

2022 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 2022.

Introduction

BCD Travel helps companies travel smart and achieve more. We drive program adoption, cost savings and talent retention through digital experiences that simplify business travel. Our 13,000 dedicated team members service clients in 170+ countries as we shape a sustainable future for business travel.

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 select suppliers who meet our business and commercial requirements. It's also important that our suppliers demonstrate responsible business practices based on ethical, environmental and social criteria.

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've signed our Supplier Code of Conduct - to date over 89% have signed the Code. It also forms part of our agreement with each partner in the BCD global network. We 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 desktop assessments of our supply chain 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.

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

We believe that as a travel management company, we're uniquely positioned to raise awareness with our employees, travellers and partners about human trafficking and child exploitation, and the role they can play in addressing it. We use our reach to raise awareness and educate on the issue, driven by our active Human Trafficking Awareness Committee.

We know that traffickers often use air and rail travel to transport victims between cities and countries and use hotels as venues to traffick or abuse victims. If every traveller can identify the signs of human trafficking and understands what to do and how to report it if they encounter a potential incident, we in turn can help end the commercial and sexual exploitation of human beings.

Members of our Human Trafficking Awareness Committee come from a broad range of functions and locations across BCD. This passionate team, motivated to drive awareness of human trafficking in and beyond our industry, has focused initiatives around four goals this year: Education, Engagement, Orchestrated Campaigns and Partnerships.

The committee's mission is to educate on vulnerabilities and signs to look for, and where to report if someone suspects human trafficking. All efforts are aimed at ending human trafficking and the sexual exploitation of children.

Since the committee officially launched back in 2017, huge strides have been made, from signing the agreement with End Child Prostitution and Trafficking (ECPAT) and The Code in 2017 to launching an end-to-end education and awareness strategy. Highlights of our achievements include:

- Continued to practice due diligence to guard against human rights violations, as demonstrated in the human rights section of our Supplier Code of Conduct.
- Continued to partner globally with ECPAT and A21.
- Continued with Don't Look Away, our human trafficking awareness training, made available to all employees to increase understanding of ECPAT, The Code and our role in raising awareness. To date we have achieved 99% completion.
- Designed and launched a new Human Trafficking Awareness intranet hub.
- Implemented National Human Trafficking Prevention Month campaign.
- Updated materials to reflect the latest International Labour Organization (ILO) report.
- Designed and executed a training project with a global client, with 450+ employees trained across two sessions.
- Supported key events such as the A21 Walk For Freedom march.
- Secured project fundraising approval for A21 Cambodia project.
- Implemented ECPAT GBTA Europe fundraiser.

We're proud of our partnerships

Partnerships are central to our work to help combat modern slavery. Today we work closely with ECPAT and A21 to raise awareness.

ECPAT is the leading international organization seeking to end the commercial sexual exploitation of children through awareness, advocacy, policy and legislation. BCD Travel is a signatory to ECPAT's Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code). The Code encourages members to provide educational tools and support initiatives to end sexual exploitation of children.

A21 combats modern-day slavery by working to reach, rescue and restore lives, reducing vulnerability, assisting victims and empowering survivors. The organization works in 18 different locations in 13 countries across the globe. We work with A21 by supporting a project in Cambodia, as well as key events like their global Walk For Freedom march.

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 key partners, A21 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) DIRECTORS

MICHÈLE LAWLEY President, Europe



CLAUDIA JACKSON Managing Director, UK & Ireland



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 2022.

Signed:

Michelle Lawley

Date:

05-09-2023