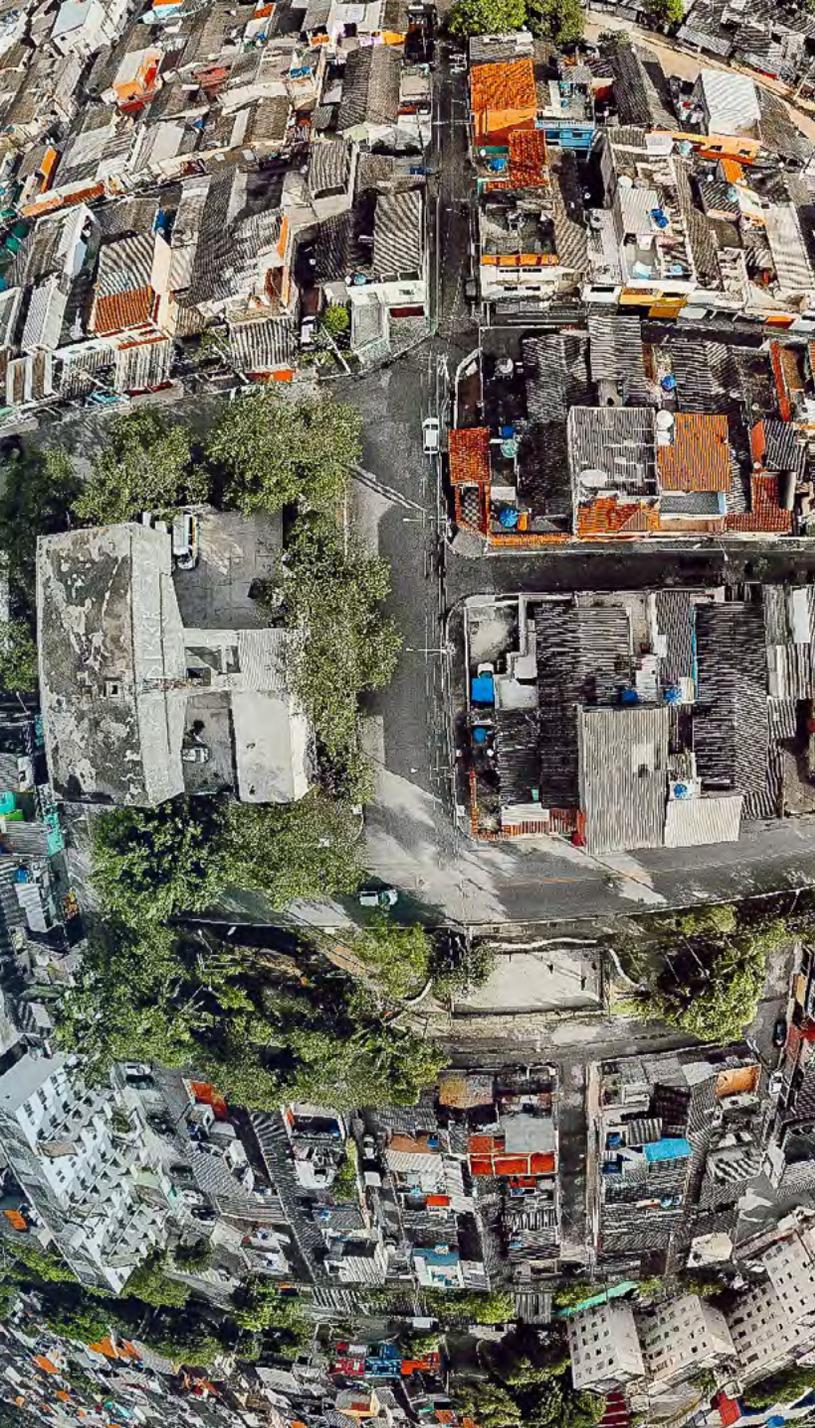


# 2021 SUSTAINABILITY REPORT





Our 2021 Sustainability Report summarizes activities, achievements and progress for the calendar years 2019 and 2020. It aligns with the 10 principles of the United Nations Global Compact, the United Nations Sustainable Development Goals and has been prepared in accordance with the GRI Standards: Core option.

- Section 1** Leadership Perspective
- Section 2** Our Company
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- Section 4** Governance, Ethics & Compliance
- Section 5** Workplace Practices
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For more information on our sustainability initiatives, visit our website [www.bcdtravel.com/sustainability](http://www.bcdtravel.com/sustainability).

## SECTION 1

# LEADERSHIP PERSPECTIVE

This report covers two years, 2019 and 2020, which in many ways represent polar opposites for BCD Travel, for our industry—and for the world. In this statement, we've chosen to speak particularly to 2020, a year that forced countries, companies and individuals to change policies, priorities and behaviors.

## BUSINESS RESILIENCE DRIVEN BY PURPOSE

For 45 years, BCD has been in the business of bringing people together through travel and meetings, two activities made nearly impossible since March 2020. But the same conditions that rocked our industry also highlighted our responsibility to our people, our clients and our community. In challenge, we found opportunities to serve, to innovate, to:

**Live our values.** For years, in speaking to clients, prospects, the press and our own people, we've called out our BCD culture as a true differentiator. The events of 2020 put that culture on shining display, as we rose to meet challenge after challenge. We've never been prouder of our employees' courage, willingness to serve and grace under pressure—and now, more than ever, these qualities remain crucial. We delivered on our promise to ourselves and our clients to keep solving together, acting with purpose, doing what's right, giving our best and feeding the future.

**Align under our core strategies.** Together, we strengthened the partnership, simplicity and innovation that our people and our clients perceive and receive at BCD. We delivered experiences and solutions that kept people safe, healthy, productive and confident. We simplified complexity through technology innovations that anticipate what lies ahead for our clients and their travelers.

We can look back at 2020 and be proud of what we achieved in the face of extraordinary circumstances—including our highest new sales and client retention ever. Our sales and retention levels are far more than numbers on a page. They represent the deep trust our clients have both in our financial stability and our ability to deliver. They establish a solid foundation for future growth as travel returns. And they will continue to fuel our capacity to focus on the essentials of sustainability.

# SUSTAINABLE INNOVATION

In a year of unparalleled disruption, we moved forward on projects, initiatives and solutions that represent our firm commitment to sustainability. Our EcoVadis Platinum rating validated our outstanding sustainability performance, confirming our position in the top 1% of all companies assessed.

We would be remiss in not calling out several developments that speak to the unique conditions of 2020 and to the influence those conditions will have on the way we and our clients will operate in the future:

**Climate change:** The management of the environmental impact of our operations and the development of innovative solutions to help our clients make their travel programs more sustainable were in focus in 2020. To be future fit to meet our internal goal to reduce carbon emissions significantly by 2030, we signed on to the Science Based Target initiative (SBTi). Our defined carbon goals will be submitted by Q4 2021.

**Sustainable collaboration:** Our focus on sustainable travel doesn't just mean protecting the environment and addressing climate change, it also covers traveler wellbeing and minimizing risk. This is an especially important factor as we manage the impact of COVID-19. We're working with clients to enable virtual collaboration as a viable alternative to business travel. It's one of the most important opportunities for companies seeking to increase sustainability, savings, and employee satisfaction. Across our business lines, we're addressing health and safety concerns related to the current pandemic by advising on strategies and facilitating both fully virtual and hybrid meetings and events.

**Be You at BCD:** We continue to grow as a company dedicated to creating thriving teams where everyone feels safe and welcome and respectful environments where everyone is valued. Driven by employee-led regional Diversity & Inclusion councils, we expanded internal education and awareness opportunities that help each of our people " *BE you* AT BCD."

**Life Sciences Center of Excellence:** It is our honor and privilege to serve 90% of the world's top 20 life sciences companies. As the companies we serve in the pharmaceutical and life science industries raced to deliver coronavirus vaccines and treatments that will help give people the confidence to travel again, we were at their sides. Our expanded service offerings focus on patient-centricity to further enhance travel programs, leverage cost and improve experience. Our support for these clients (and so many others) translates into a force for positive change backed by partnership and shared purpose. The world needs them and they need us. And that is something we can be truly proud of.

**Sustainable Development Goals:** As a signatory of the United Nations Global Compact since 2008, our actions are guided by its ten principles in the areas of human rights, labor, environment, and anti-corruption. We continue to integrate the UN Sustainable Development Goals (SDGs) that have the greatest impact on our business. In 2020, we identified five additional SDGs, extending the number of supported goals to ten. These two UN initiatives continue to be a driving force in our current and future sustainability strategy.



**Top rating for BCD Travel**  
Four times Gold and now Platinum.

[READ MORE](#)

# FIT FOR THE FUTURE

As we pass the one-year anniversary of the first coronavirus country lockdowns, uncertainty continues to rule the day. The world was galvanized by the approval of effective vaccines at the end of 2020, but we still don't know when vaccinations will create herd immunity and how national and international measures and restrictions will evolve.

Business travel will look very different as we move into a post-COVID world. But one thing will never change: **our commitment to the wellbeing of our people, our clients and their travelers, and the wellbeing of the global community in which we all live and work.** In partnership with our clients, we're tackling this dynamic global crisis with discipline and cautious optimism. Together, we look forward to renewed success and sustainable growth.



**John Snyder**  
President & CEO



**Kathy Jackson**  
Vice President & Executive  
Chair, Sustainability

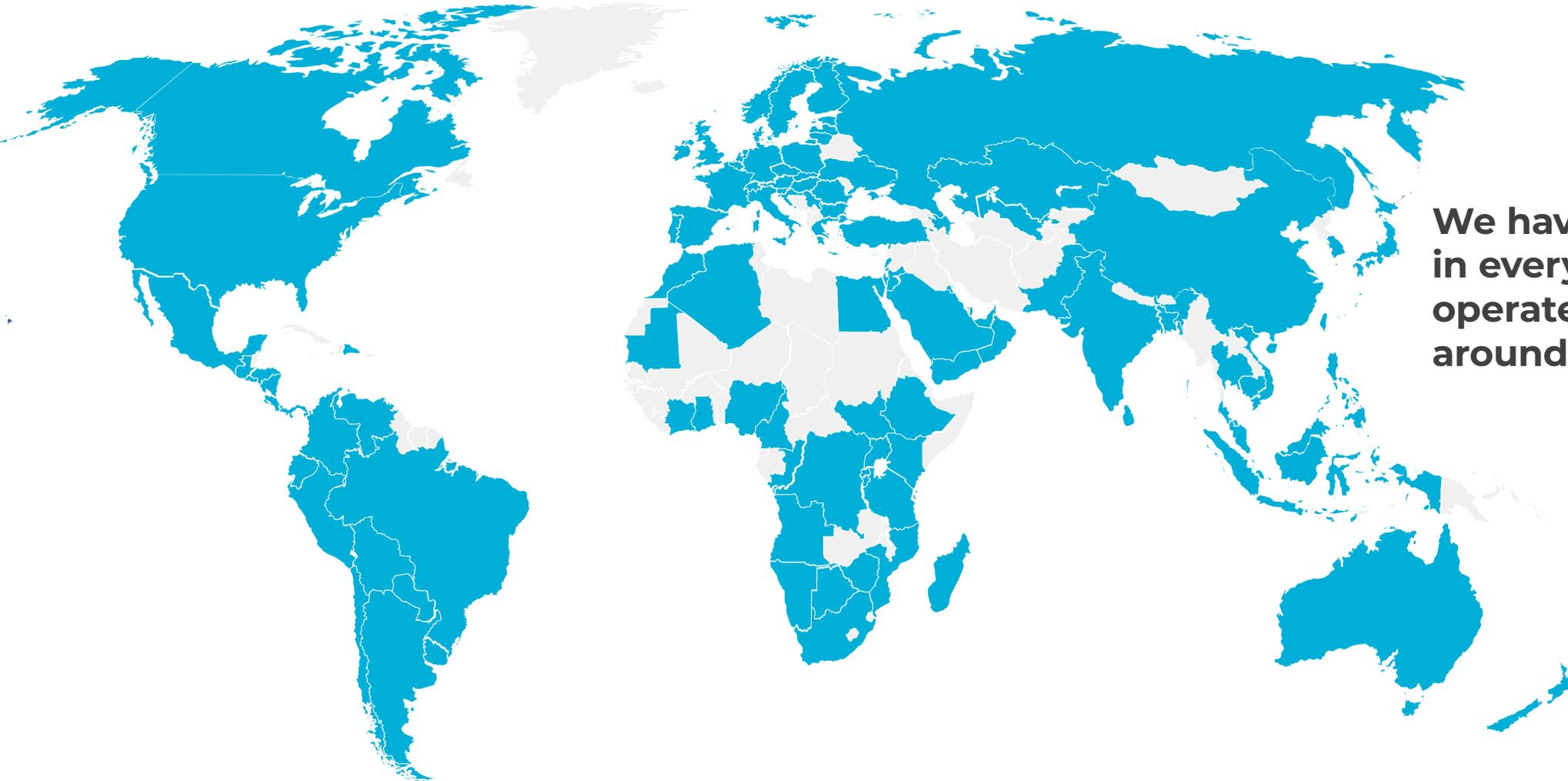
## SECTION 2

# OUR COMPANY

## ABOUT BCD TRAVEL

BCD Travel helps companies make the most of what they spend on travel. We give travelers innovative tools that keep them safe and productive and help them make good choices on the road. We partner with travel and procurement leaders to simplify the complexities of business travel, drive savings and satisfaction, and move companies toward their goals. In short, we help our clients travel smart and achieve more. We make this happen in 109 countries with a global client retention rate of 98%, the highest in the industry. For more information, visit [www.bcdtravel.com](http://www.bcdtravel.com).

## GLOBAL PRESENCE



We have headquarters in every region and operate in **109 countries** around the world.



BCD's other business lines include:

GRI 102-2, 102-45

## ADVITO

Advito is an international travel management consultancy, partnering with companies to develop innovative, highly dynamic travel programs that simultaneously reduce overall travel spend and raise employee satisfaction, delivering unparalleled, long-term savings. Our team of cross-industry experts provides analytics-driven supplier management, traveler engagement solutions and program & technology optimization tools that help businesses create measurable, meaningful and sustainable improvements in their travel program.

We start with the most robust data, collected from multiple sources, to produce a holistic view of clients' travel spend and traveler consumption. We use that data to inform our Dynamic Performance Framework model, enabling us to balance the competing needs of reducing travel spend while increasing employee satisfaction. In response to the current challenging environment, we are helping businesses integrate travel into their COVID-19 recovery plans and create customized back to travel strategies. For more information visit [www.advito.com](http://www.advito.com).

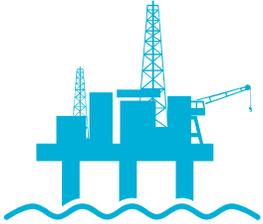
## BCD MEETINGS & EVENTS

At BCD Meetings & Events (BCD M&E), we believe in the power of human connection. Whether designing virtual or live events, we bring proactive solutions, innovation and imagination to create meaningful experiences that bring audiences together.

Working with clients, we focus on the user journey to create moments that engage, motivate, celebrate and inspire. As a world-leader in experience design and execution, we use our global network and buying power combined with our relentless passion and unmatched knowledge to drive results. Our expertise in virtual meeting solutions has earned us status as trusted advisors in a global pandemic, when human connection and safety are top priority.

For more information, visit [www.bcdme.com](http://www.bcdme.com).

**We focus on the user journey to create moments that **engage, motivate, celebrate** and **inspire**.**



### **BCD Energy, Resources and Marine Travel**

We bring together corporate and crew travel expertise to make managing travel simpler. We tailor our technology and processes by traveler type, allowing customers to manage all their traveler types within our platforms while accounting for varied policies and ways of engagement.



