A filed 54 reports of unusual transactions with the Financial Intelligence Unit (FIU) under the Wwft in 2025 (2024: 52 reports), an increase of 3.8% compared with 2024. No transactions were reported involving the transfer of cash funds between BDO and our clients (objective indicator). The law prevents us from providing any further information about the nature of these reports.

	2025	2024 *
Reports of unusual transactions	54	52

* Comparative figure adjusted due to a date correction.

Independence

We have established internal independence policies that apply not only to auditors performing assurance engagements, but to all professionals within our organisation. Compliance with those internal independence rules ensures the professional, objective and ethical performance of assurance engagements and compliance with the external independence laws and regulations applicable to us. Fifteen breaches of independence policy were identified in 2025 (2024: 2):

- ▶ In the context of the compliance statement in which partners and directors confirm their independence every year, we identified nine violations of the internal prohibition on partners and directors holding financial interests in entities that cannot be terminated or transferred within a reasonable period of time. It became clear that these non-cash interests were held in crowdfunding platforms and private equity funds, among other things, without an exemption having been granted by the Ethics & Independence Leader. Dispensation may be obtained in situations that, in accordance

with laws and regulations, do not pose a threat to independence. There are several new providers on the market that have made investing in illiquid interests more accessible and actively approached partners at BDO. The violations did not relate to any external rules or regulations.

- ▶ In four cases, partners or directors held a non-permitted financial interest in violation of our internal quality policy. None of the cases involved a violation of the ViO independence rules or the Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA Code) because the assurance clients in question were not material subsidiaries of the exchange-listed parent company. It involved inter alia a partner who provided an incomplete answer on financial interests when accepting an engagement, and two situations in which a partner or a party with which BDO has a close financial relationship held interests in listed companies with non-material subsidiaries for which BDO performs assurance activities. A case was also reported in which a director's life partner held shares in an exchange-listed company with non-material controlled subsidiaries.
- ▶ Two violations were identified in which non-audit services were provided to PIE-related entities without obtaining prior approval from the Audit Committee as required under the IESBA Code and the ViO. In the first case, a foreign BDO Member Firm performed non-assurance services for the ultimate parent company of an IESBA PIE (public interest entity), and although the services were subsequently looked at during the conflict check they were wrongly approved by the audit partner without obtaining pre-approval from the Audit Committee. The second case involved multiple non-audit services for the parent company and ultimate parent company of two IESBA PIEs within the same group, which were also approved by the audit partner during the conflict check without obtaining pre-approval from the Audit Committee.

The root causes of all fifteen identified violations were investigated. These investigations revealed, among other things, that the year-on-year increase in the number of observed violations relating to financial interests was due to: 1) an increase in the PE investment offerings for which BDO partners have been actively approached, 2) the fact that directors have been subject to the same prohibitions as partners since 1 January 2025, and 3) the phrasing of the question in the compliance statement has been made clearer. Furthermore, for each of the identified violations an assessment was made of any material threats to the independence of the responsible auditors. The conclusion was that the incidents had no serious implications for operational integrity, and appropriate measures were taken immediately. In the cases involving unauthorised financial interests held by partners and parties with which BDO has a close financial relationship, the relevant financial interests were sold immediately once they had been identified. In some situations temporary dispensation has been granted, where

appropriate and subject to certain conditions. The Audit Committee's approval was still requested and obtained for the non-assurance service violations to confirm there was no impact on independence. The insights gained have been used to further strengthen our processes and raise awareness.

	2025	2024
Number of internally identified violations of independence rules	15	2

Monitoring of financial interests, gifts and hospitality, partner and office rotation, outside activities, onboarding screening and compliance statements did not reveal any irregularities.

In 2025, we performed the annual review of the *fee cap* that the EU Regulation imposes on the concurrence of services to PIEs (where permitted). This means that, if BDO provided other services to a PIE audit client (or to that PIE's parent company or any of its subsidiaries) during the period 2022-2024, the total fees for these services are not, in the financial 2025, to exceed 70% of the average fees the PIE (and, where applicable, its parent company or any of its subsidiaries) paid for the statutory audit or audits of its separate and consolidated financial statements in the financial years 2022-2024. A comprehensive risk assessment showed that our fees were well below the *fee cap* in 2025. We also intensively monitor the acceptance of other services at PIE audit clients and no reports have been received from engagement teams regarding exceeding this *fee cap*, on which they have included a mandatory paragraph in the audit report for PIE audit clients since 2021.

Within the context of monitoring the financial situation of audit/equity partners, in 2025, the designated officer reviewed the financial position of equity partners who were appointed during 2025 and the equity partners, the policymakers and a number of equity partners who were newly appointed on 1 January 2026 (so that all equity partners are reviewed once every three years). This assessment is aimed at reviewing the equity partner's financial position, establishing compliance with the General Provisions, and verifying the accuracy of the completed Compliance Statements. This investigation did not reveal any peculiarities.

We carry out a conflict-of-interest check prior to any engagement acceptance or continuation. In doing so, we assess whether there are any conflicts of interest that could lead to a threat to our objectivity or any of the other fundamental principles (professionalism, integrity, professional competence and due care and confidentiality). This also identifies any threats to independence. In 2025, further steps were taken in the implementation of the new digital platform to be used by the international BDO network to conduct such conflict-of-interest checks and independence assessments, also known as the COI 2.0 tool. The new tool COI 2.0 consists of two systems:

- ▶ Entity Management System (EMS): this system will contain the legal structures ('corporate trees') of all BDO clients (which have been validated by the responsible BDO partner by confirming their accuracy and completeness);
- ▶ Conflict Management System (CMS): this system is an automated solution within which the entire process of international conflict-of-interest checks and independence assessments will be handled.

Confidentiality, information security and privacy

The 2025 threat assessment is characterised by further professionalisation and scaling of cyber attacks. Organisations are increasingly being targeted by attacks, further increasing the importance of strong information security. In addition, we see the use of AI increasing in attacks, making phishing emails, for example, increasingly difficult to spot. To promote awareness of information security and privacy, and encourage appropriate conduct, we required everyone at BDO to take required e-learning modules on these topics in 2025. These training sessions focus on recognising high-risk situations and are tailor-made for BDO. This year, particular attention was devoted to AI. Professionals were also regularly alerted to specific (new) information security and privacy risks on the intranet and via email, including by means of internal phishing simulations. An AI chatbot was also launched to make it easier to provide employees with information regarding privacy policies and best practices.

In 2025, the risk assessments were updated in respect of the availability, integrity and confidentiality of key processes within the organisation and the BDO Information Security Management System (ISMS) was subjected to internal as well as external audits. These audits showed that BDO manages risks effectively and meets the requirements of the ISO 27001 standard.

BDO A&A recorded 20 security incidents in 2025 (2024: 28), 18 of which involved data breaches (2024: 20). None of these data breaches was found to be a 'serious' data breach that could lead to a significant likelihood of a serious adverse impact on the protection of personal data. Therefore, no data breaches were reported to the Dutch Data Protection Authority (AP) (2024: 1).

	2025	2024
Number of recorded security incidents	20	28
Number of recorded data breaches	18	20
Number of data breaches reported to the AP	0	1

The laws and regulations on information security and privacy are undergoing major changes and additions (including the Cybersecurity Act (the Dutch translation of the Network and Information Security Directive (NIS2 Directive), the Corporate Sustainability Due Diligence Directive (CSDDD), EU AI Act, Accessibility Act, ePrivacy Regulation, and a new update of the General Data Protection Regulation (Implementation) Act)), for which we are taking the necessary preparatory measures internally (including analysis and implementation in policies, systems, and processes). Such new laws and regulations often also apply to our clients and this leads to an increase in security and privacy questions, including in requests for proposals and tender procedures.

In 2025, BDO appointed an external Data Protection Officer (FG), in line with GDPR legislation.

Handling complaints, whistleblowers and claims

In 2025, two internal complaints and one disciplinary complaint were received in relation to statutory audit engagements and/or external auditors (2024: 0). No external complaints, whistleblower reports or claims were received.

The two internal complaints related to a report of undesirable behaviour and a report of unfair and/or negligent treatment. The Head of HR handled these complaints with legal support in accordance with the complaints procedure as included in the terms of employment. A sanction was imposed in one case.



In 2025, a disciplinary complaint was filed against a former external auditor associated with BDO. The complainant accuses the auditor of having failed to identify an entity as a related party, having failed to pay sufficient attention to fraud risks and irregularities, and having failed to assess the audit client's compliance with specific laws and regulations, in the audit activities concerning the 2018 financial statements.

In 2025, the following disciplinary cases against BDO external auditors were still pending before the Accountancy Division and/or the Dutch Trade and Industry Appeals Tribunal (Cbb):

- ▶ An external auditor was accused of having made an error in the scope of the auditor's report (unqualified) that was issued on the financial statements for 2020 of a foundation. The complainant asserted that the foundation's financial statements did not comply with the law and its Articles of Association, and that the auditor's report contained incorrect information about the responsibilities and powers of the foundation's management and board. The Accountancy Division issued a ruling on 21 October 2022. While it upheld one part of the complaint, no sanctions were imposed. The complainant lodged an appeal. The oral hearing took place on 27 January 2026 and the Cbb declared the appeal unfounded. This brings the matter to an end.

