

Our commitment

# Corporate Social Responsibility Principles



**BCD Travel has selected four focus areas for its CSR Principles:**

**Ethical business practices**

**People**

**Environment**

**Privacy and data protection**

*BCD Travel's voluntary commitment to a high level of social responsibility is the foundation of our CSR Principles. As one of the largest corporate travel management companies in the world, we deem it vital to maintain our social activism at a level that matches our economic capacity.*

*Together with our shareholders, BCD Holdings N.V., we regard a commitment to and investment in improving our local and global communities as an investment in our (and their) future – we believe in building for the “next next” generation.*

*Within this document, “BCD Travel” refers to BCD Travel and its operating units Advito and BCD Meetings & Incentives.*

## UNITED NATIONS GLOBAL COMPACT

**The Compact, established in July 2000, seeks to promote responsible corporate citizenship by providing a framework for businesses to follow in response to the challenges of globalization. Participating companies embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labor standards, the environment, and anti-corruption.**

BCD Travel recognizes and endorses the practice of operating in an ethical and socially and environmentally responsible manner and supports the ten principles of the Global Compact. While we understand that the general intention behind the Global Compact may be implemented differently in different countries, in keeping with local laws and customs, it is our intent to support and advance those principles within our company and entities controlled by it. A GLOBAL CODE OF CONDUCT FOR A GLOBAL COMPANY

### Human Rights

*Businesses should:*

**Principle 1** Support and respect the protection of internationally proclaimed human rights; and

**Principle 2** Make sure that they are not complicit in human rights abuses.

### Labor Standards

*Businesses should uphold:*

**Principle 3** The freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4** The elimination of all forms of forced and compulsory labor;

**Principle 5** The effective abolition of child labor; and

**Principle 6** The elimination of discrimination in employment and occupation.

### Environment

*Businesses should:*

**Principle 7** Support a precautionary approach to environmental challenges;

**Principle 8** Undertake initiatives to promote environmental responsibility; and

**Principle 9** Encourage the development and diffusion of environmentally friendly technologies.

### Anti-corruption

**Principle 10** Businesses should work against corruption in all its forms, including extortion and bribery.



## BCD TRAVEL CSR FOCUS AREAS

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### Ethical Business Practices

BCD Travel will obey the laws and regulations of the countries in which we operate and conduct all business in an ethical manner.

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### People

BCD Travel is committed to providing a workplace free of discrimination where all employees can fulfill their potential based on merit and ability. We strive to deal with everyone in a fair and open manner and embrace and accept differences in others. We are committed to being an agent of positive change in the communities in which we live and work.

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### Environment

BCD Travel is committed to protecting the environment and the health and safety of our employees. We are conscious of our responsibility to conserve resources and continuously look for ways to more efficiently use resources to reduce the environmental burden of waste generation and emissions to the air, water, and land.

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### Privacy and Data Protection

BCD Travel is committed to user privacy in our products and services and seeks to provide a secure business environment for the protection of our employees' and customers' private information.

*Corporate Social Responsibility is the continuing commitment by business to behave ethically and contribute to economic development while improving the quality of life of the workforce and their families as well as of the local community and society at large*

**Making Good Business Sense,**  
World Business Council for Sustainable Development

## Ethical Business Practices

### A GLOBAL CODE OF CONDUCT FOR A GLOBAL COMPANY

BCD Travel is committed to creating and maintaining an environment based on respect for the individual, and to being a good corporate citizen in every country and community in which we do business. With employees, customers and suppliers all over the world, BCD Travel's Code of Conduct guides our business operations all over the world. While employees must comply with the laws, rules and regulations in each individual country where we conduct business, we recognize that local laws may in some cases be less restrictive than the principles laid out in our Code of Conduct. In those situations, employees must comply with the BCD Travel Code of Conduct, above and beyond the local legal requirements. In the event that local laws are more restrictive than BCD Travel's standards, employees must comply with the more stringent, applicable local laws.



#### A COMMITMENT TO ETHICAL BUSINESS PRACTICES

Our Code of Conduct affirms BCD Travel's commitment to uphold high moral and ethical principles and specifies the basic norms of behavior for those employees undertaking business on its behalf. While BCD Travel's business practices must be consistent with the business and social practices of the communities in which we operate, we believe that honesty is the essential standard of integrity in any locale. Although local customs may vary, BCD Travel's activities are to be based on honesty, integrity and respect.

#### Use of BCD Travel name

We recognize the value of the name and reputation of BCD Travel. This name and related marks should be used only in activities sanctioned by the Board of Directors.

#### Quality and fairness

Although we seek to protect our legitimate interests, we do not approve of unfair bargains that strain long-term relationships. The services we deliver never should be neither less than what we promise nor less than what our business partners and customers expect.

#### Health, safety, and environmental Protection

BCD Travel seeks to manage our activities so that to protect employees from unreasonable health and safety risks on the job; that we meet reasonable expectations concerning the work environment; and that we protect our customers, the public, and the environment in the use of BCD Travel facilities and services.

