



2025 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 2025. This statement also covers our meetings and events division BCD Meetings & Events Ltd (BCD M&E).

Our organisation and supply chain

BCD Travel is a global corporate travel management company. At BCD, we create connections that move people and ideas forward. Through open technology and trusted human expertise, we help companies and people navigate change, simplify complexity and make confident decisions about how and when they travel. Our intuitive digital experiences for every stakeholder power journeys that fuel success and drive progress.

With 15,000+ dedicated team members serving clients in 170+ countries, BCD is shaping a more sustainable future for business travel. Industry-leading meetings and events management and a global consultancy complete our suite of solutions and services.

BCD M&E connects organisations with the people that matter most. With over 2,000 passionate professionals in 60+ countries, we offer services in event design, brand experience, meetings management, production, venue search and sports travel.

In 2025, BCD achieved \$24.4 billion in sales. Learn more at www.bcdtravel.com.

We recognise that we have obligations to uphold the highest ethics in our employees' and in our business' activities. We prohibit all forms of slavery, servitude, forced labour and human trafficking within our operations and 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.

Human trafficking is widely recognised as one of the most urgent human rights issues of our time. At BCD, we believe it's essential to take meaningful action to help prevent modern slavery in all its forms.

Today, an estimated 50 million people are living in conditions of modern slavery – that's nearly one in every 150 people worldwide.¹ This number continues to grow as human traffickers exploit increasingly complex networks, often using air and rail travel to transport victims and hotels as locations for trafficking or abuse².

As a global leader in corporate travel, we recognise the critical role our industry plays in addressing this issue. BCD is committed to informing and empowering our employees, corporate travel managers, travelers and industry peers to help prevent human trafficking wherever it occurs.

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.



¹Source: [Global Slavery Index](#)

²Source: [Counter Trafficking Data Collective](#)

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 considerations into our procurement practices. We collaborate with suppliers who adhere to responsible business practices, aligning sustainability with our core values.

Suppliers are made aware of our standards and expectations through our Supplier Code of Conduct and related contractual requirements. We consider the overall risk of adverse human rights impacts within our supply chain to be low based on the following factors:

- The nature of the goods and services we procure, which primarily consist of services provided by skilled professions.
- The geographic locations from which we source, which are predominantly in developed countries.
- The results of our supplier due diligence activities, which indicate that the majority of assessed suppliers present a low potential risk for human rights issues.

We conduct supplier due diligence by leveraging a risk assessment platform that supports ESG-related evaluations. This tool covers topics including environmental management, human rights, labor conditions, health and safety and business ethics. Supplier self-assessments completed through the platform require the submission of supporting documentation, which is reviewed against globally recognised standards and frameworks. Based on the assessment results, we may request corrective actions through the platform or engage directly with suppliers to address identified improvement areas and monitor progress over time.

This due diligence process applies primarily to our tier 1 suppliers. We have limited oversight over tier 2 suppliers and beyond; however, the evidence-based assessments request documentation from tier 1 suppliers regarding their practices and expectations in relation to their own supply chains.

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 in our partnership work to prevent modern slavery. We provide further details on our initiatives in this area 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's commitment to preventing 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.

Organisational 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. Our standards are outlined in a number of internal operating policies, including, as examples, our Code of Conduct, Global People & Culture Policy, Human Rights Policy and Supplier Code of Conduct.

Our policies align with the principles of the UNGC and further recognise the following internationally respected human rights frameworks, and the standards contained therein:

- The Universal Declaration of Human Rights of the United Nations
- The OECD Guidelines for Multinational Enterprises
- The Principles of the United Nations Global Compact
- The ILO Core Labor Standards

Our Supplier Code of Conduct 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 2025, 94% of our top-spend suppliers either signed our Supplier Code of Conduct or demonstrated alignment through their own codes. 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 for:

- **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**, including our non-compliance reporting process, the anonymous SpeakUp System and the right to request additional information from suppliers concerning compliance, such as self-assessment questions and on-site third-party audits.

Reporting non-compliance with our Code of Conduct

All BCD employees and suppliers can report unethical behavior or non-compliance with our Code of Conduct. BCD prohibits retaliation against anyone who raises a concern or reports misconduct in good faith, with the reasonable belief the information is true. Our global Non-Compliance Reporting Policy reinforces this message and complements both our Code of Conduct and Supplier Code of Conduct.

In the first instance, we encourage employees to raise concerns with their manager or local People & Culture contact. Where concerns can't be addressed locally, employees can submit a report through BCD's independently operated SpeakUp System. BCD's Internal Audit Function and Legal department investigate submitted cases and report their findings to management and the Executive Board.

The independently operated SpeakUp System allows employees and suppliers to anonymously report any misconduct in their native language, 24 hours a day. All reported incidents are investigated, and the results are reviewed by the BCD audit and risk committee.

Assessing and managing supplier risk

BCD's governance framework includes sustainable procurement policies, ensuring our supply chain partners comply with our sustainability goals and meet or exceed all legal responsibilities.

Effective risk management safeguards our employees, assets and reputation while fostering sustainable growth. By embedding risk management into our daily operations and strategic planning, we create a resilient and secure environment that supports our long-term objectives and enhances our ability to navigate uncertainties.

Our process includes a third-party risk management tool that enables comprehensive analysis through both abstract and concrete risk evaluations.

BCD follows a three-step risk analysis approach, supported by a third-party risk management tool:

- 1. Abstract risk analysis** - We evaluate country- and industry-level risks related to social standards within our business area and immediate suppliers. This assessment categorises potential risks as 'low,' 'medium' or 'high,' forming the foundation of our risk analysis.
- 2. Concrete risk analysis** - We conduct a detailed examination of identified risks and prioritise suppliers with medium or high risks. Questionnaires based on international standards (as examples, frameworks such as the OECD Due Diligence Guidance for Responsible Business Conduct and the ILO Core Labour Standards) provide transparency on how suppliers address these risks and supplier feedback helps us identify and address potential gaps.

We also monitor a wide range of suppliers through our platform's critical news monitoring system. This allows us to stay informed and respond to reported social concerns.

- 3. Prioritising risk** - We prioritise supplier risks on the probability of occurrence and severity, as well as our ability to influence the suppliers and address risks in our own business activities.

Supplier due diligence

Our three-step procurement process ensures we work with our supply chain partners to assure compliance and alignment with our sustainability goals.

Effective supplier due diligence during onboarding and ongoing compliance help us identify and mitigate risks. We monitor performance to ensure ongoing compliance with sustainability standards and take corrective action when required to maintain accountability across our supply chain.

1. Supplier compliance and onboarding

We expect all BCD suppliers to adhere to our Supplier Code of Conduct as part of their contractual obligations. This includes our human rights standards on anti-slavery, human trafficking and forced labour. During onboarding, suppliers complete self-assessment questionnaires to assess their risk profile and ESG maturity. In 2025, the number of suppliers who signed the Code of Conduct increased by 32%.

2. Performance and assurance

Our due diligence framework covers 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) through our procurement tool to track compliance and manage risk. In 2025, our onboarding efforts increased to cover approximately 40% of procurement suppliers. We use our due diligence tool to onboard new suppliers, monitor supplier activities in real time and track supplier performance from the start of the business relationship.

3. Remediation and corrective actions

We have a process in place to engage suppliers in cases where we identify risks or violations of human rights. This detailed plan, with corrective actions and clear timeframes, is to be agreed upon and signed by suppliers. Significant risks are escalated to our Strategic Sourcing and relevant functional teams, including Legal where required, for further evaluation. In 2025, we identified no concrete value-chain risks that required corrective action.

Training and awareness

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, 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 2025, 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.

Inspiring collective action through our human trafficking awareness committee

Launched in 2017, BCD's global human trafficking awareness committee drives companywide awareness and action in combating modern slavery. The committee designs and implements initiatives that deepen awareness, strengthen industry collaboration and increase our positive impact on this issue. Our committee also reflects our broader work to manage modern slavery and human trafficking, further supported by compliance with reporting requirements, such as ECPAT's The Code.

The committee brings together BCD employees across different regions and functions, such as Operations, Marketing, Legal and Sustainability teams. This cross-functional approach ensures our initiatives are embedded across the business and aligned with our broader sustainability strategy. In 2025, we also formally integrated BCD Meetings & Events into the committee to broaden the scope of our initiatives. Executive sponsorship from BCD's Executive Vice President, Global Client Team, allows visibility and strategic support of our objectives at the highest level within our Global Executive Team.

Partnerships

Strong partnerships are central to our strategy. Our long-standing collaboration with A21 and ECPAT anchor BCD's efforts to drive industry-wide change.

A21

A21 works globally to reach, recover and restore lives. Their programs range from education and confidential hotlines to legal aid, victim identification and child advocacy – designed to address the unique challenges in each community or country they serve.

Since launching our strategic partnership in 2020, BCD has worked closely with A21 on awareness initiatives, fundraising and promotion of their tools, including the Global Freedom Summit and 'Can You See Me?' public campaign.

