

Introduction

The Commonwealth Modern Slavery Act 2018 (**Act**) established Australia's national Modern Slavery Reporting Requirement applicable to entities with annual consolidated revenue of \$100 million and above.

This Modern Slavery statement is prepared and issued by The Boston Consulting Group Pty Ltd (ACN 007 347 131). For the purposes of this statement, The Boston Consulting Group Pty Ltd is referred to as 'BCG', 'our' or 'we'. In this statement, the term 'Modern Slavery' is defined per the Act.

About BCG

Our Structure and Operations

The Boston Consulting Group is a global management consulting firm and one of the world's leading advisors 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 have the opportunity to achieve sustainable competitive advantage, build more capable organisations and secure lasting results.

Incorporated in Australia more than thirty years ago, and now known as BCG, we have over 500 employees working in our offices in Sydney, Melbourne, Canberra and Perth and in our New Zealand branch in Auckland. We work under an ultimate holding company, The Boston Consulting Group, Inc.

Our Supply Chains

BCG is committed to managing its business responsibly and to the highest ethical standards. As a professional services practice, our principal activities involve the provision of consulting and advisory services to our clients. To support our operations and service delivery, we procure various goods and services.

The majority of suppliers that we engage with are based in Australia. The main categories of goods and services that we procure are:

- Information technology and software: This includes computer hardware and software, cloud services, printers, audiovisual equipment and services, as well as mobile phones;
- Business services: This includes office equipment, stationery items, document management, courier and postal services, printer maintenance and printing services;
- Professional services: This includes consulting and advisory services, professional development, personal development, and welfare training programs;
- Office facilities management: This includes services essential for maintaining our office, including leasing, repairs and maintenance, utilities, cleaning and security;
- Accommodation and travel: This includes bookings for flights and accommodation; and
- Hospitality and catering: This includes catering services for both onsite and offsite events.

Assessment of Modern Slavery Risks

BCG has assessed the risk of Modern Slavery within its operations as low, given our highly skilled workforce, adherence to our [Global Supplier Code of Conduct \("SCOC"\)](#), strong company values, and commitment to ethical conduct. To identify and manage Modern Slavery risks, we established a dedicated Modern Slavery Working Group to oversee and guide our procurement processes. This group comprises representatives from the Board of Directors, legal services, finance, procurement, risk management, and senior leadership, who meet annually and as needed to address any emerging concerns.

To assess vendor risk, we classify vendors based on key factors that contribute to Modern Slavery risk. These factors include industry risk, product/service risk, geographic risk and entity risk, using information published by the Walk Free Foundation (The Global Slavery Index 2023). As a global business, BCG has invested significantly in ESG due diligence capability in the last year - this includes partnering with a specialist ESG risk management platform and recruiting more

subject matter experts. As part of our continuous improvement efforts, BCG Australia will leverage this technology and expertise to enhance our modern slavery approach.

For the current financial year, the key areas of potential risk identified include:

- **Business Services:** Particularly in cleaning, office fit-outs, and travel, where outsourced services and the low-skilled nature of the work may increase the risk of worker exploitation.
- **Hospitality and Catering:** Similar to business services, the reliance on low-skilled workers in catering and event roles may make them more vulnerable to exploitation.
- **Information Technology and Software:** Risks within the supply chain include exposure to conflict minerals, child labor, and worker exploitation.

Actions to Assess and Address Modern Slavery Risks

BCG 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 ("Code") [BCG Code of Conduct 2024](#) sets out that all employees 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 employees who must confirm their understanding and compliance. Our commitment to ethical conduct is reinforced by our company values, including Integrity, Respect for the Individual, and Diversity. Through our Code, values, and policies, BCG upholds ethical standards in every aspect of its operations.

BCG maintains a zero-tolerance approach to slavery and human trafficking. Aligned with our global Values and Code of Conduct, we have established a dedicated global SCOC. The SCOC is incorporated into BCG's standard contracts, client tender responses, and is publicly available on our [BCG website](#). All suppliers are required to comply with the SCOC when conducting business with or on behalf of BCG. The SCOC outlines the following:

- 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 Act;
- 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.

Our local contractor agreement templates require our suppliers to:

- Desist from engaging in Modern Slavery or any offences under the Act;
- Comply with any applicable Modern Slavery law and BCG policy concerning Modern Slavery law;
- Keep sufficient records to enable us to verify the source of the supplier's services;
- Report to us any actual or suspected instances of Modern Slavery; and
- To cooperate with us to facilitate training of our employees, suppliers and subcontractors on Modern Slavery law (if required).

