

Think.
Act.
Live.



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About CWT



Diana L. Nelson Chair

Responsible Business: at the heart of all we do



As Carlson's Board Chair, I am proud to see the principles of community engagement, philanthropy, and leadership on which Carlson was founded more than 80 years ago visibly being championed today. More than this: they are weaved into the fabric of how we all act every single day.

We understand that stakeholders have a vested interest in sustainability and corporate responsibility. They, like us, know the value these behaviors deliver to society. At a time when the world is looking to business to take immediate action to address our most pressing challenges, our company is creating positive and meaningful change. Let me share just a few highlights of our Responsible Business achievements in 2018.

We were thrilled to receive **Gold certification from EcoVadis** for the third consecutive year. Our enterprise-wide approach to embedding sustainability across our operations continues to place CWT in the top 1% of companies worldwide for Responsible Business – showcasing our commitment to RB at all levels of the organization. This commitment is further reinforced by our continued support of the **United Nations Global Compact's (UNGC) Ten Principles** on the environment, labor, human rights and anti-corruption (see p75).

Our people make our business what it is today: a successful and trusted enterprise with operations in every corner of the globe. It is the diversity of our colleagues that makes us thrive, and in 2018 we continued to promote ways to expand diversity and enhance inclusion. I was honored to sign the **UN Women's Empowerment Principles** (see p29) with CWT's top leaders. This action alongside the launch of our Global Diversity and Inclusion Charter signifies our belief that equality is the foundation of our business.

Our approach to Responsible Business does not end at our doors. It is our privilege and responsibility to support the communities around us and create a stronger, better society. In honor of Carlson's 80th anniversary, the Carlson Family Foundation offered eight **significant grants to nonprofits and charitable organizations** (see p64). The beneficiaries were selected by vote of CWT employees, who chose causes close to their hearts including **anti-human trafficking**. With long-term partners including The World Childhood Foundation and ECPAT (see p67), our company continues to take a leading role in confronting this critical human rights issue.

I hope you find this report as inspiring as I do. It is tangible proof of how enterprise-wide and individual actions have the power to make a positive difference. I am proud of all we have done, and continue to do, to ensure Responsible Business is *business as usual* at CWT.

About CWT

Kurt Ekert President & CEO, CWT

Responsible Business: commitment and action



Why is Responsible Business an important focus for CWT?

Responsible Business (RB) is an integral part of our business practice and a key component of our culture. At CWT, we exist to connect people and help businesses succeed. We do this by delivering our promises of simplifying corporate travel, connecting to unlock possibilities and moving forward together. This puts us in direct contact with our customers' employees, and they care about *how* we do business.

Our customers entrust the travel of their employees to a partner who shares a strong commitment to doing business responsibly. So not only does RB enable us to live our values of integrity, leadership, caring and passion, it is a core facet of our relationship with our customers.

What were your personal highlights relating to Responsible Business from the year?

I continue to be amazed by our collective achievements and the way we weave RB into the fabric of everything we do. First, I am very proud of our EcoVadis Gold rating for the third year in a row. I was also honored by the scale of participation from our colleagues in signing the UN Women's Empowerment Principles (see p29).

In 2018, I had the privilege of speaking at the United Nations alongside the World Childhood Foundation USA (WCF) and the Swedish Mission to spotlight the urgent issues of child sexual abuse and human trafficking. It was a highly visible and prominent platform from which to share our commitment to develop solutions and confront these pressing humanitarian issues.

Looking at CWT's role as a leading business travel provider, what are some of the key challenges you'd like to address moving forward?

Change is the only constant today, and a shifting landscape creates new and exciting opportunities in our industry. Leadership is one of our core values, and we focus on establishing a leadership position to tackle complex industry challenges. For example, as a multi-national organization with high female representation, it is our duty to promote diversity and inclusion and to advance gender equality (see p29-31). We also recognize our influence in combatting human trafficking as a global travel provider (see p44). And, as a signatory to the UN Global Compact, we share best practice throughout our supply chain to reduce risk and promote sustainable business activities (see p22-23).



What RB-related topics do you anticipate will become more prominent in the industry in the near to mid-future?

As we continue to work with our clients and their travelers in managing and dealing with their data, we know our duties relating to data protection and information security will increase. We have put in place several measures over the last year to ensure our policies and processes are up-to-speed with relevant regulations that ensure data is protected (see p24). As a global travel management company, we also recognize our role in implementing measures to reduce our collective environmental impact (see p48) and tackle climate change.

What are you most looking forward to when it comes to CWT's Responsible Business focus in 2019 and beyond?

As our clients' expectations increase, Responsible Business has become a real competitive driver for our business. We will continue to implement additional measures to further embed RB in our processes and our products and services. Beyond this, with the end of our 2020 commitment period approaching quickly, I look forward to setting our future vision for even more ambitious targets to contribute to a more sustainable future.



About



CWT is a business to business for employees (B2B4E) travel management platform. Companies and governments rely on us to keep their people connected – anywhere, anytime, anyhow – and, across six continents. We provide their employees with innovative technology and an efficient, safe and secure travel experience. Every single day, we look after enough travelers to populate Belgium more than twice, while our RoomIt operation handles enough hotel bookings to fill all the hotel rooms in Paris every night.

Around

18,000

employees

A presence in around

145

countries

Client retention rate

96%

About CWT



Our offering blends proprietary and innovative technology, with the expertise of around 18,000 employees, so that clients get the best possible value from their travel programs, while enjoying exceptional service. Our client retention rate stands at almost 96% and, in 2018, we posted total transaction volume of over US\$25 billion.

Spanning around 145 countries, our corporate travel management business is complemented by four specialized divisions, all of which delivered notable successes during 2018:

CWT Energy, Resources & Marine

CWT Energy, Resources & Marine provides travel management solutions for many of the world's leading companies in the oil and gas, mining, offshore, marine and alternative energies industries.

mycwt.com/energy-resources-and-marine/

CWT Meetings & Events

CWT Meetings & Events is CWT's meetings & events division. It delivers innovative, high-quality projects for our clients across all industry sectors globally. Our creative know-how helps us deliver awe-inspiring events, and our logistics expertise guarantees professional meeting services, group travel and compliance.

mycwt.com/cwt-meetings-events.com

CWT Solutions Group

CWT Solutions Group is the consultancy arm of CWT. CWT Solutions Group helps deliver travel procurement efficiencies through innovations in supplier sourcing, data intelligence, traveler management and mobility.

mycwt.com/travel-consulting

RoomIt by CWT™

RoomIt by CWT is the hotel distribution division of CWT. Every day we match travelers with the right room at the right rate, and every minute we book over 30 hotel rooms. We also

provide travelers with the amenities and loyalty programs they want, while helping organizations control their budget and improve travel oversight.

roomit.com

We connect people to help businesses succeed

Our vision is to be the world's leading B2B4E travel management platform. We have a proud heritage and culture as an industry leader. Thanks to everyone's commitment at CWT, and that of our business partners, thousands of clients and millions of travelers around the world trust us, year after year. However, change is the only constant today and continued leadership requires ongoing evolution.

We listened to our clients, their travelers, our suppliers and our employees. We analyzed our competitors. We heard what the market wants, and we know how the next generation of corporate travel is evolving.

We have brought these insights together into three core brand promises that will guide us going forward:

- Simplifying corporate travel
- Connecting to unlock possibilities
- Moving forward together

Strengthening CWT's culture

In 2018, CWT made significant progress on defining and promoting our company culture. We consolidated several months of research, which included employee focus groups, online

discussions, surveys and analytics, into four attributes that represent the best of our culture:

- Empowered – Employees have the support and resources they need to do what is asked of them and leaders trust their teams to do the right thing, giving them the authority to act and make confident and responsible decisions.
- Performance-driven – Be clear on who we are, who we want to be and how we are going to get there. It is about being focused on outcomes and delivering results at every level of the organization.
- Innovative – Where people have the motivation and the enthusiasm to do things differently and better, without the fear of failure.
- Customer-focused – Being there for our customers and delivering the best experience when working with our customers and servicing their travelers.

Our work defining our cultural attributes was built on research conducted in 2017 focusing on our values, which form the foundation of our culture and behaviors. We celebrated culture during a very successful Culture Week that engaged employees in online and offline discussions and education. Events were held in many locations around the world where culture was at the top of the agenda in team meetings. Online engagement around culture also doubled traffic to our social intranet during the week.

Culture Week was the crown jewel in a more extensive and holistic framework for culture in 2018, which inspired several new initiatives that are now due to be launched in 2019.



Responsible Business Strategy and Governance

We think...

"What gets measured gets managed. This is especially true when it comes to ensuring CWT lives its values and operates with integrity every day. Our Responsible Business strategy was launched as a clear set of commitments and goals that ensure we are delivering value in a responsible way for all our stakeholders.

Strategy and governance is what ensures steady, continuous progress, like what we have seen over the past several years. Having a strong governance framework that is championed by passionate people means we are continuing to go from strength to strength in building a lasting legacy and creating strong relationships.

Adhering to recognized global standards such as the United Nations Global Compact (UNGC) and the Sustainable Development Goals (SDGs) also ensures we are playing our part in contributing to sustainability at a global level."

Françoise Grumberg,

Vice President, Global Responsible Business and Diversity & Inclusion



We act...

...across seven Responsible Business domains

Responsible Business (RB) is our approach to thinking, acting and living with sustainability and integrity. In 2018, we continued to align our RB activities to our vision, business strategy and embodiment of being a trusted partner. Our approach covers seven domains and includes commitments for 2020, targeting areas identified as being important to our business and stakeholders.

Responsible Business plays a key role in how we think, act and live at CWT. The interest of clients and other stakeholders in sustainability continues to increase, so we use their feedback to guide our approach and inform our strategy. Our substantial efforts over the years have enabled us to make strong progress and adopt a leadership position in corporate social responsibility across the regions in which we operate around the world.

In March 2019, we were rated Gold for the third successive year by EcoVadis, an independent and internationally-recognized rating agency. This rating places CWT among the top 1% of all companies evaluated worldwide, both within our industry and across all industries.

Our RB domains form the basis of our program, guiding what we do and how we do it. We monitor our progress across the following domains (see next page):

1. **Responsible Business Governance:** how we implement the RB strategy day-to-day.
2. **Ethics and Business Behavior:** how we conduct business ethically.
3. **Human Resources:** how we attract, develop, reward, retain and engage a diverse workforce.
4. **Human Rights:** how we uphold human rights across all our operations and in our sphere of influence.
5. **Environment:** how we minimize the environmental impacts of the company.
6. **Responsible Products and Services:** how we integrate RB into our product and service offerings.

7. **Community Involvement:** how we support the local communities in which we live and work.

Our process for identifying material issues

By taking into account the perspective of our employees, clients, external assessors, regulators and global sustainability partners, among others, we gain an insight into what sustainability issues matter most to them. We then assess our findings from the perspective of business relevance to determine the material issues that inform our global RB strategy and governance.

This assessment process is comprised of three key stages:

1. **Identify relevant RB issues:** we analyze a range of stakeholder perspectives from sustainability experts, regulatory guidelines and legislation. This includes global initiatives such as the UN Sustainable Development Goals (SDGs), the United Nations Global Compact's (UNGC) Ten Principles, external assessors and other sources across the wider travel industry.
2. **Collect feedback from stakeholders:** having identified an extensive list of issues, we engage with key stakeholders to prioritize them. Feedback mechanisms vary depending on stakeholders engaged. For example, for employees, we use the results of our regular pulse surveys.

3. **Review issues in the context of their importance to the business:** we map issues deemed most important to internal and external stakeholders against their importance to our business activities. The outcome of this is our list of material issues.

Our last materiality assessment identified 20 topics that were grouped into our seven RB domains (see next page).



We act...

...by meeting long-term commitments

To ensure that we are consistently monitoring, improving and sustaining our impact over the long term, we have set Responsible Business commitments for 2020. Each is aligned to one of our seven domains and is supported by objectives that guide our focus.

RB domain	Priority	Long-term commitment	2020 objectives	
Responsible Business Governance	Global Responsible Business Governance Page 10	Ensure progress transparency	<ol style="list-style-type: none"> 1. Assess our Living Responsible Business maturity and performance at global and local levels on an annual basis 2. Deploy the Living Responsible Business program in functions and locations globally 	
		Integrate Responsible Business into our activities		
Ethics and Business Behavior	Business Ethics and Compliance Page 19	Strategically address compliance and ethics worldwide: conduct our business in line with our values, our Code of Business Ethics and Conduct, and the UN Global Compact principles	<ol style="list-style-type: none"> 3. Further engage all employees and CWT partners through a global multi-year Ethics Training and Communication program 4. Deploy a robust external information campaign about our global policies and our best practice approach to ethics and compliance, as well as our Responsible Purchasing program 5. Continue protecting employee and client data through cutting-edge data privacy and information security policies and practices, while continually developing expertise throughout the organization 	
		Spread the word to our key stakeholders about our ethics and zero-tolerance approach		
		Privacy and Data Protection Page 24		Maintain a secure business environment for a Global Data and Privacy Protection program
Human Resources and Human Rights	Diversity and Inclusion Page 28	Leverage diversity as one of CWT's major assets	<ol style="list-style-type: none"> 6. Deployment of our Global Diversity and Inclusion strategy through regional diversity and inclusion committees 7. Non-discrimination training of all recruiters and managers 8. Reach the level of best-performing companies while developing leaders to enhance employee engagement 9. Ensure delivery against future business needs by developing and selecting the right talent for the future and driving a culture of innovation 	
		Employee Engagement Page 38		Cultivate a highly-engaged workforce
		Human Capital Development Page 35		Establish workforce readiness to deliver against future business needs

Responsible Business Strategy and Governance



RB domain	Priority	Long-term commitment	2020 objectives
Environment	Energy and Carbon Management Page 54	Develop an environmentally-responsible culture	10. Educate all our employees through eco-attitude campaigns and an environment training module translated into several languages 11. Empower the global environment network to drive local performance
		Measure our global carbon footprint Implement a global environmental strategy	12. Reduce our global greenhouse gas (GHG) emissions by 10% per employee vs 2015
Responsible Products and Services	Responsible Portfolio Page 58	Contribute to our clients' Corporate Social Responsibility (CSR)/Responsible Business ambitions and promote sustainability	13. Further reinforce our Responsible Business products and services offering to our clients 14. Proactively propose carbon offsetting to clients
	Business Continuity Page 60	Ensure a robust Global Business Continuity Management system	15. Expand the scope of an ISO 22301-aligned Business Continuity Management system to include Crisis Management, Business Continuity Planning and Disaster Recovery
		Establish a best-in-class crisis management approach	16. Become the reference in terms of crisis management in the travel industry
Community Involvement	Corporate Community Involvement Page 62	Care for the communities where we live and work, and contribute to their development through our skills and expertise	17. Further deploy globally and measure CWT's impact in the 3E* fields of action – *Education, Emergencies, Essential needs



We act...

...through effective governance and strong policy

- Talent management
- Responsible products and services
- Environmental performance
- Carbon offsetting
- Community involvement

Our comprehensive governance framework ensures we are integrating Responsible Business into the way we do business every day.

Global governance for RB is overseen by the Executive Leadership Team, which receives regular updates on RB performance and strategy from the Vice President (VP) of Global Responsible Business, who also updates the Board annually on RB plans and activities.

The RB network spans 35 countries and includes members from nearly every function within CWT. Utilizing leadership from the Global RB team, subject matter experts, RB ambassadors and RB country correspondents, this wide-reaching and diverse network of employees is crucial for the successful development and implementation of projects across a broad range of areas, including:

- Ethics and compliance
- Data protection
- Responsible purchasing
- Diversity and inclusion



Executive Leadership Team

Chaired by the President and CEO, the Executive Leadership Team has oversight of CWT's RB strategy, supports the overall delivery of Responsible Business throughout the company and sponsors key projects.

RB Subject Matter Experts

Own particular areas of RB domains and provide specialist advice and recommendations on their areas of expertise. Their role involves developing action plans to ensure CWT reaches its 2020 RB objectives in each domain.

