



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 2018.



BCD Travel has locations in 109 countries



2018 sales of US \$27.1 billion



13,500 creative, committed and experienced staff



Investors in People Silver Level Accreditation (through 2020)



We joined the United Nations Global Compact in 2008 and continue to support its 10 principles



We're a member of 'The Code,' an organization working to protect children from sex tourism.



We formed a global partnership with ECPAT as part of our focus on Human and Social Value as a strategic directive. We also supported local charity projects for underprivileged children's causes in 28 countries around the globe through our BCD Travel Foundation.



In 2018, we again improved our gold rating by EcoVadis, the assessor providing supplier sustainability ratings for global supply chains. We currently rank in the top 1 percent of all suppliers assessed.

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.

We expect BCD employees to report any concerns using the appropriate channels. 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 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 system- and process-driven approach based on our management systems principles ensures compliance with these standards and demonstrates continual improvement.

Policies and contractual controls

Subject matter experts develop our policies, and we sign them off at Board or Global Executive sponsor level. We keep them under review and in 2018 we refreshed our Code of Conduct and Noncompliance Reporting policy and created and communicated a new global harassment policy.

We also reviewed our Supplier Code of Conduct in 2018. It states that we will not tolerate or condone abuse of human rights within any part of our business or supply chains. And that we'll take seriously any allegations that human rights are not properly respected.

Our global Business Ethics Policy expressly states, "It is a fundamental policy of the company to conduct its business with honesty and integrity and in accordance with the highest legal and ethical standards." It further sets out required standards of behaviour for our staff—matters that must be declared in business dealings, any conflicts of interests and how to report any policy violations.

BCD's Whistleblowing Policy, for our employees and others working in our business, encourages every person to report any wrongdoing, which extends to human rights violations like Modern Slavery. All reports will be fully and impartially investigated and appropriate remedial actions taken. No actions or retaliations can be taken against a person reporting genuine concerns, raised in good faith. This applies, even if after investigation, they are found to be mistaken.

Supplier standards

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



We refreshed our Corporate Social Responsibility approach to one of Sustainability, to more accurately reflect our cultural ethos towards our people, our partnerships, our planet and our performance



Following on from our SVP winning International HR Executive of the Year award, we were again a gold winner for our technological improvements to traveller wellbeing



We were again voted the most admired TMC, for the sixth time



CR Magazine named John Snyder 2018 Responsible CEO of the Year for a Private Company



Our Manchester team was voted Reservations Team of the Year at the annual People Awards in May



We regularly perform 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. Here you can find a list of our [ISO certifications](#) and other certifications

All 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.

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 2018, there were no discernible actions arising from our audit of 150 Suppliers, due to the measures we have in place to ensure our business practices are sound and our supply chain is clean.

Sustainability improvement

We achieved a gold rating by EcoVadis for the third consecutive year, maintaining our position in the top 1 percent of all suppliers assessed. 35 of our partners were assessed by EcoVadis, 80% achieved a sustainability compliance rating higher than the EcoVadis average.

The health and safety of our employees and environmental stewardship remain a top priority. In 2018, we increased the percentage of ISO 14001 & OHSAS 18001 accredited locations around the world and our U.S. data centre additionally became ISO 14001 accredited.

We refreshed and updated the branding of our Corporate Social Responsibility approach to one of Sustainability, to reflect how intrinsic this is to our culture. Externally validated awards such as our global CEO being voted Responsible CEO of the Year and previously, our global HR leader winning HR Executive of the Year serve as pointers to the commitment our board has towards ethical and sustainable business and employment practices.

ECPAT

We launched a partnership with End Child Prostitution And Trafficking (ECPAT), which is the leading international organization seeking to end the commercial, sexual exploitation of children through awareness, advocacy, policy, and legislation. We partnered with them because it's another way we express our passion for helping others as an important part of our Human and Social Value Strategy.

This partnership requires the implementation of the six criteria of the Tourism Child-Protection Code of Conduct (The Code) such as providing information to internal and external travellers as well as engaging stakeholders.

We've submitted our 2018 Annual Report to The Code outlining our progress on the implementation of the six criteria.

Training and awareness

We promoted the End It Movement on social media by sporting X on our hands and raising awareness amongst our employees and contacts. Our CEO and our Executive Sustainability sponsor, Kathy Jackson, required the top 100 BCD travellers to take the Passport to Freedom course, a collaboration with our GDS supplier. 10% of the UK workforce completed the training in 2018 and it's also available globally on our learning management system for all our staff to access at any time.

Assessment of effectiveness in preventing Modern Slavery

We recognize that there'll continue to be modern slavery risks. 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 repeat training and our "Don't Look Away" campaign to increase understanding of ECPAT and The Code
- 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