In 2025, the following disciplinary cases were completed:

- ▶ An external auditor was accused of failing to exercise professional due care in their audit of a fund's profit and/or dividend distributions and of not having provided – enough of – a true and fair view in the fund's financial statements for 2016 and 2017. The Accountancy Division ruled on 27 December 2021 that the complaint was partly founded and issued a written warning against the external auditor. Both the complainant and the external auditor appealed the decision. The appeals of both parties were declared unfounded in a judgment dated 11 November 2025. This made the measure of a warning that was imposed final.

	2025	2024
Number of external complaints submitted (in accordance with the Complaints Handling Procedure – BDO Complaints Handling Committee)	0	0
Number of internal complaints (as per Complaints Procedure (formerly the Rules for reporting and handing complaints))	2	0
Number of whistleblowing reports (in accordance with the BDO Whistleblower's Scheme (formerly: Rules for handling reports of suspected wrongdoing ('Whistleblower Scheme')))	0	0
Number of claims against organisation	0	0
Number of disciplinary complaints against external auditors	1	0
Total	3	0

ACCEPTANCE AND CONTINUATION OF CLIENT RELATIONSHIPS AND ENGAGEMENTS

Acceptance and continuation of client relationships and engagements

In 2025, further work was done to optimise the process of accepting and continuing clients and engagements and the systems used in the process, partly based on the principles elaborated above regarding risk leadership and responsibilities, efficient support from systems and procedures and availability of reliable (reconciliations between) data. The process, which consists of central Account Acceptance (AA) and subsequent Service Acceptance (SA), is firmly embedded, but needs strengthening in the implementation in parts to ensure full consistency and timeliness. For the MT A&A, central acceptance, as well as discipline, clear process design and leadership direction are indispensable to uniformly assess integrity risks and establish a consistent risk profile.

The Committee Client Onboarding (CCO), which is responsible for the entire process of accepting and continuing client relationships and engagements and consists of a delegation from each LoS MT, had initial experiences in dealing with specific issues in 2025. In 2025, the Service Center Client Onboarding (SCCO) mainly performed central activities related to the Wwft and the international conflict-of-interest check (COI). In 2025, the pilot that used external tooling to draw up risk profiles for (potential) clients based on public sources, exchanged information directly with (potential) clients, and automated identification of (potential) clients within the context the Wwft, was evaluated. The results of this pilot and the resolution of some other identified bottlenecks in the process will be followed up in 2026.

If, in the process of accepting or continuing an engagement, certain risks have been identified or certain criteria have been triggered, QRM will impose one or more risk-mitigating and/or quality measures. The measures imposed include engagement quality review (EQR), theme-based quality review (TBQR), International Financial Reporting Standards (IFRS) review, mandatory consultation with Professional Practice Department (PPD), deployment of specialist (e.g. in the field of fraud or sanctions/Wwft), mandatory rotation or an instruction for the team composition. Additional measures may be imposed after the engagement has been accepted or continued. These would include quality controls during the performance of the engagement, such as Engagement Team Discussion (ETD) coaching, TBQR, IFRS review and EQR (see also the totals of these quality controls at ['Managing the quality of an engagement'](#)). The QRM department imposed one or more measures on BDO A&A for 198 engagements (2024: 244) with an expected completion date in 2025.

Number of engagements for which QRM imposed quality controls upon acceptance or continuation

	2025	2024
Number of engagements	198	244

Revenue

BDO Netherlands' total revenue for the financial year 2025 was EUR 402.8 million (2024: EUR 379.9 million) (up 6.0%). Of this amount, EUR 164.4 million (2024: EUR 153.9 million) (up 6.8%) was generated by the A&A Line of Service.

(in EUR millions) *	2025	%	2024 **	%
Audit & Assurance	164.1	40.7	153.9	40.5%
Accountancy & Business Advisory	95.3	23.7	88.8	23.4
Tax & Legal	102.5	25.4	96.6	25.4
Advisory	40.9	10.2	40.6	10.7%
Total	402.8	100%	379.9	100%

* The total amounts/percentages may deviate due to rounding differences.

** The BDO Sustainability Advisory practice was repositioned from Audit & Assurance to Advisory in 2025. Furthermore, the Global Outsourcing practice was repositioned from Tax & Legal to Accountancy & Business Advisory in 2025. The comparative figures have been restated accordingly

The breakdown of the revenue from the various forms of services is shown below.

COMPOSITION BDO REVENUE, 2025 *	Statutory audits	Other audits of financial statements	Other audit and assurance reports	Other services	Total	%
Statutory audits – PIE	14,5	-	1.1	-	15.6	3.9%
Statutory audits – other	110.1	3.7	3.8	20.6	138.3	34.3
Other audits of financial statements	-	22.3	2.5	4.0	28.8	7.1%
Other audit and assurance reports	-	-	8.9	7.6	16.5	4.1%
Other	-	-	0,2	203.4	203.6	50.5
Total	124.6	26.0	16.5	235.6	402.8	100.0%
COMPOSITION OF REVENUE BDO, 2024 *	Statutory audits	Other audits of financial statements	Other audit and assurance reports	Other services	Total	%
Statutory audits – PIE	12.6	-	0.7	-	13.3	3.5%
Statutory audits – other	104.1	3.1	3.5	17.5	128.1	33.7%
Other audits of financial statements	-	21.3	2.0	3.8	27.1	7.1%
Other audit and assurance reports	-	-	7.7	7.1	14.7	3.9%
Other	-	-	0.1	196.5	196.6	51.8%
Total	116.7	24.4	14.0	224.9	379.9	100.0%

* The total amounts/percentages may deviate due to rounding differences.

The revenue was generated from engagements billed by entities belonging to BDO Netherlands. The table does not include any amounts billed directly by member firms of BDO Global to our internationally operating audit and other clients.

In the table, the revenue from statutory audits was presented based on the definition of a statutory audit in Section 1(1)(p) of the Dutch Audit Firms (Supervision) Act (including annex).

The segmentation of revenue is in line with Article 13(2)(k)(i-iv) of Regulation (EU) No 537/2014:

- i. Revenues from the statutory audit of annual financial statements and consolidated financial statements of public-interest entities and entities belonging to a group of companies whose parent company is a public-interest entity;
- ii. Revenues from the statutory audit of annual financial statements and consolidated financial statements of other entities;
- iii. Revenues from permitted non-audit services to entities that are audited by the statutory auditor or the audit firm; and
- iv. Revenues from non-audit services to other entities.

ENGAGEMENT PERFORMANCE

Number of engagements

BDO performed 1,091 statutory audits in 2025 (2024: 1,047), including statutory audits of 84 Public Interest Entities (PIEs) (2024: 88). The list of PIE's where BDO carried out statutory audits over the past is included in [Annex A](#).

The 4.2% increase in the number of statutory audits and an equivalent increase in revenue from statutory audits by nearly 6,8% reflects our critical thinking in accepting and continuing engagements, whereby we seek as much as possible to accept and continue engagements that are in line with the quality level we aim to achieve in our service provision as regards their nature and scope.

The number of PIE audit clients decreased slightly in 2025, which involved some client turnover: we accepted six new PIE audit clients and the number of PIE audit clients fell by ten, mainly due to rotation obligations or no longer meeting the PIE definition (for example: de-listings or a reduction in the number of rental units below the 5,000 mark).

In five cases, the audit engagement was withdrawn by the audit client or terminated prematurely by BDO (2024: 6), inter alia due to:

- ▶ the audit client's insolvency; and
- ▶ due to the fact that the audit process was very difficult and, in particular, the inability to obtain sufficient and adequate audit evidence.

The availability of sufficient time, people and resources

Total hours spent on audit engagements increased by 0.7% in 2025 compared to 2024. The number of hours spent on PIE audit engagements increased by about 10% and the number of hours spent on non-PIE audit engagements decreased very slightly by 0.1%.

Total hours worked in 2025 was up 2.9% when compared to 2024. Overall, the relative time spent on other engagements and services increased slightly at the expense of the relative time spent on audit engagements. The distribution of hours across the various job levels remained virtually the same.

The relative number of overtime hours when compared to the total number of contract hours in 2025 fell slightly to 2.6% (2024: 2.9%). Our HR and planning policies are designed to ensure that employees can finish their work within their regular contract hours as much as possible. We therefore monitor changes in overtime hours, among other things.

Number of overtime hours and overtime hours as a percentage of available contract hours

2025	Partners	(Sr.) managers	Other	Total
Overtime	1,144	17,755	33,712	52,610
Overtime hours as % of contract hours	0.8%	3.8%	2.4%	2.6%
2024	Partners	(Sr.) managers	Other	Total
Overtime	559	18,556	38,380	57,496
Overtime hours as % of contract hours	0.4%	4.3%	2.9%	2.9%

Methodology and technology

Within the engagement performance component, BDO has taken important steps towards a future-proof, IT-driven and professionally robust audit process in 2025. The combination of tightened quality measures, renewed methodology, intensified monitoring, modernisation of work programmes and further integration of technology ensures a strengthened and more consistent system of engagement performance.

