

2024 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 2024.

Introduction

BCD Travel helps companies travel smart and achieve more. We drive programme adoption, cost savings and talent retention through digital experiences that simplify business travel. Our 15,000+ 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

We adhere to local labour laws and pay our employees at least the legal minimum wage in all countries where we operate. We offer competitive pay and benefits to support our workforce.

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 also undertake an annual EcoVadis assessment, which includes analysis of our human rights practices and labour standards, amongst other key criteria.

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, which outlines a formal process for reporting non-compliance.

This process is communicated to all employees and suppliers to ensure that both our employees and wider value chain can raise ethical concerns. In 2024, our compliance programme continued to encompass 100% of our majority-owned countries, with 99% of our global employee base completing our Code of Conduct training.

Our supply chain

With evolving sustainability legislation, reporting requirements and stakeholder expectations, integrating ethical and social best practices in global procurement processes is increasingly important.

At BCD, sustainable procurement is about creating value for all stakeholders by integrating ethical, environmental and social criteria into our procurement practices. We collaborate with suppliers who adhere to responsible business practices, ensuring sustainability and alignment with our core values.

Our business depends on a reliable, global network of service providers. The majority of our direct suppliers are U.K. 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 therefore 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. As such, 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.

Our sustainable procurement approach incorporates processes to assess supplier compliance, performance and manage remediation within our supply chain (further details provided later in this statement).

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 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).

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.

Policies and contractual controls

We recognise that all positive action around preventing, identifying and minimising instances of modern slavery must start with explicit policies, guidelines and controls. This is why our Supplier Code of Conduct clearly sets the standards expected from our supply chain partners, covering ethical business practices, human rights, labour standards, privacy and environmental protection. We expect our suppliers to uphold these principles within their own supply chains and conduct business activities in full compliance with applicable laws and regulations.

In 2024, 97% of our top-spending suppliers either signed our Supplier Code of Conduct or demonstrated alignment with their own codes of conduct. Our Supplier Code of Conduct 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. It outlines key company policies and expectations on:

- **Ethical business practices**, including corruption and bribery, business integrity, conflict of interest, money laundering, fair compensation and anti-trust and trade sanctions.
- **Privacy and security**, including personal data processing.
- **Human rights, including child labour**, freely chosen employment, wages and benefits, working hours, health and safety, diversity and inclusion and freedom of association.
- **Environmental protection**, including legal compliance, reduction of waste and measurement of carbon emissions.
- **Non-compliance reporting and assurance**: This includes our non-compliance reporting process, the anonymous SpeakUp System, and the right to request additional information from suppliers concerning compliance efforts, such as self-assessment questions and on-site third-party audits.

The independently operated BCD Travel SpeakUp system offers our employees and suppliers the opportunity to anonymously report any misconduct in their native language, 24 hours a day. A compliance email account is also monitored by BCD's Internal Audit function and Legal department. All reported incidents are investigated and the results are reviewed by a designated member of the BCD Travel Board responsible for compliance.

Managing supplier risk

BCD's governance framework includes sustainable procurement policies that ensure our supply chain partners comply with our sustainability goals and meet all legal responsibilities.

By integrating ongoing risk management, we create a resilient environment that supports our long-term objectives. This is supported by a third-party risk management tool that enables comprehensive analysis through both abstract and concrete risk evaluations.

Supplier due diligence

Our three-step procurement process ensures supplier alignment with our sustainability goals and ethical standards through due diligence, ongoing performance monitoring, and corrective actions for non-compliance. This approach promotes accountability and continuous improvement across our supply chain. Our process includes:

1. **Supplier compliance and onboarding** - We expect all BCD suppliers to adhere to our Code of Conduct as part of their contractual obligations. This includes our human rights standards on anti-slavery, human trafficking and forced labour. Suppliers are invited to complete self-assessment questionnaires during onboarding to assess their risk profile and ESG maturity level.
2. **Performance and assurance** - Our due diligence framework encompasses a broad spectrum of ESG topics, including assessments on human rights with specific questions addressing modern slavery and forced labour, ensuring ongoing alignment with sustainability standards. We establish and monitor Key Performance Indicators (KPIs) to track compliance and ensure effective risk management.
3. **Remediation and corrective actions** - We have an established process to engage suppliers in cases where risks or violations of human rights are identified. This includes a detailed plan with corrective actions and clear timeframes to be signed by suppliers agreeing to immediate action. Significant risks are escalated to our Strategic Sourcing and wider functional teams, including Legal where required, for further evaluation and potential disengagement.

We monitor key KPIs to enable us to maintain transparency, accountability and long-term sustainability across our supply chain. These include:

- Number of suppliers that have signed our Code of Conduct.

- Number of suppliers that have completed supplier questionnaires.
- The number of companies flagged for potential risks.
- Changes in risk categorisation based on supplier questionnaire results.

We also integrated a new due diligence tool in Q4 2024, maintaining our evaluation of the top 35 suppliers based on annual expenditure. In 2025, we'll refine our targets to enhance our process and broaden our due diligence efforts.

Training and awareness

Human trafficking remains a pressing global issue, profoundly affecting countless lives. With resources like the Global Slavery Index, which give the broadest and most accurate reported data and insights on modern slavery to date, we know this global issue continues to grow in both magnitude and complexity. In response, we sustained our unwavering commitment to combating this crisis through our training and awareness initiatives throughout 2024.

BCD believes it is imperative to act on this issue using our platform as a leading and established travel management company within the corporate travel industry. We're uniquely positioned to raise awareness with our employees, travellers and partners about human trafficking and child exploitation, and the role our industry can play in combating it.

Human traffickers often exploit air and rail travel to move victims between cities and countries, and frequently use hotels as locations for trafficking or abuse. BCD is committed to educating and empowering corporate travel managers and travellers to combat this growing issue.

