

BearingPoint®

RegTech Supplier Code of Conduct


A stylized globe composed of a network of yellow dots and lines, set against a dark blue background. The globe is positioned on the right side of the page, with the continents of North and South America visible. The dots are connected by thin lines, creating a mesh-like structure that represents a global network or data flow.

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1 Introduction and Scope

BearingPoint RegTech (hereinafter 'RegTech') is committed to conducting business that respects our employees and society and promotes a positive work environment. The business of RegTech is based on the trust which clients, shareholders, employees, and other third parties have in the performance and integrity of our company.

To protect this trust, RegTech aims to contract with business partners who share our corporate values and conduct business in an ethical manner. Sustainability is a key element of our values and we expect our suppliers to follow the same standards of conduct.

We are fully aware of our responsibilities as Good Corporate Citizens and have summarized our business principles in the Code of Conduct. This Supplier Code of Conduct (the "Code") reflects those rules and sets out the minimum standards that BearingPoint RegTech expects its Suppliers to comply with.

In addition to any specific procurement guidelines, general or contractual terms, we require our Suppliers to comply with this Supplier Code of Conduct even if it refers to higher standards than required by applicable local law.

If compliance with any provision of the Code would result in a legal or regulatory violation, Suppliers must follow the law. Otherwise, failure to comply with the principles of this Code may result in discontinuance of the business relationship and termination of the contract.

The Supplier Code of Conduct is applicable to all our Suppliers. A Supplier is any third party, firm or individual that provides a product or service to BearingPoint RegTech or assists us otherwise, including its owners or individuals representing them ("Supplier").

Any reference in this Code which relates to a Supplier's own supply chain, does not apply to any individuals supporting us in the standard advisory, managed service and software development operations.

2 Requirements and Key Principles

When conducting business on behalf of RegTech we must act within the legal framework, regulations, and internal guidelines applicable in the countries in which we operate. The following principles and requirements are in place to manage our relationships with our Suppliers and our understanding of serving our customers.

2.1 Legal and Ethical Standards

As a minimum, the Supplier shall comply with all law and regulations which are applicable to its business, but also specifically in relation to its activities for or with BearingPoint RegTech. In addition, there are certain international standards, such as the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights and the International Labor Organization as well as all international standards on the combatting of corruption and bribery, money laundering and other financial improprieties.

Suppliers must hold any required registrations and licenses relevant to the service or product provided to BearingPoint RegTech prior to conducting any business in connection with us.

2.2 Respect for People, Human Rights and Working Conditions

BearingPoint RegTech believes that employees are the most valuable asset a company can have. A safe and healthy workplace environment, which fosters respect and inclusiveness, ensures their well-being.

Human Rights Obligations

The Supplier shall conduct business by applying the principles regarding human rights as listed in the UN Guiding Principles on Business and Human Rights¹ and the UN Global Compact².

Safe and Healthy Work Environment

BearingPoint RegTech expects that people working for our Suppliers to be provided with a safe and healthy workplace in compliance with international standards and national laws. Specifically, any Supplier from whom we procure a product, we also expect that reasonable efforts are made to enforce international standards throughout its own supply chain, in particular in countries with either no or with insufficient national laws. In these cases, we expect the Supplier to regularly assess the working environment and provide BearingPoint RegTech with relevant documentation and information on request. Workers should be adequately trained on health and safety issues.

Non-Discrimination

BearingPoint RegTech encourages an inclusive and supportive working environment free from harassment and intimidation, where all employees are valued and empowered to succeed, and be supported with their career development throughout their working lives and enhancing their skills and development. Suppliers are required to ensure that the personal dignity, privacy and personal rights of every individual are respected.

All of BearingPoint's Suppliers must commit to creating and helping to promote through its supply chain a fair work environment and to abide by all applicable local laws respecting international human right standards.

