

# Modern Slavery and Human Trafficking Statement

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## Revision History

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## Document Control

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## About us

We are BTS AB Group, founded in Stockholm in 1986 and now a community of 1200 employees, present in 36 offices over 6 continents. BTS was founded in 1986 to do things differently, to create a human-centred consulting firm.

We are a professional services firm providing Strategy and Business Acumen, Change & Transformation, Leadership, Coaching, DEI, Assessment, Sales & Marketing and Innovation services to corporate clients.

## What is Modern Slavery?

In the workplace, Modern Slavery is the term used when an individual is exploited by a person or an organisation, for personal or commercial gain.

It's unfortunate that in 2023 we are still talking about slavery, but Modern Slavery is all around us and often hidden in places we'd least expect. We are mindful that people can be particularly vulnerable to modern slavery when external circumstances push them into taking risky decisions in search of opportunities to provide for their families, or when people find they are simply pushed into jobs in exploitative conditions.

That's why we acknowledge that how we operate is just as important as the services we offer our clients. We are a business that lives by its values. This commitment is embodied in our global Code of Conduct. We expect everyone working at BTS, as well as everyone in our supply chain, to adhere to 'the Code' and to think carefully about how they do business on our behalf.

This statement sets down BTS's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. BTS employees are expected to report their concerns and management to act upon them.

### **Eliminating risks within our business**

## Supply Chain

The nature of our business is such that our supply chain consists mainly of professional services suppliers: suppliers of stationery, ICT services, cleaning and catering facilities etc. We believe that our supply chain is, therefore, low risk as regards slavery and/or human trafficking. All contractors, suppliers and vendors are asked to adhere to our Global Code of Conduct, which sets out expectations in relation to professional behaviour and conduct.

## Human Rights

BTS follows the United Nations' declaration of human rights and does not see any risks that violate human rights in BTS's operations. BTS follows the labor laws that are applicable in the countries and states where the company operates.

BTS Group supports the Ten Principles of the United Nations Global Compact and its principles part of the strategy, culture, and day-to-day operations of our company, and to engaging in collaborative projects which advice with broader development goals of the United Nations, particularly the Sustainable Development Goals.

We remain committed to embedding its ten principles for human rights, labour, environment and anti-corruption in our business and report progress against its 10 principles annually. The completion of the online questionnaire is where we disclose our company's continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals.

We support public accountability and transparency, and therefore commit to report on progress starting the calendar year after joining the UN Global Compact, and annually thereafter according to the UN Global Compact CoP policy.

## Relevant Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach:

## BTS's Modern Slavery Statement

The statement applies to all BTS employees and provides guidance to help understand what modern slavery is, areas where it is a particular risk and how to report any suspicions that modern slavery may be taking place.

## BTS Code of Conduct

The conduct sets down the actions and behaviour expected of employees when representing the Company. It provides a clear set of standards for the way we conduct business as well as ethical and behavioural guidance to help our people put the principles into action in their day-to-day work. The code makes it clear that our people also have the responsibility to report any behaviour which is inconsistent with the principles set out in the code. By 2022, all

employees and subcontractors employed or working alongside BTS have signed our Code of Conduct. We have had no reported cases of corruption or other violations of the rules against BTS's Code of Business Conduct.

## **Health and Safety Security Policy**

The company has clarified the employees' rights in a Health and Safety Policy that aims to make sure that all employees get the support and backup they need in different situations within, and outside of, BTS.

## **Review Period**

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Directors endorse this policy statement and are fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Jessica Skon

Position: President & CEO, BTS Group

Date: June 29, 2023

Signature: