

TravelPerk | Modern Slavery Statement

Introduction

The following statement is made by TravelPerk Inc. and its subsidiaries (including, without limitation, the UK-domiciled companies TravelPerk Ltd, TK Operations Ltd, Click Holdings Ltd, and TravelPerk UK IRL Ltd), referred to collectively here as **TravelPerk**.

TravelPerk is committed to play its part in the elimination of modern slavery. The statement sets out the efforts we have undertaken to assess and address the risks of modern slavery (including forced labour and human trafficking) in our operations and supply chains on a global level. This statement is made in compliance with section 54(1) of the UK Modern Slavery Act 2015.

Our business and organisational structure

TravelPerk offers corporate travel solutions through an online platform, accessible via our website at www.travelperk.com or through our mobile applications. Our global operational headquarters are in Barcelona, Spain, and we have offices located across Europe, the UK and the US.

All entities in our group are wholly owned, directly or indirectly, by TravelPerk Inc. No changes to the corporate structure of TravelPerk group have been made since 31 December 2021; however, we renamed Click Travel Ltd to TravelPerk UK IRL Ltd on 22 August 2022.

As of 31 December 2022, the group employed 1138 people.

Mission and Values

At TravelPerk, our mission is to connect people in real life. To achieve this mission we provide a business travel platform that gives businesses and travellers the freedom to meet colleagues, clients and partners, in person.

To deliver this mission, TravelPerk operates on a set of 5 core values.

- We are owners. We're a start-up for grown-ups, and that means owning up to our responsibilities and actions.
- Deliver a 7-star experience to our customers and our team - 5 star is your best, for 7 stars you have to go above and beyond.
- Impact over effort. We prioritise the actions that will have the greatest positive impact on our relationship with the end user.
- Be a good person. Be humble, act ethically and assume good intent.
- We are a team. If you win, I win; if you lose, I lose.

These values are core to our mission. They are [prominently displayed on our website](#), and maintained through our staff onboarding and training processes.

Governance and Policies

TravelPerk has implemented measures to minimise risks relating to ethics and human rights, including verifying employee compliance with its Code of Business Conduct and Ethics (the **Conduct Code**), promoting channels for stakeholders to report unethical or illegal issues, and promoting a positive working culture among its suppliers through its [Supplier Code of Conduct](#) (the **Supplier Code**).

Conduct Code

TravelPerk's Conduct Code applies to all employees, executives and directors of all TravelPerk's companies and offices. In summary, the Conduct Code:

- emphasises ethical and legal principles to be followed by our personnel, and the importance of making good, ethical decisions at all times. The Conduct Code expressly recognises the importance of ethical decision-making, and perceptions of ethical conduct.
- highlights the importance of creating a respectful workplace, inclusive culture, and equal opportunity regardless of race, gender, sexual orientation, or any other matters.
- prohibits any acts of violence, harassment, or bullying in the workplace, including gender-based behaviour discrimination, unwelcome flirtation or sexual advances, sending porn or sexual pictures, and name-calling that is insulting or humiliating.
- emphasises respecting privacy, intimacy, labour rights, and security at work.

Employees are required to read and confirm their acceptance of the Conduct Code, and TravelPerk's Anti-Corruption and Anti-Bribery Policy, during onboarding and annually thereafter. We track completion of this exercise (and the completion of other important internal policies) using the online platform [Culture AI](#). TravelPerk expects personnel to immediately report any behaviour or activity that jeopardises the safety or well-being of the company and its employees.

TravelPerk's employment and personnel policies comply with relevant labour laws, and promote the company's culture of respect as an equal opportunities employer.

Supplier Code

You can find the Supplier Code [here](#). In summary, the Supplier Code:

- incorporates specific provisions for suppliers regarding human rights and labour rights. Suppliers are required to respect diversity and ensure that everyone is treated with dignity and respect regardless of their personal characteristics.
- incorporates minimum standards for working conditions and pay including, specifically, the payment of living wages and the provision of humane conditions for workers. Workers must not work more than the maximum daily working hours set by local laws, and must receive legally mandated benefits and leave.
- prohibits all forms of offensive behaviour and harassment towards workers.

- prohibits use of forced, bonded, involuntary or child labour. Suppliers are obligated to report any risks of human trafficking or exploitation, or incidents or suspicions of sexual or other exploitation of children, to local authorities.

In case of any uncertainty or immediately on becoming aware of any matter that may contravene the External Code, Suppliers are obligated to contact legal@travelperk.com.

Risks, due diligence

TravelPerk applies a simple risk assessment to focus its modern slavery work. That risk assessment indicates that higher risk areas comprise our supply chain, our business process outsourcing partnerships in customer care, and catering and cleaning services used in our offices.

Supply Chain

TravelPerk's suppliers generally operate from the EU (~40%) or the United States (~50%). Respectable indices (such as the [Cato Institute's Human Freedom Index](#), and the [International Trade Union Confederation's Global Rights Index](#)) recognise that governments in these geographies commonly offer and enforce a higher standard of human and workers' rights than generally apply in, for example, Asia, the Middle East, and Africa; and these indices inform TravelPerk's stance towards the risk of human rights abuse among its suppliers.

In relation to hotels specifically (where TravelPerk considers its human rights risk is greatest from a supplier inventory standpoint, due to - for example - the systematic outsourcing of cleaning, maintenance and security services), TravelPerk relies on commitments made by the donor members of the [Sustainable Hospitality Alliance](#) (the **SHA**).

The SHA exists to drive action aligned with the United Nations Sustainable Development Goals. Its donor members comprise 35% of the global hotel industry by number of rooms, and include Accor, Hilton, Hyatt, IHG, Marriott and Radisson (each a brand of interest to the business travellers which TravelPerk exists to benefit).

Business Process Outsourcing (BPO) Partners

Customer care is critical to every one of our Values. TravelPerk cares about who and how customer care services are provided and selects, contracts, and verifies the provision and results of the services with due care.

We select customer care providers according to country, cultural, and business ethics, including compliance with standards expressed in the [Ethical Trading Initiative](#) base code. In addition, our contracts with outsourcing companies contain provisions we consider appropriate to support our compliance with the Modern Slavery Act.

TravelPerk also considers [The Global Slavery Index](#) and the [Transparency International Corruption Perceptions Index](#) in its assessment of locations for our BPO partners. The:

- Global Slavery Index attributes an aggregated score against an individual's estimated vulnerability to modern slavery for each country. The score is out of 100 - the higher the score, the higher an individual's vulnerability to modern slavery in that

country. Each country is also awarded a "grade" based on its' response to 5 main areas. A rating of BBB or above is considered a positive response. The most recent edition of the Global Slavery Index was issued in 2018. In this edition, Spain, the United Kingdom and the United States were the highest ranked jurisdictions in which TravelPerk maintains a presence. Each was rated BBB.

- Corruption Perceptions Index (CPI) is the most widely used global corruption ranking in the world. It is issued annually. It measures how corrupt each country's public sector is perceived to be, according to experts and businesspeople. Each country is scored on a scale of 0-100. In 2022, Germany was the highest scoring country in which TravelPerk has a presence, with a score of 79.

During the most recent financial year, we partially outsourced customer care activities to companies based in the Philippines and El Salvador. The following table summarises the scores for each country in which TravelPerk maintains a BPO presence.

Country	Estimated vulnerability to modern slavery, Global Slavery Index 2018	Governmental response, Global Slavery Index 2018	Score, Corruption Perceptions Index 2021	Score, Corruption Perceptions Index 2022
Colombia	51.6	B	39	39
El Salvador	50.7	CCC	34	33
Philippines	60.2	BB	33	33

In light of these scores, so as to assure TravelPerk and its stakeholders as to our supplier's commitment to fair treatment of workers (including catering and cleaning services used in our offices), TravelPerk's representatives paid personal visits to the outsourced facilities and confirmed, through interviews with relevant persons:

- Every hire is subject to the presentation of a certificate of birth or other equivalent documentation, in order to verify age and ensure no one under the legal age is hired.
- All employees have the skills required for their jobs' description, receive training, and can leave their jobs on 30 days' notice.
- All employees are free to associate (i.e. create or join unions) and be part of collective deals.
- The facilities are safe and hygienic as attested by the providers, checked personally by TravelPerk's staff.
- Working hours are compliant with local laws and regulations.

- Living wages are pre-agreed and over the national legal standard.
- The providers have put in place anti-discrimination measures and policies.
- There are internal rules, policies and procedures against inhumane treatment and abuse in the working environment.
- TravelPerk has directly engaged with 3rd parties to oversee the management of the providers.

Progress and looking forward

To repeat, TravelPerk is committed to play its part in the elimination of modern slavery. TravelPerk will continue to review its anti-slavery policies, obligations and processes to ensure they are fit for purpose.

Applicability

Each member of the TravelPerk group of companies jointly makes this statement in compliance with section 54(1) of the UK Modern Slavery Act 2015 and in response to their requirements and efforts in combatting Modern Slavery during the fiscal year ending 31 December 2022.

Abraham Meir Co-Founder and CEO

TravelPerk

Approved by TravelPerk, Inc's Board of Directors on 18 April 2023

TravelPerk S.L.U., TravelPerk GmbH, TravelPerk America Inc, TravelPerk US Inc., TK Operations Ltd, Click Holdings Ltd, TravelPerk Ltd and TravelPerk UK IRL Limited are all wholly owned subsidiaries of TravelPerk, Inc., directly or indirectly.