### **BCD Government Travel**

BCD Government Travel provides a wide range of travel services that align with U.S. government guidelines. Travelers get the information and options they need to make smart travel purchasing decisions. Designated government travel counselors provide expert advice and service to government travelers. They participate in specialized training to understand the specific needs of government agencies and employees on official travel.



### **BCD Life Sciences Center of Excellence**

At BCD, life sciences are our lifeblood. As the leading life sciences travel management and meetings company, we service over 100 organizations in this sector across travel, meetings and consulting, including 90% of the top 20 pharmas in the world. Within our companies, we support customers across the healthcare spectrum from pharmaceuticals to medical device companies, biotechs, hospital systems, CROs, insurance and beyond.



### **BCD Media & Entertainment Travel**

For more than 30 years, the world's leading media, entertainment artists, labels and production companies have trusted us with their travel. We provide a broad array of global services tailored to the entertainment industry's travel needs.



### **BCD Sports**

At BCD Sports, we focus on delivering unrivaled experiences. Whether it's the travel logistics of an entire sports team or building relationships through the power of athletics, our experts know success is in the details.

## AWARDS & RECOGNITION

EcoVadis Platinum rating for sustainability performance, 2020 (Gold rating 2016-2019)

Best Corporate Social Responsibility Program, Business Travel Awards, 2019

Winner in the category, 'Promotion of a Women-related Corporate Social Responsibility Project,' WINiT Awards, 2019

Flexjobs 100 Top Companies with Remote Jobs, 2015-2020

Forbes' Best Mid-sized Employers, 2021, 2019, 2017

Comparably's Best Company for Women, Diversity and Culture, 2019

Investors in People Silver-level accreditation, 2017-2020

Travel Management Company of the Year, Business Travel & Mobility Conference, 2019

Gold Stevie® Award winner for best travel app, 2020



Additional awards & recognition

[SEE MORE](#)

## SECTION 3

# OUR APPROACH

## **MISSION**

Our mission is helping people and companies travel smart and achieve more.

## **VISION**

Our vision is to be the world's most trusted and innovative travel management company. Our people make achieving our mission and executing our vision possible.

## STRATEGIC DIRECTION

Engaged, committed employees who live our values, create our brand—the partnership, simplicity and innovation that our clients perceive and receive at BCD.



### Partnership

We work together with colleagues, clients, industry peers, startups and suppliers to deliver experiences and solutions that add value and keep people healthy, happy, productive and confident.



### Simplicity

We've simplified complexity and reduced friction for clients, travelers and our own people. By improving our own responsiveness, agility and efficiency, ensuring that travel programs are fully and rapidly equipped for future growth.



### Innovation

We've invested in people, processes and technologies to deliver digital solutions to companies' travel and business problems; manage change with agility and anticipate what lies ahead for our clients and their travelers.

## OUR VALUES

Our strategy starts with our values, the guiding principles our company is based on, and the people who live them.

**Solve it together:** Collaboration connects us. There's no problem so tough that we can't tackle it together. Working as a team, we harness the wisdom (and energy) of the crowd.

**Act with purpose:** We embrace change and foster innovation. Our creativity and drive are positively contagious—and they get results.

**Do what's right:** We operate openly and foster transparency. Our team members, clients and communities always know where we stand.

**Give your best:** Passion powers us. We believe the only way to do great work is to love what you do. We're inspired by the people and places around us.

**Feed the future:** When we give others the tools, skills and opportunities to succeed, they flourish. When we give ourselves the same, we're unstoppable.

### Sustainability

We ethically manage our environmental, social and financial responsibilities to ensure our ongoing business success—without limiting options for future generations. And as we reinforce our commitment to sustainability, we're partnering with clients to help them build their own sustainable travel program initiatives.

### Diversity & Inclusion

Within our company, our own people bring D&I to life. Global and regional councils—composed of employees from every region, function and level in the company—are responsible for creating a framework for diversity and inclusion that celebrates and nurtures different voices, backgrounds and perspectives in our workforce—so that each individual can “**BE you AT BCD.**” We're working to build D&I awareness through relevant programs that engage people and teams across the organization.

**Our values are reflected in our commitment to sustainability and diversity & inclusion.**

# UN GLOBAL COMPACT

## WE SUPPORT



We've been a signatory of the UN Global Compact since 2008, and we continue to support the 10 principles on human rights, labor standards, the environment and anti-corruption across our sphere of influence. In committing to these principles – and in investing resources each year to compile our annual Communication on Progress to the UN Global Compact – we hope to enlist other companies globally to join the initiative to create sustainable organizations, sustainable governments and a sustainable planet.

# SUSTAINABLE DEVELOPMENT GOALS

We've supported the United Nation' shared plan of action for people, planet and prosperity since 2017. Through our strategic direction and business activities, we contribute directly and indirectly to the achievement of the SDGs. We identified and prioritized ten areas that are most relevant for our business.

Examples of how we support these selected goals can be found throughout the report.





## STAKEHOLDER ENGAGEMENT

We have a diverse range of stakeholders, including our customers and their travelers, travel industry groups, charities, sustainability groups and BCD staff. We engage our stakeholders around the globe in our planning and strategic development, to make sure our business direction reflects the proper priorities and business travel industry best practices. Our local markets play an important role in forming relationships with local stakeholders.

For us, engagement is a continual process, rather than a one-off exercise. We use a wide range of methods to reach our stakeholders, including focus groups, workshops, formal research and the myriad of conversations that take place between our staff, partners and customers on a daily basis.

**For us, engagement is a continual process, rather than a one-off exercise.**

GRI 102-12, 102-13, 102-21, 102-40, 102-42, 102-43, 102-46

## INDUSTRY ENGAGEMENT

We build strong relationships with industry trade associations that represent the interests of our customers and other stakeholders in the travel sector.

We are an allied member of GBTA (Global Business Travel Association) and work closely with GBTA associations in both the US and Europe. Colleagues from functions throughout the company represent BCD Travel on several GBTA committees both in the US and Europe:

- ✓ GBTA Global Board of Directors
- ✓ GBTA Advisory Board
- ✓ Sustainability Committee
- ✓ Aviation Committee
- ✓ Risk Committee
- ✓ Meetings and Events Committee
- ✓ Payment Solutions Committee

We are active across local country chapters of GBTA and are regularly invited to speak at GBTA events.

## SECTION 4

# GOVERNANCE, ETHICS & COMPLIANCE



Strong governance within BCD Travel provides the foundation for building a culture of ethical behavior and minimizing business risk. By acting with integrity, we gain the trust of our customers, business partners and other stakeholders and have a positive impact on society.



## GOVERNANCE STRUCTURE

We believe that a high level of corporate governance helps maintain our reputation as a trusted partner for our customers, partners, suppliers and other stakeholders.

### Supervisory Board, Management Board and Executive Committee

BCD Travel's Governance and Enterprise Risk Management structure is comprised of (a) Supervisory Board (Board of Directors), (b) Management Board (President & CEO, COO & CCO and Global CFO reporting to the Supervisory Board, among others, about all ERM topics) and (c) Executive Committee (Members of Management Board and Regional/Divisional Presidents & Global Function Executives such as EVP Supplier Relations, EVP Global Client Team and EVP Technology). All operational management across all functions has responsibility for directly identifying, assessing, and mitigating risks.

Operational management is supported by internal risk and compliance functions such as Information Security, Legal, Finance, HR, Performance & Process Solutions, Internal Audit and Sustainability in identifying, assessing and mitigating risk. External risk and compliance experts are engaged to support as indicated.

### Ethics Committee

The Ethics Committee comprises the global CFO, the SVP Internal Audit, SVP Global Legal and a representative of the BCD Travel Supervisory Board responsible for compliance.

**We believe that a high level of corporate governance helps maintain our reputation as a **trusted partner**.**



## SUSTAINABILITY GOVERNANCE

### Sustainability Core Team

The Sustainability Core Team defines our sustainability strategy, long-term and annual objectives. Quarterly updates from the Vice President and Executive Chair of Sustainability and the global executive team ensure that these leaders have complete insight into our sustainability program and how it's integrated throughout our organization—from strategic planning and risk management to monitoring implementation and performance. The Vice President and Executive Chair of Sustainability reports directly to the global CEO.

### Global Sustainability Team

The Global Sustainability Team is led by the Vice President and Executive Chair of Sustainability and the Director of Sustainability. To implement, monitor and maintain our sustainability projects and goals, we rely on a structure of regional and local in-country sustainability coordinators across our global network.

Representatives from various functions across our global network such as human resources, marketing, sales, program management, product development, consultancy, and meetings and events provide valuable input to our sustainability initiatives. This dedicated group of individuals helps raise awareness on sustainability issues and aids in advancing the standards of environmental, ethical and social business practices within our organization. The team meets on a monthly basis.

We also maintain separate leadership groups dedicated to areas such as operations, risk and compliance, internal audit, legal, and global procurement. These groups include leaders with relevant expertise from business segments and functions. The Sustainability Core Team meets periodically with these stakeholder groups to evaluate progress in implementing our strategies and to evaluate performance goals.

### Environment, Health & Safety Committee

The Director of Sustainability is responsible for monitoring our global environment, health and safety (EHS) management system, aligning quarterly with EHS coordinators in our wholly-owned countries and facilitating annual external ISO audits. A global network of local EHS coordinators ensures that all requirements of the management system are met in all office locations in their countries.

The Director of Sustainability reports to the Vice President and Executive Chair of Sustainability.

BCD Travel is currently ISO 14001 (environment) and ISO 45001 (health & safety) certified in 29 countries.

### Diversity & Inclusion Councils

The Vice President and Executive Chair of Sustainability is the central point of contact for regional D&I Councils and is responsible for defining and guiding the internal diversity & inclusion program.

D&I Global Councils across five regions provide recommendations for D&I strategies, set local and regional goals and champion education programs in their regions and local markets.

The Vice President and Executive Chair of Sustainability reports to the Global CEO.



### Human Trafficking Committee

The Human Trafficking Committee is championed by a group of dedicated individuals throughout our global organization to create internal and external awareness for human trafficking. The committee's mission is to educate on the vulnerabilities, signs to look for and where to report if someone suspects human trafficking. All efforts are aimed at eradicating human trafficking and the sexual exploitation of children.

The committee works closely with ECPAT and A21 in raising awareness through education. The Vice President and Executive Chair Sustainability is the Executive Sponsor for the committee.

**We rely on a structure of regional and local in-country sustainability coordinators across our global network.**

## GOVERNANCE IMPACT ON SUSTAINABLE BUSINESS PRACTICES

All BCD Travel employees are expected to behave with integrity at all times. We embed accountability for ethical business conduct through corporate policies, employee training, and transparent, stakeholder-focused reporting. To promote good governance throughout the business travel sector value chain, we use our scale, market position and trusted relationships to encourage ethical behavior by our partners.

GRI 102-16, 102-21, 102-22, 102-25, 102-42,  
102-43, 205-1, 205-2, 409-1

### Bribery and corruption controls

We're trusted by our customers throughout the world. Our zero-tolerance approach includes actively engaging all employees in anti-corruption policies and practices. We uphold the integrity of the travel industry and help support ethical societies that promote sustainable development.

This means avoiding corruption of all kinds. We abide by all applicable anti-bribery laws, including FCPA, the UKBA and the local laws in every country in which we do business. Our internal audit department is responsible for ensuring compliance with anti-bribery and corruption applicable legislation.

### Stakeholder engagement

We build relationships with customers, new prospects, employees, non-governmental groups, and suppliers who seek common ground on sound governance. We rely on these stakeholders to understand and mirror the ethical conduct we expect from our employees in all business challenges and activities.

### Responsible sales

We're committed to ensuring that all sales employees carry out their responsibilities in an honest, truthful and ethical manner, whatever the local laws, culture or regulations.

### Human rights

We practice due diligence to guard against human rights violations and have expanded existing corporate policies to set clearer expectations. This is demonstrated in our anti-slavery policy in support of the [UK Modern Slavery Act](#) and the human rights section of our [Supplier Code of Conduct](#). We also support End Child Prostitution and Trafficking (ECPAT), the leading international organization seeking to end the exploitation of children by raising awareness, advocating for victims and pushing for policy and legislative changes to protect them.

"Don't Look Away," an online human trafficking course, included in our compliance training program, is made available to all employees through our global learning system, Knowledge Hub.

## Ethics & compliance

Our Code of Conduct applies to all BCD Travel employees, members of the Executive Board, consultants and other agents when they represent or act on behalf of BCD Travel. It outlines our company's policies and expectations for:

- ✓ Practicing good citizenship, including support for human rights
- ✓ Preventing corruption
- ✓ Promoting a positive and safe work environment
- ✓ Ensuring transparency in our disclosures
- ✓ Avoiding conflicts of interest
- ✓ Protecting sensitive information
- ✓ Properly using company assets
- ✓ Complying with all laws in all countries where we operate
- ✓ Competing fairly
- ✓ Considering sustainable practices in our business dealings

Our systems and procedures ensure that our commitment to anti-corruption is steadfast.

Our stance is clearly stated within our Global Legal Group Policy, which has been made available to all employees across the globe via applicable communication channels.

A strong message against corruption is included in the [Code of Conduct](#). Our Non-Compliance Reporting Policy provides guidelines on bringing any potential misconduct to management's attention.

Anti-corruption issues may be larger in some markets than others, so we encourage local initiatives to help employees understand the broader issues and ensure all forms of corruption and bribery are prevented.

We ask suppliers and partners globally, to sign our Supplier Code of Conduct. To date, more than 88% have signed and returned the document.

In 2016, we established the Group Policy Governance Process document that defines the drafting and approval process of BCD Travel policies. It stipulates that our policies be reviewed regularly and adapted as indicated.

The Group Policy Governance Process defines the method for the creation and implementation of policies and applies to all existing and future policy documents.

Policies that were previously included in the Global Group Policy document were reviewed, updated and communicated to all employees in line with the Group Policy Governance process. These fifteen new global policies cover topics relating to legal, HR, finance, fraud management, mergers & acquisitions, sanctions and third-party payments, procurement and strategic sourcing and human rights.

The Code of Conduct, the Non-Compliance Reporting Policy and the SpeakUp System have been implemented in 30 majority-owned countries. Three newly-acquired markets, Colombia, Poland and Japan were included in 2019 and Italy in 2020.

All employees are required to participate in a mandatory Code of Conduct training which provides specific training on identifying corruption and how to report non-compliance to the Code. The participation rate in 2019 reached 97%.

Bi-annual Code of Conduct training is mandatory for all employees globally and for new hires as part of the Compass onboarding program.

In 2019, the three modules of our Code of Conduct training program and the Code of Conduct refresher training were consolidated into one compliance training course. A section covering the Global Group Policies was included.

The Code of Conduct, Non-Compliance Reporting Policy and supporting documentation, awareness materials as well all-new Global Group Policies are communicated to all employees through our global intranet.

A compliance email account is monitored by the global functions internal audit and legal group. As previously noted, the independently operated BCD Travel SpeakUp System offers our employees the opportunity to anonymously report any misconduct. All reported incidents are investigated and the results are reviewed by a designated member of the BCD Travel Board responsible for compliance.

Ethical concerns can be raised by every employee via all available communication channels:

1. The manager (in line with our open-door policy)
2. The compliance email account (compliance@bcdtravel.com) or
3. Anonymously (and in their respective native language) via the SpeakUp System

A complete review of compliance incidents since the inception of our formalized compliance program in 2014 was conducted and more sophisticated reporting with key risk indicators was put in place. The reporting allows year-over-year comparisons across regions/divisions down to individual legal entities.

The global internal audit team also partners, upon request, with the compliance and ethics departments of our clients to promote ethical business practices beyond the boundaries of the company or industry.

We've further improved our cross-functional approach to preventing and detecting fraud. External fraud attempts are reported to our fraud email account (fraud@bcdtravel.com). Fraud warnings are immediately drafted and issued using various communication tools and specifically designed communication lists.

