

BearingPoint Group on Human Rights and Modern Slavery

We are committed to, and observe, international human rights and related laws and regulations. We strongly condemn child or forced labour and pro-actively apply the UN recommendations and other international standards in this respect. We have been a proud signatory of the UN Global Compact since September 2019. We recognise that human rights violations and modern slavery matters are still being reported in the news, including in countries BearingPoint operates in.

As a technology consulting firm, we engage mainly with suppliers for IT, business support – sub contractors mainly in Europe, marketing materials and office maintenance supplies and services, all areas which do not fall in the obvious scope of potential human rights violation.

In the last few years, we all saw that change can be unexpected, and it can happen more suddenly than anyone imagines. However, we have seen how quickly people can adapt to new circumstances. The priority now is what happens next. Strategy 2025 is our way forward. Working together, and working with purpose, we are confident that we will emerge from the crisis stronger than ever.

BearingPoint's reputation for integrity goes back over one hundred years and is one of our most important assets. We are proud that BearingPoint has consistently maintained a strong focus on integrity throughout its history and we are committed to ensuring that it continues to do so.

What we did so far

We acknowledge that this is a journey - we have taken the following steps:

1. Policies

- Inclusion of the modern slavery, general human rights and ESG elements into our new Code of Business Ethics.
- Enforcement of these principles through our new Supplier Code of Business Ethics towards all of our direct suppliers managed through the firm wide procurement department and selected country level suppliers (the majority of our services are centrally procured).
- New DIVE – Diversity, Inclusion, Variety and Equality Policy in 2022.

2. Third Party Due Diligence

- Detailed compliance due diligence on third parties we are considering doing business with in pre-defined countries.
- Supplier assessments for new suppliers onboarded through firm wide procurement and risk-based country level supplier.
- Inclusion in selection criteria for new suppliers.
- New tool to ensure ongoing supplier assessment, taking external and internal risk assessment and classification into consideration.
- Screening of all suppliers including Norway specific suppliers against a global compliance data base which also included violation for human rights and environment enforcements.

3. Training & Awareness

- Roll out of mandatory Code of Business Ethics and CSR online session for all employees and selected third parties -will be renewed in 2023.
- Specific UK Slavery face to face awareness sessions in our UK practice, organized through our Group Compliance department.
- We launched the internal BearingPoint TrustLine a fully confidential reporting tool. This internet-based system for reporting concerns BearingPoint TrustLine is made available 24/7 in English, German and French and allows employees to raise concerns on all subjects covered in our Code of Business Ethics, including human rights .

4. Reporting, Enforcement and Regulations

- Introduction of Human Rights and ESG related clauses into our supplier contracts.
- Ecovadis Certification for selected legal entities.
- Regulatory watch to ensure compliance with various ESG, Human Rights and Supply Chain laws and regulations.
- Sustainability Report .

Our 2023-24 challenge

In 2023 we aim to extend the scope of our supplier risk assessments and roll out of a new third-party risk assessment tool focussing on supplier risk management and ongoing assessments.

This statement is made for the BearingPoint Group financial year ending 31 December 2023.

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