Each year, BDO invests in both existing and new auditing methodology and technology. Some of these investments concern the contribution we make to the international network in the development of the BDO Audit Manual, our worldwide methodology, and of the Audit Process Tool (APT), the technology we use to carry out and document our audit engagements. Other investments involve formulating an integrated vision of IT innovations in the audit process and the development and application of concrete tools and applications. Various technological innovations contribute to improvements in, and simplification of, our audit procedures. The AI&T Team enables the technical implementation of innovations in Dutch auditing practice. In addition, HR (with respect to change management), the Professional Practice Department (as regards professional knowledge and audit

Average ratio of hours per partner, (senior) managers and other team members (leverage), broken down by PIE and non-PIE audit engagements

2025 *	PIE audit		Non-PIE audit		Total	
		%		%		%
Partners	6,639	8.0%	50,650	6.1%	57,289	6.2%
(Senior) managers	19,090	23.0%	169,956	20.4%	189,046	20.6%
Other employees	57,200	69.0%	614,502	73.6%	671,702	73.2%
Total	82,929	100%	835,107	100%	918,036	100%
2024*	PIE audit		Non-PIE audit		Total	
		%		%		%
Partners	5,920	7.9%	50,246	6.0%	56,166	6.2%
(Senior) managers	17,385	23.1%	167,352	20.0%	184,737	20.3%
Other employees	51,959	69.0%	618,570	74.0%	670,529	73.6%
Total	75,264	100%	836,167	100%	911,431	100%

* The total amounts/percentages may deviate due to rounding differences.

Number and percentage of hours of partners, senior managers, managers and other team members spent on audit engagements (by PIE and non-PIE), other engagements, other procedures

2025 *	PIE audit		Non-PIE audit		Other engagements		Other activities		Total
		%		%		%		%	
Partners	6,639	5%	50,650	40%	7,368	6%	60,628	48%	125,284
(Senior) managers	19,090	5%	169,956	48%	30,595	9%	136,868	38%	356,509
Other employees	57,200	6%	614,502	63%	61,549	6%	243,086	25%	976,337
Total	82,929	6%	835,107	57%	99,512	7%	440,582	30%	1,458,130
2024 *	PIE audit		Non-PIE audit		Other engagements		Other activities		Total
		%		%		%		%	
Partners	5,920	5%	50,246	42%	6,432	5%	56,066	47%	118,664
(Senior) managers	17,385	5%	167,352	49%	28,239	8%	127,487	37%	340,462
Other employees	51,959	5%	618,570	65%	60,110	6%	226,696	24%	957,335
Total	75,264	5%	836,167	59%	94,780	7%	410,249	29%	1,416,461

* The total amounts/percentages may deviate due to rounding differences.

methodology) and the IT lead key user community (concerning the practical application for the business) also play an important role in implementing innovative technology in the audit process.

In 2025, BDO has taken further steps in developing a more technology-driven audit approach. This involved investment in the further development of audit-automation tools, including enhanced functionalities within APT, further deployment of applications to support data-oriented detail work during the audit, and new data and analysis tools that increase the efficiency and consistency of audit work. Additional initiatives have also been launched in the areas of AI-assisted analytics and smart support applications that help the audit team perform and document audit work.

In order to be able to deploy innovations responsibly, substantial investment was also made in training and knowledge building in 2025. This includes training aimed at using audit automation effectively, understanding AI applications and ensuring professional-critical conduct within an increasingly automated audit process. This aims to safeguard audit quality and to adequately equip employees for a changing profession. This included a specific focus on the risks associated with automation and AI, such as inconsistent application of new tools, variation in the quality of AI output generated by employees and the risk of routine work disappearing, which is important for the learning curve of start-ups. It also carefully monitored how technological efficiency gains lead to shifts in workload, required competences and staff planning.

Managing the quality of an engagement

Quality tools

The quality tools that help to safeguard the quality of engagement performance are embedded in the BDO Quality Policy. The engagement quality controls support the external auditor and the engagement team in delivering quality and they help the audit practice manage and monitor quality. As BDO is a learning organisation, the quality management policy for engagement performance makes a clear distinction between concomitant controls aimed at learning, coaching and improving the quality of the audit practice imposed by the Professional Practice Department under the direct supervision of the A&A MT (before the auditor's report is issued) and controls aimed at monitoring and testing by the QRM department (after the audit opinion is issued). For a description of the controls, see annex 'BDO System of quality management'.

In accordance with the quality policy, at least two engagements per partner are selected each year that are subject to quality controls such as ETD coaching, use of specialists, TBQR or EQR. In addition, quality controls such as consultation, support team or IFRS review can be imposed on engagements in which one or more specific risk indicators are present or emerge during performance, or instructions can be issued regarding the composition of the team. The choice of quality control depends in part on the nature and scope of any quality risks identified for the engagement and on whether the engagement meets the criteria that trigger a specific quality control.



ETD coaching

The ETD coaching quality measure was applied to eleven engagements in 2025 (2024: 12). Engagement teams were coached during the Engagement Team Discussion (ETD) to make an in-depth study of the structure of the audit and to place focus on key aspects.

	2025	2024
Number of engagements with ETD coaching	11	12

Use of specialists

The total number of hours spent by IT specialists on audit engagements increased by 1.7% to 46,135 in 2025 (2024: 45,355 hours). The relative involvement of these specialists decreased for PIE audit engagements and increased for non-PIE audit engagements when compared to 2024.

The total hours spent by other in-house specialists, such as tax and forensic specialists, increased by 22.9% to 12,387 in 2025 (2024: 10,083 hours). The relative involvement of these other specialists in audit engagements increased to 1.3% (2024: 1.0%). We will continue to work to better facilitate and encourage the use of in-house specialists for audit engagements.

Number/percentage of hours spent on audit engagements by IT specialists (by PIE and non-PIE)

IT SPECIALISTS	2025	%	2024	%
PIE audit	4,423	5.0%	4,622	5.7%
Non-PIE audit	41,712	4.6%	40,733	4.5%

Number/percentage of hours spent on audit engagements by other BDO specialists

OTHER SPECIALISTS	2025	%	2024	%
Audit engagements	12,387	1.3%	10,083	1.0%

In 2025, two new quality measures were developed to further update and professionalise the deployment of specialists: Deep Dive IT and GAAS (Goodwill & Acquisitions Audit Support). These measures have been assigned to audit engagements since the autumn of 2025: both measures strengthen the risk-based and specialist-based performance of statutory audits.

- ▶ Deep Dive IT focuses on engagements with a relevant or complex IT environment. The measure brings financial auditors and IT auditors together to analyse the client's IT infrastructure, identify where IT controls can be relied upon and develop a more informed, efficient audit approach. The session also identifies knowledge needs and opportunities for further audit automation.
- ▶ GAAS is used for engagements with complex valuations or acquisitions. A specialised pool supports teams on goodwill issues and acquisition-related risks. The measure ensures consistent application of methodology, timely use of expertise and higher quality of valuation justifications.

In 2025, BDO also renewed and clarified procedures for the use of specialists in the audit of the financial statements. The use of specialists is increasingly important for performing high-quality audits, partly because specialist involvement demonstrably contributes to higher audit quality. The new procedure gives audit teams more clarity as to when and how specialists should be involved and what quality standards apply in this connection. BDO uses these changes to strengthen the quality, transparency and uniformity of specialist engagement within statutory audits.

Central to this is a new uniform job profile for specialists, adopted by the MT A&A. Specialists accessible via the central intranet page meet this profile and are trained in the relevant auditing standards, their role within the audit and the requirements around independence. This ensures that specialists can be deployed effectively and in line with Standard 620. Specialists are divided into the following specialist areas:

- ▶ Forensics audit support (FAS)
- ▶ Goodwill accounting & audit support (GAAS)
- ▶ Going concern support (GCS)
- ▶ Financial Accounting Advisory Service (FAAS)
- ▶ Tax expertise
- ▶ Valuation expertise
- ▶ Legal expertise

The renewed working method also contains fixed process agreements: the audit team reports the need for deployment in good time, after which the specialist provides a set of agreements including the work to be performed, timelines, contact persons, declaration of independence, information to be collected and sample reports. This standardised approach ensures better planning, consistent cooperation between Lines of Service and a clear separation between audit support and advice in the context of independence requirements.

Consultation procedure

The table below shows the number of requests for formal consultations with the Professional Practice Department. In 2025, the total number of consultations fell by 6.8% to 370 (2024: 397). In line with tightened obligation to consult and the deteriorating economic conditions, the number of consultations on significant continuity risks in particular increased significantly.

In addition to an internal obligation to consult in case of (an intention to) issue a statement that deviates from the standard, there is also an obligation, in case of (an intention to) issue a disclaimer of opinion, an adverse opinion or a qualified opinion on the financial statements of a PIE, to report this to the competent authorities supervising the PIE in question (under Article 12(1)(c) of Regulation No 537/2014). BDO provided an audit opinion with qualification in two cases and an audit opinion with a going concern paragraph in one case as an outcome of statutory audits of PIEs in 2025 (2024: 2) and reported these situations to the relevant regulators.

Number of requests for formal consultations on reporting and audit submitted to PPD

CONSULTATIONS	2025	2024
Alternative wording of auditors' opinions	79	92
Engagement letters and/or reports on assurance engagements other than audit or review engagements (attestation or direct engagements under NV COS 3000A/D)	21	18
Engagement letters and/or reports for third parties in agreed-upon procedures for engagements under NV COS 4400)	50	52
Presumed or actual error in financial statements*	31	34
External reporting	20	35
Significant going concern risk	114	106
Other topics	55	60
Total	370	397

* This concerns all consultations on actual or potential error correction based on Rj 150 recorded by PPD. 22 of these related to statutory audits (2024: 28). In 21 cases, recovery took place within the guidelines of Rj 150 Error Recovery (2024: 20) and it was concluded in 8 cases that they (also) involved a fundamental mistake, requiring a notification under Section 2:362(6) of the Dutch Civil Code (2024: 12). In 2025, 2 of the 23 consultation cases involving a suspected error in the financial statements, PPD concluded, as an outcome of the consultation, that the suspicion was not well-founded and actual error correction was not necessary (2024: 2 out of 28).

Theme-based quality review (TBQR)

A total of 34 TBQRs were conducted and completed for audit engagements in 2025 (2024: 36). A TBQR is a quality review of specific elements during the audit. Most TBQRs pertained to the audit of revenue or sector-specific items, flows or themes.

In 2025 (as regards audits of the financial year 2024) 32 (2024: 39) audit engagements were subject to a mandatory IFRS review. The review procedure proved to have been observed during the audit in all cases.

Number of TBQRs and IFRS reviews

TBQR	2025	2024
Number of TBQRs	34	36
Number of IFRS reviews	32	39

Engagement Quality Review (EQR)

In 2025, a total of 142 EQRs were completed for audit engagements (2024: 116). 34 EQRs were conducted for audit engagements that met the internal review criteria, not being PIE's (2024: 17). The percentage of non-PIE audits that were subject to an EQR was 3.4% (2024: 1.8%). The number of voluntary EQRs increased in 2025, partly as a result of the horizontal inflow of several new partners. Our quality policy requires that we carry out at least two EQRs at horizontally integrated partners during the first year after they join BDO.

Number of EQRs, required and voluntary

EQR	2025	2024
Listed companies (PIEs)	19	14
Other PIEs	89	85
Voluntary EQRs	34	17
Total	142	116

In 2025, the average number hours spent by EQR reviewers as a percentage of total hours spent on statutory audits subject to an EQR was 3.1% (2024: 3.6%). In principle, the hours spent on an EQR are expected to be between 4% and 6% of total hours, with the exception of EQRs on engagements where a national industry-specific approach has been applied (e.g. housing associations, insurers and SPVs) for which the relative hours spent are expected to be between 2% and 4% of total hours.

Number of hours spent on EQRs as a percentage of total number of hours spent on audit engagements subject to an EQR

	2025	2024
Average relative hours spent on EQR per engagement	3.1%	3.6%

Support team

In 2025, there were no specific circumstances in audit engagements with potential implications for the integrity of the audit firm that required the deployment of a formal support team to guide the external auditor and the audit team (2024: 2). Ad hoc engagement team guidance was also provided by dedicated experts where necessary.

Number of engagements with support team assigned

	2025	2024
Number of engagements with support team assigned	0	2

Fraud

In 2025, 138 internal reports were made to the central internal fraud desk. These reports involved suspected fraud, unusual transactions and other irregularities relating to statutory audits (2024: 124). Alertness to circumstances that may indicate issues of fraud and/or other irregularities (such as corruption, unusual transactions or violations of laws and regulations) appears to have increased significantly.

If, during the performance of a statutory audit, the auditor has a reasonable suspicion of a material misstatement of the audit client's financial statements due to fraud, the auditor is required to make a report to the National Investigation Service (forensic accountants desk), unless the audit client is investigating the fraud and takes adequate action to prevent it. In 2025, none of the internal reports led to an external fraud report (2024: 0).

Number of internal reports of fraud and/or irregularities, and external fraud reports

	2025	2024 *
Number of internal reports of fraud and/or irregularities	138	124
Number of external fraud reports	0	0

* Comparative figure adjusted due to a date correction.

In 2025, Forensic Audit Support (FAS) was further professionalised and risk-focused. FAS is the quality tool where fraud experts from Forensics & Technology and the Fraud Community support control teams on fraud risks and complex issues. The tool makes a proven contribution to audit quality, as evidenced by previous cold reviews and thematic reviews, and has therefore been given a structural place within the quality toolbox. The selection criteria for deployment in audit year 2025 have been redefined in line with the NBA policy vision: mandatory deployment in PIE audits and risk-based selection in non-PIEs based on factors such as first-year audits, previous incidents, APT dashboard indicators, sector and country risks. It also stipulates that each FAS involvement consists of two experts and covers the entire audit process, from risk analysis and ETD sessions to review of the fraud risk paragraph in the audit opinion. FAS is also increasingly being used in incident-driven cases, where support needed is determined after a report of irregularities.

Professional Practice Department

In 2025, the total number of professionals in the A&A Professional Practice Department (PPD) remained unchanged at twelve (2024: 12). Two senior managers were promoted to the position of director in 2025.

Number of partners, directors, senior managers, managers and other staff in A&A PPD (in FTEs)

	2025	2024
Partners	2	2
Directors	3	1
(Senior) managers	7	9
Other	0	0
Total	12	12

MONITORING AND REMEDIATION

Monitoring compliance with quality controls

The QRM department carries out continuous monitoring of compliance with the measures included in the system of quality management on behalf of the Governing Board, under the supervision and responsibility of the compliance officer. In 2025, the system of quality management was monitored and evaluated again in line with ISQM 1. The monitoring programme consists of monitoring activities focused on the effective operation of quality controls and the identification and evaluation of any deficiencies in the system of quality management, including evaluation of remedial action undertaken in response to deficiencies identified in prior periods. A fundamental aspect of effective monitoring and remediation is to conduct root cause analyses on identified deficiencies in order to understand why those deficiencies occurred and to be able to design an effective remedial plan that prevents the recurrence of those deficiencies in the future. In early 2026, the Compliance Officer issued a report on QRM's monitoring activities in 2025 to the Governing Board. The statement by the policymakers in this Transparency Report is based, in part, on this report.

The staffing of the QRM department decreased to 25 FTEs in 2025 (2024: 33). This decrease is mainly caused by first-line quality management work being reshaped into dedicated departments. The QRM department is increasingly focusing on consulting and monitoring from a second-line role. Firstly, the executive and registration activities related to accepting and continuing clients, including under the Wwft, have been differentiated to the Service Centre Client Onboarding (SCCO). This means that several employees of the QRM department transferred to the SCCO in 2025. Secondly, a new Team Quality Management (TQM) has been set up within the LoS A&A for first-line quality management of mission execution. Several QRM department employees transferred to TQM in 2025.

Number of partners, directors, senior managers, managers and other staff with a focus on compliance and risk management (in FTEs)

	2025	2024
Partners	3	3
Directors	1	1
(Senior) managers	13	13
Overige	8	16
Total	25	33

Supervision of professional services

One of the ways in which we exercise supervision of our professional services is by conducting file reviews; these are internal checks after the auditor's report has been issued. A file review focuses on the quality of an audit file and the effectiveness of elements of the system of quality management that are reflected in the audit file. We distinguish between two types of file reviews: cold reviews and theme-based quality inspections.

- ▶ **Cold review.** A cold review targets certain focus areas that are decisive for the engagement and results in an opinion on the entire file. The review of the file and the choice of focus areas are risk-based. Partners are subject to a cold review every three years.
- ▶ **Theme-based quality inspection (TBQI).** A TBQI targets the quality of a specific theme in the audit file or the effectiveness of a specific theme in the system of quality management. Unlike a cold review, a TBQI is not aimed at expressing an opinion on the quality of the entire engagement or the entire audit file. It only focuses on the specific theme that is subject to review. TBQIs were conducted as part of the promotion process, for lateral hires (partners) and for partners who had been instructed to improve their performance.

In 2025, 24 cold reviews were completed (2024: 12) and 17 were rated 'satisfactory' (2024: 9), 7 of which were rated 'unsatisfactory' (2024: 3). The seven insufficient cold reviews involved six cold reviews that had already started in 2024 but were not completed until 2025 and one cold review that was started and completed in 2025. A total of seventeen cold reviews were launched by 2025, with fifteen completed by 2025 (2024: 17 and 10 respectively), of which fourteen had an outcome 'satisfactory' and one 'unsatisfactory'. The remaining two cold reviews will be completed in early 2026.

In addition, fifteen TBQIs were completed in 2025 (2024: 15), one of which was rated 'unsatisfactory' (2024: 5) and fourteen with the outcome 'sufficient' (2024: 10).

Number of cold reviews and theme-based quality inspections performed, including outcomes

	2025	2024
NUMBER OF COLD REVIEWS	24	12
Satisfactory	17	9
Unsatisfactory	7	3
THEME-BASED QUALITY INSPECTIONS	15	15
Satisfactory	14	10
Unsatisfactory	1	5

The cold reviews were conducted by experienced internal reviewers and external reviewers. The group of testers deployed attended the 'from resistance to acceptance' skills training on a mandatory basis. where reviewers learn to also pay attention to soft factors during the review process and so to make the process run more smoothly.

As we are a learning organisation, a file that has been rated unsatisfactory will not generally lead to sanctions. Rather, we will sit down with the persons involved to discuss how they can go about improving the quality of their work in subsequent engagements. Everyone at BDO who wishes to contribute to quality improvements has the opportunity to do so. Remedial plans were executed for files rated as 'unsatisfactory'. In one case, an error in the financial statements was rectified. In the other cases, there were no material misstatements in the audited financial statements or errors in the scope of the issued auditor's reports.

Quality reviews – international

In December 2025, BDO Global conducted an Audit Quality Review (AQR), which focused on the system of quality management, the internal Engagement Inspection Program, selected audit and TRA files and compliance with Non-Assurance Services (NAS) requirements. The AQR confirms that BDO Netherlands has a solid quality foundation, with targeted areas of concern that are being addressed within the regular monitoring and remediation process and are part of the 2025 system of quality management review. As regards the system of quality management, BDO Global reported a number of recommendations to further refine and strengthen it, and with regard to the internal Engagement Inspection Program a single finding and made several recommendations. Individual file reviews showed no signs of quality deficiencies. Finally, BDO Global concluded that the NAS policy is applied in line with BDO Global guidelines.

Root cause analysis

In 2025, seventeen (2024: 16) *root cause analyses* (RCAs) were performed with engagement teams after the relevant engagement had been subject to a cold review. A total of 129 colleagues participated (2024: 122) in the RCAs.

As part of the RCA process, all engagement teams reviewed which factors contributed to the quality of their engagement (success factors) and which factors stood in the way of quality (barrier factors), regardless of the outcome of the cold review of their engagement (satisfactory or unsatisfactory). The engagement teams also reflected on lessons learned by them as individuals, by the team and by BDO as an organisation. The top five success factors in files that were rated satisfactory and the top five improvement factors in files rated unsatisfactory are shown in the table on the right.

In addition, as part of the monitoring and remediation process, root cause analyses were conducted on the deficiencies in the system of quality management identified as an outcome of monitoring activities. The identified causes were used to understand why those deficiencies occurred and allowed us to effectively design remedial actions that would prevent the recurrence of those deficiencies in the future.

Success factors – satisfactory

1. Team composition
2. Sense of community
3. Face-to-face coordination in team
4. Time allotment
5. Coordination at appropriate client level

Barrier factors – unsatisfactory

1. Focus
2. Short throughput time
3. Questioning and contradicting
4. Coordination at appropriate client level
5. Overview, project planning



External supervision

Supervision by the AFM

The AFM conducted several review and exploratory investigations at BDO in 2025. These surveys focused on the functioning and maturity of the system of quality management (quality control system) and on sharing best practices and thereby strengthening the sector. In 2025, the AFM also completed its investigation into undesirable behaviour in exams and reported incidents were intensively discussed.

In 2025, the AFM conducted an exploratory review of BDO regarding:

- ▶ **Information security.** In 2025, the AFM has completed the exploratory investigation into information security. In this review, the AFM selected fourteen control measures, as defined in De Nederlandsche Bank's "Information Security Good Practice 2023", for further investigation. The AFM rated three of the fourteen control measures at BDO at a lower maturity level than it expects from BDO. In January 2026, BDO presented a plan of action to the AFM to improve these control measures.
- ▶ **Cash flow statement.** In the third quarter, the AFM conducted an exploratory investigation into the audit work relating to the cash flow statement. This investigation is a collaboration between the supervision of financial reporting of listed companies and the supervision of audit firms. The review looked at both the quality control system and the performance of the audit work on the cash flow statement. The AFM has no findings related to the file examined and no findings related to the quality control system. The AFM has announced it will re-examine a reporting theme in 2026.
- ▶ **Audit tooling.** The AFM conducted an exploratory investigation into the use of audit tooling in the performance of audit work. In December 2025, the AFM released a public report concluding that advanced audit tooling, including (Gen)AI, offers great opportunities for quality improvement, efficiency and attractiveness of the audit profession. The AFM stresses the importance of a solid foundation to deploy this tooling in a controlled and responsible manner. The AFM has since announced further investigations into the use of audit tooling in audit engagements in 2026.
- ▶ **CSRD assurance.** In the third quarter, the AFM conducted an exploratory investigation into the implementation and execution of CSRD assurance by PIE audit firms. The aim was to gain insight into the manner in which the quality of assurance work is assured, both within the quality control system and at file level, as well as to share observations and good practices that support sector-wide development. The investigation consisted of a review of system components and a file review.

The AFM identified a number of positive developments such as strong training and knowledge sharing within the assurance practice, effective deployment of external ESG specialists and consistent reviews by FAAS. At the same time, the AFM sees development points such as further structuring quality safeguards towards future 'waves', further development and streamlining of methodology and templates and optimisation of APT integration.

In the first half of 2025, the AFM conducted a review of the quality control system on the topic of fraud risk analysis. The AFM has investigated whether BDO's quality control system provides sufficient safeguards for quality fraud risk analysis. The study focused on the period June 2023 – March 2025 and consisted of two parts:

- ▶ an assessment of the quality control system around fraud; and
- ▶ review of two conducted fraud risk assessments within statutory audits.

The objective of the investigation also focused on determining whether BDO has taken appropriate action in response to previous AFM sector-wide findings. The AFM notes that BDO has made clear improvements, such as professionalising the Fraud Panel, strengthening fraud expertise and focusing on professional-critical attitude. The AFM did not identify any findings, but it did identify some areas of concern with regard to the two files examined. Furthermore, the AFM does emphasise the need to continue making further improvements on the topic of fraud risk analysis, including with regard to measuring the effectiveness of the measures deployed and performing root cause analyses. The results of this AFM survey were included in the 2025 system of quality management review. The AFM has since announced it will re-examine the quality of audit files with regard to fraud risks in 2026.

In 2025, the AFM conducted a review and exploratory investigation into BDO's remuneration policy.

- ▶ The review part of the AFM remuneration investigation assesses – based on policy documents – whether the formal design of the remuneration policy complies with Section 18b of the Wta, including assessment, remuneration, appointment, sanctioning and profit sharing.
- ▶ The exploratory part examines the application of the remuneration policy in practice through a validated self-assessment. Here, audit firms assess their maturity level on four AFM expectations around quality assurance by boards and supervisory boards. The aim is to understand incentives in practice and encourage further quality development.

In February 2026, BDO received the final feedback letter from the AFM. As an outcome of the review part of the investigation, the AFM identifies two concerns regarding the complexity of the policy and its performance incentives to ensure the quality of statutory audits. As an outcome of the exploratory investigation into the application of the remuneration policy, the AFM qualifies BDO's maturity level with regard to the four AFM expectations as 'monitored': with monitoring, BDO obtains insight into whether the policy is actually implemented as intended. The AFM encourages BDO to further develop to the level of 'evaluated' by assessing with a certain regularity and with more distance and depth whether the goals of the policy are achieved in practice and whether the policy has unintended effects, and in addition, when adjusting the policy, to record with what purpose the adjustments are made and how the quality of statutory audits is thereby ensured.

In Q4 2025, the AFM conducted a survey of PIE audit firms on elements of the Engagement Inspection Program (IKO). The study focuses on the objectives, representativeness and predictability of the IKO. The AFM conducted an on-site investigation at BDO and held interviews with relevant officers. BDO received the draft report with the preliminary results of the study in March 2026. BDO will consider these outcomes when evaluating and further improving the IKO process in 2026.

As part of its data-driven supervision, the AFM has requested audit firms to provide data. The data query consists of three parts:

- ▶ A questionnaire with data points about the audit organisation (AO list);
- ▶ A questionnaire with data points on each individual statutory audit (WeCo list); and
- ▶ A questionnaire with data points on each individual external auditor.

We have made arrangements with the AFM as regards a trajectory that should lead to data being delivered in accordance with the AFM's full data query. For this purpose additional steps were made in 2025 in order to realise the required significant adjustments to the functionalities of various systems, the way in which data is recorded in those systems, and should establish reliable links between them.

The AFM completed its investigation into exam fraud at BDO in 2025 and imposed an administrative fine of €765,000 on BDO in December 2025. The fine was imposed because BDO did not have an adequate system of quality control in place from the beginning of 2018 to the end of 2023 and had not set up its business operations in such a way as to ensure the controlled and sound conduct of business. Due to the lack of specific policies and procedures on exams, employees could be guilty of undesirable behaviour in tests unnoticed. Within the six-year period, for example, several hundred employees from all levels of the organisation received or distributed questions, or took tests together.

BDO fully cooperated with the investigation, submitted its views on the final AFM report and opted for a simplified settlement of the fine, after which the AFM published the public version of the fine decision and press release on 18 December 2025.

The AFM expects the BDO board to "*show sufficient urgency, focus and commitment to sustainably address exam fraud, its underlying causes and other situations with similar characteristics or risks.*" In doing so, the AFM expects visible leadership, firm direction, transparent reporting and active involvement in all remediation and improvement measures, including for culture and governance. BDO has since drawn up a plan of action for further follow-up. The AFM has enhanced its supervision of this follow-up, focusing in particular on:

- ▶ monitoring the follow-up of the examination fraud file, with the AFM determining that BDO is taking timely and complete steps necessary to complete the examination fraud investigation;
- ▶ embedding a structural root cause analysis (RCA), whereby the AFM expects BDO to thoroughly and demonstrably analyse the root causes of exam fraud, as these insights form the basis for sustainable recovery;
- ▶ monitoring measures to prevent recurrence, where the AFM wants to be assured that BDO is taking effective measures to reduce future risk of exam fraud, such as governance improvements, culture interventions and robust internal controls.

BDO reported an incident to the AFM in 2025 (2024: 4): In 2025, BDO found that due to a technical problem in the audit file filing system, part of the commitments in an audit file were lost. The backup and recovery procedures proved insufficient to prevent the loss, making it impossible to fully comply with legal retention periods for audit files. This was a comprehensive audit, which included information on several entities. As a result, it is not possible to fully account for the audit work carried out afterwards. The connection between the nature of the lost data, the size of the audit client, the successor auditor's request for access to the file and the potential breach this has on confidence in the audit firm were reasons for assessing the event as an incident. The AFM has received the investigation and root cause analysis report and will provide final feedback on it after the AFM receives our concluding report.

Oversight by the Public Company Accounting Oversight Board (PCAOB)

BDO Audit & Assurance B.V. has not been registered with the PCAOB since 9 September 2025 and is therefore no longer under the supervision of the PCAOB. Based on a strategic consideration, which considered that BDO does not perform audit engagements for 'US Issuers' and does not play a 'substantial role' in group engagements that require PCAOB registration, nor does it expect to

perform such engagements in the near future, it was decided to apply to the PCAOB for withdrawal of registration. In 2025, the PCAOB did not conduct any file reviews or other investigations.

Supervision by the Netherlands Institute of Chartered Accountants (NBA)

In December 2025, BDO submitted the monitoring questionnaire to the NBA for both BDO Audit & Assurance B.V. and BDO Accountancy, Tax and Legal B.V. The completion of these (annual) questionnaires is mandatory under the Regulation on Quality Assessments and aims mainly to provide insight into the developments of auditing practices.

The NBA did not conduct any reviews at BDO in 2025.

Supervision by the Central Government Audit Service (ADR) and Education Inspectorate

In 2025, the Dutch Central Government Audit Service (ADR) reviewed two BDO files (2024: 2) and considered them to be adequate. The reviews covered the performance of required work on specific disbursements where the principle of single information and single audit (SiSa-review) applies to the accountability of the regional authority and the performance of required work on the accountability for grants received.

In 2024, the Dutch Education Inspectorate conducted one review at BDO and completed it at the start of 2025. The review focused on the specific requirements set by the Dutch Ministry of Education, Culture and Science (OCW) for the reporting of educational institutions in the Education Accountants' Protocol. The Inspectorate's preliminary verdict is 'unsatisfactory' and sums up several concerns regarding the documentation in the file. The Inspectorate also indicated that no remedial or additional work needed to be carried out as a result of the unsatisfactory rating. In 2025, the Education Inspectorate carried out another survey on the same educational institution, resulting in a 'satisfactory' verdict.

Financial Supervision Office (BFT)

On 1 October 2024, the BFT imposed a fine of €1.3 million on BDO Audit & Assurance B.V. for failing to immediately report an unusual transaction in 2020 (Article 16 of the Money Laundering and Terrorist Financing (Prevention) Act (Wwft)). BDO filed an objection to the BFT's decision, after which BFT nevertheless concluded that the fine decision could stand. BDO lodged an appeal against this decision with the Rotterdam District Court.

Number, nature and outcome of file reviews by ADR and Education Inspectorate

NATURE AND OUTCOME	2025	2024
SiSa	1	2
Sufficient	1	2
Insufficient	0	0
Financial statements	0	0
Sufficient	0	0
Insufficient	0	0
Dutch Senior Executives in the Public and Semi-Public Sector (Standards for Remuneration) Act (WNT)	0	0
Sufficient	0	0
Insufficient	0	0
Grant	1	0
Sufficient	1	0
Insufficient	0	0
Other	0	0
Sufficient	0	0
Insufficient	0	0
Education	2	1
Sufficient	1	0
Insufficient	1	0

Statements by policymakers

The objective of the BDO system of quality management as a whole is to provide reasonable assurance that:

- ▶ the organisation and the professionals fulfil their responsibilities in accordance with professional standards and applicable requirements in laws and regulations and perform engagements in accordance with such standards and requirements; and
- ▶ the reports and opinions we provide are correct under the circumstances.

Reasonable assurance exists when the system of quality management reduces the risk of not achieving the system of quality management's objectives to an acceptably low level. Reasonable assurance is not absolute assurance because there are inherent limitations to a system of quality management.

In the annual review of the BDO system of quality management, as outlined in this report (including appendices), we have taken into account information gathered on the design, implementation and operation of the system of quality management based on monitoring activities carried out in the period up to 31 December 2025. Monitoring activities include testing the effective operation of quality controls, evaluating outcomes of internal and external inspections of engagements and considering other relevant information obtained about the system of quality management.

We apply professional judgement when evaluating the outcomes of these monitoring activities to determine whether findings, individually or collectively, are assessed as deficiencies in the system of quality management. For all identified deficiencies, root causes were analysed and it was evaluated whether these, individually and in combination with other identified deficiencies, have a severe and/or pervasive impact on achieving the quality objectives in our system of quality management. Furthermore, we design and implement remedial measures for all identified deficiencies to eliminate those deficiencies, taking into account root causes, and monitor the progress of remediation.

We conducted our evaluation in accordance with ISQM 1 and concluded that BDO's system of quality management gives us reasonable assurance that the system of quality management objectives are being achieved as of 31 December 2025.

Based on the above, the policymakers confirm that:

- ▶ the outlines of the system of quality management are described correctly in this report and the system is effective in the policymakers' opinion;

- ▶ internal compliance with the independence rules was monitored; and
- ▶ the policy for the continuing professional development of partners and other employees was followed.

Eindhoven, 30 April 2026

- ▶ C.M. (Kirsten) Konst (chair of the Governing Board, Chief Executive Officer)
- ▶ L.M. (Leon) Jansen (member of the Governing Board, Chief Financial Officer/Chief Operating Officer)
- ▶ E.H.B. (Edwin) Schrijver RA (member of Governing Board, Chief Quality Officer)
- ▶ M.M.G. (Marcel) Mans RA (member of the Governing Board, Head of Audit)



A. List of Public Interest Entities

- ▶ Anker Insurance Company N.V.
- ▶ Brand New Day Bank N.V.
- ▶ Cabka N.V.
- ▶ ClearBank Europe B.V.
- ▶ Coteq Netbeheer N.V.
- ▶ DSV Finance B.V.
- ▶ EnBW International Finance B.V.
- ▶ Envipco Holding N.V.
- ▶ Fastned B.V.
- ▶ Hill FL 2022-1 B.V.
- ▶ Hill FL 2023-1 B.V.
- ▶ Hill FL 2024-1 B.V.
- ▶ Mutual Insurance Association 'Munis' (Onderlinge Verzekeringsmaatschappij 'Munis') U.A.
- ▶ N.V. Rendo
- ▶ N.V. Schadeverzekeringsmaatschappij Maas Lloyd (Hampden)
- ▶ N.V. Verzekering Maatschappij 'De Burcht'
- ▶ New Amsterdam Invest N.V.
- ▶ OBAM N.V.
- ▶ Onderlinge Hagelverzekering Maatschappij Agriver
- ▶ Onderlinge Verzekeringmaatschappij "SOM" U.A.
- ▶ OOM Global Care N.V.
- ▶ OOM Schadeverzekering N.V.

- ▶ PB Holding N.V.
- ▶ Roche Finance Europe B.V.
- ▶ Schlumberger Finance B.V.
- ▶ Stichting Acantus
- ▶ Stichting Beveland Wonen
- ▶ Stichting Bo-Ex '91
- ▶ Stichting Brabantwonen
- ▶ Stichting de Woonmensen
- ▶ Stichting deltaWonen
- ▶ Stichting Dudok Wonen
- ▶ Stichting Elkien
- ▶ Stichting Intermaris
- ▶ Stichting KleurrijkWonen
- ▶ Stichting Leystromen
- ▶ Stichting Nijestee
- ▶ Stichting Pré Wonen
- ▶ Stichting ProWonen
- ▶ Stichting Sité Woondiensten
- ▶ Stichting SSHN
- ▶ Stichting Stadgenoot
- ▶ Stichting Talis
- ▶ Stichting Thius

-
- ▶ Stichting Uwoon

 - ▶ Stichting Vivare

 - ▶ Stichting woCom

 - ▶ Stichting Wold & Waard

 - ▶ Stichting Woonbedrijf SWS.Hhvl

 - ▶ Stichting Woonbron

 - ▶ Stichting Wooncompagnie

 - ▶ Stichting Wooncompas

 - ▶ Stichting Woonforte

 - ▶ Stichting Woongoed Zeeuws-Vlaanderen

 - ▶ Stichting Wooninc.

 - ▶ Stichting Woonkracht10

 - ▶ Stichting Woonopmaat

 - ▶ Stichting Wooschakel West Friesland

 - ▶ Stichting Woonstede

 - ▶ Stichting Woonveste

 - ▶ Stichting Woonwaard Noord-Kennemerland

 - ▶ Stichting WoonWenz

 - ▶ Stichting Ymere

 - ▶ Stichting Zaandams Volkshuisvesting (ZVH)

 - ▶ Stichting Zayaz

 - ▶ Stichtische Onderlinge Brand-Herverzekering U.A.
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- ▶ Teva Pharmaceutical Finance Netherlands II B.V.

 - ▶ Tiwos, Tilburgse Woonstichting

 - ▶ TT Club Mutual Insurance N.V.

 - ▶ TVM Verzekeringen N.V.

 - ▶ Unilever Finance Netherlands B.V.

 - ▶ Unilever Insurances N.V.

 - ▶ Vestas Wind Systems Finance B.V.

 - ▶ Westland Infra Netbeheer B.V.

 - ▶ Woningbouwvereniging Bergopwaarts

 - ▶ Woningstichting De Woonplaats

 - ▶ Woningstichting GoedeStede

 - ▶ Woningstichting Kennemer Wonen

 - ▶ Woningstichting "Ons Huis"

 - ▶ Woningstichting Sint Joseph Almelo

 - ▶ Woonpartners Midden-Nederland

 - ▶ Woonstichting Stek

 - ▶ Woonstichting Triada

 - ▶ Wurth Finance International B.V.
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B. List of BDO member firms in EU/EEA

COUNTRY	COUNTRY OF ESTABLISHMENT/GEOGRAPHY	NAME OF MEMBER FIRM
AUSTRIA	Austria	BDO Audit GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft 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.
		BDO Group s.r.o.
		BDO Czech Republic s.r.o.
		BDO EURO-Trend Audit, a.s.
DENMARK	Denmark	BDO Statsautoriseret revisionsaktieselskab
ESTONIA	Estonia	Aktsiaselts BDO Eesti
FINLAND	Finland	BDO Oy
		BDO Audiator Oy
FRANCE	France	BDO Atlantique
		BDO IDF
		BDO Méditerranée
		BDO Paris Audit & Advisory
		BDO Rhone - Alpes BDO Strasbourg

COUNTRY	COUNTRY OF ESTABLISHMENT/GEOGRAPHY	NAME OF MEMBER FIRM
GERMANY	Germany	BDO AG Wirtschaftsprüfungsgesellschaft
		BDO Concunia GmbH Wirtschaftsprüfungsgesellschaft
		BDO DPI AG Wirtschaftsprüfungsgesellschaft
		BDO DPI Mentoring GmbH & Co. KG
		BDO Oldenburg GmbH & Co. KG 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
		BDO Technology Advisory Limited
THE NETHERLANDS	The 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

COUNTRY	COUNTRY OF ESTABLISHMENT/GEOGRAPHY	NAME OF MEMBER FIRM
ROMANIA	Romania	BDO Audit SRL
		BDO Audit & Consulting SRL
		BDO Auditors & Accountants SRL
		BDO Auditors and Business Advisors SRL
SLOVAKIA	Slovakia	BDO Audit, spol. s r.o.
SLOVENIA	Slovenia	BDO Revizija d.o.o.
SPAIN	Spain	BDO Auditores, S.L.P.
		BDO Quota Auditores SL.
SWEDEN	Sweden	BDO AB
		BDO Göteborg AB
		BDO Göteborg KB
		BDO Mälardalen AB
		BDO Norr AB
		BDO Sweden AB
		BDO Syd AB
		BDO Syd KB

C. List of abbreviations and acronyms

A&A	▶ Audit & Assurance	COI	▶ Conflict of interest
A&B	▶ Accountancy & Business Advisory	COO	▶ Chief Operating Officer
AA	▶ Account Acceptance	CPE	▶ Continuing Professional Education
ADR	▶ Dutch Central Government Audit Service	CQO	▶ Chief Quality Officer
AFM	▶ Netherlands Authority for the Financial Markets (AFM)	CSDDD	▶ Corporate Sustainability Due Diligence Directive
AI	▶ Artificial Intelligence	CSRD	▶ Corporate Sustainability Reporting Directive
AI&T	▶ Audit Innovation & Technology	CTO	▶ Chief Transformation Officer
AO	▶ Audit organisation	DNB	▶ The Dutch Central Bank
AP	▶ Dutch Data Protection Authority	DTS	▶ Digital Technology Services
APRP	▶ Audit Partner Refreshment Programme	EEA	▶ European Economic Area
AQI	▶ Audit Quality Indicator	EIL	▶ Ethics & Independence Leader
AQR	▶ Audit Quality Review	EMS	▶ Entity Management System
BAC	▶ Appointment Advisory Committee	EP	▶ Equity partner
BAM	▶ BDO Audit Manual	EQR	▶ Engagement Quality Review
BDO PRO	▶ BDO Professional Reflection & Development	ESG	▶ Environmental, Social and Governance
BFT	▶ Financial Supervision Office	F&T	▶ Forensics & Technology
Bta	▶ Audit Firms (Supervision) Decree	FAAS	▶ Financial Accounting Advisory Services
B.V.	▶ Private limited liability company	FAS	▶ Forensic Audit Support
CCO	▶ Committee Client Onboarding	FEC	▶ Financial-economic crime
CEO	▶ Chief Executive Officer	ESRS	▶ European Sustainability Reporting Standards
CFO	▶ Chief Financial Officer	ETD	▶ Engagement Team Discussion
CKO	▶ Quality Assurance Board	EU	▶ European Union
CBb	▶ Trade and Industry Appeals Tribunal	F&O	▶ Finance & Operations
CMS	▶ Conflict Management System	FG	▶ Data Protection Officer

FIU	▶ Financial Intelligence Unit
FRC	▶ Financial Reporting Council
FTE	▶ Full-time equivalent
GAAS	▶ Goodwill & Acquisitions Audit Support
GB	▶ Governing Board
GCS	▶ Going concern support
GDPR	▶ General Data Protection Regulation
HAAQM	▶ Head of Audit & Accounting Quality Management
HMR	▶ Head of Monitoring & Remediation
HR	▶ Human resources
ICT	▶ Information & Communication Technology
IESBA	▶ International Ethics Standards Board for Accountants
IFIAR	▶ International Forum of Independent Audit Regulators
IFRS	▶ International Financial Reporting Standards
IKO	▶ Internal quality review
ISA	▶ International Standards on Auditing
ISMS	▶ Information Security Management System
ISQM	▶ International Standard on Quality Management
IT	▶ Information Technology
KPI	▶ Key Performance Indicator
LoS	▶ Line of Service
ISO	▶ International Standards Organisation
ISPMS	▶ Information Security & Privacy Management System
MOT	▶ Unusual transaction report

MT	▶ Management team
MT A&A	▶ Audit & Assurance Management Team
NAS	▶ Non-Assurance Services
NBA	▶ Netherlands Institute of Chartered Accountants
NIS	▶ Network and Information Security
NOREA	▶ Dutch Association of Registered EDP Auditors
N.V.	▶ Public limited company
NV COS	▶ Detailed requirements for auditing and other standards
NV PE	▶ Further rules on continuing education
OCW	▶ Education, Culture and Science
PCAOB	▶ Public Company Accounting Oversight Board
PDP	▶ Professional Development Program
PIE	▶ Public Interest Entity
PPD	▶ Professional Practice Department
PRC	▶ Practice Review Committee
QRM	▶ Quality & Risk Management
RA	▶ Chartered accountant
RCA	▶ Root Cause Analysis
RE	▶ Registered EDP auditor
RPA	▶ Robotic Process Automation
RPL	▶ Region practice leader
PE	▶ Continuing education
PES	▶ Pre-Employment Screening
RJ	▶ Accounting Standards Board

SA	▶ Service Acceptance
SB	▶ Supervisory Board
SCCO	▶ Service Center Client Onboarding
SEC	▶ Securities and Exchange Commission
SiSa	▶ Single information Single audit
SP	▶ Salary partner
SPP	▶ Strategic workforce planning
SPV	▶ Special Purpose Vehicle
SRA	▶ Collaborating Chartered Accountants and Accounting Consultants
TBQI	▶ Theme-based quality inspection
TBQR	▶ Theme-based quality review
TOP	▶ Talent Development & Performance
TOPP	▶ Talent Development & Performance for Partners
TQM	▶ Team Quality Management
TRA	▶ Technology Risk Assurance
U.A.	▶ Excluded Liability
UAVG	▶ General Data Protection Regulation Implementation Act
VAO	▶ Dutch Accounting Bodies Regulation
VGBA	▶ Dutch Code of Conduct and Professional Practice for Accountants Regulation
ViO	▶ Regulation regarding the Independence of Accountants in the case of Assurance Engagements
WeCo	▶ Statutory audit
WNT	▶ Dutch Senior Executives in the Public and Semi-Public Sector (Standards for Remuneration) Act (WNT) or Senior Officials (Standard Remuneration) Act

Wta	▶ Audit Firms (Supervision) Act
Wwft	▶ Money Laundering and Terrorist Financing (Prevention) Act

D. Legal framework

The content of this Transparency Report is subject to requirements under laws and (professional) regulations. The tables below provide an overview of those statutory requirements and shows where the elements in question are addressed in this Transparency Report.

