

# BCD Travel Modern Slavery Statement 2016/17

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by BCD Travel UK & Ireland during year ending 31st December 2016 to prevent modern slavery and human trafficking in our business and supply chains.



BCD Travel has locations in 108 countries



2016 sales of US \$24.6 billion



13,000 creative, committed and experienced staff



BCD Travel are a United Nations Global Signatory, and support the 'ten principles' of the UN Global Compact.



In 2016 BCD Travel earned a gold ranking by EcoVadis, the assessor providing supplier sustainability ratings for global supply chains. We're the only travel management company to achieve the top rating and are in the top one percent of all suppliers.



We regularly perform audits (including ISO 9001, ISO 27001 and Payment Card Industry Data Protection Standard (PCI)) to make sure we comply with best practices, industry regulations, ethical and legal obligations. You may find a list of our ISO certifications and other certifications [here](#).



As part of our commitment to driving human and social value, BCD Travel and the BCD Travel Foundation are proud to support the Haiti Project. Our mission is to offer a high-quality education for children living in extreme poverty in Mirebalais, Haiti, through L'Ecole de Choix (School of Choice).

Global Business Travel Association Awards (GBTA)



BCD Travel won the Sustainability Outstanding Achievement Award in 2014 & 2016

## Introduction

We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue given the rapid rise in global migration, existing in every region in the world and in every type of economy, whether industrialised, developing or in transition. No sector or industry can be considered immune or untainted. BCD Travel has a zero tolerance approach to Modern Slavery of any kind within our operations and supply chain. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

## Our business and supply chains

Our business depends on a reliable, global network of Service Providers - more than 500 companies provide us with services and products.

We expect all suppliers to demonstrate responsible business practices, including sustainable sourcing and protecting human rights.

We aim to fulfil this commitment by seeking relationships with suppliers who 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 ILO Conventions including conventions pertaining to;
  - freedom of association and the right to collective bargaining
  - elimination of all forms of forced or compulsory labour
  - effective abolition of child labour
  - elimination of discrimination with respect to employment and occupation
  - Respect the human rights of all stakeholders in the supply chain

- Provide a safe and healthy workplace to its employees and other partners
- Demonstrate commitment to protect the environment by conserving natural resources, preventing pollution, implementing waste reduction and management programs and minimising its impact on the climate
- Promote diversity and inclusivity
- Maintain transparency and disclose sustainability performance and practices in line with regulations or international practices
- Demonstrate leadership by propagating the sustainability agenda upstream to its own supply chain

A system and process driven approach based on our management systems principles ensures compliance with these standards and demonstrates continual improvement.

BCD Travel looks forward to building sustainable and mutually rewarding partnerships with its supply chain with a view to contribute to its own business governance and that of the people & planet.

## Policies and contractual controls

BCD Travel's internal policies include our Human Rights Policy and our [Supplier Code of Conduct](#) where we confirm that we will not tolerate or condone abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected. We also operate a Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial actions taken.

We have a long-standing approach to Modern Slavery in our service supply chains, reflected in our policies and controls on ethical trading. Policies are developed by subject matter experts, and signed off at Director-level.

All suppliers are required to comply with our [Supplier Code of Conduct](#), and with business-area specific ethical policies, which require them to: participate in ethical trading audits assessments;

- Provide employees with good working conditions, fair treatment and reasonable rates of pay; and
- Respect workers' human rights and comply fully with all applicable laws.

**The above policies also require that:**

All work must be voluntary, and not done under any threat of penalties or sanctions

- Workers must not pay any deposits for work, and employers – whether labour users or recruiters – must not keep original copies of identity documents.
- Indentured labour is prohibited, and workers must be free to leave work at any time, with all salary owed to be paid.

## Supplier diversity

We are strongly committed to using and developing small business suppliers including companies that are owned by women, or minorities, or are based in economically disadvantaged areas.

BCD Travel engage the services of Ecovadis to rate and score our suppliers.

Ecovadis rates a company based on four themes;

- 1.Environment
- 2.Labour practices
- 3.Fair business practices
- 4.Sustainable procurement

The results will allow us to continually improve our supply chain.

This year BCD Travel has amended its standard supplier contractual terms to include obligations on suppliers to: comply with the Modern Slavery Act, conduct regular Modern Slavery risk assessments within their own supply chains, implement appropriate controls to prevent Modern Slavery, and notify BCD Travel immediately if they become aware of any Modern Slavery within their supply chains. Suppliers who breach these obligations will face appropriate actions which could include termination of contracts.

We place importance on the provision of effective remedy wherever human rights abuses occur through company based grievance mechanisms. In the year ahead, we will review how our grievance mechanisms can be strengthened.

## Due Diligence and audits of suppliers and supply chain

We understand that our biggest exposure to Modern Slavery is in our supply chains, where we have undertaken activity recently to minimise the risk of Modern Slavery.

Within these areas, new suppliers are subject to due diligence checks in the form of ethical/compliance audits conducted by or on behalf of BCD Travel. Such audits are also regularly conducted for existing suppliers.

These audits assess compliance with our [Supplier Code of Conduct](#) and are, amongst other things, intended to identify any Modern Slavery practices.

## Supplier standards

We expect our suppliers to uphold the same standards for business conduct we ask of our own employees, as stated in our [Supplier Code of Conduct](#). Building capacity among suppliers to live these values improves environmental and social conditions worldwide.

## Progress towards a sustainable supply chain

We pursue sustainable supply chain management by engaging and doing business with suppliers worldwide in ways that drive affordability and innovation through responsible sourcing and environmental stewardship. The goal is to align our supplier base's social, ethical, environmental, safety and health responsibilities with our own ethical goals and objectives.

## Assessment of Modern Slavery risk within our supply chain

In the past year we have increased our focus on Modern Slavery within our wider business operations, we have mapped our supply chains to assess particular industry/sector and geographical risk. These assessments cover the entire scope of our business, encompassing Travel Operations, Property, Logistics, HR, IT and service supply chains.

## Modern Slavery training

We have trained our key staff in Modern Slavery and human rights using an expert 3rd party consultancy and then used that consultancy to evaluate our existing supply chain.

## Assessment of effectiveness in preventing Modern Slavery

We understand that Modern Slavery risk is not static, and we will continue our leading approach to mitigating this risk in the year ahead.

In order to assess the effectiveness of the measures taken by BCD Travel we will be reviewing the following key performance indicators and reporting on them in future Modern Slavery Statements:

- staff training levels;
- actions taken to strengthen supply chain auditing and verification;
- steps taken to upskill our high risk suppliers, and assessing their ability to detect and mitigate modern slavery risk in supply chains; and
- investigations undertaken into reports of Modern Slavery and remedial actions taken in response.

Signed

Angela Williams

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Vice President, Human Resources BCD Travel UK&IE