BCG's contractor agreement template also requires suppliers (local, regional and global) to comply with applicable laws and regulations governing the supplier's activities under their respective agreement, including without limitation, securities laws, Modern Slavery laws, and laws prohibiting bribery and corruption, including the US Foreign Corrupt Practices Act and the UK Bribery Act of 2010.

Due Diligence and Remediation

In those parts of our business and supplier service categories where we identify a higher potential risk of Modern Slavery - such as facilities management, travel, utilities, and contractors, we have implemented various measures to mitigate these risks. These measures include:

- Conducting an annual review of our Top 25 local suppliers within high-risk service categories to assess their efforts in promoting compliance within their own supply chains.
- Internally escalating and appropriately managing any breaches of the SCOC.
- Evaluating supplier commitments to eliminating the risk for Modern Slavery when onboarding new high-risk suppliers or those engaged in significant contracts.
- Continuously monitoring the sourcing practices of BCG's critical suppliers.
- Providing training to key stakeholders, including buyers responsible for procuring services on behalf of BCG.

In addition to this we will be implementing further measures including (but not limited to):

- Implementation of a new procurement system to serve as a central repository for supplier documentation including that related to Modern Slavery and to enhance the supplier screening process for onboarding.
- Implementing an ESG supplier risk management platform to aid supply chain sustainability and compliance. The platform remains under internal testing, and we anticipate the platform will be set up by in the near future..

When onboarding suppliers in higher risk categories, BCG follows robust processes to assess human rights, ethical and environmental risks. As part of the supplier onboarding process, new suppliers are required to provide detailed information on their human rights policies, procedures, and risk assessments, including measures to prevent slavery and human trafficking within their own operations and supply chains.

Acknowledging the complexity of Modern Slavery, BCG remains committed to collaboration with budget owners and buyers, ensuring they are informed and educated about the risks within our supply chain. This is achieved through our responsible purchasing policy and Supplier Code of Conduct.

Based on the results of our risk assessment for 2024, no remediation or mitigation measures were necessary to address Modern Slavery risks within our own operations and supply chain.

Reporting any Grievance

Modern Slavery grievances can be reported through BCG's existing grievance mechanisms outlined in our Whistle-blower Policy. Reports can be submitted via the BCG Speak Up Line, accessible on the Company's Internal Navigator page and external website ([BCG - Home \(integrityline.com\)](https://www.bcg.com/integrityline)). The Speak Up Line allows anyone, anywhere in the world to report issues, such as suspected violations of applicable law and BCG policies and values to BCG. Once raised, each concern is handled by our team with sensitivity and strict confidence and may be forwarded to appropriate external parties if warranted. Additionally, informal internal complaints may be directed to any member of the Ombuds team, as detailed in the policy.

No Modern Slavery infringements or violations have been reported this year within our operations or direct supply chain. We remain committed to enhancing and strengthening our due diligence approach in the coming year.

Assessing the Effectiveness of our Actions

We continually evaluate our key suppliers to identify and mitigate Modern Slavery risks within our operations and supply chain, while also educating key stakeholders and buyers on these risks.

To ensure the effectiveness of our current and future actions, we will continue our assessments and, have implemented the following measures:

- Conduct periodic reviews of our policies and Code of Conduct to ensure they remain up to date and adequately address Modern Slavery risks.

- Monitor internal compliance with our policies and Code of Conduct, particularly regarding Modern Slavery obligations.
- Incorporate contractual provisions, where necessary, to support our Modern Slavery framework.
- Engage with suppliers to assess their progress in implementing actions to address Modern Slavery risks.
- Closely monitor suppliers identified as having a higher potential risk of Modern Slavery.
- Review cases reported through our grievance and reporting mechanisms.

Other Information

With a commitment to managing our business responsibly and to the highest ethical standards, our plan is to continue to take actions during our subsequent reporting periods to reduce the risk posed by Modern Slavery in our operations and supply chains by:

- Continually reviewing and updating our procurement policy and developing standards which set out the minimum expectations for our suppliers and third-party labour providers to operate ethically, including to address Modern Slavery risks in their business and also in their suppliers;
- Capturing any reported incidents of Modern Slavery within BCG or within our supply chain, undertaking prompt investigation and reporting, and remediating and mitigating risk of repeated occurrence;
- Implementing specific training in relation to the Modern Slavery risk management; and
- Working with our global network where appropriate to establish processes, review and control.

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.

As a participant in the United Nations Global Compact (UNGC), BCG supports the Ten Principles on human rights, labour, environment, and anti-corruption, and is committed to respecting 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 practices, and we will not knowingly do business with partners or suppliers that violate our policies and standards.

The statement has been approved by the Board of Directors of The Boston Consulting Group Pty Ltd.



Grant McCabe

Managing Director and Senior Partner

29th April 2025