

MODERN SLAVERY ACT STATEMENT 2020

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 chains during the year ending 31 December 2020.



Global presence in 109 countries



2019 sales of US \$27.5 billion



13,800 creative, committed and experienced staff



Investors in People Silver Level Accreditation (through 2020)



Joined the United Nations Global Compact in 2008 in support of its 10 principles.



Support of the 17 UN Sustainable Development Goals to end poverty, protect the planet and improve the lives of those in need.



Annual audits, including ISO 9001, ISO 14001, ISO 45001, ISO 27001 and Payment Card Industry Data Protection Standard (PCI). To make sure we comply with best practices, industry regulations, ethical and legal obligations. A list of our ISO certifications and other certifications can be found [here](#).



Global Freedom Summit



Updated and Refreshed our Internal Awareness Branding

Supplier standards

We expect our suppliers to uphold the same standards for business conduct we ask of our own employees.

All of our suppliers are required to adhere to our ethical business principles. 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.

Introduction

At BCD Travel, we recognize 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 supply chain. We accept that all members of our supply chain must be alert to the risks of modern slavery, however small, and be able to act upon them.

BCD employees are expected to report any concerns using the appropriate channels, and our management is required to immediately and effectively act upon them.

Our business and supply chains

Our business depends on a reliable, global network of service providers. We expect all of our 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 and the 10 principles of the UN Global Compact.

A policy and process-driven approach ensures compliance with these standards and demonstrates continual improvement.

Policies and contractual controls

In 2020 we incorporated a Diversity & Inclusion Charter into our Global Set of Group Policies, to reflect the growing appetite for better awareness and socialization of this important movement towards greater equality for all.

Our Global Harassment Policy and Code of Conduct were also reviewed and updated in line with our annual global governance process to reflect our revised company values: Solve it Together; Act with Purpose; Do What's Right; Give your Best and Feed the Future.

We also identified the 10 most pertinent UN Sustainable Development Goals to our organization and prioritised these as documented in our Sustainability Report <https://www.bcdtravel.com/sustainability/>

Due diligence and assessment of modern slavery risk within our supply chain

Annually, we undertake an audit of our Key Suppliers through a third-party consultancy, to ensure integrity and complete transparency in the process. In 2020, due to the impact of Covid-19 on the travel industry and our business, we did not undertake our usual audit process. However, our top 30 suppliers were audited by third parties with:

- ✓ 27% achieving a gold or silver rating by EcoVadis
- ✓ 40% are listed on the DJSI (Dow Jones Sustainability Index)
- ✓ 30% received a sustainability rating by other third-parties

Additionally, in 2020, as part of our Sustainable Procurement and Compliance approach, a total of 193 requests for security risk assessment (SRA) were reviewed and processed by our risk management team. More than 90% of our top 30 suppliers were reviewed for information security compliance.

All historical supplier contracts managed by the global procurement team have all been updated to include our Supplier Code of Conduct. To date, 88% of all suppliers have signed the document.

Sustainability improvement

- ✓ BCD Travel improved its EcoVadis Gold rating to Platinum and its overall position in the top 1 percent of all suppliers assessed.
- ✓ We were named a 2020 top company for remote work by FlexJobs, an online resource for professionals seeking telecommuting, flexible schedules and part-time work. BCD is one of only 20 companies to have made FlexJobs' list every year since 2014.
- ✓ We achieved a Gold Award for our mobile Travel App which supports business travelers on the move and keeps them informed so that they can travel safe and achieve more with smart notifications.
- ✓ The health and safety of our employees particularly with Covid-19 impacts was a priority and we launched a Wellbeing platform on our intranet to share and disseminate employee support information and best practices for both working staff and those furloughed.
- ✓ We also consolidated our property portfolio and supported many of our staff to move to a virtual or hybrid model, enhancing work-life balance and reducing environmental impacts from carbon travel and waste.

The code

We are a member of The Tourism Child Protection Code of Conduct (The Code) and ECPAT, and received recognition as a Top Member, as one of the 4 new entrants into their top 20 achievers for "our exceptional work to integrate child protection practices into our business".

Training and awareness

- ✓ In 2020, our Human Trafficking training program was mandated globally and achieved a 92% completion rate.
- ✓ In October we hosted a series of live calls as part of A21's first Global Freedom Summit – a one day social justice event to equip, train and mobilize people to play their part in abolishing modern day-slavery right where they are. Around 1,400 BCD staff attended this virtual Summit.
- ✓ We refreshed our marketing and branding around human trafficking awareness to ensure it remains current, at the front of our peoples' minds and instantly recognizable.
- ✓ Following an initial trial in 2019, we also have a compulsory health and safety course which all staff must complete now as part of our annual ISO certification programme.

Assessment of effectiveness in preventing Modern Slavery

We recognize that there will continue to be modern slavery risks and to mitigate them in our business, we shall continue to identify, adopt and implement best practices in the following areas in the year ahead:

- ✓ Staff awareness levels through continued mandated training and opportunities to participate in wider global events
- ✓ Actions to strengthen auditing and verification of our supply chain
- ✓ Steps to educate any suppliers deemed to be high-risk and enhance their ability to detect and mitigate modern slavery risk in their supply chains
- ✓ Investigations into any reports of Modern Slavery and remedial actions taken in response.



Michèle Lawley

Managing Director
UK & Ireland Region



Mike Walley

President
UK & Ireland Region

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 2020.