

## Modern Slavery Act 2015

The following statement sets out the steps The Boston Consulting Group ("BCG") has taken in relation to our responsibilities under Section 54, Part 6 of the 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 The Boston Consulting Group

BCG is committed to running our business responsibly and to the highest ethical standards. BCG is a global management consulting firm and the world's leading advisor on business strategy. We partner with clients from the private, public, and not-for-profit sectors in all regions to identify their highest value opportunities, address their most critical challenges, and transform their enterprises. Our customised approach combines deep insight into the dynamics of companies and markets with close collaboration at all levels of the client organisation. This ensures that our clients achieve sustainable competitive advantage, build more capable organizations, and secure lasting results.

### Policies

BCG's culture is rooted in outstanding professional standards and whilst we do not currently have a specific Modern Slavery Policy, we have a number of policies which govern our conduct, values and behaviour.

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 in accordance with our values 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. Through our Code, our Values and the full range of our policies, BCG is committed to ethical conduct in every aspect of its business.

We have zero-tolerance to slavery and human trafficking, and, consistent with BCG's Values and Code of Conduct, we have, within the last 12 months, developed a specific Supplier Code of Conduct ("SCOC"). The SCOC is being rolled out on a phased basis and all suppliers will be required to adhere to it while conducting business with or on behalf of BCG. The SCOC:

- Requires our suppliers to conduct their business activities and operations with integrity and in full compliance with applicable laws and regulations, with specific reference to the MSA;
- Prohibits suppliers from using all forms of forced or compulsory labour, and from supporting any form of human trafficking of involuntary labour;
- Requires the 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; and
- Mandates 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.

Link to [BCG Supplier Code of Conduct](#)

### Ongoing Initiatives

In those parts of our business and supplier service categories where we assess or believe the potential risks of modern slavery to be higher, such as facilities management, travel, utilities and contractors we are taking a number of measures to reduce the risk. These include:

- Gaining further information from our Top 100 spend suppliers that fall into the aforementioned higher risk service categories to understand what the supplier is doing to promote compliance within their own supply chain;

- In accordance with the BCG SCOC suppliers must promptly inform a dedicated member of the BCG Supplier Risk Management team when a situation develops that causes the Supplier to operate in violation of the SCOC or as specified within their contractual agreement with BCG;
- Conducting negative news searches on new suppliers for red flags of slavery for a six month duration following the supplier on boarding; and
- Continuous negative news monitoring of BCG's critical suppliers.

Recognising the complex nature of modern slavery BCG continues to emphasise the importance of collaboration with budget owners and buyers to inform and educate them on the risk of Modern Slavery in our supply chain through its responsible purchasing policy and the Supplier Code of Conduct.

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



Stuart Quickenden  
On behalf of The Boston Consulting Group  
June 2019

