



2018  
**sustainability**  
GRI Report

**BCD**  **travel**  
*travel smart. achieve more.™*

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BCD Travel's 2018 Sustainability Report relies upon guidance issued by the Global Reporting Initiative (GRI), the world's most widely used sustainability reporting framework. We report in accordance with GRI 102 General Disclosures. The determination of which GRI aspects are material to our business is a direct result of our core issues assessment. This formal process includes ongoing feedback from internal and external stakeholders. The process and procedures for the data collection and reporting underwent third-party review. Additionally, we report against our alignment with the 10 principles of the United Nations Global Compact and the United Nations Sustainable Development Goals (SDGs).

The GRI reference column shows where you can find more information on each GRI indicator, as well as how the indicators relate to the United Nations Sustainable Development Goals (SDGs) and United Nations Global Compact (UNGC) principles. References are made to our 2018 Sustainability Report, website, 2017 Carbon Verification Statement and other documents as indicated.

## Organizational Profile

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-1	Name of the organization	BCD Travel	Section 2 — Our Company <a href="http://www.bcdtravel.com">www.bcdtravel.com</a>		
102-2	Activities, brands, products and services	BCD Travel helps companies make the most of what they spend on travel. For travelers, this means keeping them safe and productive and equipping them to make good choices on the road. For travel and procurement managers, it means advising them on how to grow the value of their travel program. For executives, we ensure that the travel program supports company objectives. In short, we help our clients travel smart and achieve more. We make this happen in 109 countries with more than 13,500 creative, committed and experienced people. Travel services include: <ul style="list-style-type: none"> <li>• Travel management</li> <li>• Advito (consulting)</li> <li>• Meetings &amp; Events</li> </ul>	Section 2 — Our Company <a href="http://www.bcdtravel.com">www.bcdtravel.com</a>		
102-3	Location of headquarters	Global Headquarters: Utrecht, The Netherlands; Europe: Utrecht, The Netherlands; U.K. & Ireland: London; Americas: Atlanta; Asia Pacific: Singapore	<a href="http://www.bcdtravel.com">www.bcdtravel.com</a>		
102-4	Location of operations	BCD Travel has majority-owned operations in 26 countries and partners in 83 countries.	Section 2 — Our Company		
102-5	Ownership and legal form	BCD Travel is a market leader in the travel industry. The privately owned company was founded in 1975 by John Fentener van Vlissingen. For more information, visit <a href="http://www.bcdgroup.com">www.bcdgroup.com</a> .	Section 2 — Our Company		
102-6	Markets served	Information on markets served is included on the global presence map in the “Our Company” section of the 2018 Sustainability Report.	Section 2 — Our Company		8



## Organizational Profile

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-7	Scale of the organization	BCD Travel has 13,500 employees with majority-owned operations in 26 countries and partners in 83 countries. BCD Travel's 2017 annual sales revenues was USD 25.7 billion.	Section 2 — Our Company		
102-8	Information on employees and other workers	In 2017, 70.2% of BCD Travel's global employee base was female and 29.8% male.	Section 5 — Workplace Practices	6	
102-9	Supply chain	BCD Travel has more than 1,000 active suppliers in 100 countries. Of those, 81% provide services, 19% are manufacturers, and 8% of active suppliers are small businesses.	Section 7 — Sustainable Procurement		
102-10	Significant changes to the organization and its supply chain	BCD Travel acquired majority ownership in Poland in October 2017.	<a href="https://www.bcdtravel.com/get-to-know-us/news-releases/">https://www.bcdtravel.com/get-to-know-us/news-releases/</a>		
102-11	Precautionary principle or approach	BCD Travel has a rigorous compliance program in place. We hold accreditations for ISO 9001 (Quality), ISO 27001 (Information Security), ISO 14001 (Environment). Our OHSAS 18001 (Health & Safety) management system was implemented in 2016.  Compliance with these accreditations forms part of our approach to understanding and reducing risk for both our internal and external stakeholders.  Additionally, BCD Travel supports the UN Global Compact's 10 principles, which include the precautionary principle, based on which we have integrated risk assessments into central processes such as our supply chain and data center operations.	Section 4 — Governance, Ethics & Compliance  Section 5 — Workplace Practices  Section 6 — Environment  Section 7 — Sustainable Procurement	7	



