

# Modern Slavery Act Statement 2019

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 2019.



Global presence in 109 countries



2019 sales of US \$27.5 billion



14,900 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.



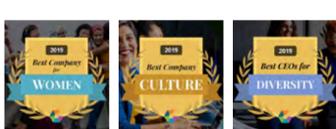
Support of the 17 UN Sustainable Development Goals to end poverty, protect the planet and improve the lives of those in need since 2016.



Partnered with ECPAT in 2017 as part of our focus on Human and Social Value. Supported local charity projects for underprivileged children's causes in 38 countries around the globe through John & Marine van Vlissingen Foundation.



Maintained our gold rating by EcoVadis, assessor of supplier sustainability ratings for global supply chains. We currently rank in the top 1 percent of all suppliers assessed.



Comparably Awards 2019



Ranked 23rd on the FlexJobs list of top 100 companies with remote jobs.



Voted the most admired TMC for the 7th time.



Received top honors for the Best Corporate Social Responsibility Program at the 2019 Business Travel Awards in the UK.



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](#).

## 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 system- and process-driven approach based on our management systems' principles ensures compliance with these standards and demonstrates continual improvement.

## Policies and contractual controls

Our Policies are developed by subject matter experts and signed off at Board or Global Executive sponsor level. In 2019 we continued the review of our Global Group Policies in line with our new Policy Governance process. Our Global Procurement and Strategic Sourcing policy was reviewed and updated to include human rights and other social criteria in procurement and strategic sourcing processes.

Our Supplier Code of Conduct states that we will not tolerate or condone abuse of human rights within any part of our business or supply chains and that we will 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.

In addition, in 2019, we rolled out a global Employee Engagement Tool (PEAKON) to gather intelligence on employee welfare and matters of any concern to them in their own language so they could be addressed in real-time by BCD management.

## 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 2019, we audited over 200 Suppliers globally and supported them specifically, where required. BCD Travel operate in a global market where our suppliers are located around the globe, so we have streamlined our approach. In 2020 we will be launching our supplier assessment scorecard, so that suppliers can be monitored using a more consistent approach.

## Sustainability improvement

BCD Travel maintained its EcoVadis Gold rating and its position in the top 1 percent of all suppliers assessed.

The health and safety of our employees and environmental stewardship were also a priority. Focus areas included removing single-use plastics from all our global offices and replacing catering supplies for meetings with paper based and alternative bio-degradable products.

ISO 14001 and ISO 45001 certification was achieved in our 30 wholly-owned countries.

We rolled out a global HRIS, enabling better tracking of staff and contingent workers. This provides enhanced scrutiny of employee data to ensure compliance with regulatory requirements.

## ECPAT

We continued supporting End Child Prostitution And Trafficking, which is the leading international organization seeking to end the commercial, sexual exploitation of children through awareness, advocacy, policy, and legislation. We launched our own **Don't Look Away** initiative and appointed two dedicated Ambassadors to promote awareness and educate people both internally and externally with our clients and suppliers.

We have spoken at an external leadership conference which was the first step in raising awareness across multiple sectors, not just the travel industry and this led to discussions with the United Nations Women, a partnership with whom we intend to explore further.

We published articles across our global network of media platforms and worked with our global marketing group, focused on internet usage and advert placement to reach 225,000 impressions.

We also prepared the way for a mandatory human trafficking training programme in 2020.

## Training and awareness

In 2019, the global employee participation rate in annual security awareness training reached 95.5%, 90% in GDPR training and 92% in Code of Conduct training.

As part of our ISO certification programme, we also mandated a global environment, health and safety course and included mandatory training in the onboarding process for all new recruits.

## 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 mandated 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.

Financial Year Ending December 2019.