In line with our zero-tolerance stance against fraud, we investigate all reported misconduct and take decisive action, including legal action if necessary, towards any internal or external party.

We participate in an annual sustainability performance assessment conducted by EcoVadis, the leader in global sustainability ratings. Our ranking in the top 1% of all suppliers assessed by EcoVadis since 2016 confirms our high standards of business ethics and compliance. Our sustainability performance was recognized by EcoVadis in April 2020 with the new Platinum rating.

## Corporate initiatives and policies that support governance and direct employee action

## Risk management

BCD Travel's risk assessment process represents the cornerstone of our governance framework. We evaluate risk based on levels of confidentiality, integrity and availability. The risk assessment process outlines our methods for capturing and analyzing risks within our business. Risk assessments consider both our organization-wide strategic, operational, compliance, and reporting requirements, plus those requirements relating to our services, processes, or functions such as supply chain, or regulatory compliance.

BCD Travel has implemented the following risk mitigation management systems and policies globally:

- ✓ ISO 14001:2015 environmental management
- ✓ ISO 45001:2018 occupational health and safety management
- ✓ ISO 27001:2013
- ✓ ISO 9001:2015
- ✓ Code of Conduct
- ✓ Global Group policies
- ✓ Global Information Protection Policy
- ✓ Privacy policy
- ✓ Supplier Code of Conduct



Risk  
categories

## PROTECTING OUR ORGANIZATION

### Information Security

BCD Travel relies on information and information technology (IT) to provide services and information to users and customers around the globe. As the use of technology increases, so do the risks associated with technology, including the unauthorized disclosure of sensitive information and the unscheduled downtime of IT services and applications.

To mitigate these circumstances and protect client data, we base our Information Security program on international security standards, such as the ISO 27001, data privacy laws, best practices as well as input from our clients.

**We base our Information Security program on international security standards, data privacy laws, best practices and input from our clients.**

### Security policies and procedures

Our Information Security team develops, implements, monitors and maintains policies and procedures aligned with ISO 27001 controls and PCI-DSS requirements. Below are some examples of the policies and procedures we have in place for maintaining data protection and privacy.

- ✓ Acceptable use
- ✓ Access controls
- ✓ Antivirus and malware
- ✓ Application development
- ✓ Configuration change management
- ✓ Data classification
- ✓ Password
- ✓ Patch management
- ✓ Privacy
- ✓ Personnel screening
- ✓ Third-party connectivity

## Information Security organization

Dedicated Certified Security Professionals protect assets in the care of BCD Travel. These professionals, located in America, Europe, and Asia Pacific maintain cutting-edge technical expertise and professional designations such as Certified Information Security Manager (CISM), Certified Information System Security Professional (CISSP), Certified in Risk and Information System Control (CRISC) and many more. BCD Travel integrates information protection within our operations and we maintain business alignment using steering and advisory committees and risk assessments.

## Information Security program — operations

**Application security assessments** provide an added layer of security by assessing the security of applications used by BCD Travel to collect, store or process sensitive information. We use internal and external resources to perform these assessments and we track any issues until resolved.

**Change management** includes detailed testing, approval and implementation procedures for moving changes to the production environment.

**Client management** provides proactive management of client security expectations.

**Communication and training** provides security notification, awareness, training and messaging throughout the company and all its business lines.

**Compliance** manages compliance efforts for appropriate business and IT assets with an efficient, streamlined, lifecycle-based approach.

**Fraud management** includes assisting with the prevention, detection, mitigation, investigation and prosecution of fraudulent activities against BCD Travel.

**Growth and development** identifies, assesses, matures and enhances the security posture of the countries within the BCD Travel group portfolio.

**Incident management** includes procedures to investigate, correct, document, and review security events, mitigate their impact, and prevent future security events. We deploy network IDS/IPS to monitor network traffic for malicious activity.

**Network operations center and security operations center** personnel monitor systems, respond to alerts and distribute reports.

**Risk management** supports the business operations in identifying, assessing and mitigating risks within business processes, applications and information technology systems.

**Security architecture** establishes and guides the architecture of the BCD Travel enterprise to ensure security integration throughout the technical infrastructure.

**Security monitoring** ensures that security technologies operate to protect and secure the BCD Travel enterprise.

**Strategy and governance** ensures our security program and tasks align with business objectives.

## 2019/2020 Highlights

During 2019 and 2020 we continued to work to protect the integrity of our employees' personally identifiable information and customers' sensitive data, as well as the intellectual property that supports our business operations and service innovation. Despite the COVID-19 pandemic, the requirements and challenges for data protection and information security have remained high. Initiatives in the areas of governance, compliance, cybersecurity, payment security, customer security and operations security, as well as new business and risk management, were continuously monitored and improved.

## Compliance

The following certifications were renewed through external audits:

- ISO 27001 and ISO 9001
- PCI Reports on compliance for:
  - TSPM, AgentSource Booking, Atlanta CDE, PCI Merchant Compliance

In 2020, we obtained the following audit reports and certifications for the first time:

### SOC 2 Type 2 Report

- Auditing procedure that ensures that we securely manage data to protect the interests of the organization and the privacy of our clients.
- Defines criteria for managing customer data based on five "trust service principles"—security, availability, processing integrity, confidentiality and privacy
- Type 2 details the operational effectiveness of those systems.
- TISAX-VDA Certification
  - TISAX (Trusted Information Security Assessment Exchange) serves as a cross-company recognition of assessments of information security in the automotive industry based on a common testing and exchange mechanism under the sponsorship of the ENX Association.

## BY THE NUMBERS

**> 95% security awareness training** completion rate for six years in a row

**109 countries** audited on security compliance minimums

**400 billion logs** analyzed and scanned for security issues

**24x7x365 monitoring** for potential threats

**118 client assessment** questionnaires completed

**193 requests** for security risk assessments completed

**90% of top 30 suppliers reviewed** for information security compliance due diligence

**340% increase** in Application Security scanning compared to 2018

**89 RFP/RFI** questionnaires,  
**16,500** security-related questions answered

## Data Privacy

We take the responsibility to protect the client, traveler and employee data that we hold very seriously. We manage that protection through an interdisciplinary approach to data privacy that includes a global data protection officer, IT security specialists, and legal and privacy experts.

Our dedicated Data Privacy team is part of BCD's Global Legal department and provides support by:

- ✓ Negotiating privacy provisions of agreements with customers, vendors, suppliers, and others that BCD enters into agreements with that touch on personal data.
- ✓ Reviewing the privacy friendliness of BCD systems, tools, and development projects.
- ✓ Forming part of the incident response team in the event personal data may be accessed inappropriately and helps stakeholders communicate with affected parties.
- ✓ Serving as the initial point of contact for individuals who have questions about how BCD handles their personal data.

- ✓ Working closely with many teams throughout the organization, including Information Security, Global CDS Operations and Human Resources.
- ✓ Helping employees understand how we can best handle personal data for our employees, customers, and business partners.

### Updates and monitoring

We continuously monitor data protection laws in all the countries where we operate to update our policies, procedures and agreements relating to personal data. Our privacy team also monitors non-data protection laws and proposals which may impact how BCD processes personal data. Brexit serves as an example. The Trade and Co-operation Agreement (TCA) between the European Union and the United Kingdom, reached in the final days of 2020, includes a section on transferring personal data across the English Channel. The TCA provides a four to (possibly) six-month grace period during which personal data may be transferred. We continue assessing our agreements, internal systems, vendors and business partners in preparation for any changes which may be required for EU-UK personal data.

### International data transfers

International transfers of personal data were a major topic in the privacy world in 2020 due to a high court decision (European Union Court of Justice Judgment of the Court (Grand Chamber) of 16 July 2020). We continue to lawfully transfer personal data internationally using our Intra-Group Agreement and Standard Contractual Clauses. Our Binding Corporate Rules (BCR) are in the final stages of approval with the Dutch Data Protection Authority. Once approved, the BCR will document BCD's adherence to some of the highest data protection standards currently available. Since the high court decision, we've carefully reviewed and assessed the impact on our way of working, our business, our systems and our business partners. We continue to monitor these and adjust accordingly.

**We take the responsibility to protect the client, traveler and employee data that we hold very seriously.**

## Assessments

Continuous improvements to our assessment process for data protection and privacy practices impact assessments which include a review of our internally developed tools and technologies. We continue enhancing our methods to ensure internal consistency and coordination between departments.

## Data subject rights

We continue improving and enhancing our process to respond to requests from data subjects seeking to exercise their rights (access, correct, delete) to their personal data. Every member of our privacy team is trained to address requests and coordinate with the appropriate systems, technology and colleagues to expedite responses.

## Training and awareness

Data protection training is required during the onboarding of all staff and annually thereafter. Certain stakeholders receive supplemental information to appropriately inform our clients and business partners about our data protection standards and program. 97% of employees completed mandatory GDPR training.



## OBJECTIVES & RESULTS

FOCUS AREA	LONG-TERM COMMITMENT	2019 OBJECTIVE	2019 RESULTS	2021 OBJECTIVE
<b>Business Governance, Ethics &amp; Compliance</b>	Further develop our governance, compliance and ethics programs to cover global operations; demonstrate transparency and leadership to all stakeholders.	<p>Continue the multi-year review and update of five global group policies; include sustainability criteria where appropriate.</p> <p>Revise Code of Conduct refresher training to include a section on the new Global Groups Policies.</p> <p>Roll out Code of Conduct, Non-Compliance Reporting Policy and SpeakUp System to all employees in recently acquired markets.</p>	<p>Four new global group policies were introduced, 3 policies were reviewed and updated.</p> <p>Training on Global Groups Policies was included in Code of Conduct training in 2019.</p> <p>Rolled out Code of Conduct compliance training modules to newly acquired markets - Colombia, Poland and Japan in 2019, Italy in 2020.</p>	<p>Review and update all Code of Conduct training modules for inclusion in 2021 all-staff, mandatory compliance training.</p> <p>Monitor legislative regulations to implement the EU Whistleblowing Protection Directive; identify whether any adjustments need to be made to the Non-Compliance Reporting policy.</p>
<b>IT Governance &amp; Data Protection</b>	Continue to protect 100% of corporate and customer data and information from loss, manipulation, unauthorized access and falsification, by complying with legal provisions and by adopting international security standards such as ISO 27000 series and PCI - DSS into global security standards.	Implement new security solutions to protect our key systems and information such as URL filtering, Web security services, DLP cloud deployment and endpoint detection and response tools.	<p>Deployed proactive threat hunting technology in NORAM and global DLP rollout started.</p> <p>340% increase in Application Security scanning compared to 2018.</p> <p>33% increase in logs analyzed and triaged by Cybersecurity Operations.</p>	<p>Aggregate and manage risk at an enterprise level. Renewal and additional certification - NIST 800-171 Audit and SSP maintenance.</p> <p>GDS Security improvement – access management, incident response and triage.</p>
<b>Sustainability Governance</b>	Continue to improve sustainability performance throughout all areas of our business.	<p>Transition from OHSAS 18001 to ISO 45001; complete ISO 45001 certification in 100% of all wholly owned countries.</p> <p>Maintain EcoVadis Gold rating.</p>	<p>Transitioned the OHSAS 18001 health &amp; safety management system to ISO 45001:2018. Achieved certification in 99% of wholly-owned locations by December 2019.</p> <p>Achieved EcoVadis Gold rating for the 4th consecutive year in 2019. Achieved Platinum rating in 2020.</p>	<p>Re-certify 100% of locations to the ISO 14001:2015 and ISO 45001:2018 standards.</p> <p>Maintain EcoVadis Platinum rating.</p>

Due to COVID-19's effect on the travel industry and our business, no objectives were set for 2020

## SECTION 5

# WORKPLACE PRACTICES



Our company's future depends on the quality, performance and commitment of our workforce. A talented, healthy and engaged employee population drives performance and powers innovation, making it imperative that we continue to attract, develop, motivate and retain employees.

## A BETTER WORKPLACE

We help our people strike a healthy balance between their professional and personal lives, creating a flexible workplace that meets the needs of the company and the individual. We operate our services and facilities with a single-minded objective: to protect the wellbeing of our employees, customers, the public and the environment. We defend our employees from unreasonable health and safety risks, forbidding any acts or threats of physical violence—including intimidation, harassment or coercion in the workplace or while conducting business off company property. We specifically prohibit harassment based on race, color, national origin, ancestry, religion, creed, sexual orientation, disability, marital status, medical condition and age.

**We operate our services and facilities with a single-minded objective: to protect the wellbeing of our employees, customers, the public and the environment.**

Our global HR policy outlines the standards and criteria in place to protect the wellbeing of our worldwide workforce.

### **Recruitment, selection and onboarding**

Our long-term success depends on our ability to attract, recruit, develop and retain engaged employees, ensuring our continuous growth. In line with the Global Harassment Policy, we don't tolerate discrimination or harassment. In upholding the Global Equal Opportunities Policy, we're fully committed to promoting equal opportunities in employment. Our employees and applicants receive fair and equal treatment.

Our onboarding process offers a consistent, robust experience, ensuring that every new team member has the same opportunity to learn about our culture, immerse themselves in it and feel supported from day one.

## Work environment

Honest communication is a vital part of a positive work environment. We encourage employees to bring forth their ideas, suggestions, questions and concerns. We listen carefully and act upon what we hear. We protect the confidentiality of all personal information in our employees' records and never release personal information to outside sources unless we're legally required to do so. We also offer competitive pay and benefits, appropriate for the markets we operate in.

## Social dialogue

We foster engagement and social dialogue by regularly seeking direct feedback from our people on improvements that need to be made and ways to achieve them (e.g., employee surveys, enterprise social media, virtual and face-to-face meetings, project teams). We provide information through multiple channels (e.g., global intranet, videos, email, internal and external company magazines, white papers, blogs and company websites) to help our employees stay updated on the company's progress and their contribution to it.

We nominate high-achieving employees to the Circle of Excellence program, designed to reward staff members who demonstrate outstanding achievement in support of BCD Travel's core values: Solve it together, Act with purpose, Do what's right, Give your best and Feed the future.