ARTICLE 13(2) OF REGULATION (EU) NO 537/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 16 APRIL 2014	CHAPTER
a. A description of the legal structure and ownership of the audit firm	BDO System of quality management > Organisational structure > Legal structure
b. Where the statutory auditor or the audit firm is a member of a network:	
i. a description of the network and the legal and structural arrangements in the network;	i. BDO System of quality management > Organisational structure > International network
ii. the name of each statutory auditor operating as a sole practitioner or audit firm that is a member of the network;	ii. and iii. Annex B: List of BDO member firms in EU/EEA
iii. the countries in which each statutory auditor operating as a sole practitioner or audit firm that is a member of the network is qualified as a statutory auditor or has his, her or its registered office, central administration or principal place of business;	
iv. the total turnover achieved by the statutory auditors operating as sole practitioners and audit firms that are members of the network, resulting from the statutory audit of annual and consolidated financial statements	iv. Quality in 2025 > Organisational Structure > Key figures BDO network international
c. A description of the governance structure of the audit firm	BDO System of quality management > Organisational structure > Legal structure, Organisational structure
d. A description of the internal quality control system of the statutory auditor or of the audit firm and a statement by the administrative or management body on the effectiveness of its functioning	Description of set-up: BDO system of quality management Description of changes and effectiveness: Quality in 2025 Statement: Quality in 2025 > Statements of policymakers
e. An indication of when the last quality assurance review referred to in Article 26 was carried out	Quality in 2025 > External supervision > Supervision by the AFM
f. a list of public-interest entities for which the statutory auditor or the audit firm carried out statutory audits during the preceding financial year	Annex A: List of Public Interest Entities audited by BDO in reporting period
g. a statement concerning the statutory auditor's or the audit firm's independence practices which also confirms that an internal review of independence compliance has been conducted	Quality in 2025 > Statements of policymakers
h. a statement on the policy followed by the statutory auditor or the audit firm concerning the continuing education of statutory auditors referred to in Article 13 of Directive 2006/43/EC	Quality in 2025 > Statements of policymakers
i. information concerning the basis for the partners' remuneration in audit firms	BDO System of quality management > Our people > Assessment and remuneration of external auditors
j. a description of the statutory auditor's or the audit firm's policy concerning the rotation of key audit partners and staff in accordance with Article 17(7)	BDO System of quality management > Ethical standards > Integrity and independence > Sustainable client relationships
k. where not disclosed in its financial statements within the meaning of Article 4(2) of Directive 2013/34/EU, information about the total turnover of the statutory auditor or the audit firm, divided into the following categories:	Quality in 2025 > Acceptance and continuation of client relationships and engagements > Revenue
i. revenues from the statutory audit of annual and consolidated financial statements of public-interest entities and entities belonging to a group of undertakings whose parent undertaking is a public-interest entity;	
ii. revenues from the statutory audit of annual and consolidated financial statements of other entities;	
iii. revenues from permitted non-audit services to entities that are audited by the statutory auditor or the audit firm; and	
iv. revenues from non-audit services to other entities	

ARTICLE 34I(2) OF DUTCH AUDIT FIRMS (SUPERVISION) DECREE	CHAPTER
a. The manner in which the body has fulfilled its role in respect of all duties and responsibilities assigned to it	Report of the Supervisory Board
b. The attendance rate of the individual members of the body responsible for internal supervision at the body's meetings	Report of the Supervisory Board > Meetings and attendance of members of Supervisory Board
c. The subject matter of the main findings, discussions and decision-making of the body	Report of the Supervisory Board
d. The manner in which the evaluation referred to in Article 34h was carried out and how the outcomes of the evaluation are followed up	Report of the Supervisory Board > Self-assessment of Supervisory Board
NBA GUIDANCE 1135: PUBLICATION OF QUALITY FACTORS	CHAPTER
Input: investments in quality, people, time available for audit engagements, technology and methodology (via network or otherwise)	
Leverage on the audit engagements by expressing the number of hours spent by partners/directors as a percentage of total number of hours spent.	Quality in 2025 > Engagement performance > Capacity planning > <i>Average ratio of hours per partner, (senior) managers and other team members (leverage), by PIE and non-PIE audit engagements</i>
The number of hours per FTE (full-time equivalent) spent on audit engagements, respectively on other engagements in total and by function.	Quality in 2025 > Engagement performance > Capacity planning > <i>Number and percentage of hours of partners, (senior) managers and other team members devoted to audit engagements (PIE and non-PIE), other engagements, internal activities</i>
The investments in technology and methodology for the benefit of the audit conducted by the audit firm, whether independently or through its contribution to the development as part of a network. The investments must be identified as a percentage of the audit revenue on an annual basis.	Quality in 2025 > Engagement performance > Methodology and technology
The average number of hours spent on training and education per employee (internal and external training).	Quality in 2025 > Our people > Development and continuing education > <i>Average number of hours (internal and external) training and education divided into partners, (senior) managers and other team members (in FTEs)</i>
Staff turnover, addressing the relevant characteristics based on which the organisation monitors the ratio of staff turnover, such as turnover by job level and years of experience, or by differentiating between key talents and other employees.	Quality in 2025 > Our people > Staffing > <i>Turnover rate among partners, (senior) managers and other team members</i>
Outcomes of employee satisfaction surveys on aspects related to coaching and audit quality.	Quality in 2025 > Culture and leadership

NBA GUIDANCE 1135: PUBLICATION OF QUALITY FACTORS	CHAPTER
Process: insight into key measures and how their implementation is monitored.	
Number of FTEs or hours spent on audit support (PPD, Compliance and Independence). expressed as a percentage of total number of FTEs or audit hours.	<p>PPD: Quality in 2025 > Engagement performance > Professional Practice Department > <i>Number of partners, directors, (senior) managers and other team members in A&A PPD (in FTEs)</i></p> <p>Compliance and Independence (QRM): Quality in 2025 > Monitoring and evaluation > Monitoring compliance with measures included in the system of quality management > <i>Number of partners, managers and other team members with a focus on compliance and risk management (in FTEs)</i></p>
Number of consultations on reporting and audit issues as a percentage of number of audit engagements.	Quality in 2025 > Engagement performance > Managing the quality of engagement performance > Consultation procedure > <i>Number of requests for formal consultation on reporting and audit submitted to PPD</i>
Number of engagement quality reviews (EQRs) and other quality reviews performed prior to issuing an auditor's report as a percentage of statutory audits, broken down by required and voluntary EQRs.	Quality in 2025 > Engagement performance > Managing the quality of engagement performance > Engagement Quality Review (EQR) > <i>Number of EQRs, broken down by required and voluntary EQRs</i>
Number of hours spent on EQRs and other quality reviews prior to issuing an auditor's report as a percentage of total number of hours spent on audit engagements subject to a quality review, broken down by required and voluntary EQRs.	Quality in 2025 > Engagement performance > Managing the quality of engagement performance > Engagement Quality Review (EQR) > <i>Number of hours spent on EQRs as a percentage of total number of hours spent on audit engagements subject to an EQR</i>
Percentage of hours spent by IT specialists and other specialists on audit engagements (broken down by specialists governed by Standard 620), by PIE and non-PIE.	Quality in 2025 > Engagement performance > Managing the quality of an engagement > Use of specialists > <i>Number/percentage of hours spent on audit engagements by IT and other internal specialists (by PIE and non-PIE)</i>

NBA GUIDANCE 1135: PUBLICATION OF QUALITY FACTORS	CHAPTER
Output: insight into the effects of system controls	
Number of internal and external quality reviews performed after issuing an auditor' report, as a percentage of total number of issued auditor's reports, and the outcomes of these quality reviews.	Quality in 2025 > Monitoring and evaluation > Supervision of professional services > <i>Number of file investigations within the context of cold reviews and theme-based quality reviews performed, including the outcomes of these investigations</i>
Number of internally reported violations of independence rules, as a percentage of total number of employees.	Quality in 2025 > Ethical standards > Integrity and independence > Independence > <i>Number of internally identified breaches of independence rules</i>
Number of fundamental errors that were corrected, where the financial statements containing the error were audited by the organisation, as a percentage of number of issued auditor's reports.	Quality in 2025 > Engagement performance > Managing the quality of engagement performance > Consultation procedure > <i>Number of requests for formal consultation on reporting and audit submitted to PPD</i>

BDO Audit & Assurance B.V.
info@bdo.nl

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