## Organizational Profile

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-12	External initiatives	BCD Travel endorses its businesses' certification to ISO 14001, OHSAS 18001, and other external Environment, Safety and Health (ESH) standards and initiatives. In 2016, a management system in compliance with OHSAS 18001 and ISO 14001 standards was implemented in all global locations. Our offices located in the European Union are in accordance with Article 8 of the Energy Efficiency Directive.	Section 5 — Workplace Practices  Section 6 — Environment		17
102-13	Membership of associations	<p>DRV &amp; VDR – BCD Travel Germany is a member of the DRV (Deutsche Reise Verband 'German Travel Association') and of the VDR 'Association for German Business Travel.'</p> <p>Additional memberships include:</p> <ul style="list-style-type: none"> <li>• ACTE – Association of Corporate Travel Executives (Chairman's Circle Partner)</li> <li>• GBTA – Global Business Travel Association</li> <li>• AFTA – Association of Finnish Travel Agents</li> <li>• American Chamber (Singapore)</li> <li>• ANVR – "Algemene Nederlandse Vereniging van Reisbureaus" (Dutch association of travel organizations)</li> <li>• BATM – Belgian Association of Corporate Travel Management</li> <li>• BECI – Brussels Enterprises Commerce and Industry</li> <li>• BME – Bundesverband Materialwirtschaft, Einkauf und Logistik (DE)</li> <li>• Business network (SE)?</li> <li>• Chamber of Commerce (SE)</li> <li>• DBTA – Danish Business Travel Association</li> <li>• DRF – Danish Travel Agency Association</li> <li>• Dutch Chamber (Singapore)</li> <li>• FBTA – Finnish Business Travel Association Femmes du Tourisme (FR)</li> <li>• Glomex (NE)</li> <li>• LATM (LUX)</li> <li>• Marco Polo (FR)</li> <li>• Marknadsföring i Göteborg (MIG), (SE)</li> </ul>			17



## Strategy

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-14	Statement from senior decision maker	Refer to the “Leadership Perspective” section of the 2018 Sustainability Report.	Section 1 — Leadership Perspective		
102-15	Key impacts, risks and opportunities	Refer to the “Leadership Perspective” section of the 2018 Sustainability Report.	Section 1 — Leadership Perspective		

## Ethics & Integrity

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-16	Values, principles, standards and norms of behaviour	BCD Travel has a history of ethical conduct and anti-corruption controls. Our sustainability principles have been in place since 2007 and our Code of Conduct since 2014. Both documents apply to all employees and board members. They outline our policies and expectations for: human rights, labor standards, environmental stewardship, information security, ethical business practices, and health and safety.	Section 4 — Governance, Ethics & Compliance	1, 2, 6 & 10	
102-17	Mechanisms for advice and concerns about ethics	BCD Travel has a Non-Conformance Reporting Policy and a last resort reporting system, the SpeakUp system, in place.	Section 4 — Governance, Ethics & Compliance	1, 2 & 10	



## Governance

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-18	Governance structure	<p>The sustainability executive committee is comprised of five members of the global executive team and representatives from functions relevant to our sustainability initiative. During 2017, the committee met four times to discuss strategy and to oversee efforts in the areas of human rights, environmental stewardship, employee health and safety, ethical business practices, information security, community initiatives, diversity and inclusion, and equal opportunity employment.</p> <p>The committee monitored the company's compliance with related laws and regulations and adherence to our internal Code of Conduct.</p> <p>The company's highest executive governance body, the executive team, governs and guides corporate-wide sustainability objectives.</p>	Section 3 — Our Approach		
102-19	Delegating authority	Senior vice president, global internal audit	Section 4 — Governance, Ethics & Compliance		
102-20	Executive-level responsibility for economic, environmental and social topics	Executive vice president, global program management and executive chair of sustainability.	Section 1 — Leadership Perspective Section 4 — Governance, Ethics & Compliance		10, 13, 14 & 15
102-21	Consulting on economic, environmental and social topics	BCD Travel engages with industry stakeholders and local office community programs.	Section 4 — Governance, Ethics & Compliance		
102-22	The composition of the highest governance body and its committees	Global executive team	Section 4 — Governance, Ethics & Compliance		