The Supplier shall not discriminate or tolerate discrimination based on characteristics such as race, color, gender identity, age, family status and marital status, religion, disability, national origin, sexual orientation, trade union affiliation or other legally protected status. This shall be ensured across all employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

Child and Forced Labor

BearingPoint RegTech will not use involuntary labor, bonded, forced or child labor nor any form of modern slavery or let anyone do so on our behalf. Suppliers must comply with internationally recognized standards such as the guidelines of UNICEF, and the International Labor Organization³, as well as local legislation and offer appropriate remuneration and comply with relevant national minimum wage legislation or standards. If a minimum age is not defined in the country of the Suppliers operation or the country where its product is produced, the minimum age shall be 15 years (13 for light work) and the minimum age for hazardous work 18 years (16 under certain strict conditions).

We absolutely condemn any inhuman or discriminatory treatment or threat thereof, resulting in physical harm or sexual harassment, abuse, or any physical disciplinary measures.

Freedom of Association

BearingPoint RegTech expects its Suppliers to respect and uphold their employee's freedom of association involving trade unions or similar external representative organizations, the right to collective bargaining in accordance with applicable laws and regulations, as well as the right for employees to elect not to join a trade union or other representative body.

¹ <https://www.un.org/en/sections/issues-depth/human-rights/>

² <https://www.unglobalcompact.org/>

³ <https://www.ilo.org/global/standards/lang--len/index.htm>

2.3 Ethics and Business Integrity

Bribery and Corruption

BearingPoint RegTech does not tolerate bribery or corruption in any form and expects its Suppliers to uphold the highest standards of business ethics, to respect local laws and regulations and not to engage in any form of corruption, bribery, fraud, facilitation payments, or extortion. Suppliers are required to comply at any time with the principles of the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the French Sapin II and all applicable international and national anti-bribery laws.

Business Gifts and Entertainment

The provision of business courtesies can be misinterpreted or suggest the appearance of an improper exchange. Suppliers should use discretion and care to ensure that any business courtesy (i.e., gifts, meals or entertainment) offered to or received by any BearingPoint RegTech employee is in the ordinary and proper course of business and could not reasonably be construed as a bribe or improper inducement.

Prevention of Money Laundering, Terrorist Financing, Sanctions breaches of Illegal Activities

BearingPoint RegTech will not tolerate its Suppliers engaging in, supporting or condoning any activity in connection with BearingPoint RegTech which infringes or circumvents applicable laws against money laundering or terror financing, applicable sanctions or which otherwise could be interpreted as illegal activity in any location on its behalf. BearingPoint RegTech prohibits the trade with any Supplier of services or products which (a) is located in any country subject to comprehensive economic sanctions⁴ (or acting on behalf of persons or entities located in such countries) or (b) appears on the lists of restricted or prohibited persons maintained by the United Nations, U.S., EU, or any other country involved in the business relationship between us and the Supplier. Suppliers will keep - and provide to BearingPoint RegTech upon request – accurate records of all matters related to the Supplier’s business with BearingPoint RegTech and shall not engage in any form of money laundering and shall never knowingly accept funds acquired through illicit means.

Fair Competition

BearingPoint RegTech strictly prohibits anti-competitive agreements or conduct, including, amongst others, fixing prices, restricting the supply of goods or services, bid rigging and market sharing. We require our Suppliers to be committed to free and fair competition and to abide by relevant competition laws and regulations. Antitrust or competition laws vary from country to country, but generally, such laws prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition.

Conflict of Interest

Suppliers will avoid any interaction with a BearingPoint RegTech employee or representative that may conflict, or appear to conflict (e.g., personal relationships or financial interests), with that employee acting in the best interests of BearingPoint RegTech. Any actual or perceived conflict between the Supplier and BearingPoint RegTech or for a specific project BearingPoint RegTech’s client, such as family relationships, must be disclosed to regtechcompliance@bearingpoint.com.

2.4 Environment, Corporate and Social Responsibility

BearingPoint RegTech’s Supplier selection and referencing of its Suppliers takes into consideration ecological criteria in order to act sustainably and to support Suppliers who are acting in accordance.

Any Supplier is expected to operate in compliance with all applicable laws and regulations addressing environmental protection. All Suppliers should conduct operations throughout their supply chain in a manner that protects the environment by making reasonable efforts to meet industry best practices and standards with

⁴ Applicable Anti - Boycott laws will be taken into consideration

respect to the reduction of energy use, greenhouse gas emissions, waste and water use.

Suppliers must also ensure that potential impacts to community health, safety and security – such as accidents, impacts on natural resources or wildlife, exposure to pollution or other community issues – that may arise from business operations are mitigated and managed appropriately.

We do not tolerate any behavior that actively promotes or causes a negative impact on any conversation efforts, nor do we tolerate any Supplier who has gained its licenses or registrations through illicit means, including but not limited through corrupt behavior.

We encourage our Suppliers to actively contribute to local corporate social and environmental activities or community programs and encourage their employees to travel to work using environmentally friendly ways of transport such as public transport, car sharing, cycling, group shuttles, etc.

We prefer any Supplier who actively strives to support the goals and principles stated in the Paris Agreement⁵ and can provide us with adequate documentation, e.g. based on Communication of Progress in the context of the UN Global Compact⁶.

2.5 Data & Information Protection and Confidentiality

BearingPoint RegTech is dedicated to protecting confidential and personal information entrusted to us. Suppliers must implement technical and organization measures to ensure adequate protection, strictly limit, delete when required and safeguard the data and information belonging to BearingPoint RegTech and any related third party, e.g. BearingPoint RegTech's clients, including any information created, received or learned by Supplier whilst engaged by BearingPoint RegTech.

To ensure any trade secret requirements the Supplier must always apply the relevant classification level for data and information and related security measures for their protection as provided by BearingPoint RegTech during the engagement.

More generally Suppliers are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of BearingPoint RegTech proprietary, confidential, and personal information, such as the GDPR.

2.6 Company Representation

The only persons with the authority to legally represent any RegTech company are those expressly appointed by management and granted such power by applicable law or by relevant powers of attorney.

To protect RegTech's reputation and avoid exposing the company to contractual liability, all representations made concerning RegTech products, services and solutions must be current, accurate and clear, and not misleading or false. We recognize that social media assets can and should be a valuable tool for enhancing communication and promoting RegTech and its values.

But remember, we foster a safe, professional, and appropriate online behavior and will treat unacceptable "electronic behavior", through social media and other means, in the same way as we would treat other unacceptable behaviors, so always remain vigilant.

People are prohibited from disclosing any non - public information relating to RegTech or its business activities to the media including social media, without the prior approval of the Head of Marketing & Communications.

Any enquiries and requests from the media must be forwarded to the Head of Marketing & Communications.

⁵ <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>

⁶ <https://www.unglobalcompact.org/>

3 Compliance and Review

At all times, our goal is to work collaboratively with our Suppliers. We expect Suppliers to maintain at any time accurate and appropriate records to demonstrate compliance with applicable laws and regulations and this Code and must inform us, when any situation develops that causes, or could cause the Supplier to operate (relating to the provision of service or products for BearingPoint RegTech) in violation of this Code, via regtechcompliance@bearingpoint.com.

During the selection process Suppliers may be asked to provide supporting documentation and confirmations on how they ensure compliance with the mentioned key principles.

As a minimum, we expect all our Suppliers to self-monitor compliance with these principles and if required provide us with a right for reasonable audits to confirm your ongoing compliance with them.

The Supplier shall cooperate and shall ensure that its subcontractors cooperate, make available and give access to all information required to conduct the assessment and assist with all reasonable efforts as deemed necessary. We will notify the Supplier in writing, outlining the scope and timeline, giving reasonable notice.

Each party will bear their own costs, including any cost for third party contractors required to conduct the assessment. If the results reveal that the Supplier is in breach of any material principle of this Code and does not make reasonable efforts in remediating the finding, the Supplier shall bear the cost of that assessment



About BearingPoint RegTech

BearingPoint RegTech is a leading international provider of innovative regulatory, risk, and supervisory technology solutions (RegTech, RiskTech, and SupTech) and services along the Regulatory Value Chain for financial services. Customers representing 6,000 firms worldwide, among them large international banks, a major part of the largest European banks, leading insurance companies as well as supervisory authorities and central banks, trust BearingPoint RegTech's products and services. BearingPoint RegTech works closely with regulators and, as a member of standardization bodies such as XBRL, actively contributes to the standard-setting process. BearingPoint RegTech combines regulatory know-how with a proven, reliable, and forward-looking RegTech solution suite, expert consulting capabilities, managed services, and training seminars.

For more information, please visit: www.reg.tech

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