

# Code of Conduct

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Policy owner: Global Internal Audit Department

On behalf of BCD Travel

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## Message from our global executives

We care about one another, our customers and the members of our local and global communities. This fundamental respect underpins our company values, and shapes our [Corporate Social Responsibility principles](#). And we bring it to life in the way we operate, day in and day out.

This Code of Conduct sets forth the standards by which we, as a collective organization and as individuals, should act. It gives an ethical and legal framework for our day-to-day activities, and offers guidance for dealing with challenging situations.

We put our trust in each of you to exercise good judgment and act in a manner that reflects favorably upon yourself and our company. We have to work together to maintain our reputation as a good corporate citizen and trusted advisor. We're all responsible for upholding the Code.

If you have any questions about the Code of Conduct or how to follow it in a specific situation, please consult your manager or speak with your local HR representative.

On behalf of our customers, suppliers and colleagues, thank you for your commitment to the Code of Conduct and the values in which it's rooted.

John Snyder  
President & CEO

Mike Jansen  
COO

Cees Batenburg  
CFO

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## Our values

### Innovation

We're creative and we love solving problems in new ways. With a genuinely talented group of people, great products, open minds and clients with complex and unique challenges, we just can't help ourselves.

### Integrity

We deliver what we promise, and only promise what we can deliver. We do what we say with warmth, humor, and a great deal of thought.

### Service

Business travel isn't just about technology and systems. It's what we do for people and with them that counts. Simply put, we like helping people—whether they're colleagues, clients or partners.

### Teamwork

We're natural partners with our clients, colleagues, and our community, and we're at our best when working together to produce extraordinary results.

### Strength

We aim to always exceed our financial goals and the expectations of our clients, our colleagues and our shareholders. We build our human resources by giving exciting opportunities to our own people, and bringing aboard new people whose skills enhance and expand our already strong base. We're committed to growing our global footprint together with our customers.

### Vision

We look beyond the horizon to anticipate change. We're passionate about shaping the next generation of business travel.



**We put our trust in each of you to exercise good judgment and act in a manner that reflects favorably upon yourself and our company.**

# Code of Conduct

Note: “We” and “BCD” refer to the BCD Travel Group, including Advito and BCD Meetings & Events. “You” refers to the employee or third party reading this code.

This Code of Conduct (or “Code”) translates our corporate values into general conduct rules that apply to daily business. The Code applies to all employees and third parties acting on behalf of BCD.

## 1. Employees

### 1.1. Respect, equal treatment and health safety

We deal openly and honestly with our employees in all matters related to their employment, work environment and professional development. We won’t discriminate (or tolerate discrimination by our employees) against any applicant or employee based on any characteristic protected by law.

We promise to protect you from unreasonable health and safety risks on the job. We meet reasonable expectations concerning the work environment and strive to protect our customers, the public and the environment in the use of BCD facilities and services.

### 1.2. Employee privacy

In order to make our internal processes and procedures as effective and efficient as possible, we collect and maintain personal information related to our employees. Access to this information is restricted to authorized people on a need-to-know basis. We will never release personal information to outside parties without your prior approval, unless we’re legally required to do so.

Employees who have access to personal information must make every effort to protect it from any disclosure which would violate a law or company policy. For further details, please refer to the applicable HR policies and other provisions governing the protection of personal data.

### 1.3. Conflict of interest

Work-related decisions must not be influenced by personal considerations. Therefore, you must avoid any activity that could conflict with your responsibilities and loyalty towards our company. No employee, relative or other third party can benefit from his or her position due to a conflict of interest. When a conflict of interest is identified, we’ll always seek to resolve it in a mutually acceptable way, on a case-by-case basis.

### 1.4. Business secrets / insider trading


During your employment with our company, you may be given access to information about BCD, our subsidiaries or our customers and/or service providers that hasn’t been made public and could be of benefit to you. The use of such non-public information about our companies,

customers or service providers for personal or third party benefit is strictly prohibited and may constitute a violation of law.

### 1.5. Social media

When you use public social media accounts, avoid comments that are derogatory or damaging to our business, business practices or performance, employees, colleagues, competitors or clients.

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We're natural partners with our clients, colleagues, and our community, and we're at our best when working together to produce extraordinary results.

## 2. Customers, competitors and third parties

### 2.1. Data protection, information Security and privacy

We protect the confidentiality, integrity and availability of information we have access to in accordance with applicable laws and contractual obligations. It's essential that we safeguard the personal data of customers, competitors, third parties and employees from infringement, and use it only for the purposes for which it's collected. Our safeguards apply to the reception, collection, use, transfer, processing, storage and deletion of personal data.

