



Bain & Company Norway AS
Kronprinsesse Märthas plass 1
0160 Oslo, Norway

Tel: +47 22 01 82 00

Organisasjonsnummer: 891 482 922

Report regarding the Norwegian Transparency Act

The Transparency Act

The Transparency Act (“Åpenhetsloven”) (the “Act”) came into force on 1 July 2022. The Act stipulates certain reporting and due diligence obligations for large Norwegian companies to secure transparency on certain areas.

Bain & Company Norway AS is subject to the Act, and we are thus obliged to publish an account of our due diligence on compliance with human rights and working environment regulations pursuant to Section 4 of the Act.

Bain & Company

Bain & Company Norway AS (“Bain”) is a subsidiary of a global management consulting firm, Bain & Company, ultimately owned by Bain & Company Inc., a Massachusetts (US) based cooperation.

We work with Norwegian, Nordic and Global clients to solve industry defining challenges across all industries and geographies.

Bain is committed to the highest standards of ethical conduct and social and environmental responsibility. We comply with applicable laws concerning human rights and labor regulations and support the principles of the International Labor Organisation, the UN Global Compact and the UN Universal Declaration of Human Rights.

Bain values and policies

At Bain, our objective, first and foremost, is to create outstanding results for our clients. Our operating principles guide us in our commitment to helping our clients, our people and our communities succeed. Our Code of Conduct provides each person at Bain with the rules, tools and resources to make sound decisions in complex situations.

Our Code of Conduct contains important rules and guidelines that apply equally to everyone at Bain, regardless of role or seniority. We also expect our clients, contractors, and vendors to follow similar principles with respect to fundamental human rights and decent working conditions.

Organization and responsibilities for transparency efforts

Responsibility for transparency efforts in Bain rests with Bain leadership and the board of directors, supported by relevant local and global functions including Legal, HR/Talent, Professional Standards and third-party risk management. These functions support implementation of Bain policies, due diligence assessments and follow-up on identified risks and concerns.



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Guidelines and procedures for due diligence assessments

Bain applies a risk-based approach to due diligence assessments. In practice, this includes review of Bain's own operations and third-party relationships, including supplier onboarding, periodic refresh of supplier risk reviews and use of broader group sustainability and risk inputs to identify potential and actual impacts on human rights and decent working conditions.

Whistleblowing channels and complaint mechanisms

Employees are encouraged to raise concerns with a manager or another trusted individual, and Bain also maintains the True North Line as a reporting channel for employees and suppliers. Reports are investigated promptly, fairly, consistently and expeditiously, and relevant complaint-handling processes are intended to protect confidentiality and support appropriate follow-up. In addition, Bain has safety representatives ("verneombud") who represent employees on working environment matters and can be contacted with concerns relating to the working environment.

- **Non-Discrimination and Equal Opportunities**

We believe that diversity and inclusion contribute to our excellence. We strive to recruit people from diverse backgrounds who have exceptional talent and ability. We celebrate our differences and believe that our different perspectives are a key factor in our success and the impact our work has in the world. We are committed to making Bain a place where everyone has the potential to succeed. We support active networks throughout Bain that foster an inclusive work environment by offering coaching, mentoring and professional development.

We do not tolerate any kind of discrimination including unlawful discrimination based on race, color, religion, national origin, sexual orientation, gender, gender identity, pregnancy, marital status, age, disability, social/ economic status or any other legally protected status.

- **Anti-Harassment**

At Bain, harassment of any kind is not acceptable and will not be tolerated. While harassment based on an employee's protected status (such as race, gender, religion, etc.) also may be unlawful in most locations, we consider harassment for any reason to be a violation of our Code of Conduct.

Bain takes all allegations of harassment seriously; we will respond promptly to complaints of harassment and take action when inappropriate conduct has occurred. Individuals found in violation of these policies will be subject to disciplinary action, up to and including termination.

Working environment at Bain

Bain is committed to providing its employees a safe working environment and ensuring they are treated with consideration, dignity and respect. In turn, we share a collective responsibility to create and maintain a safe environment for our clients, visitors and co-workers. We are committed to continue our efforts in diversity, equity and inclusion and share accountability for those efforts and continue to embed and scale what we see have impact. Our DE&I report is available here: <https://www.bain.com/about/further/diversity-equity-inclusion/dei-report/>.



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At Bain we regularly survey our employees in order to check working conditions and work environment.

The work we do in connection to the work environment must be considered for all business decisions that are made and all activities that are carried out. We do not accept any form of bullying or harassment in our workplace, and the work environment is characterized by inclusiveness and openness and all individuals must be treated equally and respectfully. Current legislation in the work environment ensure that we strive to constantly improve our work environment, both organizationally and socially as well as physically. All employees are offered in-office and external training opportunities. Bain also maintains a commitment to equal employment opportunity in all employment practices. The Equal Employment Opportunity statement can be found here: <https://careers.bain.com/recruits/EEO>

Identification of adverse impacts and risk assessment

As part of Bain's due diligence assessments, Bain considers risks relating to working conditions and the work environment in its own operations. This includes employee surveys, assessment of workplace conduct concerns, and ongoing attention to bullying, harassment, equal treatment, safety and inclusion in the workplace.

Actual adverse impacts and findings

In 2025, Bain has not identified actual adverse impacts through its diligence of Bain's working environment. Bain nevertheless continues to review employee feedback and any reported concerns in order to identify themes requiring remediation or further review.

Measures implemented and follow-up on measures

Measures include communication of Bain's Code of Conduct and workplace standards, investigation of reported conduct issues, regular employee surveys, in-office and external training opportunities, and continued focus on equal employment opportunity and a respectful, inclusive work environment.

Results from investigations into working conditions and the work environment

Bain takes allegations of harassment and other workplace conduct issues seriously and responds promptly to complaints. Based on the assessments and investigations completed to date, Bain has not identified adverse impacts through its diligence of Bain's working environment.

Supply chain

Bain is committed to the highest standards of ethical conduct and social and environmental responsibility. We expect our suppliers to aspire to these same standards in their business operations and, to have their own policies and processes in place addressing the matters detailed below. Accordingly, Bain has created a Supplier Code of Conduct, which sets out the standards expected of any supplier doing business with Bain. It follows from the Supplier Code of Conduct that supplier shall comply with all laws applicable to its business. Moreover, we expect suppliers to support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work.



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Supplier must promptly report any offending behavior, whether such behavior is directed to Supplier or to employees of Bain, by notifying any member of Bain management.

Our Supplier Code of Conduct is available here: <https://www.bain.com/about/further/our-sustainability/supplier-code-of-conduct/>.

Furthermore, Bain is EcoVadis Platinum rated in 2023.

Risk Due Diligence

Bain has set up a risk management process in order to screen third parties that cooperate with our organization. It enables Bain to manage overall supplier risk exposure based on comprehensive data about their activity and potential issues that might be attributed to a potential supplier. Bain has a dedicated third-party risk management team that conducts risk due diligence on Bain's suppliers that address key risk dimensions, including those related to human rights and social and environmental responsibility. The due diligence is conducted upon engaging a supplier and might periodically be refreshed to keep the data on potential risks up to date.

Due diligence assessments ("aktsomhetsvurdering") and findings

Bain's due diligence assessments are intended to identify, prevent, mitigate and account for potential adverse impacts on human rights and decent working conditions. In the supply chain, this includes screening of third parties, assessment of supplier activity and risk indicators, and review of key risk dimensions including human rights and social and environmental responsibility.

Identification of adverse impacts and risk assessment, including the supply chain

The supply chain risk assessment is conducted upon engaging suppliers and may be periodically refreshed to keep information on potential risks up to date. Bain uses available data about supplier activity and potential issues to manage overall supplier risk exposure and to determine whether follow-up or further review is required.

Actual adverse impacts, including the supply chain

Based on the due diligence assessments completed to date, Bain has not identified actual adverse impacts through its diligence of Bain's supply chain. If concerns are raised, Bain's processes are intended to support investigation, follow-up and appropriate action.

Measures implemented and follow-up on measures

Measures in the supply chain include use of the Supplier Code of Conduct, onboarding due diligence, periodic refresh of supplier reviews, and follow-up through Bain's third-party risk management process where potential issues or heightened risks are identified.

Requests/questions

Questions regarding matters relating to the Act may be directed to LegalEMEA@bain.com

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