BCD travel



2021
MODERN SLAVERY ACT STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It outlines how BCD Travel UK & Ireland worked to help prevent modern slavery and human trafficking in our business and supply chain during the year ending 31 December 2021.



Introduction

BCD Travel helps companies make the most of what they spend on travel. We give travellers innovative tools that keep them safe and productive and help them make good choices on the road. We partner with travel and procurement leaders to simplify the complexities of business travel, drive savings and satisfaction, and move whole companies toward their goals. In short, we help our clients travel smart and achieve more. We make this happen in more than 100 countries with a global client retention rate of 97 percent, the highest in the industry.

We recognise that we have obligations to uphold the highest ethics in our employees' and in our business' activities. We have a zero-tolerance approach to slavery, servitude, forced labour and human trafficking within our operations and our supply chain. We accept that all members of our operations and supply chain must be alert to the risks of modern slavery, however small, and be able to act upon them.

Our business and supply chain

Due to the nature of our business, we are at low risk of employing victims of child labour, forced labour, modern slavery or human trafficking in our own operations. We adhere to local labour laws and pay our employees at least the legal minimum wage in all countries where we operate. We perform all due diligence within the hiring process and we ensure any contractors we are planning to engage are also compliant. We train our people to be alert to any behaviour that could resemble forced labour, child labour or human trafficking activity and to highlight and safely report any such instances; this training is compulsory.

We expect BCD employees to report any concerns using the appropriate channels. Management is required to immediately and effectively act upon them. This is supported by our Code of Conduct and Non-Compliance Reporting policy.

Our business depends on a reliable, global network of service providers. The majority of our direct suppliers are UK and U.S.-based companies providing technology and professional services that we have identified as low-risk sectors. Indirect suppliers in the travel industry, such as airlines and hotels, are in a higher risk category.

We seek business relationships that are built on trust, respect and shared values. We only select suppliers who meet our business and commercial requirements and who demonstrate responsible business practices based on ethical, environmental and social criteria.

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Our commitment to human rights is based on principles of leading international standards and conventions and covers our global operational scope. All suppliers are expected to share a common commitment to:

- Conduct business in an ethical manner and abide by all legal and regulatory requirements and other requirements included in BCD Travel's Supplier Code of Conduct.
- Comply with the international labour practice standards with specific focus on the International Labour Organisation (ILO) Conventions, the 10 principles of the UN Global Compact (UNGC) and the UN Sustainable Development Goals (SDGs).

A policy and process-driven approach ensures compliance with these standards and demonstrates continual improvement.

Policies and contractual controls

As new sustainability legislation is implemented, and stakeholder requirements evolve across the supply chain, the importance of integrating ethical and social best practices across global procurement processes continues to increase.

We recognise that all positive action around preventing, identifying and minimising instances of modern slavery must start with clear policies, guidelines and controls. This is why we clearly outline our expectations of the standards we require from our suppliers and partners in our Supplier Code of Conduct. Ethically conducting business and abiding by all legal and regulatory requirements are important components of this shared commitment. We continue to increase the number of global suppliers who have signed our Supplier Code of Conduct and encourage them to promote our shared values of sustainable procurement within their own supply chain.

We ensure our Supplier Code of Conduct is aligned with the latest ethical business legislation. In 2021 we included an additional clause outlining how suppliers can report any potential violations of the Supplier Code of Conduct, committed either by their own employees or representatives, or by any of BCD Travel's employees or representatives. This amendment ensures compliance with the new EU Whistleblowing Protection Directive and provides a regulated channel through which any instances of suspected modern slavery can be reported.

Our independently operated BCD Travel SpeakUp system offers our employees and suppliers the opportunity to anonymously report any incidents. A compliance email account is also monitored by the global group internal audit and legal functions. All reported incidents are investigated, and the results are reviewed by a designated member of the BCD Travel Board responsible for compliance.

Due diligence of modern slavery risks within our supply chain

Our sustainable procurement initiatives incorporate several processes to assess supplier compliance and sustainable practices within our supply chain of direct suppliers. As outlined earlier in this statement, we consider our risk of modern slavery, human trafficking and child or forced labour within our operations and direct supply chain to be low.

While this is the case, we recognise that certain services and processes within the wider travel industry are used by human trafficking organisations to facilitate their crimes. We are uniquely positioned to enhance education and awareness across our industry as part of the solution to modern slavery. This is a primary focus for BCD Travel in our partnership work to prevent modern slavery. We provide further details on our initiatives in this area later in this statement.

