

BCG UK Modern slavery statement



Executive summary

The Boston Consulting Group UK LLP, The Boston Consulting Group Limited, and BCG UK1 Ltd (collectively "BCG UK") are committed to identifying and addressing modern slavery risks in our business and our supply chain. This statement describes the actions undertaken by BCG during the financial year from January 2024 to December 2024, in relation to our responsibilities under Section 54, Part 6 of the UK Modern Slavery Act 2015 ("MSA"), to address and ensure that slavery and human trafficking does not occur in any part of our business or our supply chains.

For the purposes of this statement, 'BCG UK' refers collectively to The Boston Consulting Group UK LLP, The Boston Consulting Group Limited, and BCG UK1 Ltd. References to "BCG" refer more broadly to the global Boston Consulting Group organisation where relevant. In addition to publishing this statement annually on our company website (since 2017), we are also submitting it to report on the UK government's modern slavery statement registry (from 2021 onwards).

BCG's commitment to human rights extends beyond compliance. At BCG, we strive to have a positive impact on society and lead with integrity. Highlights of this include:

- BCG globally invested over \$600m in societal impact initiatives in 2024
- Expanded our team focusing on ESG due diligence in our supply chain and own operations
- 100% of supplier requests-for-proposal templates include a supplier sustainability questionnaire



1. About Boston Consulting Group (BCG)

Our structure and operations

Since its founding in 1963, BCG has been a pioneer in business strategy. Today, we work closely with clients to empower their organisations to grow, build sustainable competitive advantage, and drive positive societal impact. Maintaining a strong culture anchored in clear, frequently communicated values is at the heart of what makes BCG a market leader. We are committed to the highest standards of ethics, business conduct, and company principles, and we expect every employee to uphold these standards. BCG has operated in the UK since 1969.

Our supply chains

Beyond our own structure and operations, at BCG, we recognise that being a responsible business also means upholding the highest ethical standards when it comes to our supply chain. BCG has a zero-tolerance approach to any form of human rights abuse and expects our suppliers to share our commitment to this and equal opportunity. We will not knowingly do business with any partner or supplier that violates our policies or standards.

Our global supplier risk team screens third parties for sanctions, bribery, corruption, and negative media as indications of each supplier's historical behaviour. While professional services firms such as BCG are generally considered to have a lower risk of modern slavery, our diverse procurement needs extend across various sectors.



2. Our policies in relation to modern slavery and human rights

BCG is committed to upholding and advancing human rights by ensuring our operations and supply chains remain free from modern slavery. As a leader in management consulting and with global clients and employees, we recognise our responsibility in fostering a culture of respect, dignity, equality and fairness across the industries and communities which we serve. Our commitment to ethical conduct and integrity is embedded in our values, purpose and principles.

The [BCG Code of Conduct](#) and the [BCG Supplier Code of Conduct](#) (SCOC) embody our dedication to responsible business practices, underpinned by individual integrity and professional ethics. We expect integrity in our conduct as an organisation and from all our people. We are committed to ethical leadership and transparent decision-making and have a zero-tolerance approach to any form of human rights abuse, including modern slavery and human trafficking, within our business and supply chain. We distribute our BCG Code of Conduct annually to all staff who must confirm they understand and are compliant with its content.

We strongly encourage BCG colleagues and any of our stakeholders to report 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 programme and '[Speak Up](#)' Line. The Speak Up line allows anyone, anywhere in the world, to confidentially report issues to BCG. Once raised, each concern is handled with sensitivity and in confidence, subject to any applicable overriding legal or regulatory requirements.

In addition to the above, we organise workplace behaviour training to make sure BCG works in line with our company values, which include Integrity, Respect for the Individual and Diversity.

We are committed to upholding individual human rights across our operations and supply chains. Our respect for human rights includes a deep appreciation of diversity. We provide equitable base pay and award bonuses based on performance, which we monitor worldwide. In keeping with our values, we have zero tolerance for any use of child labour or forced labour practices in our own operations as well as our supply chain.

Our SCOC outlines the minimum requirements expected of suppliers and forms the foundation of our systematic approach to cultivating a more sustainable and responsible supply chain. To that end, BCG includes our SCOC in all our standard contract templates.

The SCOC establishes minimum requirements across four broad categories:

- Business practices and ethics
- Labour practices and human rights
- Environmental regulations and protection
- Protection of assets, intellectual property, and data

The SCOC also delineates the process for suppliers to use in reporting on their compliance, as well as the range of potential BCG responses to suppliers' failure to meet SCOC requirements.

Additional related reports and policies demonstrate BCG's commitment to ethical conduct in every aspect of its business:

1. [Annual Sustainability Report](#) - outlining BCG's global societal impact in 2024.
2. [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.
3. [Human Resources \(“HR”\) policies](#) –We follow the same assessment procedures for all candidates, whether they are introduced by an external recruiter or apply directly through our website/application system, 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 aspects of their employment with BCG.



3. Supplier Due Diligence Processes

Pre-engagement

When BCG onboards new suppliers, it conducts searches for sanctions, bribery, corruption, negative news, and financial risk to identify any red flags or areas of concern. This screening is mandatory, and the findings will inform a decision on engaging the supplier.

Our supplier contract templates require compliance with modern slavery laws and mandate that suppliers notify BCG of actual or suspected instances of modern slavery in their supply chains. These templates also require our suppliers to maintain sufficient records so that BCG can verify supply sources where necessary. BCG reserves the right to terminate agreements if a supplier does not comply with these requirements.

Post-engagement

For onboarded suppliers, BCG continues to improve its risk-based approach for ESG due diligence, which covers labour and human rights issues, including modern slavery. For suppliers who meet certain criteria (e.g. BCG has a direct relationship with), we perform risk assessments to understand our ESG risk areas.