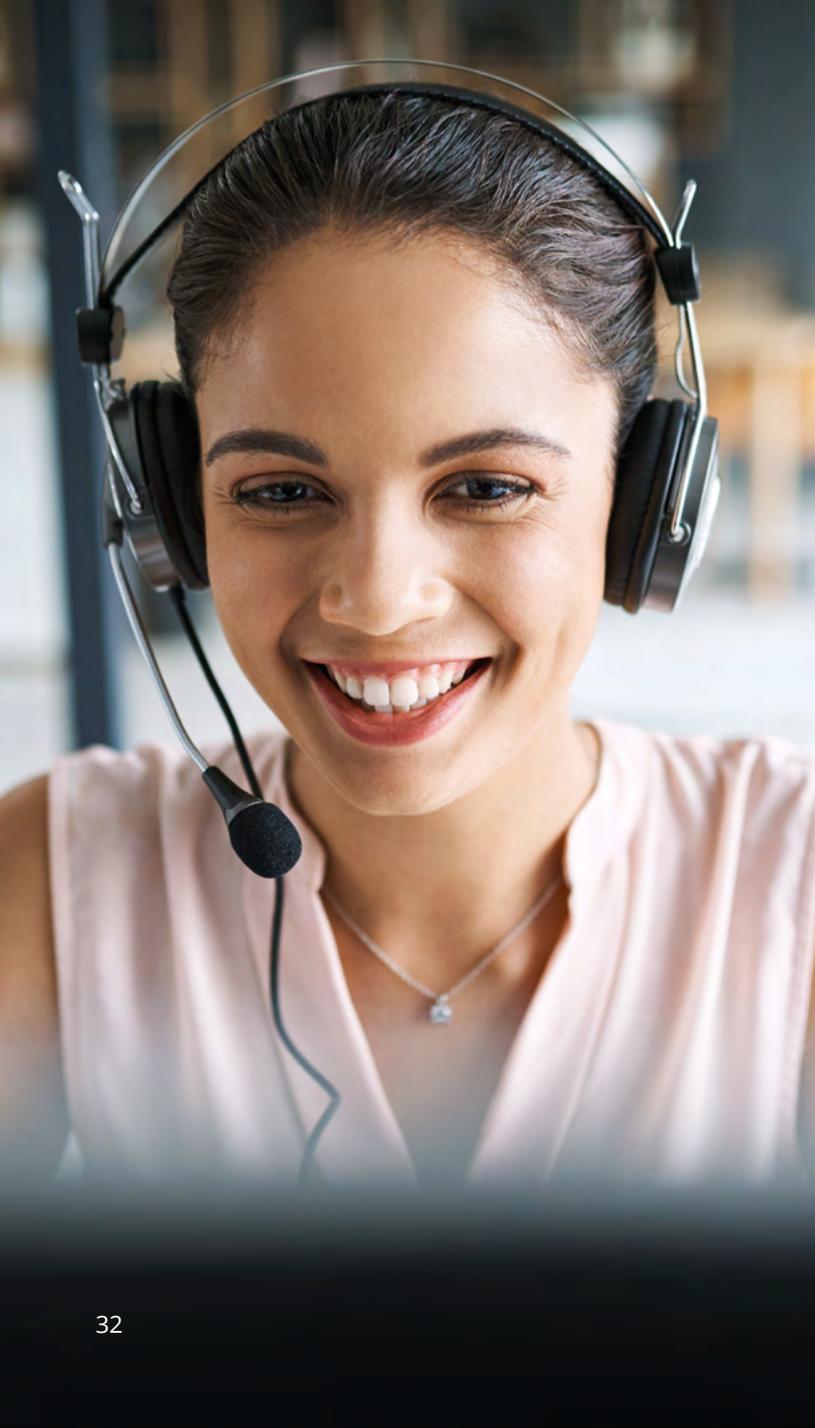
We recognize and respect our employees' right to freedom of association and to join collective bargaining organizations. Currently, 23% of our employees are covered by collective bargaining agreements. The European Works Council (EWC) was created in 2008 to act as a platform for information and consultation to support BCD Travel's business activities in the European Economic Area. The EWC contributes to the preparation and transparency of transnational projects and promotes considering how employees may be significantly impacted by business decisions.

EWC meetings take place at least once per year and provide an opportunity to facilitate social dialogue, strengthen cohesion and further develop the spirit of cooperation between management, employees and their representatives.

## Duty of care

We uphold the duty of care for our employees while they're on the road by providing traveler tracking, crisis and emergency response and security awareness and education. We issued 'Travelsafe' cards to our employees, a consolidated company ID, IATA and travel insurance card in one, allowing us to better support them when outside of their regular working environment.

**BCD Travel's core values:  
Solve it together, Act with  
purpose, Do what's right,  
Give your best and Feed the  
future.**



## Talent support and growth

We continue to build on existing initiatives that make great people want to stay with us. Job enrichment is key. Our people are already exploring new environments, working with new teams and developing new skills. For example, thanks to programs like Challenge and to the sheer, everyday motivation of our people, hundreds of employees work on special assignments or projects each year, beyond the scope of their defined role. We continue to explore opportunities for employees to gain new experience in their own countries and across borders.

We help people grow through a comprehensive, consistent appraisal process linked to individually tailored development opportunities. We expect our managers to devote time and energy to coaching their team members and helping our people succeed. To make this happen, we invested heavily in an online learning platform with a wealth of robust training content. And we continue to emphasize career progression so people can grow with the company, ensuring renewed focus on our long-term sustainability through succession planning workshops to identify future leaders.

Our frontline agents are the voice of our company. We have a great reputation for service—but customer demands are evolving, and we've upped our game. We align training, technologies and best practices for our operations teams with our growing consumer-focused mentality. The tools we use, improve data quality, reduce manual work for agents and give them more consultative time with their clients. AgentSource® gives agents access to greater content in a consumer-grade booking environment. The result: They can be savvy, trusted advisers for every customer they interact with.

## Human resources management

2019 saw the company make the single biggest people investment in the history of our company with the implementation of SAP SuccessFactors. We've made implementing global standards and processes more efficient and taken our HR administration to the next level. We can benefit from economies of scale with opportunities that are future-fit and aligned with our growth as a global service provider.



### **Workplace health and safety**

We focus on providing our employees with a safe and healthy work environment. Our goal is to provide an injury-free workplace and our “target zero” initiative promotes a global culture where employees embrace a zero-injury mentality.

As part of our global sustainability initiative and in response to internal, client and market expectations, we developed and implemented an environment, health and safety (EHS) program. This management system was designed to meet global best practice standards, reduce our environmental impact and reduce health and safety risks. We are dedicated to avoiding environmental incidents, accidents, injuries and work-related illnesses at the locations we occupy and operate.

**99% of global, wholly owned operations are covered by ISO 45001 health and safety certification.**

To achieve this target, a series of policies and standards have been adopted globally that define a framework for the management of environmental, health and safety topics. The model for our EHSMS is based on the internationally recognized ISO 14001:2015 and ISO 45001:2018 standards.

99% of our global locations covering twenty-nine wholly owned markets achieved ISO 14001 and ISO 45001 certification by December 2019.

In 2020 we updated our global EHS management system to include global and local health and safety requirements to ensure the safety of our employees during the COVID-19 pandemic.

### **Workplace flexibility**

Our flexible work policy supports working from home and shared parental leave, helping our employees accommodate their priorities outside of work.

### Learning and development

We also give people more and better ways to learn. We strive for customized, individualized approaches that balance practical experience, virtual classrooms, self-guided learning and group learning. We know that different people learn in different ways, so we'll continue leveraging blended learning via Knowledge Hub, boosting the rich and relevant training available across the globe.

As we give exciting opportunities to current employees who want new challenges, we also want to bring new people onboard whose skills enhance our strong base. To drive this effort, we continue using relevant social media-driven recruiting channels.



Each year the Global Business Travel Association (GBTA) runs GBTA Ladders, a mentoring program aimed at helping the next generation of business travel professionals build connections, knowledge and skills. We're proud to announce that eight BCD employees from different functions throughout the company will participate in the GBTA Ladders 2020-2021 program.

Three senior leaders have also committed their time to serve the important role as mentors to in the program. They join other highly accomplished travel professionals from buyer and supplier organizations.

### Diversity & Inclusion

Our global and regional councils, comprised of employees from across the company, collectively set BCD's diversity and inclusion priorities and course, crafting a framework that celebrates and nurtures different voices, backgrounds and perspectives in our workforce—so that every individual can **"BE you AT BCD."** We're building D&I awareness and education through relevant programs that engage people and teams across the organization.

### Women of Distinction Award

We created the Women of Distinction award in 2019 to celebrate extraordinary women in our organization. We hope it will inspire people across the company by putting a spotlight on role models of achievement and innovation. The annual award is timed to coincide with International Women's Day on March 8.

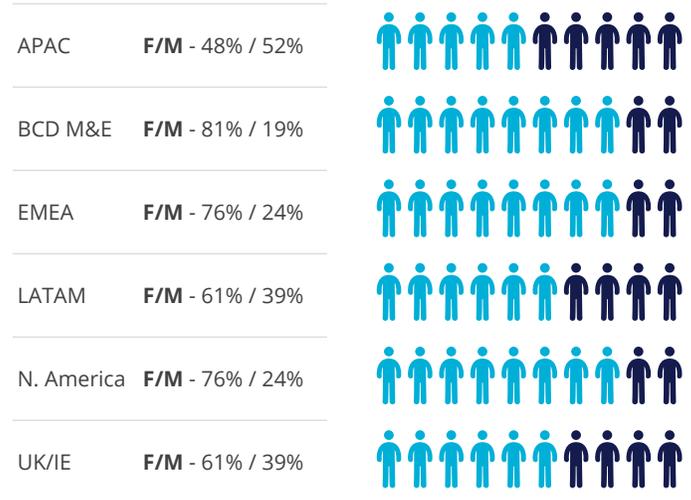
In 2019, BCD Travel won the Company Achievement Award in the category, "Promotion of a Women-related Corporate Social Responsibility Project."

We are increasing flexibility in jobs, expanding training programs and cultivating an environment that motivates women to climb the ranks.

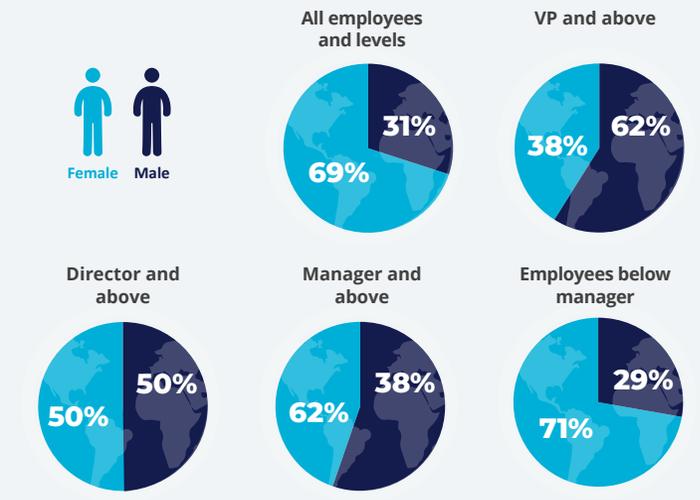
In 2019, a BCD Travel Senior Vice President was named one of the Top 40 Women in Travel by the organization, Women in Travel (WINiT). WINiT's inaugural list recognizes women and their respective companies for highlighting the value of female leadership in the travel industry.

### Gender split

#### Regional gender



### Gender by level



## EMPLOYEE FEEDBACK

Since late 2018 we've solicited weekly employee feedback via a global employee engagement platform and providing managers with a real-time results dashboard. With this process, we increased the priority and focus on the wellbeing and engagement of our most valuable asset: our people. This strategic investment has seen employee engagement rise year over year.

**Employee appreciation week** takes place every year in many countries in North America, Latin America and Asia Pacific. Office events are sponsored by supplier partners and prizes are awarded to employees. Virtual employees participate digitally.

A global **Equal Employment Opportunity** statement, as well as policy statements on drugs, harassment, quality and fairness are included in local employee handbooks.

**Circle of Excellence** (COE) is a peer recognition program for all employees. It is an important part of the company's culture. Employees and leaders vote to honor the excellent work of their peers. The program includes all employees from BCD Travel and Advito in wholly owned countries.

### Recognition

- ✓ We've earned eight "Most Admired Travel Management Company" honors by readers of The Beat, a leading travel industry publication.
- ✓ Repeated recognition by Forbes that we're a top U.S. employer.
- ✓ Client awards for service excellence.
- ✓ Recognition for our innovative Management Associate Program for interns and more.



## SUPPORTING OUR EMPLOYEES IN A GLOBAL PANDEMIC

Wellbeing has always been important at BCD Travel, and COVID-19 has shone a new spotlight on its relevance. As a family-owned organization, work-life balance is key for us. Supporting our employees through the stresses and strains that the pandemic continues to bring, is core to our employees' wellbeing.

Like many other businesses, we were forced to temporarily close many offices around the globe and revert to remote working with little or no time to plan. We recognized the impact that this change had and the importance of offering support to our employees across all areas of their lives, both personally and professionally.

Regular communication and engagement with our employees was, and continues to be, key to this support. We've shifted from traditional face-to-face methods to more creative virtual communication such as virtual team meetings, town halls, virtual cafes, and MySource, our global intranet.

Managers have been actively encouraged to reach out and stay connected to their teams, including those employees who are on furlough or work time reduction.



Our Wellbeing hub on MySource supports three key pillars of employee wellbeing: Emotional, Physical and Social.

Regular articles, videos and resources are shared with our employees on topics such as stress and anxiety, resilience, nutrition, physical exercise, finance, remote working, social skills and many more.

Highlights in 2020 included promoting Global Mental Health day in October by reminding people around the world of the value of taking care of their mental health. Never before has its message been more meaningful than during a global pandemic.

We continue to promote a culture of openness and understand that wellbeing should continue to be a priority at BCD Travel. Our employees are encouraged to speak with their manager, a colleague or friend if they are struggling or reach out to our Employee Assistance Programs for professional support.

Employee wellbeing remains a high priority for us as we continue to build better employee morale and engagement and a healthier and more inclusive workplace.

## OBJECTIVES & RESULTS

FOCUS AREA	LONG-TERM COMMITMENT	2019 OBJECTIVE	2019 RESULTS	2021 OBJECTIVE
<b>Talent Management</b>	<p>Foster a high-performance inclusive culture that develops talent to excel in our organization.</p> <p>Build on talent management initiatives to enrich our people's work environment and put them on a clear path to professional growth.</p>	<p>Extend the Challenge development program to Director and Senior Director level to increase their focus on people, management and strategic direction.</p> <p>Achieve a 12% participation rate in the program.</p>	<p>60 program graduates in 3 separate programs that each ran over 6 month periods. Achieved 15.79% participation at the director level.</p>	<p>Enhance the employee/ manager relationship across 100% of the organization to regain strength in an engaged workforce post COVID-19.</p> <p>Use eNPS as a measurement of progress.</p>
<b>Health and Safety</b>	<p>Focus on providing our employees with a safe and healthy work environment.</p> <p>Work with our people to find the work-life fit that's best for them, creating a flexible workplace that serves the requirements of both the company and the individual.</p>	<p>Achieve ISO 45001 certification in 100% of wholly owned locations.</p> <p>Improve the focus on employees' occupational health and wellbeing requirements. Introduce three new commitments for employee wellbeing.</p>	<p>Achieved ISO 45001:2018 certification in 99% of all wholly-owned locations in December, 2019.</p> <p>A global health and safety training course was mandated; a 94% completion rate was achieved in 2019.</p> <p>A global wellbeing platform to centrally host all employee targeted information was launched in 2020.</p> <p>Employee engagement scores highlighted a higher employee satisfaction rating from employees who were home-based. Our global work from home employee base increased in 2019 by 3.2% to 35.3%</p>	<p>Update ISO 45001:2018 management system to include local COVID-19 legal requirements. Re-certify 100% of wholly-owned locations.</p> <p>Continue to support all employees working from home with wellbeing initiatives under three key pillars: Emotional, Physical and Social, through regular articles, videos and training resources. Professional assistance, if required, will be provided through the Employee Assistance Program.</p>

## OBJECTIVES & RESULTS CONTINUED

FOCUS AREA	LONG-TERM COMMITMENT	2019 OBJECTIVE	2019 RESULTS	2021 OBJECTIVE
<b>Employee Engagement</b>	<p>Build an engaged workforce that generates ideas and innovations and encourages stronger performance so that we may better serve our customers.</p> <p>Create a culture that inspires, motivates, and rewards people for their performance.</p>	<p>Ensure our Employee Engagement Score (eNPS) is 25 or higher, to match or exceed the True Benchmark for our organization.</p> <p>Improve by 4% the first-year retention rate for employees 30 years old and younger.</p>	<p>Achieved an Employee Engagement Score of 31, exceeding the True Benchmark by 6 points. The 2019 eNPS was 5 points higher than 2018.</p>	<p>Meet or exceed 2019 eNPS score at all levels, company-wide, team and individual leader.</p>
<b>Human Rights</b>	<p>Respect and proactively support the human rights of our employees.</p>	<p>Establish a BCD Travel – Women of Distinction Award to coincide with the UN International Women’s Day to maintain a focus on successful women and spotlight gender equality.</p> <p>Continue to educate our employees, suppliers and customers on ECPAT and The Code.</p>	<p>Presented the first Women of Distinction Award to a female employee on International Women’s Day, March 8th, 2019.</p> <p>Created and rolled out a mandatory human trafficking training course.</p> <p>92% of our global employee base participated in human trafficking awareness training in 2019/2020.</p>	<p>Implement a D&amp;I program across 100% of wholly-owned locations.</p> <p>Continue to build on D&amp;I education and awareness with specific focus on three areas: cultural awareness and intelligence, embracing diversity and promoting inclusion.</p> <p>Highlight gender diversity by nominating a female employee for the annual Women of Distinction award.</p> <p>Increase support for ECPAT and A21; create awareness for human trafficking through regular internal and external communication campaigns.</p>

Due to COVID-19's effect on the travel industry and our business, no objectives were set for 2020

## SECTION 6

# ENVIRONMENT



We're committed to supporting a healthy and sustainable environment by establishing policies and programs that specifically address how we conduct business in a safe, environmentally-sound manner while following relevant legislation and regulations.



## ENVIRONMENTAL STEWARDSHIP

Climate change and global efforts to fight it will see a renewed focus in 2021. The COVID-19 pandemic has shown us the importance of acting on known, long-term risks. Climate change was identified as a long-term risk decades ago, but global action has not yet met the need to reduce environmental impact. Initiatives such as the COP26 will push governments and companies to reduce emissions, and the European Green Deal outlines policies to make Europe the first climate-neutral continent by 2050. Governments, corporations and the public sector must work together to identify the environmental challenges we face and act on them, ensuring a sustainable future.

**Governments, corporations and the public sector must work together to **identify** the environmental challenges we face and **act on them**, ensuring a sustainable future.**

Our facilities and data centers have the greatest environmental impact of our business operations. With the onset of COVID-19, we quickly pivoted to make operational decisions that reduced that impact. During 2020, our employees transitioned from office-based locations to working from home and business travel was reduced to an absolute minimum. As we return to offices and business travel in 2021, we're committed to revising our strategy to support more sustainable ways of working, further reducing our environmental impact.

We acknowledge the need to act urgently to reduce the global threat of climate change. This increased realization, coupled with falling costs of renewable energy and sustainable technologies will hasten our transition to a low-carbon business and world.

## ENVIRONMENTAL MANAGEMENT

We are a global company with a local approach to the exchange of expertise, experience and insights within the communities in which we operate. Our approach to environmental management considers local and regional differences to universal issues like greenhouse gas (GHG) emissions.

Our operations reflect our focus on recycling, conserving resources and preventing pollution. And our facilities, planning and processes reflect environmental considerations such as minimal energy consumption, resource reduction and efficient use of office space. We're dedicated to promoting practices that help minimize waste and reduce harmful emissions to the air, water and land.

In 2016, we began the implementation and certification of an ISO 14001 Environmental Management System (EMS) that defines our strategies and programs for managing the environmental aspects of our global operations.

Our EMS is defined by corporate-level policies and procedures, which provide organizational direction based on the level of potential risk of regulatory non-compliance and reputational loss as well as opportunities for business growth through operational and environmental stewardship.

Our sustainability team identifies potential climate-related risks through peer review, legal and regulatory review, market analysis, competitor analysis and stakeholder consultation. Risk management is part of our ISO 14001 environmental management process and our legal requirements in all countries, on an annual basis.

Having the EMS in place allows us to improve and monitor reduction targets for our business-related carbon emissions and meet our reduction goals. The three main components of our materiality analysis are:

- ✓ **Energy use:** The highest contribution to our energy use is electricity. Our electricity consumption is a measure for office locations and in our owned data centers.
- ✓ **CO<sub>2</sub> emissions:** We use the Greenhouse Gas Protocol (GHGP) standard to measure and report on Scope 1, Scope 2 and Significant Scope 3 emissions.
- ✓ **Resource consumption and waste:** Paper consumption and water usage, waste generation.

## Environmental reporting, alignment and external validation

Our global EMS is aligned with the following initiatives:

- ✓ United Nations Global Compact – Principles 7, 8 and 9
- ✓ Sustainable Development Goals – SDG 13 – Climate Action
- ✓ GRI – Standards 101, 102, 103 & 300

We engage with external parties to validate our annual environmental reporting:

### 1. Annual ISO 14001 audits

2. **EcoVadis** – Platinum rating in 2020

3. **ISO 14064-3** – Carbon Footprint reduction. We measure and report our carbon footprint annually. The verification process is performed by an external auditor who helps us develop better measurement tools to reflect more accurate results.

4. **CDP** - We report annually to the Carbon Disclosure Project (CDP), a global disclosure platform allowing us to measure and manage our environmental impact.

The scope of our EMS covers 101 locations in 29 countries. 99% of all locations are certified to the ISO 14001:2015 standard.

### Science-Based Targets

Building on our industry leadership in environmental management, we joined the Science-Based Targets initiative (SBTi) in early 2020. The SBTi is a collaboration between CDP, the United Nations Global Compact (UNGC), World Resources Institute (WRI), and the Worldwide Fund for Nature (WWF).

Our science-based targets will be submitted for approval in FY21. Targets to reduce commercial greenhouse gas emissions are considered science-based if they are in line with what climate science considers necessary to meet the goals of the Paris Agreement – to limit global warming to below 2°C above pre-industrial levels and pursue efforts to

limit warming to 1.5°C. Science-based target setting is seen as a powerful way of boosting companies' competitive advantage in the transition to the low-carbon economy.

In FY22, we'll publish our science-based targets to reduce our absolute Scope 1 and 2 CO<sub>2</sub> emissions and Scope 3 emissions from purchased goods and services. This new goal challenges us to work even harder to reduce our environmental footprint, while actively engaging with our suppliers and customers to reduce CO<sub>2</sub> emissions through our supply chain.



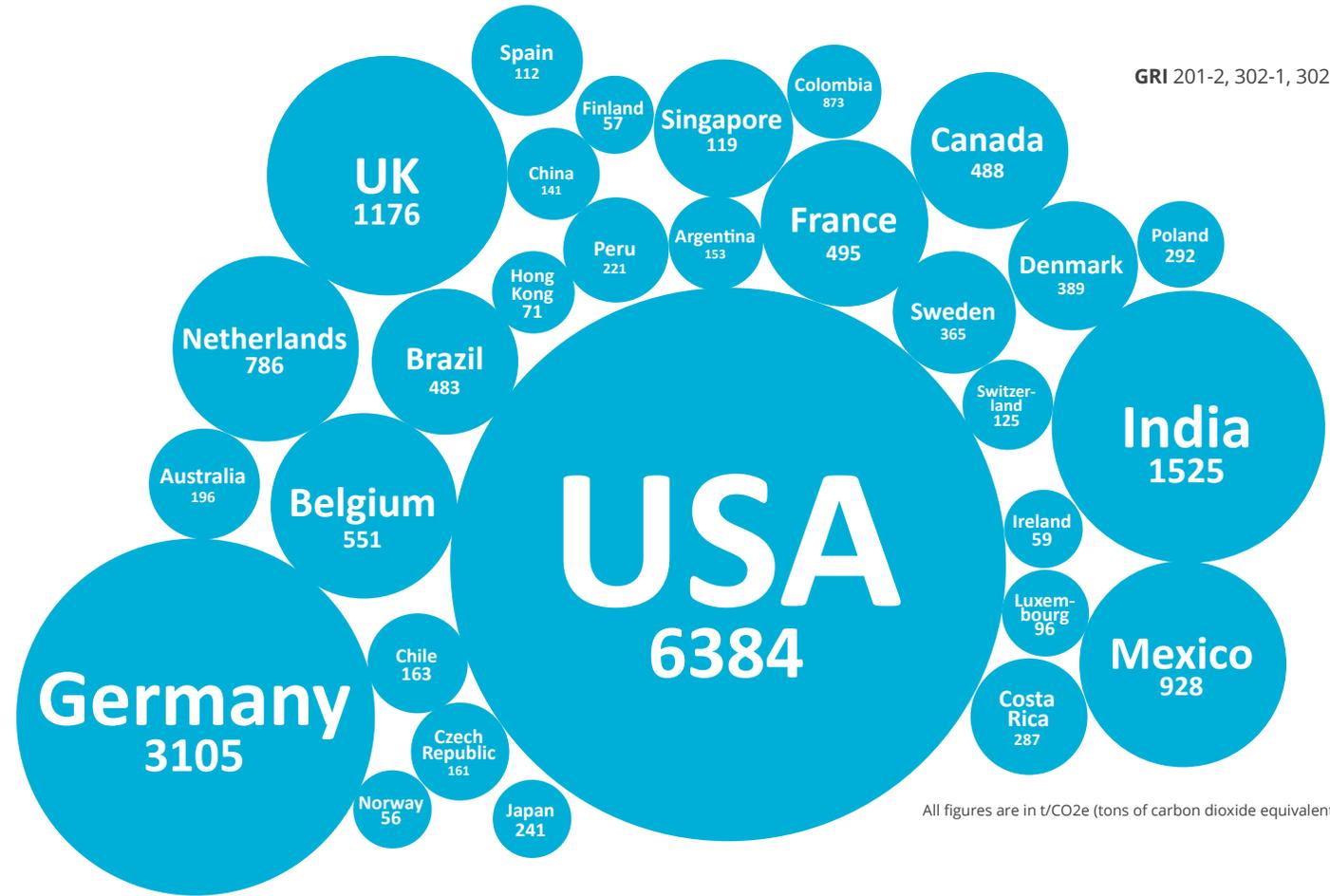
# SUSTAINABLE OPERATIONS

GRI 201-2, 302-1, 302-4, 305-5

In 2020, we defined new goals to reduce our environmental impact, including a goal to reduce greenhouse gas emissions from global operations by 50% by 2030.

Our offices and data centers account for 63% of our global carbon footprint, and this is the area where we have the greatest control. In setting bold goals to improve our environmental performance and demonstrating the benefits of sustainable operations, we model the change we wish to see in our industry and beyond. By innovating to minimize GHG emissions, transitioning to a higher percentage of renewable electricity, consuming less water and creating less waste, we can move toward a circular and low-carbon economy, while also reducing operational costs and risks.

We monitor our scope 1, 2 and 3 emissions to ensure we're on target to meet our defined goals. Our annual consolidated carbon footprint is externally verified.



All figures are in t/CO2e (tons of carbon dioxide equivalent)

## Carbon footprint

The table above details our carbon footprint across all our wholly owned locations for 2019. We calculated our scope 1 and 2, and significant scope 3 emissions, using the GHG Protocol Corporate Accounting and Reporting Standard

(revised edition) and emission factors from the U.K. Government's GHG Conversion Factors for Company Reporting, 2019. We have used the financial control approach to identify the GHG emissions for which we have responsibility.

The boundaries of the reported emissions comprise all office/building-related emissions of our global locations, including business travel, covering car, train and air (long haul and domestic flights).



**2019 global staff travel emissions = 6,981 t/CO2e**



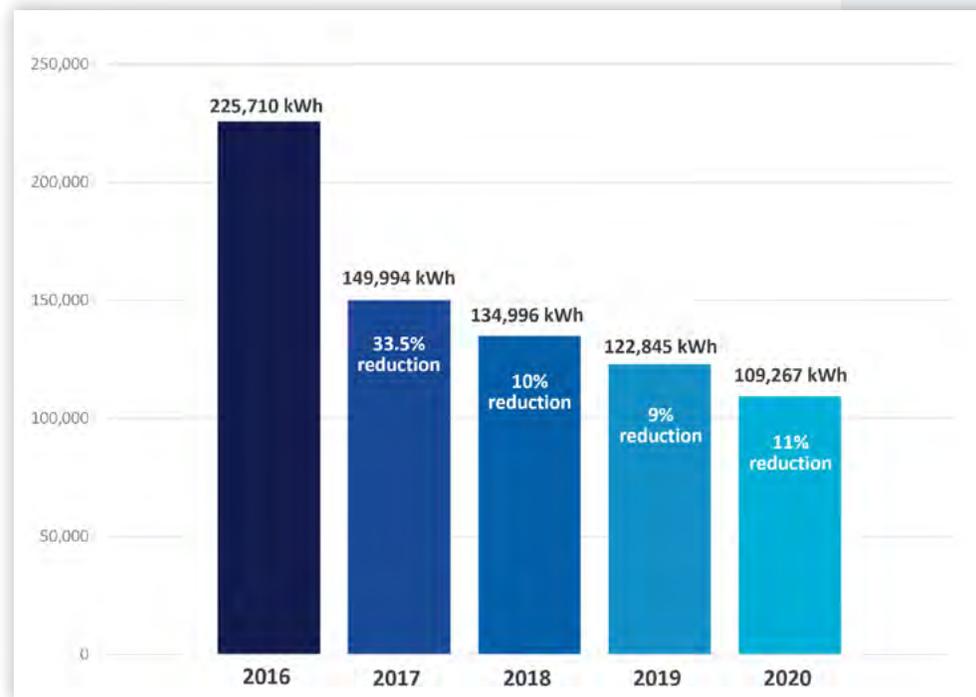
**% of green electricity used in our offices globally = 36%**

### Green data centers

Our data center team continues to implement and improve existing energy efficiency programs across the Information Technology (IT) landscape, to reduce the environmental impact of our data centers. Some initiatives include:

- ✓ Maintaining ISO 14001:2015 certification
- ✓ Continuing a multi-year program to virtualize physical servers
- ✓ Reducing the global data center footprint by decreasing the number of facilities required to host and operate our computer environment
- ✓ Reducing utility consumption
- ✓ Enhanced use of advanced cooling management solutions
- ✓ Regularly scheduled maintenance for all key systems to avoid system inefficiency
- ✓ Ensuring that third-party data centers in key regions align with our energy reduction goals and ISO 14001 and other certifications

The result of these initiatives was a significant reduction in operating costs, data center space and a decrease in electricity consumption of 51.6% between 2016 and 2020.



**Carbon footprint 2020:**  
260.84 t/CO<sub>2</sub>e



**ISO 14001:2015 certified**



**97% server virtualization complete**



## ENVIRONMENTAL AWARENESS

Achieving ISO 14001:2015 certification in 29 wholly owned markets by the end of 2019 was a company-wide challenge that required educating and engaging employees around the world.

Our teams of environment, health and safety coordinators in each certified location are responsible for maintaining the EHS management system and ensuring we meet all requirements of the ISO 14001 standard. All employees were required to participate in an environment, health and safety training course in 2019.

Together with local sustainability coordinators, EHS coordinators engaged employees in local activities such as beach and city clean-ups, sponsored runs to raise donations for environmental causes and reducing electricity consumption and waste in our offices.

Through internal communication channels, we encourage all employees to participate in global environmental initiatives such as Earth Hour, Earth Day and World Environment Day each year. We share tips on how to reduce single-use plastics in the office, contributing to our company-wide goal. Through our global intranet, we regularly share tips with employees on how to reduce environmental impact in their home offices and personal lives.

## 2019 initiatives:

**Italy:** Our partner company in Italy was acquired by BCD Travel in 2019. They celebrated their integration into our global organization by partnering with Treedom by planting a tree for each of their 386 employees. This sustainability initiative symbolized their passion, strong integration with BCD, and commitment to our shared future.

**Colombia:** Our colleagues in Colombia continue to support the Planet Foundation by collecting and donating wastepaper for recycling. 730 kilos of paper were recycled, contributing to waste reduction in our office and to deforestation.

**Brazil:** Brazil's focus is on providing sustainable gifts to employees for special occasions. On Travel Agent's Day all employees received a sustainable straw made from stainless steel; on Mother's Day all mothers received a potted plant.

**Costa Rica:** Composting is a long-term project at our office in Costa Rica. All waste is separated and organic waste is composted, creating fertilizer that is distributed to all employees for use in their home garden. Our colleagues also participate in an accessible beach project.