Because authorized recipients of information regarding BCD Travel are entitled to rely on that information, we will take all reasonable measures to ensure the accuracy of the information in all material respects. BCD Travel will not disclose information unless we are comfortable with its accuracy and/or have included appropriate qualifications.

#### Protection and proper use of company assets

If you have responsibility for the use of BCD Travel's physical assets or funds, you are accountable and responsible for your proper conduct as a fiduciary in the use or protection of those assets.

#### Internal financial reports

We will maintain accounts and records and prepare financial reports in a manner that conforms to BCD Travel's policies and procedures and applicable laws.

#### Vendor Relationships

It is our policy to have no arrangements with any specific vendor that would involve additional cost to our customers or to BCD Travel. Employees of BCD Travel may not select a vendor for any reason other than its ability to fulfill the organization's needs. In particular, employees may not personally accept any goods or services or other forms of compensation or favors from a supplier for less than market value. BCD Travel allows gifts from suppliers only if the gift is given to the department head for disposition/sharing with others in the department. (These provisions are not intended to apply to routine, reasonable business entertainment.)



### Customer relationships

In some situations it is appropriate to provide a reasonable amount of customer entertainment or a gift to develop a positive business relationship and provide an opportunity to discuss business in an informal setting. In these cases, employees of BCD Travel will adhere to the guidelines of our customers, vendors and local offices.

Kickbacks, fees, commissions, or any form of payment intended to induce or reward favorable decisions and actions are unacceptable and prohibited. Employees of BCD Travel may not, in violation of any law, pay or offer to pay or give anything of value to induce or reward favorable action in any business transaction. These provisions are not intended to apply to routine, reasonable business entertainment or gifts of minor value, customary in local business relationships, provided full disclosure is made to an immediate supervisor and do not violate any law or organization policy.

### Conflict Of Interest/outside activities

BCD Travel's policy is that no employee, officer, or member of the board of directors shall hold any interest, financial or otherwise, or be actively involved in, any activity, business or other entity, civic, charitable or social organization where such would constitute a conflict of interest with the interest of BCD Travel.

### ACCOUNTABILITY FOR ADHERENCE TO THE CODE

Failure by any employee to comply with the laws or regulations governing the Company's business, this Code or any other Company policy or requirement may result in disciplinary action including termination and, if warranted, legal proceedings. All employees are required to cooperate in any internal investigations of misconduct.

### WAIVERS OF THE CODE OF CONDUCT

Any change in or waiver of this Code may be made only by the Board or by a Board Committee and will be promptly disclosed as required by law or regulation.

### Insider Information

By virtue of close working relationships with customers, vendors and suppliers, BCD Travel employees, from time to time, may become aware of information which would constitute "insider information" under the rules of applicable security laws or which constitutes "confidential information" which is the property of our customers. Apart from the fact that there are various civil and criminal penalties for violations of the laws concerning insider information, it is extremely important from a business perspective that each and every employee of BCD Travel respect the confidential nature of the information learned during the course of employment, and that such information never be utilized for personal gain or shared with any person (family or otherwise) not employed by BCD Travel.





## People

### BCD TRAVEL PEOPLE POLICY

BCD Travel is committed to providing a workplace free of discrimination where all employees can fulfill their potential based on merit and ability. We strive to deal with everyone in a fair and open manner and embrace and accept differences in others. We are committed to being an agent of positive change in the communities in which we live and work.

Our employees are the back bone of our business and their dedication, productivity and experience make it possible for us to remain innovative and competitive. BCD Travel's continued success is dependent upon our ability to meet the needs of our global, diverse workforce.

#### EMBRACING DIFFERENCES

BCD Travel employs individuals of different ages, genders, ethnicities, physical and mental abilities and lifestyles and values the unique background of each of its employees. BCD Travel will not discriminate (or tolerate discrimination by its employees) against any applicant or employee based on age, gender, race, color, religion, national origin, ancestry, sexual orientation, disability, marital status, veteran status and sex (including pregnancy, childbirth, and other specific conditions), or any other characteristic protected by law.

The Company bases all employment decisions related to hires, transfers, promotions, and compensation, on experience, skills, qualifications, and responsibilities. BCD Travel will strive to achieve the full potential of all employees.

#### Harassment

BCD Travel believes in the worth and dignity of the individual and respects the right of each person to work in an environment free from discrimination and harassment. BCD Travel prohibits sexual harassment and harassment because of race, color, national origin, ancestry, religion, creed, sexual orientation, physical or mental disability, marital status, medical condition, veteran status, age, or any other basis protected by law.

#### Substance-free workplace

Individuals under the influence of drugs and/or alcohol on the job pose serious safety and health risks to themselves and to all those who surround or come in contact with them. BCD Travel's goal is to establish and maintain a drug-free workplace and to ensure that Company employees perform their duties unimpaired by the effects of drugs or alcohol. BCD Travel will also comply with any requirements under applicable law.