## Governance

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-23	Chair of the highest governance body	John Snyder- President and chief executive officer	Section 4 — Governance, Ethics & Compliance		
102-24	Nominating and selecting the highest governance body	Global executive team	Section 4 — Governance, Ethics & Compliance		5
102-25	Conflicts of interest	All BCD Travel employees are expected to behave with integrity and in compliance with our Code of Conduct at all times. We embed accountability for conflicts of interest in corporate policies; employee training; and transparent, stakeholder-focused reporting.	Section 4 — Governance, Ethics & Compliance	10	
102-26	Role of highest governance body in setting purpose, values and strategy	The global executive team has overall responsibility for BCD Travel’s strategy, including identifying risks and opportunities.	Section 4 — Governance, Ethics & Compliance	1, 7 & 8	
102-27	Collective knowledge of highest governance body	The global executive team has overall responsibility for BCD Travel’s strategy, including identifying risks and opportunities.	Section 4 — Governance, Ethics & Compliance		
102-28	Evaluating the highest governance body’s performance	The sustainability executive committee’s performance is reviewed by the global executive team and the global internal audit team.	Section 4 — Governance, Ethics & Compliance		
102-29	Identifying and managing economic, environmental and social impacts	We solicit and use feedback from employees, customers, investors, analysts, community leaders, suppliers, regulators and non-governmental organizations to inform our sustainability agenda and broader business strategy.	Section 4 — Governance, Ethics & Compliance	1, 2, 7, 8, 9 & 10	3, 5, 6, 7, 8, 9, 12, 13, 14 & 15





## Governance

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-30	Effectiveness of risk management processes	The risk management process is defined and reviewed by the global executive team and the global internal audit team.	Section 4 — Governance, Ethics & Compliance	1, 2, 7, 8, 9 & 10	3, 5, 6, 7, 8, 9, 12, 13, 14 & 15
102-31	Review of economic, environmental and social impact	Economic, environmental and social impact is reviewed by the director of sustainability and the sustainability executive committee on a quarterly basis.	Section 4 — Governance, Ethics & Compliance	1, 2, 7, 8, 9 & 10	3, 5, 6, 7, 8, 9, 12, 13, 14 & 15
102-32	Highest governance body's role in sustainability reporting	The executive vice president of global program management and executive chair of sustainability formally reviews and approves our sustainability report and ensures that all material topics are covered.	Section 4 — Governance, Ethics & Compliance		
102-33	Communicating critical concerns	BCD Travel's process for communicating critical sustainability concerns to the highest governance body is based on our strategic management approach.	Section 4 — Governance, Ethics & Compliance	1 & 10	3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 & 17
102-34	Nature of total number of critical concerns	We do not report the nature and number of critical concerns due to confidentiality considerations.	Section 4 — Governance, Ethics & Compliance		6, 7, 8, 9, 10, 11, 12, 13, 14 & 15
102-35	Remuneration policies	We do not report this information due to its confidentiality.			
102-36	Process for determining remuneration	We do not report this information due to its confidentiality.		10	8
102-37	How stakeholders' views are sought and taken into account regarding remuneration	We do not report this information due to its confidentiality.			8



