

## **Introduction**

The Commonwealth Modern Slavery Act 2018 (the “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.

This statement is made in accordance with the Act and outlines BCG’s modern slavery risks and actions for the financial year ending 31 December 2025.

## **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, Perth and Brisbane 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 relatively low, given our highly skilled workforce, adherence to our [Global Supplier Code of Conduct \(“SCOC”\)](#), strong company values, and commitment to ethical conduct.

BCG recognises that modern slavery and labour risks can arise in complex supply chains and takes a proactive, risk-based approach to managing them. BCG screens suppliers prior to engagement for sanctions, negative media, and other risk indicators.

As a global business, BCG uses a technology-enabled supplier risk management platform to assess inherent risk across its supplier base, informed by factors such as industry and geographic location. Suppliers identified as presenting elevated risk may be subject to further due diligence, including targeted self-assessments and engagement to implement appropriate corrective measures where necessary. BCG applies this global platform within its local procurement processes, ensuring alignment with BCG's broader supplier risk management 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;
- **Office facilities management:** This includes services essential for maintaining our office, including leasing, repairs and maintenance, utilities, cleaning and security;
- **Hospitality and Catering:** Similar to business services, the reliance on labour-intensive workers in catering and event roles may make them more vulnerable to exploitation; and
- **Information Technology and Software:** Risks within the supply chain include exposure to conflict minerals, child labour, and worker exploitation.

### **Actions to Assess and Address Modern Slavery Risks**

#### *BCG Policies*

BCG's culture is rooted in outstanding professional standards and responsible business conduct. In 2025, BCG published its first [Global Human Rights Statement](#), which affirms our zero tolerance for child labour, forced labour, and modern slavery and consolidates our human rights commitments across our operations and supply chain.

Our [BCG Code of Conduct](#) 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. In 2025, 100% of active full-time employees completed the annual acknowledgement of the Code of Conduct.

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 company 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](#). 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. 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
- Cooperate with BCG to facilitate training of our employees, suppliers and subcontractors on Modern Slavery law.

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*

As part of its ongoing enhancement of supplier risk management processes, BCG has strengthened its risk-based approach to identifying, assessing, and mitigating human rights risks, including modern slavery. These measures include:

- Expanding our risk and sustainability capabilities within procurement, enhancing our ability to implement risk-based supplier due diligence and mitigate human rights issues including modern slavery;
- Monitoring 100% of active suppliers for sanctions and adverse media, enabling timely identification of potential compliance and reputational risks;
- Expanding usage of a technology-enabled supplier risk management platform to assess inherent human rights and modern slavery risk across the supplier base and prioritise suppliers for further due diligence where appropriate;
- Conducting an annual review of our top 25 local suppliers within higher-risk service categories to maintain focused oversight, including targeted self-assessments where appropriate;
- Internally escalating and appropriately managing breaches of the SCOC (if any);
- Evaluating supplier commitments to eliminating the risk for Modern Slavery when onboarding new high-risk suppliers or those engaged in significant contracts; and
- 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):

- Development of a new procurement system to be implemented in 2026, to serve as a central repository for supplier documentation including that related to modern slavery and to enhance the supplier screening process for onboarding.

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 may be required to provide information regarding their human rights policies, procedures, and risk mitigation measures within their own operations and supply chains.

Recognising the complexity of modern slavery risks, BCG continues to collaborate with budget owners and procurement stakeholders to strengthen awareness and accountability for supplier risk management across our supply chain. These expectations are embedded within our responsible purchasing policy and Supplier Code of Conduct.

Through these due diligence processes, BCG did not identify any modern slavery issues requiring remediation within its operations or direct supply chain for 2025.

### *Reporting Grievances*

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. 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.

BCG also offers an Ombudsperson program for BCG employees as an additional, confidential resource for individuals seeking guidance or support in raising concerns. No Modern slavery infringements or violations have been reported this year within our operations or direct supply chain.

### **Assessing the Effectiveness of our Actions**

BCG continually evaluates its supplier risk management processes to identify and mitigate modern slavery risks across its operations and supply chain.

To ensure the effectiveness of our current and future actions, we continue to assess 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;
- Monitor supplier screening coverage and due diligence outcomes to inform continuous improvement of our risk-based approach;
- 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; and
- 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 reinforcing minimum expectations for suppliers and third-party labour providers to operate ethically and manage modern slavery risks within their own operations and supply chains;
- 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 targeted training on modern slavery risk identification and management; and
- Working with our global network where appropriate to establish processes, review and continuously improve controls and oversight.

### **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.

These commitments are reinforced through our Global Human Rights Statement, BCG Code of Conduct and Supplier Code of Conduct.

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



**Grant McCabe**  
**Managing Director and Senior Partner**  
**30<sup>th</sup> April 2026**