Plastic bottle caps are collected, processed and converted into material to build the first wheelchair-accessible pathway to the beach in Costa Rica, the Parque Nacional Cahuita.

**Spain:** Beach cleanups at Barceleta Beach are a favorite environmental activity. The colleague coordinating this employee activity describes it as a "saving the environment/teambuilding/good karma task."

**United Kingdom:** In support of our charity project for children with complex and life-limiting needs, Wellchild, our colleagues transformed a wasteland garden into a full sensory environment for children. The transformation included open green play spaces and large planter boxes to grown bee-loving plants, flowers and vegetables.

**Denmark:** Our sports-minded colleagues in Denmark like to go 'plogging," a combination of jogging and picking up litter. Plogging (Swedish: plocka upp) started as an organized activity in Sweden in 2016 and spread to other Nordic countries. It's a good way to combine staying fit and keeping the local environment clean.

## We also engage in environmental activities with our suppliers and clients:

- ✓ Our Supplier Relations team in the U.K. and Ireland, in collaboration with two airline partners, created a co-branded, sustainable and reusable bottle for workplace and home, supporting our global goal to beat plastic pollution by reducing single-use plastics.
- ✓ The service team of a sports clothing manufacturing client participated in their Run for the Oceans initiative to raise awareness of plastic waste in oceans and to inspire environmental activism.
- ✓ The thirteen-member BCD team of a global pharmaceutical client measured their carbon footprint, defined a baseline and identified areas of improvement and reduction goals to track year-over-year. This initiative contributes not only to our own internal environmental goals but to those of our clients.

# OBJECTIVES & RESULTS

FOCUS AREA	LONG-TERM COMMITMENT	2019 OBJECTIVE	2019 RESULTS	2021 OBJECTIVE
<b>Energy Reduction</b>	<p>Reduce our operational energy performance and carbon emissions by &gt;50% by 2030.</p> <p>Reduce the carbon footprint and energy usage requirements in owned data centers.</p>	<p>Reduce our carbon emissions by 2.75% compared to 2018.</p> <p>Develop science based carbon targets across all areas of our operations to look at further ways to constantly monitor and reduce our carbon footprint.</p>	<p>Reduced carbon emissions by 6.5% compared to the 2016 baseline.</p> <p>Reduced carbon emissions in our data centers by 46% compared to the 2016 baseline.</p> <p>Signed up to the Science Based Target Initiative.</p>	<p>Reduce carbon emissions by 5% compared to 2019 figures (2020 will not be used due to the COVID-19 pandemic and its effects on the travel industry).</p> <p>Carry out a global real estate review; implement targets to increase the use of renewable energy throughout our wholly-owned office locations.</p>
<b>ISO 14001 Certification</b>	<p>Establish policies and programs that specifically outline how we conduct business in a safe, environmentally sound manner in accordance with relevant legislation and regulations.</p>	<p>Achieve ISO 14001 certification in 100% of our wholly owned operations.</p>	<p>ISO 14001 certification was achieved in 99% of all wholly-owned locations in December 2019.</p>	<p>Re-certify 100% of locations to the ISO 14001:2015 standard.</p> <p>Work with at least five interested parties and stakeholders to identify how we can share best practices and improve our environmental management system.</p>
<b>Environmental Awareness</b>	<p>Promote environmental awareness at locations worldwide, concentrating on reducing our biggest environmental impacts.</p> <p>Achieve 100% of our Science Based Targets by 2030.</p>	<p>Rollout the environment, health &amp; safety training course to all employees.</p> <p>Phase-out use of single-use plastics by 100% over 3-year period (2018-2020).</p>	<p>94% of all employees completed mandatory environment, health &amp; safety training.</p> <p>86% reduction of single-use plastics compared to the 2018 baseline.</p>	<p>Continue to engage employees in our environmental program; measure engagement to identify a baseline.</p> <p>Reduce the use of single-use plastics by 100% throughout our global operations.</p> <p>Implement and submit our defined goals to the Science Based Targets Initiative for approval.</p>

Due to COVID-19's effect on the travel industry and our business, no objectives were set for 2020

## SECTION 7

# SUSTAINABLE PROCUREMENT

8 DECENT WORK AND  
ECONOMIC GROWTH



10 REDUCED  
INEQUALITIES



12 RESPONSIBLE  
CONSUMPTION  
AND PRODUCTION



17 PARTNERSHIPS  
FOR THE GOALS



At BCD Travel, we strive to build sustainable and mutually rewarding partnerships with our supply chain while contributing to our business sustainability and that of the people and planet.



## SHARED VALUES

We seek business relationships that are built on trust, respect and shared values and select suppliers who demonstrate responsible business practices based on ethical, environmental and social criteria. Our expectations of the standards we require from our suppliers and partners are outlined in our Supplier Code of Conduct. Ethically conducting business and abiding by all legal and regulatory requirements are important components of this shared commitment.

The Supplier Code of Conduct defines our expectations of suppliers in the areas of human rights, labor standards, environmental protection, and business ethics. Focus areas include our commitment to:

- ✓ Fair compensation including wages, overtime hours and legally mandated benefits
- ✓ Freedom of association and the right to collective bargaining
- ✓ Elimination of all forms of forced or compulsory labor
- ✓ Effective abolition of child labor

- ✓ Eliminating discrimination with respect to employment and occupation
- ✓ Respect for the human rights of all stakeholders in the supply chain
- ✓ Provide a safe and healthy workplace for employees and other partners
- ✓ Promote diversity and inclusion
- ✓ Demonstrate a commitment to protect the environment by conserving natural resources, preventing pollution, implementing waste reduction and management programs and minimizing the impact on the climate
- ✓ Ensure the highest ethical standards in all business dealings
- ✓ Maintain transparency and disclose sustainability performance and practices in line with regulations or international practices
- ✓ Demonstrate leadership by propagating the sustainability agenda upstream to supplier's supply chain

## SUSTAINABILITY IN THE SUPPLY CHAIN

We pursue sustainable supply chain management by aligning our supplier base's social, ethical, environmental, health and safety responsibilities with our own sustainability goals and objectives. Suppliers are critical partners in achieving our goals and we continue to expand supplier development and engagement.

Our sustainable procurement initiative is overseen by the Global Procurement team. All members of the team are required to participate in annual sustainable procurement training. In 2019, we reviewed and updated the Global Procurement and Strategic Sourcing Procurement Policy as part of our Group Policy Governance process. In this review, additional information was included relating to the environmental, ethical and social considerations taken into account in the procurement and sourcing processes.

In the request for proposal (RFP) process, potential new suppliers are required to review and sign the Supplier Code of Conduct as a prerequisite of supplier selection.

All historical supplier contracts managed by the global procurement team have been updated to include the Supplier Code of Conduct. To date, 88% of all suppliers have signed the document.

### Supplier diversity

We're strongly committed to selecting and developing small business suppliers and recognize the importance of supplier diversity and its contribution to the success of our business relationships. Our goal is to support supplier-diversified business enterprises as vendors of quality products and services at competitive prices.

We track the use of diverse suppliers in the United States using a third party. We currently contract with many diverse suppliers, including organizations classed as Women-Owned Business Enterprises (WBE), Minority-Owned Business Enterprises (MBE), Disadvantaged Business Enterprises (DBE), Veteran-Owned Business Enterprises (VET) and Small Business Enterprises (SBE).

**Suppliers are critical partners in achieving our goals and we continue to expand supplier development and engagement.**

## Supplier assessments

Ensuring the sustainability compliance of our suppliers and partners is an important component of our sustainable procurement initiative. Several methods and process are in place to assess supplier compliance:

- ✓ **Third-party assessments:** Between 2016 and 2019, 52 sustainability assessments were carried out by EcoVadis, the world's largest and most trusted provider of business sustainability ratings.
- ✓ **Internal assessments:** 42% of our direct suppliers of goods and services were assessed using specific sustainability criteria in the areas of business ethics, labor standards, human rights, modern slavery, environmental protection and participation in the United Nations Global Compact program.
- ✓ **Information security assessments:** The Information Security Risk Management team ensures risk to products and services deployed and used in support of business objectives are continually assessed and managed to minimize potential impact from unexpected events, protecting organizational assets.

A security risk assessment (SRA) is required for all internally developed products and third-party procured products and services. We continually perform supplier assessments and reassessments to validate adherence to security and compliance requirements to ensure the delivery of secure products and services.

- ✓ In 2020, a total of 193 requests for security risk assessment (SRA) were reviewed and processed by the risk management team. More than 90% of our top 30 suppliers were reviewed for information security compliance.
- ✓ **Financial due diligence:** We complete assessments and monitor third parties as needed for financial and operational competency, business continuity, disaster recovery, information security, physical security, fourth party, country, legal and compliance, data privacy, and reputational risk.

## BY THE NUMBERS

### % of our top 30 suppliers with a third-party sustainability rating:

- ✓ 27% achieved a gold or silver rating by EcoVadis
- ✓ 40% are listed on the DJSI (Dow Jones Sustainability Index)
- ✓ 30% received a sustainability rating by other third-parties

### Support of the Modern Slavery Act 2015

Slavery, servitude, forced labor and human trafficking (modern slavery) is a global and growing issue, existing in every region in the world and in every type of economy, whether industrialized, developing or in transition. We have a zero-tolerance approach to modern slavery of any kind within our operations and supply chain.

Our commitment to supporting the Modern Slavery Act 2015 goes beyond our legal requirement to support the Act in the UK and Ireland. We have a unique opportunity in the travel industry to raise awareness of the global issue of human trafficking and actively engage with internal and external stakeholders. Since 2017, we've included human trafficking awareness initiatives throughout our global organization and require all employees to participate in mandatory human trafficking awareness training.

To meet our legal obligations in support of the Modern Slavery Act 2015 in the UK and Ireland, we developed and distributed a Modern Slavery Act policy to UK and Ireland employees in 2016.

We also distributed our revised Supplier Code of Conduct to local suppliers and carry out annual assessments of our supply chain for MSA compliance. A Statement of Support, a requirement of the Modern Slavery Act, is published on our website, annually.

We recognize that there will continue to be modern slavery risks and to mitigate them in our business, we'll continue to identify, adopt and implement best practices in the following areas:

- ✓ Staff awareness 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 any reports of modern slavery and take action in response

**Slavery, servitude, forced labor and human trafficking (modern slavery) is a global and growing issue, existing in every region in the world and in every type of economy, whether industrialized, developing or in transition.**

## OBJECTIVES & RESULTS

FOCUS AREA	LONG-TERM COMMITMENT	2019 OBJECTIVE	2019 RESULTS	2021 OBJECTIVE
<b>Supplier Compliance</b>	Ensure all partners and suppliers demonstrate responsible business practices. Align suppliers' social, ethical and environmental responsibilities with our own goals and objectives.	Carry out assessments on 25% of our suppliers and partners.	42% of suppliers and partners were assessed based on environmental and social criteria.	Extend supplier assessment criteria, focusing on the top 30 suppliers based on annual spend. Create a supplier dashboard to better visualize supplier sustainability performance.
<b>Sustainable Procurement</b>	Increase awareness of sustainability issues (environmental, ethical and social considerations) within global procurement and sourcing processes.	All members of the Global Procurement team to participate in a sustainable procurement training course.	100% of the Global Procurement team participated in sustainable procurement training.	Incorporate supplier diversity and inclusion principles in the Global Procurement and Strategic Sourcing policy.  All members of the Global Procurement team to participate in further sustainable procurement online training.
<b>Data Protection in the Supply Chain</b>	Continue to develop controls to protect the integrity of the data we hold and to demonstrate compliance to ISO 27001, PCI DSS and U.S. Privacy Shield.	Supplier risk reports to be reviewed and updated for 100% of all key technology suppliers.	90% of our top 30 suppliers were reviewed for information security compliance due diligence.	Continue the assessment/reassessment of 96-100% of products, services and suppliers.

Due to COVID-19's effect on the travel industry and our business, no objectives were set for 2020

## SECTION 8

# SERVICE PERFORMANCE



Our commitment to delivering optimal service, products, tools and solutions to help our customers improve their travel program's environmental and social impacts remains paramount. We recognize that customers judge their experience with BCD Travel in terms of cost, duty of care and service performance. Now more than ever, they also measure value by how closely our innovative solutions meet their shifting business travel requirements.



## CLIENT SATISFACTION AND STAKEHOLDER ENGAGEMENT

Our focus on **partnership, simplicity** and **innovation** is reflected in our client retention, client satisfaction and sales numbers.

Our client retention rate of over 98% keeps our average above 95% for more than a decade, an industry-leading accomplishment. We increased our client Net Promoter Score by 28% from 2018 to 2019. Even in a challenging global economic environment, we secured notable wins and expansions, ending the year with USD 1.89 billion in new sales.

This marks our tenth straight year over the USD 1 billion mark.

## ADVITO

In 2019, our consulting arm announced the launch of a new sustainability consulting practice that leverages all areas of their expertise, including data integration, analytics and visualizations, traveler engagement messaging and supplier sourcing and management.

### **Sustainable Collaboration™**

Our focus on sustainable travel doesn't just mean protecting the environment and addressing climate change, it also covers traveler wellbeing and minimizing risk. This is an especially important factor as we manage the impact of COVID-19.

With more employees working from home, virtual collaboration is a viable alternative to business travel. It's one of the most important opportunities for companies working to increase sustainability, savings, and employee satisfaction. We've seen a huge increase in the need for hybrid meetings/ events, (a mix of live and virtual components) addressing health and safety concerns related to the current pandemic and sustainability.

Our holistic approach tackles the problem from all angles by using advanced business intelligence to examine carbon emissions and provide what-if scenario modeling, proven traveler engagement strategies and virtual options. By encouraging these more sustainable forms of collaboration, clients can reduce or redirect 4-10 percent of their travel spend and significantly reduce CO<sub>2</sub> emissions.

### **Advanced business intelligence**

Our clients benefit from deeper insights into their environmental impact with dynamic data visualization dashboards that analyze a program's travel footprint and CO<sub>2</sub> emissions. Our advanced analytics measure progress toward sustainability goals, including emissions trends, supplier sustainability score and rankings and scenario modeling to measure the impact of better travel decisions.

### **Airline Sustainability Index**

Advito has developed an Airline Sustainability Index that can help travel managers ensure they are working with airlines that prioritize sustainable business practices. Carriers are given a sustainability score that can be used during the sourcing process or to shift market share throughout the year to prioritize sustainability goals.

### **Industry-leading traveler engagement**

Our clients can inform and educate their employees and build organizational norms around sustainable business travel with traveler engagement. Advito develops specific messaging tailored to their sustainability goals, driving smarter collaboration and eco-friendly decision-making.

When travel is a must, we offer offsetting solutions to support zero-emissions travel programs. Our Carbon Footprint Calculator for air travel automatically shows a flight's CO<sub>2</sub> emission on all BCD Travel itineraries, making travelers aware of their trip's impact.

## TRIP MANAGEMENT

### Tripsource®

Traveler engagement platforms, like our mobile app TripSource, can be used to share relevant information with travelers before, during and after their trip, through company messaging and policy guidance like:

- ✓ Advising them to take public transport to the city's center.
- ✓ Combining several appointments in one business trip.
- ✓ Renting electric cars, using public transport, reusable mugs, glasses and plates instead of disposable ones.

### Stay by BCD Travel

Stay by BCD Travel helps hotel programs yield more value with less effort by offering savings opportunities, hotel rate availability management, analytics and traveler engagement services.

Guiding travelers toward smart buying decisions yields greater savings and travel program compliance. Through hotel target rates, spend guidelines and traveler awareness and adoption campaigns, companies can easily make sustainable choices, reducing their travel spend and carbon footprint.

