

UK Modern Slavery Act 2015

The following statement sets out the steps Boston Consulting Group UK LLP and The Boston Consulting Group Limited (collectively "BCG UK") have taken during 2022 in relation to our responsibilities under Section 54, Part 6 of the UK Modern Slavery Act 2015 ("MSA"), to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chains. In addition to publishing this statement annually on our website, as of June 2021 we are also submitting our report on the UK government modern slavery statement registry.

About Boston Consulting Group

Boston Consulting Group partners with leaders in business and society to tackle their most important challenges and capture their greatest opportunities. BCG was the pioneer in business strategy when it was founded in 1963. Today, we help clients with total transformation - inspiring complex change, enabling organisations to grow, building competitive advantage, and driving bottom-line impact. BCG delivers solutions through leading-edge management consulting along with technology and design, corporate and digital ventures, and business purpose. We work in a uniquely collaborative model across the firm and throughout all levels of the client organisation, generating results that allow our clients to thrive.

Our Policies and Values

BCG's Code of Conduct encapsulates our commitment to acting responsibly, backed by individual integrity and professional and ethical conduct. Integrity is at the centre of who we are at BCG – as an organisation and as individuals that make up the organisation. We are committed to instilling bold, truth-telling leadership and we will not tolerate any form of human rights abuse, including modern slavery or human trafficking, in any part of our business.

Our Code of Conduct sets out that all colleagues in the BCG community are personally accountable for behaving in a manner that is professional, lawful, and serves as a bridge between our purpose, our values, our processes and policies. We encourage BCG colleagues to report any behaviours or activities that they believe to be unethical or unlawful either to a trusted member of staff or via our multiple channels of reporting, including our Ombudsperson program and 'speak up' line, both of which are designed to prevent and identify misconduct and support BCG's aim to lead with integrity. Once raised, each concern is handled with sensitivity and in confidence, subject to any applicable overriding legal or regulatory requirements. Our Code of Conduct is distributed annually to all staff who by return must confirm they understand and are compliant with the Code. We work in adherence to our company values, which include Integrity, Respect for the Individual and Diversity.

In addition, we have related policies that show that BCG is committed to ethical conduct in every aspect of its business.

- **Anti-Bribery and Corruption ("ABC") policy** – states BCG's position and business ethical conduct expected from BCG employees and the third parties we engage with
- **Supplier Governance Policy** - outlines our purchasing practices for employees involved in the purchasing process
- **[Supplier Code of Conduct \("SCOC"\)](#)** – sets forth the minimum standards that suppliers must follow to do business with BCG
- **Human Resources ("HR") policies** – where we engage with recruitment services agreements, we require agencies to comply with applicable laws. For all applications whether made through an agency or directly through our website/application system, we ensure that the same assessment process is adhered to for all candidates to provide a fair and transparent recruitment process. In addition, our non-discrimination policy affirms our position regarding integrity and respect for our employees in all areas during their employment with BCG.

Supply Chain / Risk Assessment

Due to the nature of our business, we purchase goods and services from a range of sectors. We have identified the main categories of purchases during the reporting period (January 2022 to December 2022) as HR Services, Business Services and Knowledge, Professional Services, Facilities Management and Events. Buyers procuring these services are required to follow our purchasing policy and guidelines when engaging suppliers. Spend over a certain threshold requires the

involvement of our Global Procurement team to ensure relevant due diligence is undertaken.

Our suppliers are required to adhere to the SCOC while conducting business with or on behalf of BCG, including:

- Conducting their business activities and operations with integrity and in full compliance with applicable laws and regulations, with specific reference to the MSA.
- Prohibiting suppliers from using all forms of forced or compulsory labour, and from supporting any form of human trafficking or involuntary labour.
- Maintenance and promotion of fundamental human rights, where employment decisions are based on free choice without any coerced or prison labour, use of physical punishment, threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control.
- Compliance with all applicable wage, benefit and hour laws, health and safety legislation, local and national minimum working age laws, and prohibitions on suppliers' use of child labour.

In addition, our suppliers are required to notify us of any violations of the SCOC. No violations were reported to us in 2022.

Due Diligence

As a part of the onboarding process for new suppliers, we conduct searches for sanctions, bribery, corruption, negative news, and financial risk to identify any red flags or areas of concern. For suppliers that fall within scope of the Modern Slavery Act, with >£36m global consolidated revenue, we also seek further assurance on the actions they have taken to address the potential risk of modern slavery in their business and supply chains. In 2022,

- Following on from the assessment and spend done in 2021, we have identified four priority categories of Office Services, IT Hardware (mobile and laptops), Telecom, and Events as potentially high-risk areas for BCG. Based on this we selected a sample of vendors which also included high spend and newly onboarded vendors to complete our Modern Slavery Act questionnaire. The questionnaires were returned with no issues flagged and no breaches recorded for supplier code of conduct.
- We strengthened our contract template language regarding compliance with modern slavery laws and principles, including requiring suppliers notify BCG of actual or suspected instances of modern slavery in their supply chains and to keep sufficient records to enable BCG to verify supply sources, and giving BCG the right to terminate for cause if suppliers do not comply with these requirements. For suppliers operating in countries without modern slavery laws, the United Nations Human Rights Council's definition of modern slavery applies.
- Discussions were held with some of our significant operational contractors to better understand their approach to compliance under the Modern Slavery Act in their supply chain. In 2023, we will conduct further due diligence sessions with other key contractors on the process to mitigate and manage modern slavery risk.

Our commitment

Recognising the evolving and complex nature of modern slavery, we will continue to build capabilities and provide relevant training to ensure that our employees are well-informed to deal with the risk of modern slavery. In 2022 we worked in partnership with Modern Slavery victims' charity Hestia to provide awareness training in Modern Slavery, how to identify it and report modern slavery risks. For 2023 we intend to implement further training to our key operational staff to continue increasing the awareness of this.

We will continue to build on previous years' work in centralising our supplier management and governance framework. For 2023, our aim is to strengthen our end-to-end risk assessment capability by leveraging technology in our identification and assessment of Environmental, Social, and Governance ("ESG") risks including modern slavery and human trafficking in our global supply chain.

BCG is a participant in the United Nations Global Compact ("UNGC") and has publicly committed to adhering to the UNGC's principles. Notably, this commitment includes supporting and respecting the protection of internationally proclaimed human rights and ensuring that we are not complicit in human rights abuses. The UNGC's principles are derived from the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, both of which accord with BCG's values.

Finally, we will continuously realign and implement appropriate measures in line with the UK government's guidelines in reducing and mitigating modern slavery risks in our business and supply chain.

Approval and Signature

This statement was approved on behalf the members of The Boston Consulting Group UK LLP on 26/06/2023.

This statement was approved by the board of The Boston Consulting Group UK Limited on 26/06/2023.



Mark Ben Holden
Company Director of The Boston Consulting Group Limited
Designated member The Boston Consulting Group UK LLP