

2023 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 2023.

Introduction

BCD Travel helps companies travel smart and achieve more. We drive program 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 and supply chain

Due to the nature of our business, we are at low risk of employing victims of child labour, forced labour, modern slavery or human trafficking in our own operations. We adhere to local labour laws and pay our employees at least the legal minimum wage in all countries where we operate. 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 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.

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 seek business relationships that are built on trust, respect and shared values. We select suppliers who meet our business and commercial requirements. It's also important that our suppliers demonstrate responsible business practices based on ethical, environmental and social criteria.

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 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 International Labour Organisation (ILO) Conventions, the 10 principles of the UN Global Compact (UNGC) and the UN Sustainable Development Goals (SDGs).

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

Policies and contractual controls

As new sustainability legislation is implemented, and stakeholder requirements evolve across the supply chain, the importance of integrating ethical and social best practices across global procurement processes continues to increase. 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 we clearly outline our expectations of the standards we require from our suppliers and partners in our Supplier Code of Conduct.

Ethically conducting business and abiding by all legal and regulatory requirements are important components of this shared commitment. We continue to increase the number of global suppliers who've signed our Supplier Code of Conduct. It 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. In 2023 a core cross-functional team reviewed and updated our Supplier Code of Conduct to ensure it continues to be fit for purpose. Key changes included more robust language and expectations around labor standards, human rights, ethical business practices and environmental protection. The key requirements outlined in our Supplier Code of Conduct include:

- **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

Our independently operated BCD Travel SpeakUp system offers our employees and suppliers the opportunity to anonymously report any incidents. A compliance email account is also monitored by the global group internal audit and legal functions. All reported incidents are investigated, and the results are reviewed by a designated member of the BCD Travel Board responsible for compliance.

Supply chain due diligence

Our sustainable procurement initiatives incorporate several processes to assess supplier compliance and sustainable practices within our supply chain of direct suppliers. As outlined earlier in this statement, we 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. 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.

As part of our supplier due diligence process, we carry out desktop assessments of our supply chain to assess risk in the areas of environment, business ethics, labour standards, human rights and modern slavery, as well as their participation in the UNGC.

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.

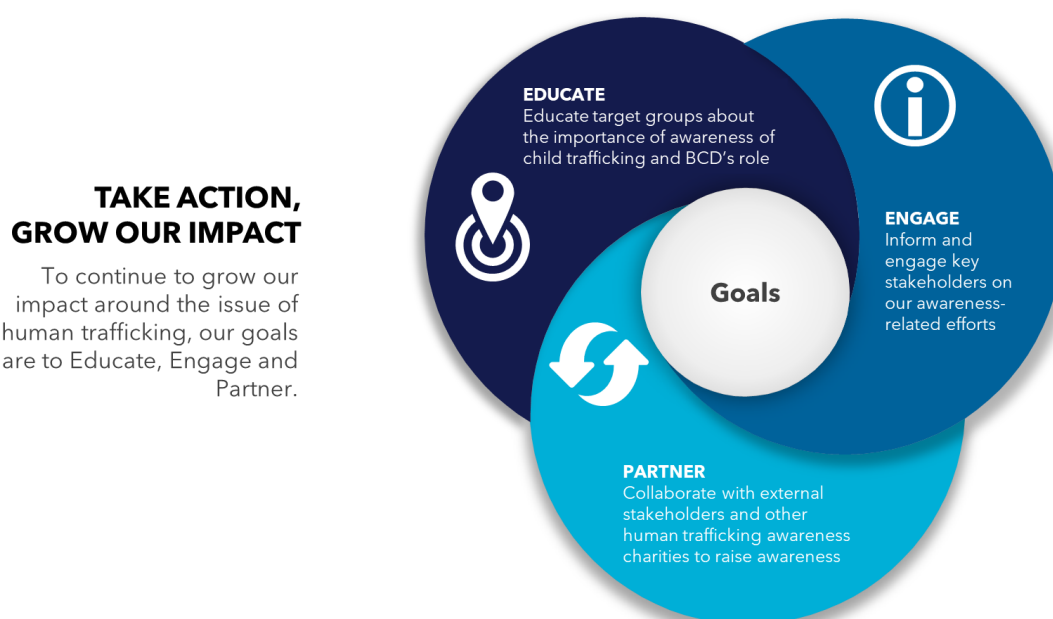
Training and awareness

Human trafficking continues to be a huge issue that negatively impacts the lives of millions of people globally. For this reason, our commitment to taking action on this issue in 2023 didn't falter.

We believe that as a travel management company, we're uniquely positioned to raise awareness with our employees, travellers and partners about human trafficking and child exploitation, and the role they can play in addressing it. We use our reach to raise awareness and educate on the issue, driven by our active human trafficking awareness committee.