### Measuring and tracking carbon emissions with DecisionSource®

With our reporting tool DecisionSource, clients can track and report on key metrics such as CO<sub>2</sub> air emissions, per the methodologies of both the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard and the United Kingdom's Department for Environment, Food and Rural Affairs (DEFRA). We recently made enhancements to DecisionSource, including:

- ✓ More summary options
- ✓ Dynamic long and short-haul metrics
- ✓ Expanded subtotal options (up to five fields)
- ✓ Advanced sorting

## **SolutionSource®**

Our platform for third-party travel technology solutions saw significant expansion and innovation in 2019. Aimed at business travel managers and sourcing executives, the SolutionSource Marketplace provides visibility into vetted, innovative third-party solutions including risk management, price monitoring, flight disruption, program optimization, and more. All easily integrated into travel programs. The SolutionSource Developer Hub gives developers access to BCD's APIs to support innovation around new technology solutions. By the end of 2019, 300 clients had implemented one or more SolutionSource technology partners into their program.

**SolutionSource® partners provide carbon off setting, duty of care and travel wellness services to our clients.**

A few of our sustainable solution partners include:

### **Climate Neutral Group**

A provider offering a range of services for clients that are looking to voluntarily offset emissions caused by business travel. The client can select from one of several sustainable climate projects that prevent or remove the emissions of an equivalent amount of greenhouse gases elsewhere. They get regular summaries (quarterly or every six months) reviewing their CO<sub>2</sub> spend and contributions to certified projects that reduce carbon emissions in underdeveloped countries, supporting the United Nation's Sustainable Development goals.

### **Hubtobee**

A shared, company travel calendar that connects colleagues. It's ideal for clients who have a mix of employees who travel often for business or are located in multiple locations. By sharing travel plans within an organization, Hubtobee suggests opportunities for collaboration, allowing colleagues to connect while they're on the road, save time, reduce CO<sub>2</sub> emissions and travel spend.

**By the end of 2019,  
300 clients had  
implemented one or  
more SolutionSource  
technology partners into  
their program.**



## TRAVELER DUTY OF CARE

Our Global Crisis Management team is a 24/7 resource, helping companies keep their travelers safe.

### **TSPA (Traveler Security Program Assessment)**

Duty of care is a top priority for our clients. During business travel, employees are faced with unfamiliar situations, environments and additional risks. We are committed to helping our clients keep their employees safe. We are the only TMC that offers this critical assessment, partnering with our clients to develop their travel risk management program and duty of care initiatives. Our Traveler Security Program Assessment is designed to help clients evaluate their existing travel risk management program by:

- ✓ Discovery sessions with all key stakeholders to review the current travel risk management program
- ✓ Objective analysis of 11 key process areas
- ✓ Identifying areas of improvement, best practices and strategic initiatives

- ✓ Providing a comprehensive report including findings, evaluations and recommendations for improvement
- ✓ The Global Crisis Management (GCM) team received three times more inquiries regarding our Traveler Security Program Assessment in 2020
- ✓ GCM tripled the number of client assessments in 2020
- ✓ Overall travel risk management inquiries increased by 43% in 2020

## THE NEW WAY TO TRAVEL IN 2020

As the global travel landscape shifted with the onset of COVID-19, so did our approach to business.

We focused on getting the most relevant and timely information to our clients and employees, providing tools and resources to navigate swift changes in travel restrictions and safety protocol. We enhanced our business offerings to include more reports and insights, guidance, and tools to keep them informed.

### Back to travel – For travel managers

In this time of uncertainty, one thing is true—travel managers are facing more pressure than ever before. Our Back to Travel guide is designed for reimagining travel programs, leading companies back to business safely and efficiently while preparing for very different times ahead. It covers four essential program areas: duty of care, traveler communications, spend management and travel policy. Each section highlights trends, practical advice, checklists and solutions.

### Know before you go: COVID-19 Information Hub – For travelers

Travelers can access the COVID-19 Information Hub on <https://need2know.tripsource.com/>, providing real-time information they need before, during and after their trip. We pull data from more than 800 sources, providing details on destination risk alerts, airline and hotel policies, ground transportation protocols and travel restrictions, eliminating the need to visit numerous websites. The COVID-19 Information Hub features:

- ✓ Search functionality for destination/departure restrictions
- ✓ Interactive world map of COVID-19 risk levels
- ✓ At-a-glance chart to compare airlines across key categories like boarding instructions, temperature scans and hygiene protocols

Our travel consultants are also equipped with this information and can give in-person advice to travelers.

### DecisionSource® Traveler care

With our DecisionSource tool, clients can set up traveler alerts, act fast using a color-coded interactive security map and inform travelers of risk around security threats and breaking news.

### Communication and virtual events

We launched regular, online webinars giving updates to clients and prospects. We share research on the path to safe travel, business trends, traveler insights, updates on vaccines and regulatory measures that directly impact travel.

### Research and innovation

Our comprehensive research and reports provide valuable information for clients and prospects when they need it most. What you need to know and Travel Bite reports and Infographics like our Travel Policy and Sourcing During COVID-19, summarize recent travel restriction developments around the world.



### Case study, “Travel in 2020”

The COVID-19 pandemic has exacerbated the humanitarian emergencies that charitable agencies are tasked to combat. Its drastic impact on commercial travel and flight availability has created an emergency within an emergency, as agencies struggle to get their people where they need to go.

We tackled this problem for our client, a humanitarian organization, by assisting them with leasing planes from commercial airlines that currently have reduced capacity.

**In less than two weeks, BCD implemented all the necessary **staffing, training and procedural changes** required to bring the incredibly complex operation to life.**

This provided passenger service for humanitarian aid agencies, other non-governmental organizations and members of the diplomatic community. Thanks to the trust built with this client over years of service, they asked BCD to run the entire booking process and manifest (passenger list) generation for the project.

In less than two weeks, BCD implemented all the necessary staffing, training and procedural changes required to bring the incredibly complex operation to life. Our client is once again able to get their people where they need to go. The project also enabled BCD to bring people back from unemployment to handle the new transactions. The agents working on this initiative quickly mastered a completely new operational process, and met the client’s needs so that they were able to help others. It’s an example of the special synergy that happens when mutual values unite.

## OBJECTIVES & RESULTS

FOCUS AREA	LONG-TERM COMMITMENT	2019 OBJECTIVE	2019 RESULTS	2021 OBJECTIVE
<b>Products and Services</b>	Deliver innovative services, products and performance value to our clients; improve travel program environmental and social impacts.	Expand travel program offerings, including sustainability initiatives in the ERM and government sectors.	Launched a dedicated service line and integrated non-GDS lodging content (like crew housing) in TripSource for companies in the Energy, Resources & Marine sector.	Provide auditing services to clients to assess their duty of care initiatives and identify potential gaps.  Support clients with health and security provider RFP services. As business travel resumes post-COVID-19, companies are seeking third-party assistance to keep them and their traveling employees safe.
<b>Fast, High-Quality Data</b>	Provide enhanced quality data to our travelers.	Review external provider and suppliers performance (adherence to data specification).  Data quality scorecard - enhance the data quality dashboard to provide additional data to enable more granular filtering.	Implemented enhanced data quality checking capabilities, enabling additional quality control earlier in the data processing, resulting in cleaner and compliant data for reporting.  Enhanced the Data Quality Scorecard with more detail and fields, enabling users to drill into specific details of quality issues. This resulted in actionable metrics on data quality issue patterns, driving operational improvements.	Expand our data quality metrics to include: - Quality goals in each category - Highlight areas where goal was not met - Indicate improvement or steps required to meet customer expectations.
<b>Client Satisfaction and Stakeholder Engagement</b>	Empower travelers to make smart choices through effective engagement strategies.	Enhance the customer experience by providing more targeted program recommendations based on issues and opportunities noted in traveler satisfaction survey feedback.	Increased our client Net Promoter Score (NPS) by 28% by taking action to create an enhanced client experience, addressing issues and identifying opportunities for improvement, based on traveler satisfaction survey feedback.	Move the satisfaction measurement process into the 'point of experience' and refine the scope of our listening stations.

Due to COVID-19's effect on the travel industry and our business, no objectives were set for 2020

## SECTION 9

# CHARITY & COMMUNITY SUPPORT



Helping others and giving back reflect our company values and are integral to our sustainability principles. We support our employees in their own efforts to support local community charities through companywide charitable initiatives like Making a Difference and our partnership with organizations to end child trafficking and exploitation. Our commitment to these causes in 109 countries continues to make a difference in the lives of others in the communities in which we work and live.



**Students Run Chicago** challenges high school students to experience the benefits of goal setting, character development, adult mentoring, and improved health by providing them with access to a comprehensive mentor-based running program.

## MAKING A DIFFERENCE

The John and Marine van Vlissingen Foundation, a non-profit organization whose mission is to improve the lives of people around the world, with an emphasis on helping children in need in local communities, continues to operate our Making a Difference (MAD) initiative.

Employees around the globe engage in fundraising activities to support their chosen local children's charity.

Projects also receive funding from the John & Marine van Vlissingen Foundation. Examples of projects include:

- ✓ Mentoring programs for underprivileged children
- ✓ Helping children with life-threatening illnesses
- ✓ Supporting orphanages and school projects

The number of Making a Difference projects has increased steadily each year: In 2020, we supported 47 charitable projects. Despite the adverse impacts of the COVID-19 pandemic, 44 projects will be supported in 2021.

# LOCAL CHARITY PROJECTS 2020



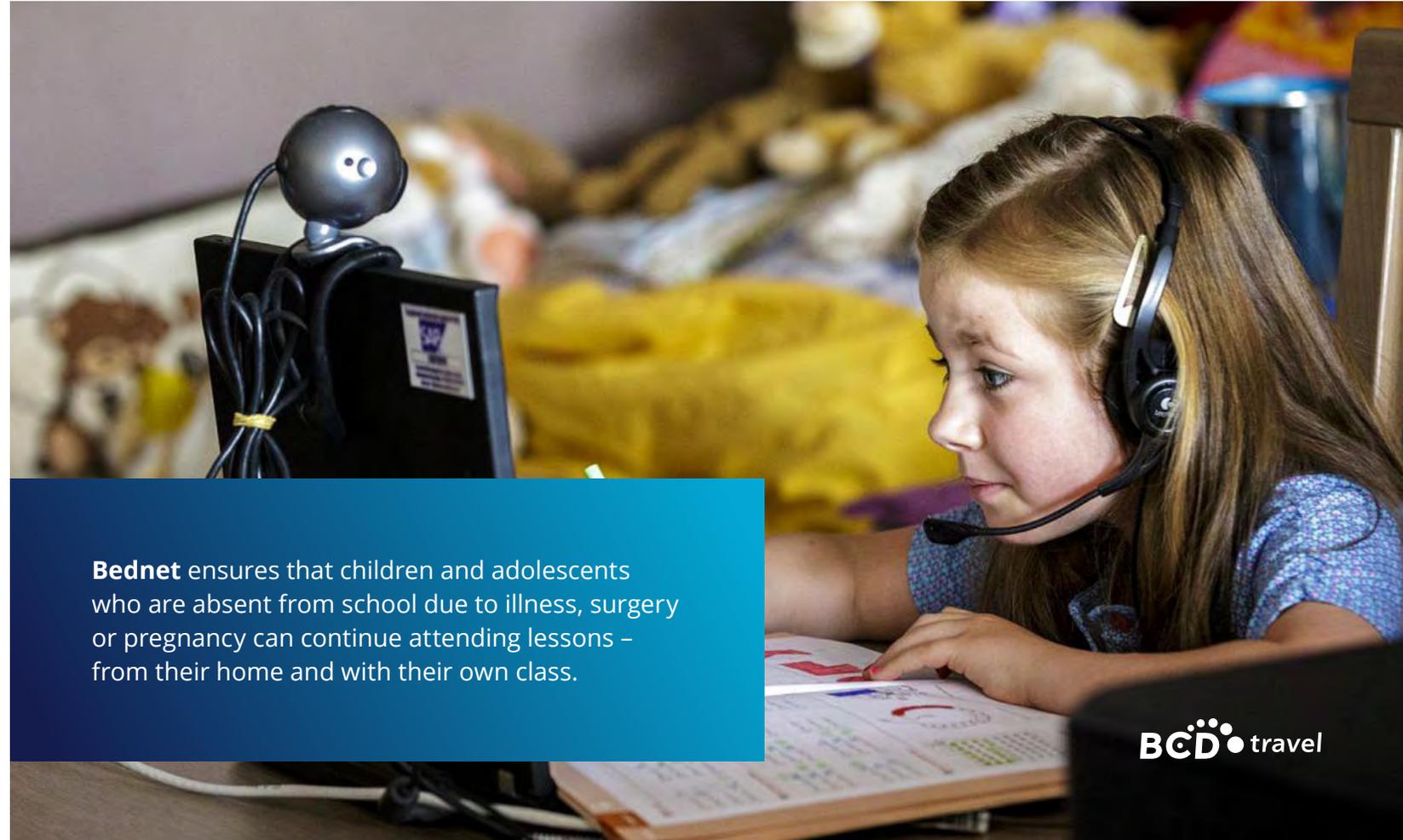
Together with our shareholders, John and Marine van Vlissingen, we currently run 47 charitable projects worldwide. These small, targeted projects directly benefit children in communities where we live and work.

## GIVING BACK

Since August 2020, we've partnered with local charities and non-profit organizations to donate IT computer equipment that had reached its life span in supporting our business needs. To date, we've donated more than 1,400 monitors, laptops, desktops and peripheral devices, which have been distributed to children in need. With the substantial increase in online education due to COVID-19, the need has never been greater, and we're proud to provide a sustainable solution for retired devices.

When closing one of our offices in Burbank, CA we found an appreciative home for many items: Taft Elementary School, located in a lower-income neighborhood between Anaheim and Santa Ana. The school was already pressed for funding and the pandemic hasn't helped. The 510 students and their families struggle to meet food, clothing and shelter needs. While cleaning and moving out of our Burbank office, we set aside a large donation of supplies for the school. We transported writing materials, office furniture, pre-packaged food and even a hot dog maker and popcorn machine to their new home at Taft Elementary School.

To date, we've donated more than **1,400 monitors, laptops, desktops and peripheral devices**, which have been distributed to children in need.



**Bednet** ensures that children and adolescents who are absent from school due to illness, surgery or pregnancy can continue attending lessons – from their home and with their own class.

# HUMAN TRAFFICKING AWARENESS

We have a unique opportunity in the travel industry to raise awareness of the global issue of human trafficking. BCD employees volunteer their time to work with ECPAT (End Child Prostitution and Trafficking), a global initiative to stop the trafficking and exploitation of children. Our target in 2019 was to raise awareness internally, within our employee base and externally with clients and partners. The core message: Don't look away. Several marketing campaigns were initiated.

### In 2019:

- ✓ Published an awareness video on YouTube
- ✓ Placed an ECPAT banner on all BCD Travel itineraries
- ✓ Created a mandatory online human trafficking training course for all employees
- ✓ Added verbiage on all Request for Proposal (RFP) documents to raise awareness
- ✓ Implemented internet account-based marketing campaign, generating 250,000 views within 3 months

### In 2020:

- ✓ Launched mandatory employee human trafficking awareness training. Despite furloughs and work time reduction, a 67% completion rate was achieved in seven months increasing total training completions to 92%.
- ✓ Earned Top Member status with The Tourism Child Protection Code of Conduct (The Code) and ECPAT USA for our "exceptional work to integrate child protection practices into our business."
- ✓ 1,350 employees attended A21's virtual Global Freedom Summit aimed at increasing awareness on what signs to look for and where to report trafficking and exploitation.