As part of our supplier due diligence process, we carry out annual desktop assessments of our direct suppliers to assess risk in the areas of environment, business ethics, labour standards, human rights and modern slavery, as well as their participation in the UNGC and the UN SDGs. In 2021 we assessed 100 percent of our top 30 suppliers on extended criteria, including modern slavery.



As a minimum, our suppliers are strongly encouraged to:

- Comply with BCD Travel's zero-tolerance stance regarding human slavery, human trafficking and the sexual exploitation of children.
- Apply the highest standards of integrity in all business interactions with us.
- Respect workers' human rights and comply fully with all applicable laws.
- Promote our Supplier Code of Conduct within their own supply chain.

Training and awareness

The Global Human Trafficking Committee represent BCD in partnering with leading anti-modern slavery partners including A21, Anti-Slavery International and ECPAT. Our mission is to create internal and external awareness of human trafficking by educating on the vulnerabilities, such as low self-esteem or homelessness, signs to look for and where to report if human trafficking is suspected.

According to the UN Office on Drugs and Crime (UNODC), as a result of COVID-19 measures, this crime may have been driven further underground. The UNODC also emphasise the potential limitations on the ability of state authorities and non-governmental organisations to provide essential services to the victims of human trafficking*.

As COVID-19 unfolded, BCD knew it was important to continue with our objective to drive education and awareness about modern slavery. Throughout the pandemic our commitment didn't stop

In November 2021 we launched our BCD Global Human Trafficking Committee intranet hub – a key step in our education and awareness plan. The hub is split into sections that address why we participate, any current news, tools available to clients and employees, our key partnerships and how employees can get involved.

Our why – As an extension of our training, this part of the hub helps our global employees understand how the travel industry is uniquely positioned to drive education and awareness, as traffickers use air travel and hotels to support their crimes. It also introduces the committee, so employees know who to contact for further action and advocacy.

Tools our employees and clients can use – This includes presentations, resource links to our partners A21, Anti-Slavery International and ECPAT and infographics to drive awareness for our clients.

Get involved – This section guides BCD employees on the part they can play in helping to raise awareness, including any upcoming events for their calendar.

News – Employees can get the latest news from our committee and partners, such as the A21 Walk for Freedom and our participation in the END IT Movement with ECPAT-USA.

*Reference to the UNODC HTMSS Thematic Brief on COVID-19
https://www.unodc.org/documents/Advocacy-Section/HTMSS_Thematic_Brief_on_COVID-19.pdf

By launching this hub, we continue to engage our employees with the important work we're doing in this area. Other key achievements include:

- We partnered with ECPAT and A21 to deliver training globally, further increasing awareness of the issue. 99% of global employees have either completed or are in progress with the training since the inception of the course in 2019.
- We rebranded our project with an update on both internal and external marketing materials to ensure they remain impactful.
- We continued our support of key events including Human Trafficking Awareness Day, National Human Trafficking Prevention Month in the U.S., the END IT Movement with ECPAT-USA and A21's Walk to Freedom.

We're proud of our partnerships

Our relationships with our partners are essential to our work to help combat modern slavery. We have supported these partnerships since signing The Code in 2015, reporting on our activities annually, and becoming a member of ECPAT International in 2017. We invite our employees, clients and suppliers to find out more about what they can do too.

ECPAT is the leading international organisation seeking to end children's commercial sexual exploitation through awareness, advocacy, policy and legislation.

A21 combats modern-day slavery by working to Reach, Rescue and Restore lives —reducing vulnerability, assisting victims and empowering survivors. The organisation works in 18 different locations in 13 countries across the globe.

Anti-Slavery International was founded in 1839 and is the oldest international human rights organisation in the world.

In summary - effectiveness in preventing modern slavery

We have identified that enhancing education and awareness around modern slavery is where our organisation is able to make the most impact. We also recognise that there will continue to be modern slavery risks. To mitigate these risks in our business, as well as support our objectives for education and awareness, we will continue to identify, adopt and implement best practices in the following areas in the year ahead:

- Continue to raise staff awareness levels through mandated training and opportunities to participate in wider global events.
- Continue to focus on education and awareness driven by our Global Human Trafficking Committee.
- Continue to work with our three key partners, A21, Anti-Slavery International and ECPAT including sharing news, campaigns and client awareness collateral on our Human Trafficking Committee intranet hub.
- Continue with investigations into any reports of modern slavery and remedial actions taken in response.

BCD TRAVEL (UK) BOARD DIRECTORS



MICHÈLE LAWLEY
Managing Director
UK & Ireland Region



MIKE WALLEY
President
Europe Region

We approve this statement against modern slavery and human trafficking pursuant to section 54(1) of the Modern Slavery Act 2015.

Financial Year Ending December 2021.