

BearingPoint®

# BearingPoint RegTech on Modern Slavery



We are aware that human rights violations and modern slavery matters are still being reported in the news.

We observe international human rights and related laws and regulations. We strongly condemn child or forced labor and pro-actively apply the UN recommendations and other related international standards.

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

However, given our international reach and the versatility of the business partners we work with, be it as clients, suppliers, service providers or partners, we realize that these issues concern us, and this is a subject where we need to do more throughout our supply chain. As a minimum, we need to ask questions and find out where our equipment comes from.

## What we did so far

Whilst this is our first statement, since the corporate split from the BearingPoint Group at the end of December 2020, we are a separate group of companies, aiming full alignment with the requirements of the UK Modern Slavery Act. We acknowledge that this is a journey, but we have already started to implement the following steps since the end of 2020:

### 1. Policies

- Inclusion of the modern slavery and general human rights elements into our new Code of Conduct.
- Enforcement of these principles through our new Supplier Code of Conduct towards our direct suppliers.

### 2. Third Party Due Diligence

- Compliance due diligence on third parties we are considering doing business with in pre -defined countries.
- Supplier assessments for new suppliers.

### 3. Training & Awareness

- Mandatory Code of Conduct and CSR online session for all employees.
- We have the BearingPoint RegTech TrustLine in place, a fully confidential reporting tool. This internet-based system for reporting concerns, BearingPoint RegTech 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 Conduct, including human rights.

## Our 2021 challenge

Due to the importance of the subject, we will include human rights elements into the selection process for our key suppliers in 2021.

Furthermore, we aim to provide additional awareness trainings to selected employees and third parties.

Specifically, during this challenging transition period operating as an independent group of companies, we will continue to foster a positive culture of integrity and support our employees in acting as such.

This modern slavery and human trafficking statement is made for the BearingPoint RegTech financial year ending 31 December 2021.

## BearingPoint RegTech

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