## Stakeholder Engagement

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-40	List of stakeholder groups	We solicit and use feedback from employees, customers, investors, analysts, community leaders, suppliers, regulators and non-governmental organizations to inform our business strategy.	Section 4 — Governance, Ethics & Compliance		10
102-41	Collective bargaining agreements	Thirty percent (30%) of BCD Travel employees are covered by an EMEA workers council and local workers councils which include collective bargaining agreements.	Section 4 — Governance, Ethics & Compliance		8
102-42	Identifying and selecting stakeholders	This is determined by regularly reviewing BCD Travel's interested parties.	Section 4 — Governance, Ethics & Compliance		
102-43	Approach to stakeholder engagement	<p>We have a diverse range of stakeholders, including our customers and their travelers, travel industry groups, charities, sustainability groups and BCD staff.</p> <p>We engage our stakeholders around the globe in our planning and strategic development, to make sure our business direction reflects the proper priorities and business travel industry best practices. Our local markets play an important role in forming relationships with local stakeholders.</p> <p>We use a wide range of methods to reach our stakeholders, including focus groups, workshops, formal research and the myriad of conversations which take place between our staff, partners and customers on a daily basis.</p>	Section 4 — Governance, Ethics & Compliance		11
102-44	Key topics and concerns raised	Risk & opportunity assessments consider both our organization-wide strategic, operational, compliance, and reporting requirements, and those requirements relating to our services, processes, or functions such as supply chain, or regulatory compliance.	Section 4 — Governance, Ethics & Compliance		11



## Reporting Practice

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
102-45	Entities included in the consolidated financial statements	BCD Travel refers to BCD Travel and its operating units Advito and BCD Meetings & Events.	Section 2 — Our Company		
102-46	Defining report content and topic boundaries	We have prepared our sustainability reports in accordance with the GRI Standards.			
102-47	List of material topics	We have prepared our sustainability reports in accordance with the GRI Standards.			
102-48	Restatements of information	We have prepared our sustainability reports in accordance with the GRI Standards.			
102-49	Changes in reporting	BCD Travel has used the new GRI structure for company reporting for the first time.			
102-50	Reporting period	Reporting period is 1st January 2017-31st December 2017	Inside front cover		
102-51	Date of most recent report	2018			
102-52	Reporting cycle	Annually- 1st January-31st December	Inside front cover		
102-53	Contact point for questions regarding the report	Sharon Dirks- Director of sustainability	Back cover		
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option.	Inside front cover		
102-55	GRI content index	Enclosed within this report.	2018 GRI Report		
102-56	External assurance	An external verification audit was performed.	Section 10 — Sustainability Reporting		



## Economic Performance

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
103-01	Management Approach Disclosures	As part of its management and governance approach, BCD Travel carries out a risk assessment of each material aspect applicable.	Section 4 — Governance, Ethics & Compliance	6, 10	8
201-1	Direct economic value generated and distributed	BCD Travel is a privately held company and does not report its financial results publicly. The company's 2017 sales totaled USD 25.7 billion.	Section 2 — Our Company	10	8
201-2	Financial implications and other risks and opportunities due to climate change	BCD Travel reviews climate change risks as part of our risk management process.	Section 4 — Governance, Ethics & Compliance	4	13
201-3	Define benefit plan obligations and other retirement plans	BCD Travel is a privately held company and does not disclose this information.			
201-4	Financial assistance received from the Government	BCD Travel does not receive tax credits or other government financial assistance.			

## Indirect Economic Impacts

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
203-1	Infrastructure investment & services supported	BCD Travel invests heavily in technology infrastructure. This does not have an impact on the local communities or environments in which we work.	Section 6 — Environment		
203-2	Significant indirect economic impacts	Through improvement of our technology infrastructure there has been no negative direct economic impacts on local staff or their communities.	Section 8 — Service Performance		1, 2, 4 & 17