ECPAT

ECPAT is the leading international organisation dedicated to ending the sexual exploitation of children. BCD became a signatory to ECPAT's Code of Conduct for the Protection of Children from Sexual Exploitation in Travel

and Tourism (The Code) in 2017 and completes annual reporting to The Code to ensure transparency and track progress.

We also support ECPAT's awareness initiatives and promote PACT's (ECPAT-USA) free online training for travel professionals. In 2025, BCD was named one of ECPAT's Top Members for the second consecutive year.

Education and awareness examples

In 2025, our committee focused on three strategic priorities: partnership, engagement and education. This allowed us to grow the reach of our initiatives both within BCD and the wider industry. We mobilised employees and industry stakeholders to actively support BCD's initiatives and the work of our partners, A21 and ECPAT, promoted continued learning through BCD's recommended resources, and strengthened awareness of safe and responsible methods for reporting indicators of human trafficking. This focused approach advanced key initiatives throughout the year where we:

- Achieved 99% completion on our human trafficking awareness training.
- Promoted A21's Global Freedom Summit, a digital session that focused on online sexual exploitation of children, including statistics and emerging trends, red flags, safety tips and practical guidance for talking with children about online safety. Two committee members connected with global leaders at the Summits in London and Washington and contributed to a panel discussion called How Businesses Are Leading the Fight Against Exploitation.
- Started the BCD Runs for Freedom campaign. 100 BCD runners, including Global CEO Stephan Baars, joined the TUI Palma Marathon in October to raise funds for A21. Through individual donations and corporate sponsorship, we raised over US\$150,000 to support A21 and continued to drive awareness both within and beyond our company.
- Launched BCD's Freedom Forward Pledge, which encouraged over 500 employees to commit to educating at least one person on human trafficking using resources from BCD and A21.
- Organised a joint human trafficking awareness and education session with United Airlines at Heathrow Airport in the U.K. The session covered reporting and data, A21's "Can You See Me?" Campaign, how to safely report as well as educational resources and how to mobilise global organisations on this issue.
- Through the John & Marine van Vlissingen Foundation's Making a Difference programme, supported A21's U.K. education initiative, reaching over 4,830 people in 2025. This collaboration helps us to deliver critical online prevention education and e-learning resources to vulnerable children across the U.K. The initiative also empowers parents, educators and youth workers with the knowledge and tools they need to recognise and report potential cases of human trafficking and online exploitation – strengthening community protection where it is needed most.
- Ran global communication campaigns aligned with key dates to address this issue, including National Human Trafficking Prevention Month and UN World Day Against Trafficking in Persons. We also created new communication materials, presentation resources and developed content available via our global intranet.
- Supported A21 at a client event, promoting our partnership and educational tools to our top clients.

Monitoring and evaluation

To cease, prevent and mitigate potential adverse impacts within our supply chain, BCD has implemented a range of preventive and monitoring measures.

- We conduct annual sustainability and responsible procurement training for procurement staff to ensure awareness of human rights, environmental risks and our internal due diligence processes.

- We have continued the roll-out of our supplier risk assessment platform, inviting an increasing number of suppliers to complete the ESG assessments described above and strengthening our coverage of tier 1 suppliers.
- We conducted a supplemental risk analysis of our supplier base to further assess potential environmental and human rights risks. The results of this analysis support our overall assessment that the environmental and human rights risks within our supply chain remain low.

By continuously refining our KPIs, we enhance our ability to prevent and mitigate priority risks, particularly in cases where the likelihood or severity of non-compliance is high. This approach supports transparency, accountability and long-term sustainability across our supply chain.

Key aspects we monitor include:

- Number of suppliers that have signed our Supplier 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.

In 2025, 94% of our top-spend suppliers either signed our Supplier Code of Conduct or demonstrated alignment through their own codes. We conducted due diligence of our top 35 suppliers based on annual expenditure using our assessment tool.

Our Global Senior Vice President of Strategic Sourcing is responsible for setting the above KPIs and our Sustainable Procurement Consultant focuses on tracking their implementation.

We also undertake an annual EcoVadis assessment, which includes analysis of our human rights practices and labour standards, amongst other key criteria. In 2025 we received EcoVadis platinum rating, including a high-performing score for Labour and Human Rights.

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, including strengthening the integration of BCD M&E into our education and awareness planning.
- 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.
- Strengthen supply chain due diligence by continuing to analyse and monitor modern slavery risks within our supplier base.

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 2025.

23 June 2026