We know that traffickers often use air and rail travel to transport victims between cities and countries and use hotels as venues to traffic or abuse victims. If every traveller can identify the signs of human trafficking and understands what to do and how to report it if they encounter a potential incident, we in turn can help end the commercial and sexual exploitation of human beings.

This year, we expanded and raised the profile of our human trafficking awareness 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, has focused initiatives around three goals over the past year: educate, engage, and partner.



Officially launched back in 2017, our mission remains clear: to raise awareness and educate on the issue. All efforts are aimed at ending human trafficking and the sexual exploitation of children.

Since 2017, huge strides have been made, from signing the agreement with ECPAT and The Code in 2017 to launching an end-to-end education and awareness strategy. Highlights of our achievements over the past year include:

- Continued to practice due diligence to guard against human rights violations, as demonstrated in the human rights section of our Supplier Code of Conduct.
- Expanded and raised the profile of our human trafficking awareness committee.
- Continued to partner globally with ECPAT (including reporting to The Code) and A21.
- Continued with Don't Look Away, our human trafficking awareness training, made available to all employees to increase understanding of ECPAT, The Code and our role in raising awareness. To date we have achieved a 94% completion rate.
- Continued our National Human Trafficking Prevention Month campaign.
- Supported key events such as the A21 Walk For Freedom march with campaigns and BCD volunteers.
- Supported the A21 Cambodia human trafficking education project through our Making a Difference program.
- Implemented flagship A21 fundraising initiative and additional fundraising.
- Received the Travel Partner of the Year - Large TMC award in 2023 from Business Travel Awards Europe, who specifically referenced our awareness approach to human trafficking as key to our partnership success.

Partnerships are central to BCD's education and awareness strategy

Partnerships are central to our work to help combat modern slavery. We formed a global partnership with ECPAT in 2017 and with A21 in 2020. Our commitment to both ECPAT and A21 is to raise awareness through education and training with our employees, suppliers, partners and clients.

ECPAT

ECPAT are the leading international organization seeking to end children's commercial sexual exploitation through awareness, advocacy, policy, and legislation. They have a membership of 125 civil society organizations in 104 countries.

They work to better understand the problem through research while pushing for the critical systemic and social changes necessary to end the sexual exploitation of children with governments, intergovernmental institutions, the private sector, civil society, and the general public, including with the children themselves.



How we partner with them

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, Rescue* and *Restore* lives – they are working to reduce vulnerability, assist victims, and empower survivors. The organisation works in 19 different locations in 14 countries across the globe.

A21 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 support.

They provide aftercare services from trauma-informed holistic support for survivors, emergency shelters, accommodation and relocation services and much more.

How we partner with them

We work closely with A21 on key initiatives including their Annual Walk For Freedom, fundraising projects, and in 2023 supported a children-centered human trafficking education project in Cambodia through our Making a Difference programme.

Key partnership initiatives included:

Walk For Freedom - BCD employees once again showed unwavering support for the A21 Walk For Freedom in 2023. 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. The event took place on October 14th and tens of thousands of people participated in more than 425 communities across over 56 countries reaching nearly 800 million people through media with awareness of human trafficking. In support of our partnership with A21, BCD people took to the pavements across regions.

Open water swimming fundraising - Last year the Vice President Global Client Team and chair of the committee challenged her fear of open water swimming with an open water sea swim from Lyme Regis to Charmouth to raise funds and awareness for A21's Cambodia human trafficking education project.

Business Travel Awards Europe

Travel Partner of the Year award - As a testament to the impact of our awareness initiatives, BCD Travel also received the Travel Partner of the Year Award for large TMCs from the Business Travel Awards Europe in 2023. The judges applauded our work to create awareness and training around human trafficking, and our willingness to go above and beyond with our partnerships. They noted that while many industry ESG efforts highlight traditional sustainability efforts, this commitment to the broader social and ethical impact illustrates ways that organisations can go above and beyond with their partnerships.

In summary - effectiveness in preventing modern slavery

We have identified that enhancing education and awareness around modern slavery is where our organisation is able to make the most impact. We also recognise that there will continue to be modern slavery risks. To mitigate these risks in our business, as well as support our objectives for education and awareness, we will continue to identify, adopt and implement best practices in the following areas in the year ahead:

- Continue to raise staff awareness levels through mandated training and opportunities to participate in wider global events.
- Continue to focus on education and awareness driven by our human trafficking awareness committee.
- Continue to work with our key partners, A21 and ECPAT including sharing news, campaigns and client awareness collateral on our human trafficking awareness committee intranet hub.
- Continue with investigations into any reports of modern slavery and remedial actions taken in response.

BCD TRAVEL (UK) DIRECTORS

MICHÈLE LAWLEY President, Europe



CLAUDIA JACKSON Managing Director, UK & 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 2023.