To learn more about data protection and privacy, please contact our legal department ([legal.privacy@bcdtravel.eu](mailto:legal.privacy@bcdtravel.eu)) and/or our Data Privacy Officer, where applicable.

#### 2.1.1. Company proprietary information

Company proprietary information is any information relating to our current and future products, services, or research; business or marketing plans or projections; earnings, income and other financial data; personnel information, including organizational changes; and software. No one may disclose or distribute this information without authorization by our company. You must follow all company safeguards for protecting this information.

#### 2.1.2. Anti-bribery and corruption

Bribery and corruption generally involve receiving, giving, promising, authorizing or offering anything of value to someone in order to obtain or retain a commercial advantage, or to encourage or reward the recipient for acting improperly. If this is done in a business relationship, it

constitutes bribery. If it's done in a government relationship, it constitutes corruption. We don't tolerate bribery or corruption in any circumstances.

### 2.1.3. Government officials

Government employees or public officials, government agencies, government-owned or controlled entities and facilitated payments often have specific and stringent ethical and legal standards relating to bribery. You should provide nothing of value to government employees unless clearly permitted by law and applicable regulations. Be aware as well that political contributions, charity contributions, donations and sponsoring activities can be used for bribery or corruption purposes.

## 2.2. Gifts and entertainment

We allow commercial business gifts and entertainment that are reasonable in nature, frequency, and cost. Reasonable business gifts and entertainment might include a lunch, dinner, or occasional sporting or cultural event; gifts of nominal value; entertainment at facilities of the company; or authorized transportation in BCD vehicles. Reasonable business entertainment also includes traditional promotional events sponsored by the company.

## 2.3. Money laundering

Money laundering is the process of concealing funds raised from illegal activity and making these funds look legitimate. We neither facilitate nor tolerate money laundering. We must make or receive payments only via authorized processes and channels, and document those payments properly. We'll reject any business transaction which requires any form of money laundering.

## Further information

### Social media

Please refer to our  
Social Media Guidelines

### Information security

Please refer to our  
Global Information  
Security Policy, owned  
by the Corporate  
Security Department.

### Data protection and privacy

Please contact  
Global Legal  
[legal.privacy@bcdtravel.eu](mailto:legal.privacy@bcdtravel.eu)

### Books and records

Please refer to our  
Accounting Handbook.



## 3. 3. Financial integrity

### 3.1. Books and records

Our company's books, records, and accounts must accurately and fairly reflect our transactions in reasonable detail.

We formalize all arrangements with third parties such as distributors, licensees, and suppliers in a written contract or agreement. The contract or agreement must provide a clear description of the services to be performed and/or the products to be delivered. Services and products will be performed and delivered against reasonable fees and/or reasonable prices. We must maintain proper documentation of all contracts and agreements.

### 3.2. Business assets

We don't permit the use of any company assets for an unlawful or improper purpose. Protecting company assets, which specifically include intangible assets such as customer accounts and intellectual property related to business travel service processes and systems, is critical. You are personally responsible for doing so.

#### **Not sure your actions reflect our Code?**

If you're ever uncertain whether or not your behavior or any planned action is in line with this Code, consider the following questions:  
Would I feel comfortable if information about my actions was investigated by law enforcement authorities, competition authorities or other third parties?

*Would I feel comfortable if I saw my actions publicized online, on television or in a newspaper?*

*Would I feel comfortable if I had to explain my actions to my manager?*

*Would my manager or colleagues be following the compliance rules if they acted this way?*

*Would I feel comfortable telling one of my family members about my actions?*

If the answer to any of these questions is "no", you're probably not complying with this Code or should not follow through with your planned action.

If you have a question as to whether any specific conduct is permissible or would like advice on applying our values and rules, you should consult your manager or your local HR contact. If your concerns cannot be addressed locally, please contact [compliance@bcdtravel.com](mailto:compliance@bcdtravel.com).

## Responsibility

Our Executive Board has established and approved this Code. It's your responsibility to ensure you're compliant with it. The Senior Vice President, Global Internal Audit is responsible for revising and updating the Code periodically. HR contacts are responsible for making employees aware of this Code.

### Reporting violations

Infringements of this Code may lead to disciplinary actions. You're strongly encouraged to report misconduct immediately under the terms of our Non-compliance Reporting Policy. BCD prohibits retaliation against anyone who raises a concern or reports misconduct in good faith and with the reasonable belief that the information is true.

Further information about reporting violations can be found in our Non-compliance Reporting Policy.



For further information regarding reporting misconduct,  
please refer to our Non-compliance Reporting Policy.