#### Violence-free workplace

Acts or threats of physical violence, including intimidation, harassment, and/or coercion, that involve or affect the Company or that occur in the workplace or in the conduct of company business off company property, will not be tolerated. This prohibition against threats and acts of violence applies to all persons involved in company operations, including, but not limited to, BCD Travel personnel, contract workers, temporary employees, and anyone else in the workplace or conducting company business off company property.

#### Protection of personal employee data

BCD Travel will limit collection of employee information to that information needed for business and legal purposes. The Company will protect the confidentiality of all personal information in employee records. We will refuse to release personal information to outside sources without an employee's written approval, unless legally required to do so.



## Environment

### BCD TRAVEL ENVIRONMENTAL POLICY

BCD Travel is committed to protecting the environment and the health and safety of our employees. We are conscious of our responsibility to conserve resources and continuously look for ways to more efficiently use resources to reduce the environmental burden of waste generation and emissions to the air, water, and land.

BCD Travel will limit access to employees with an authorized, business-related “need-to-know” or to third parties who are authorized to access the requested information or who have obtained a court order for specified employee records.

#### Compensation and benefits

BCD Travel is committed to providing benefit and compensation programs that are competitive and appropriate for the markets in which we compete.

#### Flexible workplace

BCD Travel is committed to creating a flexible workplace that serves the requirements of both the Company and the individual. First, we must serve our customers, obtain business results and respect the local customs, laws and practices regarding work schedules and/or place of work. Second, we must respect individual employee needs for flexible work arrangements.

#### Open communication

BCD Travel considers open and honest communication to be a vital part of a positive work environment. Employees are encouraged to bring forth ideas, suggestions, questions, concerns, or any other issues that the employee feels are important.

#### Employee development

BCD Travel strives to provide employees with the opportunities and resources needed to enhance their competencies and performance so they may better support the company and achieve individual success.

#### We will support and advance our commitment by:

1. Establishing and continuously improving policies, programs and practices for conducting our business in a safe, environmentally sound manner and in accordance with relevant safety and environmental legislation and regulations.
2. Incorporating environmental considerations into our planning processes, with special attention paid to environmental issues during our selection and management of business locations and facilities.
3. Conducting our operations in a manner that is committed to recycling, conservation of resources, prevention of pollution, and promotion of environmental responsibility among our employees.
4. Providing products and services to our internal and external customers that promote environmentally sound travel management practices; focusing on the efficient use of resources, minimizing the creation of waste, and reduction of harmful emissions to the air, water, and land.
5. Informing suppliers and other industry business partners of our environmental principles and encouraging the adoption of environmental management practices aligned with these principles.
6. Periodically conducting formal reviews of our activities to assure compliance with environmental regulations and internal practices and report results to the board.

## Privacy and Data Protection

### OUR COMMITMENT TO PRIVACY AND DATA PROTECTION

Unauthorized disclosure of sensitive information can result in BCD Travel and our customers failing to comply with industry best practices, compliance or legislative requirements. These events impact customer retention and result in financial or reputation damage. BCD Travel takes great care and responsibility with customer data and information systems.

#### EXECUTIVE STATEMENT

Unauthorized disclosure of sensitive information can result in BCD Travel and our customers failing to comply with industry best practices, compliance, or legislative requirements. Additionally, unscheduled downtime of the services and applications BCD Travel provides to our customers negatively affects our performance and reputation. These events impact customer retention and result in financial or reputation damage. Because of this, BCD Travel takes great care and responsibility with customer data and Information Systems. BCD Travel computers will be protected using appropriate information security policies, procedures, and technologies.

All information traveling over BCD Travel computer networks will be treated as though it is a BCD Travel corporate asset. BCD Travel's policy is to prohibit unauthorized access, disclosure, duplication, modification, diversion, destruction, loss, misuse, or theft of this information. In addition, it is the policy of BCD Travel to protect information belonging to third parties which has been entrusted to BCD Travel, in a manner consistent with its sensitivity as well as in accordance with all applicable agreements.

BCD Travel's Information Protection and Security Program is based on the ISO 27001:2005 standard.

#### Compliance requirements

Compliance requirements are defined by monitoring industry, international standard, legislative and client expectations. BCD Travel's Information Protection and Security Program is updated in order to maintain compliance with these requirements. Audits are performed regularly to verify compliance with best practices, industry regulations and legal obligations. These include internal audits and vulnerability and risk assessments, ISO 9001, Payment Card Industry Data Protection Standard (PCI), Safe Harbor, SAS-70 Type II, Third-Party Assessments.

#### Acceptable use protocol

BCD Travel information, and information that has been entrusted to BCD Travel, must be protected in a manner commensurate with its sensitivity and criticality. Security measures are employed regardless of the:

- 1 **Media on which information is stored** (paper, overhead transparency, computer bits, etc.)
- 2 **Systems which process it** (personal computers, voicemail systems, etc.),
- 3 **Methods by which it is moved** (electronic mail, face-to-face conversation, etc.)
- 4 **Information must also be protected in a manner that is consistent with its classification**