## Energy

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
302-1	Energy consumption within the organisation	BCD Travel reports their energy consumption details in the “2017 Carbon Verification Statement.” We report our energy reduction goals and performance in the “Environment” section of the 2018 Sustainability Report.	Section 6 — Environment  2017 Carbon Verification Statement	8	12
302-3	Energy intensity	BCD Travel reports energy usage intensity measures indexed to revenues and full-time employees.	Section 6 — Environment  2017 Carbon Verification Statement	8	12
302-4	Reduction of energy consumption	We also report energy intensity metrics in the “2017 Carbon Verification Statement”: metric tons CO <sub>2</sub> e/m <sup>2</sup> of office space, metric tons CO <sub>2</sub> e/employees.	Section 6 — Environment  2017 Carbon Verification Statement	8, 9	13
302-5	Reductions in energy requirements of products and services	BCD Travel achieved a 33.5% reduction year on year due to the virtualization of our hosted environment which supports many of our client services.	Section 6 — Environment	8, 9	12

## Emissions

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
305-1	Direct (Scope 1) GHG emissions	BCD Travel reports scope 1 emissions, including a breakdown by energy source, in the “2017 Carbon Verification Statement.”	Section 6 — Environment  2017 Carbon Verification Statement	8, 9	12, 13
305-2	Energy indirect (Scope 2) GHG emissions	BCD Travel reports scope 2 emissions, including a breakdown by energy source, in the “2017 Carbon Verification Statement.”	Section 6 — Environment  2017 Carbon Verification Statement	8, 9	12, 13



## Emissions

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
305-3	Other indirect (Scope 3) GHG emissions	BCD Travel reports scope 3 emissions in the “2017 Carbon Verification Statement.”	Section 6 — Environment  2017 Carbon Verification Statement		
305-4	GHG emissions intensity	BCD Travel reports energy usage intensity measures indexed to revenues and full-time employees.  We report energy intensity metrics in the “2017 Carbon Verification Statement”: metric tons CO2e/revenue, metric tons CO2e/ employees.	2017 Carbon Verification Statement	8, 9	12, 13
305-5	Reduction of GHG emissions	The driving factors behind our approach to resource efficiency are: - Reduced energy use - Efficient use of technology  In 2017, we reduced our data center carbon emissions by 337.20 metric tons of carbon dioxide – the equivalent of planting 900 trees and taking 200 cars off the road.	Section 6 — Environment	7,8, 9	12, 13
305-7	Nitrogen oxides (Nox), Sulphur oxides (Sox) and other significant air emissions	Not applicable to BCD Travel.			



## Supplier Environmental Assessment

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
308-1	New suppliers that were screened using environmental criteria	<p>BCD Travel has been working during the reporting period to factor sustainability criteria into the buying of goods and services. This process faces challenges, including changing the cultural mindset beyond only conventional cost, quality and delivery factors.</p> <p>Additionally, some suppliers may resist providing information on internal practices. Our RFI and RFP documents include our Supplier Code of Conduct, explain our sustainable supply chain management objective, and invite suppliers to partner with us to raise standards and drive responsible growth.</p>	<p>Section 7 — Sustainable Procurement</p> <p>Supplier Code of Conduct</p>	8	12
308-2	Negative environmental impacts in the supply chain and actions taken	<p>BCD Travel does not track specific information on the environmental impacts across our supply chain. We have taken measures to mitigate such a future environmental impact. Our Supplier Code of Conduct contains a section on the Environment. We expect our suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.</p> <p>In 2017, we assessed partners and suppliers using the EcoVadis Corporate Platform and other assessment methods.</p>	<p>Section 7 — Sustainable Procurement</p> <p>Supplier Code of Conduct</p>	8	12



## Non-Discrimination

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
406-1	Incidents of discrimination and corrective actions taken	BCD Travel recorded zero incidents of discrimination in 2017.		1, 2, 6	5, 8

## Human Rights Assessment

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
412-1	Operations that have been subject to human rights reviews or impact assessments	One hundred percent (100%) of BCD Travel's operations have been assessed to ensure compliance with both global and local human rights legislation, supporting Principles 1 & 2 of the UN Global Compact.	Section 3 — Our Approach		

## Occupational Health & Safety

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
403-1	Workers' representation in formal joint management worker health and safety committees	<p>Approximately 12% of employees in BCD Travel's 26 wholly owned countries are represented on various safety committees and teams.</p> <p>BCD Travel has implemented an accredited OHSAS 18001 Health &amp; Safety management system that defines our processes to identify, evaluate and control workplace hazards. Safety representatives participate in a variety of activities to promote and improve workplace safety, including site safety auditing to identify and address unsafe acts and conditions; attendance at regularly scheduled committee meetings; reviewing injury data in an effort to identify trends and determine corrective actions; and ongoing safety awareness communications regarding workplace hazards and procedures.</p>	Section 5 — Workplace Practices	1, 3	3, 8





## Occupational Health & Safety

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
403-2	Types of injury and rates of injury, occupational diseases, lost days and absenteeism, and number of work related fatalities	<p>BCD Travel tracks injury rates in accordance with United States Occupational Safety and Health Administration protocol. We do not report the metrics by the breakdown described in this indicator (gender, region). We continue to analyze and target injury reduction activities based on frequency and occurrence across the company. In the reporting period, we tracked a Recordable Rate of 0, a Day Away Case Rate of 0, and a Severity (Lost Days) Rate of 0.</p> <p>Each rate is calculated per 100 employees, working 40 hours per week for 50 weeks per year. Metrics include all BCD Travel facilities, which account for 100% of all employees.</p>		1	3, 8

## Training and Education

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
404-2	Programs for upgrading employee skills and transition assistance programs	BCD Travel's learning and development programs are available through the online training system Knowledge Hub, in classrooms, via web conference, self-paced online courses, and self-study opportunities. We also provide employees with programs and publications from external vendors.	Section 5 — Workplace Practices		4, 8
404-3	Percentage of employees receiving regular performance and career development reviews	BCD Travel has a comprehensive performance appraisal and career development process that reaches 100% of our active, exempt, and non-represented employees.	Section 5 — Workplace Practices		8



## Diversity & Equality Opportunity

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
405-1	Diversity of governance bodies and employees	<p>Diversity and Inclusion are priorities for BCD Travel. In a number of countries, Governance bodies include Workers Council's.</p> <p>Refer to the "Workplace Practices" section of our 2018 Sustainability Report for a breakdown of employees per employee category according to gender, numbers working from home, and overall satisfaction.</p>	Section 5 — Workplace Practices	1, 6	5, 8

## Supplier Social Assessment

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
414-1	New suppliers that were screened using social criteria	More than 85% of all partners and suppliers have signed our Supplier Code of Conduct which includes human rights clauses.	<p>Section 7- Sustainable Procurement</p> <p>Supplier Code of Conduct</p>		12
414-2	Negative social impacts in the supply chain and actions taken	<p>BCD Travel is not aware of any actual or potential negative human rights impacts in the supply chain. We have taken measures to prevent such an impact. We include our Supplier Code of Conduct in global supplier contracts and partner agreements. We comply with U.S. government regulations on trafficking in persons (e.g., FAR 52.222-50) and child labor and with the United Kingdom's Modern Slavery Act. Our Supplier Code of Conduct contains an explicit section on Human Rights. We will never knowingly do business with suppliers who engage in human rights violations.</p>	<p>Section 7- Sustainable Procurement</p> <p>Supplier Code of Conduct</p>		12



## Anti-Corruption

GRI Standard Number	Indicator Name	Indicator Response	Reference	UNGC Principles	UN SDGs
205-1	Operations assessed for risks related to corruption	BCD Travel assesses all its businesses and partner companies for risks related to corruption.	Section 4 — Governance, Ethics & Compliance	10	
205-2	Communication and training on anti-corruption policies and procedures	<p>The Code of Conduct applies to all BCD Travel employees and defines clear policies and expectations in areas that include preventing corruption.</p> <p>Mandatory business conduct compliance training, including anti-corruption, is provided to all employees on a bi-annual basis. Training comprises three modules: the Code of Conduct, Non-Compliance Reporting Policy and the last resort reporting tool, the SpeakUp system.</p>	Section 4 — Governance, Ethics & Compliance	10	

