

Modern Slavery Act Statement 2017-18

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 2017.



BCD Travel has locations in 109 countries



2017 sales of US \$25.7 billion



13,500 creative, committed and experienced staff



Investors in People Silver Level Accreditation (through 2020)



BCD Travel joined the United Nations Global Compact in 2008 and continues to support its 10 principles.



BCD Travel is a member of 'The Code,' an organization working to protect children from sex tourism.



In 2017, BCD Travel earned a second 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.



We regularly perform audits (including ISO 9001, 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](#).



As part of our commitment to driving human and social value, BCD Travel is proud to support the Haiti Project. We also support local charity projects for underprivileged children's causes in 28 countries around the globe.



BCD Travel won the Sustainability Outstanding Achievement Award in 2014 and 2016

Introduction

BCD Travel recognizes its obligations to uphold the highest ethics in employee and 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

The BCD Supplier Code of Conduct, stipulates that we will not tolerate or condone abuse of human rights within any part of our business or supply chains and 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 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.

Policies are developed by subject matter experts and signed off at Board or Global Executive sponsor level.

Supplier standards

We expect our suppliers to uphold the same standards for business conduct we ask of our own employees. We firmly believe that socialising our standards and beliefs with our suppliers increases the momentum towards eliminating the risks of modern slavery in our supply chain.

All of our suppliers are asked to regard our Supplier Code of Conduct as a total supply chain initiative and 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.

Sustainability improvement

BCD Travel achieved a gold rating by Ecovadis for the second consecutive year. This places us among the top 1 percent of all suppliers assessed and is an acknowledgement of the sustainable initiatives the company has undertaken to improve all areas of our business:

- ✓ **Environment:** Top 1% of suppliers assessed
- ✓ **Labour practices:** Top 1% of suppliers assessed
- ✓ **Fair Business practices:** Top 1% of suppliers assessed
- ✓ **Sustainable procurement:** Top 1% of suppliers assessed

We also use EcoVadis to assess our partners' and suppliers' sustainability compliance. We pursue sustainable supply chain management by aligning our supplier base's social, ethical and environmental responsibilities with our own sustainability goals and objectives.

Investors in People accreditation

We achieved an international silver accreditation by Investors in People, being the first global travel management company to be recognised in this way. We had to validate and prove to IIP assessors that our employee working practices actually match what we say we do. This is an international endorsement of our understanding of the needs of our workforce and how we manage improved organizational change to continually improve our people, processes and performance.

The Code membership

We implemented The Code's six criteria in support of measures to prevent child sex trafficking in the travel industry:

1. To establish a policy and procedures against sexual exploitation of children.
2. Train employees in children's rights, the prevention of sexual exploitation and how to report suspected cases.
3. Include a clause in contracts throughout the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children.
4. Provide information to travellers on children's rights, the prevention of sexual exploitation of children and how to report suspected cases.
5. Support, collaborate and engage stakeholders in the prevention of sexual exploitation of children.
6. Report annually on their implementation of The Code related activities.

Training

In 2017, we held a management conference with a strong focus on Modern Slavery and Gender Equality and subsequently mandated a Human Trafficking – Passport to Freedom training course for all employees across our UK and Ireland region.

This training, in collaboration with a key supplier, served to educate our staff on trafficking and modern slavery and how to alert officials to intervene if they spot or suspect the presence of any of the signs.

We are committed to the ongoing education of our people and members of our supply chain about trafficking and modern slavery.

Due diligence and assessment of modern slavery risk within our supply chain

Our biggest exposure to modern slavery is in our supply chains; so we continue to keep them under review to assess particular industry/sector and geographical risk.

These risk assessments comply with our Supplier Code of Conduct and are, amongst other things, intended to identify any modern slavery practices. The assessments cover the entire scope of our business, encompassing Travel Operations, Property, Logistics, HR, IT and service supply chains.

Assessment of effectiveness in preventing modern slavery

We understand that modern slavery risk is not static, and we will continue our approach to mitigate this risk in the year ahead.

In order to assess the effectiveness of the measures taken by BCD Travel, we will review the following key performance indicators and report on them in future Modern Slavery Statements:

- Staff training levels
- Actions taken to strengthen supply chain auditing and verification
- Steps taken to educate our high-risk suppliers and assess their ability to detect and mitigate modern slavery risk in supply chains
- Investigations undertaken into reports of Modern Slavery and remedial actions taken in response.



Michèle Lawley
Managing Director,
UK & Ireland Region



Mike Walley
President and COO,
UK & Ireland Region

We approve this statement against modern slavery and human trafficking pursuant to section 54(1) of the Modern Slavery Act 2015