On a bi-monthly basis, we upload our supplier data to a dedicated ESG risk management platform, which provides an indicative risk assessment based on factors such as the supplier's industry and location. The indicative ESG risk assessment provides a high, medium, and low risk score – this score helps us identify potential issues and prioritise our approach. For suppliers where we have elevated risk, we may perform further due diligence by requesting the respective supplier complete a self-assessment. Based on the outcome of the indicative risk analysis, we will routinely request self-assessments from certain suppliers to ascertain additional information on their policies, certifications, and practices to better understand potential risks.

When further actions are warranted concerning unacceptable risk levels, we will use our supplier risk framework to engage with our suppliers to implement corrective measures, taking into consideration severity or risk, probability, and contribution to causation, as well as the materiality of the supplier within our supply chain and our ability to influence changes in their business practices. We will take further remediation actions as appropriate.



4. Risk assessment and management

Given the nature of BCG's operations and supply chain, the risk of modern slavery is relatively low. However, as a global business with diverse procurement needs, we recognise our obligations under the UK Modern Slavery Act and our commitments as a values-driven organisation.

Throughout the reporting period from January 2024 to December 2024, BCG has focused its due diligence efforts on a range of categories. We have determined that the categories below present a higher risk to the business and the communities in which it operates:

- Facilities Management
- Office Maintenance
- Catering Services
- Ground Transportation

BCG continues to refine and scale our risk-based approach, which means constantly reviewing our data, working with our partners, and leveraging peer-to-peer conversations with other professional services organisations. In 2024, we hired more specialist personnel to support due diligence efforts and engaged more suppliers to complete ESG assessments than ever before. Suppliers were prompted to provide detailed information about their labour practices, recruitment procedures, and adherence to international standards.



5. KPIs to measure the effectiveness of the steps being taken

We continually evaluate our approach to ensure that we are effectively identifying and mitigating modern slavery risks within our supply chain and own operations. In addition, we are raising awareness and educating our stakeholders by:

- Running annual acknowledgements and trainings of our Code of Conduct and global policies. 100% of active full-time employees completed the annual acknowledgement of the Code of Conduct in 2024
- Conduct periodic reviews of our policies, Code of Conduct and Supplier Code of Conduct to ensure they remain up to date and adequately address Modern Slavery risks
- 100% of our suppliers are monitored for sanctions
- From 2023 to 2024, a nearly tenfold (9.4) increase in the number of our suppliers who have been loaded and assessed on our specialist ESG supplier risk management platform
- Incorporate contractual provisions, where necessary, to support our Modern Slavery framework
- Closely monitor negative media coverage and suppliers identified as having a higher potential risk of Modern Slavery
- Review any modern slavery cases reported through our grievance and reporting mechanisms
- We are implementing a new procurement system that will integrate with our specialist ESG supplier risk management platform



6. Training on modern slavery and trafficking

In past years, we have delivered modern slavery training to key buyers across London and other geographies. The training aimed to provide attendees with an understanding of modern slavery issues, our approach to due diligence, and risk identification. Recognising that modern slavery can impact our operations and supply chain, we have also delivered training to our functional operation heads.

From 2023 to 2024, BCG increased the number of our suppliers assessed in our specialist ESG supplier risk management platform nearly tenfold. Our global ESG risk team has engaged more suppliers and supplier relationship owners than ever before about ESG due diligence, raising awareness of risk issues, including modern slavery.

BCG is also bringing together global colleagues to share best practices on how to combat modern slavery issues, and it plans to deliver specific training to larger cohorts of employees for future reporting periods.

In 2024, we also ran a training exercise with personnel from legal, procurement, human resources and sustainability to stress test the effectiveness of the Speak Up line. In this exercise, we created a dummy human rights complaint and a dummy environmental-related complaint and tested how this would work through the complaints' procedure steps. We are using the learnings from the stress test to continuously improve our current complaints procedure process.

We will continue to scale our training efforts relating to ESG topics, including modern slavery. We will continue to upskill key internal stakeholders on our due diligence processes, policies, and the risk areas which are specific to BCG. We also plan to increase our engagement with suppliers about training, highlighting that doing business with BCG requires awareness of our Supplier Code of Conduct and the commitments it encompasses, including to modern slavery issues.



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 risks of modern slavery.

As a participant in the United Nations Global Compact (UNGC), BCG supports the Ten Principles on human rights, labour, environment, and anti-corruption, and respects the UN Guiding Principles on Business and Human Rights. BCG is committed to incorporating the UNGC goals into the strategy, culture, and day-to-day operations of the firm. We provide fair wages for those who work on our behalf, we have no tolerance for the use of child or forced labour, and we will not knowingly do business with partners or suppliers that violate our policies and standards. We are proud to confirm that BCG UK is accredited as a Living Wage Employer.

By empowering our key stakeholders with modern slavery knowledge and resources, our organisation reaffirmed its commitment to upholding human rights, promoting dignity, and combatting exploitation in all its forms. We will continue to strengthen our supplier risk assessment program by working closely with our third parties on addressing modern slavery by continuing our technology-enabled risk screening, ongoing monitoring activities and training as needed across our supplier base.

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 of the members of The Boston Consulting Group UK LLP on 16/06/2025

This statement was approved by the board of The Boston Consulting Group UK Limited on 16/06/2025

This statement was approved by the board of BCG UK1 Limited on 16/06/2025

A handwritten signature in black ink that reads "Ben Holden". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Mark Ben Holden
Company Director of The Boston Consulting Group Limited
Designated member The Boston Consulting Group UK LLP
Company Director of BCG UK1 Limited