

SUPPLIER CODE OF CONDUCT

Introduction

Together with our shareholder, BCD Holdings N.V., we regard a commitment to and improving our local and global communities as an investment in our (and their) future: We believe in building for the “next next” generation. That’s why sustainability is core to our company strategy and integrated into our company vision: to be the world’s most trusted, innovative and sustainable TMC.

We recognize and endorse the practice of operating in an ethically, socially and environmentally responsible manner and support the ten principles of the United Nations Global Compact, the UN Sustainable Development Goals (SDGs) and other applicable standards. While we understand that the general intention behind these standards may be implemented differently in different countries, in keeping with local laws and customs, it is our intent to support and advance those principles within our company and entities controlled by it. Within this document, “BCD Travel,” “BCD,” “we” and “our” are understood to refer to BCD Travel and its operating units Advito and BCD Meetings & Events.

We put sustainability at the center of our relationships to best influence change for our company, our people, our suppliers and our business partners. We expect our suppliers and business partners (each “Suppliers”) to regard this Supplier Code of Conduct as a total supply chain initiative and to adhere to the same ethical principles as outlined therein. As a minimum, we expect our Suppliers to promote the principles of our Supplier Code of Conduct within their own supply chains and to conduct their business activities in full compliance with applicable laws and regulations.

This Supplier Code of Conduct includes standards on ethical business practices, human rights, labor standards, privacy and environmental protection.

Ethical business practices

- **Corruption and bribery:** Corruption and bribery are recognized as some of the barriers for sustainable development. These practices are not acceptable and the offer or acceptance of any undue payments by Suppliers is not permissible.
- **Business integrity:** The highest standards of integrity are to be expected in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited.
- **Conflict of interest:** Suppliers shall not engage with BCD employees in a way which results in, or may be perceived to result in, an inappropriate conflict of interest for them. A conflict of interest can arise when the personal interests of a BCD employee are inconsistent with the responsibility of his or her position.

- Money laundering: Payments must be made and received only via authorized processes and channels, and those payments must be documented properly. BCD rejects any business transaction which involves any form of money laundering. Suppliers shall comply with all applicable anti-money laundering laws and regulations.
- Fair competition and anti-trust: Suppliers shall conduct business in full compliance with anti-trust and fair competition laws that govern the jurisdictions in which they operate.
- Trade sanctions: Suppliers shall comply with all trade sanction laws and regulations. Suppliers are not and shall not fund or facilitate any activities or business of or with any person subject to trade sanctions or located, organized or resident in a sanctioned Country.

Privacy and security

- Suppliers shall process personal data in compliance with all the applicable data protection, privacy and security laws for the processing of personal data. Suppliers shall implement best industry standards, technical and organizational measures to ensure an appropriate level of security.

Human rights

- Working environment: Suppliers shall provide a workplace free of harsh and/or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.
- Anti-discrimination: Suppliers shall not engage in discrimination based on race, national origin, color, language, religion, political convictions, gender, union membership, sexual orientation, marital status, age, disability, or on any other basis prohibited by applicable law.
- Anti-slavery and human trafficking: Suppliers shall comply with BCD's zero tolerance stance regarding human slavery, human trafficking and the sexual exploitation of children. All Suppliers shall uphold the human rights of children, including their right to a safe and secure childhood without the fear of exploitation or harm.

Labor standards

- Child labor: Children under the minimum age as determined in the Conventions of the International Labor Organization (ILO) or by local law, whichever is higher, shall not be employed by BCD Travel's Suppliers.
- Freely chosen employment: Suppliers shall not use forced, bonded, indentured or involuntary labor.
- Wages and benefits: Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

- Working hours: Work weeks should not exceed the maximum set by local law and should not be more than 60 hours per week including overtime.
- Health and safety: Suppliers shall comply with applicable occupational health and safety regulations and provide a healthy and safe work environment for their employees.
- Diversity and inclusion: Suppliers shall comply with all applicable laws and promote equal treatment within their workplace.
- Freedom of association: Suppliers shall respect the right of workers to associate freely, form and join works councils of their own choosing or collectively bargain within the framework established by local laws.

Environmental protection

- Legal compliance: Suppliers shall comply with applicable environmental laws, regulations and standards and endeavor to implement a system to identify and eliminate potential hazards to the environment.
- Reduction of waste: Suppliers shall conduct their business operations in a manner that is committed to recycling, conserving resources, preventing pollution, and to promoting environmental responsibility among their employees.
- Measurement of carbon emissions: Supplier shall strive to measure their carbon footprint in line with international best practice and set targets to reduce their scope 1, 2 and 3 carbon emissions.

Reporting violations / Monitoring activities

- Suppliers shall promptly report to BCD any potential violations of these standards, committed either by their own employees or representatives, or by any of BCD's employees or representatives. Such reports should be made by emailing compliance@bcdtravel.com, which is monitored by BCD's heads of Legal and Internal Audit. As a last resort, such reports could be made through Speakup System, an interactive voice response phone and web-based service provided by People Intouch B.V., which is available in multiple languages and may be accessed [here](#). Reports can be made anonymously where allowed under local law.
- BCD prohibits any form of retaliation against anyone who in good faith reports suspected misconduct. Supplier's disclosure to BCD of misconduct by Supplier's employee(s) does not guarantee that the misconduct will not adversely impact BCD's relationship with Supplier, but BCD will generally view such a disclosure as evidence of Supplier's good faith intent to follow BCD's standards for supplier relationships. Suppliers are expected to cooperate fully in any investigation of potential misconduct.
- BCD may request additional information from Suppliers regarding their compliance efforts and/or engage in additional monitoring activities to confirm their compliance to this Supplier Code of Conduct, including self-assessment questionnaires, review of publicly available information, on-site third-party audits or other measures necessary to assess Supplier's performance.

Additional information on BCD's sustainability policies and procedures can be found at <https://www.bcdtravel.com/sustainability>.

We hereby agree to adhere to BCD Travel's Supplier Code of Conduct.

Company:
Signature:
Name:
Title:
Date: