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 2020 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.

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 organizations 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 organization, 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 and our processes and policies. We encourage people to report any behaviours or activities that they believe to be unethical or unlawful either to a trusted member of staff or via our Ombudsman process. 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
- **HR policies** – where we engage with recruitment services agreements, we require agencies to comply with applicable laws. For all applications when 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 to December 2020) as HR Services, Business Services and Knowledge, Professional Services, Facilities and Event Management. Buyers procuring these services are required to follow our purchasing policy when engaging suppliers. Spend over a certain threshold require our Global Procurement involvement 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 of 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 or 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 prohibits suppliers from using child labour; and
- Reporting of any violations of the SCOC.

Due Diligence

As a part of the onboarding process for new suppliers, we conduct sanctions, negative news, and financial risk searches to identify any red flags or areas of concern. ABC checks are also completed where the product or service is considered to present higher risks. For suppliers that fall within scope of the Modern Slavery Act, with >£36m global consolidated revenue, we also seek further assurance from the supplier and obtain copy of their current Modern Slavery Statement.

Our suppliers are required to notify us of any violations of the SCOC and we recorded no reported cases during 2020.

We analysed our Top 100 suppliers (by spend) during the year into IT and non-IT spend. 10% of the spend related to IT which includes IT services, hardware, and software. The Global Slavery Index[1] identifies Electronics (laptops, computers and mobile phones) as one of the top risks imported products in the UK. We will therefore undertake further assessment to better understand our exposure to any risk in this area and take appropriate actions in the coming year.

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.

We will aim to work with our 3rd party suppliers in mitigating the modern slavery risks in our supply chain and taking appropriate remediation actions where required. In 2021,

- We plan to develop a modern slavery assessment questionnaire for suppliers that fall within our high-risk categories.
- We will undertake further assessment and design appropriate mitigating actions to identified risk if any, in our Information Technology supply chain.

We are aware that late payments potentially / unintentionally increase the risk of modern slavery and unethical behaviours in business, therefore, we aim to pay our vendors timely following submission of valid invoices. Our last Payment Practices and Performance Reports show that we are paying around 95% of our vendors within 60 days.

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

Finally, we will continue to build on previous years' work in centralising our supplier management and governance framework.

Approval and Signature

The statement will be reviewed annually and is signed on behalf of Boston Consulting Group in the United Kingdom.

Patrick Roche
Managing Director and Senior Partner
Boston Consulting Group UK LLP
June 2021

Mark Ben Holden
Company Director
BCG Limited
June 2021

[1] Downloads | Global Slavery Index