**We're thankful for BCD Travel's partnership to end child sexual exploitation and trafficking. Congratulations for being a newly promoted Top Member!**

**Yvonne Chen**  
Director of Private Sector Engagement at ECPAT-USA



# OBJECTIVES & RESULTS

FOCUS AREA	LONG-TERM COMMITMENT	2019 OBJECTIVE	2019 RESULTS	2021 OBJECTIVE
<b>Local Communities</b>	Strive to create a better world by improving the lives of people around the world, with an emphasis on helping children.	Increase the number of Making a Difference projects by 20%.	The number of supported projects increased by 27% compared to 2018.  Supported 38 projects around the globe in 2019.	Maintain 44 Making a Difference projects in 2021.
<b>Modern Slavery/ Human Trafficking</b>	Raise awareness for children’s human rights by supporting global human trafficking and modern slavery initiatives.	Continue to educate our employees, suppliers and customers on ECPAT and The Code.	Launched a mandatory education course on Human Trafficking to all employees.	Completion of human trafficking awareness training by all employees.

SECTION 10

# SUSTAINABILITY REPORTING

- Sustainability Performance
- Materiality Matrix
- GRI Content Index
- Auditor Verification Statement

## SUSTAINABILITY PERFORMANCE

Governance, Ethics & Compliance	2019	2018	2017	2016
Number of countries covered by compliance program	30	27	25	24
Code of Conduct, Non-Compliance Reporting and SpeakUp training completion rate	99%	98%	97%	96%
Staff who have completed GDPR data protection training	97%	90%	-	-
Number of countries covered by ISO 14001/45001 certification	29	27	25	24
EcoVadis rating covering all wholly-owned markets	Gold	Gold	Gold	Gold

Environment	2019	2018	2017	2016 (BASELINE)
Locations accredited to ISO 14001	99%	66%	58%	26%
Total energy consumption (MWh)	2.988	3.067	3.215	3.013
Green electricity	36%	24%	19,80%	16,71%
Scope 1 GHG emissions (tCO <sub>2</sub> e)	1.086	1.018	1.224,01	1.182,84
Scope 2 GHG emissions (tCO <sub>2</sub> e)	12.034	11.221	11.357.23	10.645,56
Scope 3 GHG emissions (tCO <sub>2</sub> e)	6.981	7.202	6.689,36	7.885,60
Global staff business travel miles	32.479.070	33.518.132	32.242.922	40.304.496
Single-use plastic reduction	86%	37%	21%	0%

Sustainability performance reporting covers the calendar year 2019. 2020 data for some performance indicators is not available due to organizational impacts from COVID-19 and therefore not included here.

Workplace Practices	2019	2018	2017	2016
Number of employees (wholly-owned markets)	13,495	13,160	12,275	11,959
Employees covered by a collective bargaining agreement	23%	25%	28%	30%
Number of training hours per employee	26.48	13,72	12,83	11,93
Women at all levels	69%	69,60%	70,10%	70,20%
Women in management roles (Director & above)	50%	50%	51%	47%
Employees working at from home	35.3%	32.,10%	31.,20%	29.,70%
Locations accredited to ISO 45001	99%	66%	58%	2642%
Environment, health & safety training completion rate	94%	-	-	-
Human trafficking awareness training completion rate	92%	-	-	-

Sustainable Procurement	2019	2018	2017	2016
Suppliers that have signed the Supplier Code of Conduct	88%	88%	85%	85%
Suppliers that have been assessed against Supplier Code of Conduct requirements*	42%	72%	40%	22%
Number of staff trained on the Modern Slavery Act (UK only)	-	100%	100%	74%
Global Procurement staff trained on sustainable procurement topics	100%	100%	85%	85%
Number of partner assessments using EcoVadis*	10	11	7	24

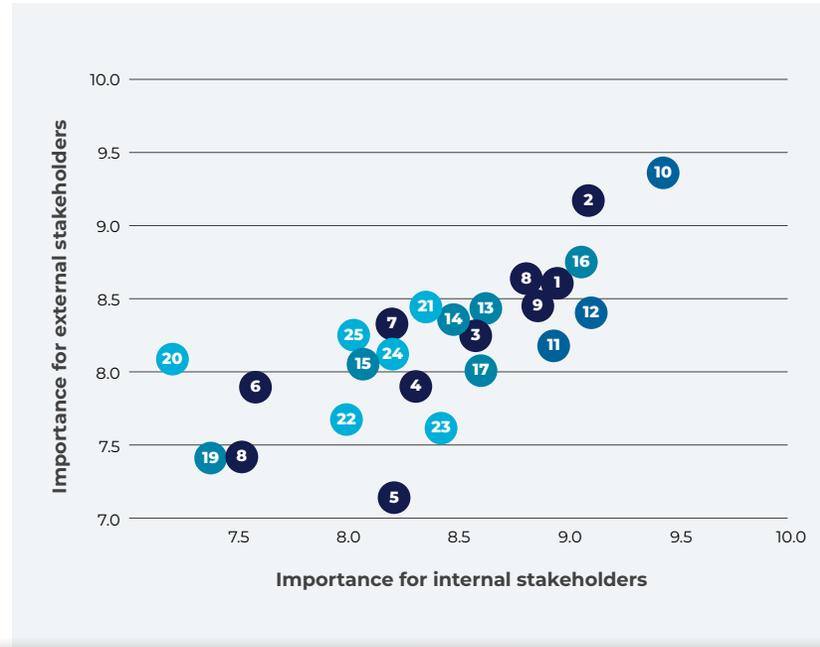
\* Suppliers assessed per year.

# MATERIALITY MATRIX

Our materiality analysis is our approach to identifying critical economic, environmental and social issues, which may reflect a significant impact on the company’s business performance or substantively influence the assessments and decisions of its stakeholders.

Our objectives in regularly assessing materiality are:

- Identify and prioritize critical issues
- Inform our performance and responsibility approach
- Engage our stakeholders
- Inform our approach to disclosing sustainability information



## Results

- There has been a general convergence among external stakeholders and employees concerning the relative importance of the various issues assessed.
- There is a significant importance to being involved in every aspect of sustainable development including the environment, human rights, relations with local host communities and governance.
- We have an important role to play in building and promoting sustainable business travel.
- We have a responsibility to reduce carbon in our operations and improve our employees’ knowledge of sustainability principles.

Our commitments to sustainable development	Offering responsible travel services/solutions to all	Improving the impact of sustainable development activities	Exploring new, innovative, value-driven markets
1. Sustainable, responsible governance	10. Traveler duty of care	13. Sustainable, responsible operations	21. Development of services in-line with client expectations
2. Business ethics	11. Commitment to sustainable and responsible business travel	14. Carbon reduction	22. Innovation via new partnerships
3. Transparency	12. Competitive, responsible services	15. Responsible purchasing	23. Business opportunities offered by an innovative range of sustainable services e.g. Advito
4. Staff commitment to sustainable development		16. Staff health and wellbeing	24. Development of partner countries
5. Diversity of teams		17. Staff development	25. Expertise in emerging markets
6. Contributing to the development of local communities		18. Balanced development in emerging countries	
7. Dialogue with stakeholders		19. Impact on local communities	
8. Environment (as a BCD Travel performance indicator)		20. Sustainable travel services	
9. Respecting human rights and duty of vigilance			

# GRI CONTENT INDEX

BCD Travel's 2021 Sustainability Report relies upon guidance issued by the Global Reporting Initiative (GRI sustainability reporting framework). This report has been prepared in accordance with the GRI Standards: Core option. The determination of which GRI aspects are material to our business is a direct result of our core issues assessment. This formal process includes ongoing feedback from internal and external stakeholders. The process and procedures for the data collection and reporting underwent third-party review. Additionally, we report against our alignment with the 10 principles of the United Nations Global Compact and the United Nations Sustainable Development Goals (SDGs).

The GRI reference column below shows where more information on each GRI indicator can be found within the report.

GRI STANDARD NUMBER	INDICATOR NAME	INDICATOR RESPONSE	REFERENCE
<b>Organizational Profile</b>			
102-1	Name of the organization	BCD Travel	Cover page
102-2	Activities, brands, products and services		P. 7-8
102-3	Location of headquarters	Atlanta, USA - Utrecht, The Netherlands and Singapore	P. 6
102-4	Location of operations		P. 6
102-5	Ownership and legal form		<a href="http://www.bcdgroup.com">www.bcdgroup.com</a>
102-6	Markets served		P. 6
102-7	Scale of the organization	109 countries with 14.900 employees and sales of US\$ 27.5 billion in 2019.	P. 6
102-8	Information on employees and other workers		P. 35
102-9	Supply chain		P. 51-52
102-10	Significant changes to the organization and its supply chain		P. 20
102-11	Precautionary principle or approach		P. 22, 30, 33, 41, 50
102-12	External initiatives		P. 13-14, 43
102-13	Membership of associations		P. 14

GRI STANDARD NUMBER	INDICATOR NAME	INDICATOR RESPONSE	REFERENCE
<b>Strategy</b>			
102-14	Statement from senior decision maker		P. 2-3
102-15	Key impacts, risks and opportunities		P. 2-3, 57-61
<b>Ethics &amp; Integrity</b>			
102-16	Values, principles, standards and norms of behaviour		P. 19-27
102-17	Mechanisms for advice and concerns about ethics		P. 20-21
<b>Governance</b>			
102-18	Governance structure		P. 16-18
102-19	Delegating authority		P. 16-18
102-20	Executive-level responsibility for economic, environmental and social topics		P. 16-18
102-21	Consulting on economic, environmental and social topics		P. 14, 16-19
102-22	The composition of the highest governance body and its committees		P. 16-19
102-23	Chair of the highest governance body		P. 16
102-24	Nominating and selecting the highest governance body		P. 16
102-25	Conflicts of interest		P. 19-21
102-26	Role of highest governance body in setting purpose, values and strategy		P. 16
102-29	Identifying and managing economic, environmental and social impacts		P. 16-17
102-30	Effectiveness of risk management processes		P. 16-17, 22, 24
102-31	Review of economic, environmental and social impact		P. 16-17
102-32	Highest governance body's role in sustainability reporting		P. 17
102-33	Communicating critical concerns		P. 16-17, 20
102-34	Nature of total number of critical concerns	We track critical concerns through the SpeakUp system. As a privately held company, we do not report the nature and number of critical concerns due to confidentiality considerations.	P. 30

GRI STANDARD NUMBER	INDICATOR NAME	INDICATOR RESPONSE	REFERENCE
<b>Governance</b>			
102-40	List of stakeholder groups		P. 14
102-41	Collective bargaining agreements		P. 31, 71
102-42	Identifying and selecting stakeholders		P. 14, 19
102-43	Approach to stakeholder engagement		P. 14, 19, 31, 36
102-44	Key topics and concerns raised		P. 14, 56, 60-63
<b>Reporting Practice</b>			
102-45	Entities included in the consolidated financial statements		P. 6-7
102-46	Defining report content and topic boundaries		P. 11-14
102-47	List of material topics		P. 72
102-48	Restatements of information	There are no essential changes or corrections compared to prior sustainability reports	
102-49	Changes in reporting	No changes from previous reporting periods.	
102-50	Reporting period		Inside front cover
102-51	Date of most recent report	May 2019	
102-52	Reporting cycle		Inside front cover
102-53	Contact point for questions regarding the report		Back cover
102-54	Claims of reporting in accordance with the GRI Standards		Inside front cover
102-55	GRI content index		P. 73-78
102-56	External assurance		P. 79

GRI STANDARD NUMBER	INDICATOR NAME	INDICATOR RESPONSE	REFERENCE
<b>Economic Topics</b>			
201-1	Direct economic value generated and distributed	BCD Travel is a privately held company and does not report its financial results publicly.	P. 56
201-2	Financial implications and other risks and opportunities due to climate change		P. 42-45
<b>Anti-Corruption</b>			
205-1	Operations assessed for risks related to corruption		P. 19-22
205-2	Communication and training about anti-corruption policies and procedures		P. 19-22
<b>Environmental Topics</b>			
<b>Energy</b>			
302-1	Energy consumption within the organisation		P. 44-45 <a href="#">2020 Carbon Verification Statement</a>
302-3	Energy intensity		<a href="#">2020 Carbon Verification Statement</a>
302-4	Reduction of energy consumption		P. 44-45, 48 <a href="#">2020 Carbon Verification Statement</a>
302-5	Reductions in energy requirements of products and services		P. 45
<b>Emissions</b>			
305-1	Direct (Scope 1) GHG emissions		P. 71 <a href="#">2020 Carbon Verification Statement</a>
305-2	Energy indirect (Scope 2) GHG emissions		P. 71 <a href="#">2020 Carbon Verification Statement</a>

GRI STANDARD NUMBER	INDICATOR NAME	INDICATOR RESPONSE	REFERENCE
<b>Emissions</b>			
305-3	Other indirect (Scope 3) GHG emissions		P. 71 <a href="#">2020 Carbon Verification Statement</a>
305-4	GHG emissions intensity		P. 71 <a href="#">2020 Carbon Verification Statement</a>
305-5	Reduction of GHG emissions		P. 41-45
<b>Supplier Environmental Assessment</b>			
308-1	New suppliers that were screened using environmental criteria		P. 50-52
308-2	Negative environmental impacts in the supply chain and actions taken		P. 51-52
<b>Social Topics</b>			
<b>Occupational Health and Safety</b>			
403-1	Occupational health and safety management system		P. 33
403-2	Hazard identification, risk assessment, and incident investigation		P. 33
403-4	Worker participation, consultation, and communication on occupational health and safety		P. 18, 33
403-5	Worker training on occupational health and safety		P. 33, 38
403-6	Promotion of worker health		P. 37-38
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		P. 30, 31, 33, 39
403-8	Workers covered by an occupational health and safety management system	98% of employees are covered by ISO 45001 certification	P. 33
403-9	Work-related injuries	Zero work-related injuries	
403-10	Work-related ill health	BCD Travel is a privately held company and does not publish this information publicly.	

GRI STANDARD NUMBER	INDICATOR NAME	INDICATOR RESPONSE	REFERENCE
<b>Training and Education</b>			
404-1	Average hours of training per year per employee		P. 34
404-2	Programs for upgrading employee skills and transition assistance programs		P. 32, 34
404-3	Percentage of employees receiving regular performance and career development reviews		P. 32
<b>Diversity &amp; Equality Opportunity</b>			
405-1	Diversity of governance bodies and employees		P. 35
<b>Non-Discrimination</b>			
406-1	Incidents of discrimination and corrective actions taken	We record incidents of discrimination and the corrective actions taken as part of our global HR and Governance functions. As a privately held company we do not publicly disclose this information.	
<b>Forced or Compulsory Labor</b>			
409-1	Operations and suppliers that are at risk for incidents of forced or compulsory labor		P. 19, 50-53, 68
<b>Human Rights Assessment</b>			
412-1	Operations that have been subject to human rights reviews or impact assessments		P. 12-13, 30-39
412-2	Employee training on human rights policies or procedures		P. 38, 53, 68
<b>Local Communities</b>			
413-1	Operations with local community engagement, impact assessments, and development programs		P. 65-69
<b>Supplier Social Assessment</b>			
414-1	New suppliers that were screened using social criteria		P. 50-52

## APPROACH TO ASSURANCE



### Statement of independence, impartiality and competence

Alphacello Ltd/LLC conduct an annual review of BCD Travel's carbon emissions, data collation and calculation processes, and provide independent verification to the integrity of BCD Travel's Annual Sustainability Report.

Alphacello has conducted this verification independently and to the company's knowledge there has been no conflict of interest.

Alphacello has a Code of Ethics implemented within our business to maintain high ethical standards amongst staff in our day-to-day business activities. Our verification team has over 20 years' combined experience in conducting assurance over environmental, social, ethical and health & safety information, systems and processes, including the verification of greenhouse gas emissions data to GHG Protocol, and ISO 14064-Part 3 standards.

[www.alphacello.com](http://www.alphacello.com)

## AUDITOR VERIFICATION STATEMENT

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