If every traveller can recognise the signs of human trafficking and know how to safely report potential incidents, we can collectively help end the commercial and sexual exploitation of human beings.

This commitment is driven by BCD's human trafficking awareness committee. Launched in 2017, the role of the committee is to develop and implement initiatives that allow BCD to act and grow our positive impact around the issue of human trafficking.

Committee members 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, focuses initiatives around three goals: educate, engage, and partner. All efforts are aimed at ending human trafficking and the sexual exploitation of children.

TAKE ACTION, GROW OUR IMPACT

To continue to grow our impact around the issue of human trafficking, our goals are to Educate, Engage and Partner.



Since 2017, huge strides have been made, from signing the agreement with ECPAT and The Code in 2017 to launching an education and awareness strategy.

We encourage our employees and industry peers to support BCD's initiatives and our partners A21 and ECPAT, continue learning with the resources that BCD promotes and amplify our voice to educate more people on how to safely report signs of human trafficking. Concentrating on these objectives allowed us to focus our positive impact on this issue in the following ways over the past year:

- Supported key campaigns that address this issue, including National Human Trafficking Prevention Month and UN World Day Against Trafficking in Persons, as well as the A21 Walk For Freedom.
- For the second consecutive year, we organised a human trafficking awareness and education session at United Airline's World Business Centre at Heathrow Airport in partnership with United and A21.
- Achieved 97% completion on our human trafficking awareness training.
- Conducted client awareness sessions.
- Worked closely with A21 to integrate one of their child-focused U.K. projects into our Making a Difference programme. This includes supporting the hosting of online prevention education resources and e-courses so they're made available to vulnerable children in the U.K. The project also helps parents, educators and youth workers receive training on how to recognise and report potential human trafficking and online exploitation cases.
- Were recognised as one of the EPCAT top members for 2024, in honour of our commitment to combating child sexual exploitation.

Partnerships

In 2017, we established a global partnership with ECPAT (known as PACT in the U.S.), followed by a partnership with A21 in 2020. Our commitment to these organisations is to raise awareness through education and training for our employees, suppliers, partners and clients worldwide.

ECPAT

ECPAT is the leading international organisation seeking to end children's commercial sexual exploitation through awareness, advocacy, policy and legislation. The sexual exploitation of children in the context of travel and tourism (SECTT) has continued to thrive globally, with child sex offenders using the infrastructure of the industry, increasingly combined with online technologies, to commit their crimes. This can change only if we actively take steps to fight this crime.

BCD 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.

We undertake annual reporting to The Code which provides a framework for tracking progress, as well as supporting ECPAT through awareness and fundraising initiatives throughout the year. We also promote PACT (by ECPAT-USA), a human trafficking awareness free online training developed specifically for travel professionals.

A21

A21 combats modern-day slavery by working to Reach, Recover and Restore lives. They have many different education programmes and initiatives, as well as 24/7 confidential hotlines, child advocacy centres, professional training, victim identification operations, legal aid representation and much more. We work closely with A21 on key initiatives, including their annual Walk For Freedom and promoting their education tools and 'Can You See Me?' campaigns.

Key partnership initiatives in 2024 included:

Walk For Freedom - BCD employees once again showed unwavering support for the A21 Walk For Freedom in 2024. The A21 Walk For Freedom is a day of global awareness and local action in the fight against human trafficking. Their aim is to reduce vulnerability locally by empowering neighbours, friends, and communities to identify and report trafficking suspicions. With 2024 being the event's 10th anniversary, we ran a global campaign to promote the walk to our employees, as well as providing alternative resources if they could not attend. In support of our partnership with A21, BCD people took to the pavements across regions.

Human Trafficking Awareness Session - For the second consecutive year, BCD hosted a human trafficking awareness and education session at United Airlines' World Business Centre at Heathrow Airport, in partnership with United Airlines and A21. The session provided attendees with insights into the realities of human trafficking and equipped them with the tools to recognise and respond to suspicious activities. Highlights from the session included an introduction to the A21 'Can You See Me?' campaign, real-life scenarios, breaking down misconceptions and BCD's commitment to change.

Mandatory training - In 2024, we achieved 97% completion on our human trafficking awareness training. This training underscores our commitment to raising awareness about human trafficking, including key information around how to spot the signs of potential cases and safely report, as well as signposting key resources from our partners A21 and ECPAT.

ECPAT Top Member - ECPAT and The Code named BCD Travel as one of their Top Members for 2024 for our commitment to combating child sexual exploitation. The Code measured us against six criteria and commended our serious commitment to implementing all of these areas, specifically calling out our alliances and efforts to prevent human trafficking. We were invited to speak at an ECPAT webinar, where we presented insights on how BCD has used our global reach and industry-leading status to build alliances and educate companies, suppliers, business travellers and our employees. With over 110 participants, this was another opportunity to share best practices on this issue.

In summary:

Our commitment to preventing modern slavery

We have determined that increasing education and raising awareness about modern slavery are the areas where our organisation can drive the most significant impact. Recognising the continuous risks associated with modern slavery, we are committed to mitigating these risks by adopting and implementing best practices across our operations in the coming year. This includes:

- Enhance staff awareness through mandatory training and additional opportunities to engage in global events.
- Maintain a strong focus on education and awareness initiatives led by the human trafficking awareness committee.
- Collaborate closely with key partners, such as A21 and ECPAT, by sharing updates, campaigns, and client awareness materials on the human trafficking awareness committee's intranet hub.
- Continue investigating all reported instances of modern slavery and ensure appropriate remedial actions are implemented.

BCD TRAVEL (UK) DIRECTORS



Michèle Lawley
President, Europe



Laura Everitt
Chief Financial Officer, UK and 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 2024.

27 June 2025