RB Ambassadors

Contribute to the deployment of CWT's RB strategy and initiatives across the organization. RB ambassadors, who are either regional or functional, collaborate to define key programs and initiatives, and identify specific areas for progress within their region/function.

RB Country Correspondents

Develop, manage and implement programs in their respective countries. RB country correspondents foster an RB environment that embraces both CWT and local cultures and expectations. Their main contributions are implementing local RB action plans, sharing best practices relevant to their country as well as facilitating and communicating about RB initiatives.

Global RB team

Sits at the heart of our RB framework. The team develops the strategy and coordinates RB programs globally across the RB network. It facilitates the sharing of information, monitors and communicates performance, and liaises with internal and external stakeholders to ensure that we meet our commitments.

We live...

...to take action through our global taskforces

With the aim of taking a proactive approach to RB-related issues, we launched two global taskforces in 2017 to focus on the topics of diversity and inclusion and anti-human trafficking. Committed CWT employees and members of our Executive Leadership Team make up these taskforces.

In 2018, the Diversity and Inclusion Taskforce focused on encouraging our senior leaders and employees to pledge their commitment to the UN Women's Empowerment Principles. Their efforts resulted in the publication of CWT's Global Diversity and Inclusion Charter, and rolling out non-discrimination and unconscious bias trainings for employees (see p28).

The Anti-Human Trafficking Taskforce focused on raising awareness among our stakeholders. We reinforced our collaboration with partners such as the World Childhood Foundation, ECPAT, Orphaned Starfish Foundation and Thorn.

In partnership with ECPAT International we launched digital anti-trafficking ads on myCWT portal for travelers, to create awareness about reporting child sexual abuse and trafficking. Our leaders continued to share best practices at international forums and sit on the boards of anti-human trafficking organizations (see p67).



We act...

...to apply widely-recognized global principles and standards

We align our RB strategy to widely-recognized international principles and standards. In doing so, we ensure we are reflecting the most pressing societal and environmental challenges in our industry and beyond.

United Nations Global Compact (UNGC)

We have been a signatory to the UNGC since 2012 and remain committed to operating in a way that nurtures respect, dignity and sustainability. In 2018, our annual Communication on Progress (COP) reached the UNGC Advanced Level for demonstrating the integration of Global Compact Principles in our core business and strategy.

As the world's largest corporate social responsibility initiative, we support the UNGC's Ten Principles on Human Rights, Labor, Environment and Anti-Corruption. We also seek to take strategic actions to advance broader social goals such as the UN Sustainable Development Goals (see next page). Our UN Global Compact correspondence table can be found on p75.

Global Reporting Initiative (GRI)

GRI is an international, independent organization that helps businesses, governments and other organizations understand and communicate their impact on critical sustainability issues. This report is prepared in accordance with the GRI Standards Reporting Guidelines: core options and our full GRI Index can be found on p70 of this report.

CDP

Formerly known as the Carbon Disclosure Project, CDP provides a global disclosure system for organizations to measure, disclose, manage and share key environmental information. We have been reporting our environmental performance to the CDP Supply Chain program since 2013. Our environmental data can be found on p54.

ISO Standards (ISO 26000, ISO 14001, ISO 20121)

ISO 26000 is the international standard that serves as a reference for companies to assess and address their social responsibilities. We refer to this standard when developing and reviewing our RB approach. We also hold ISO 14001 Environmental Management certification in European markets, including three UK sites (recertified 2016) and all offices in Spain (recertified 2018). In 2018, CWT Meetings & Events Italy obtained ISO 20121:2013 certification for 'Event Sustainability Management Systems' (see p50).

EcoVadis

This environmental and social performance rating agency assesses over 55,000 businesses against 21 CSR criteria covering environment, labor, fair business and sustainable procurement.

International Labor Organization (ILO)

ILO brings together governments, employers and workers to set labor standards, develop policies and devise programs promoting decent work for all women and men. We comply with the ILO Fundamental Principles and Rights at Work.

Green Office certifications

WWF Green Office is an environmental management system developed by the WWF. It helps offices to reduce their ecological footprint and greenhouse gas emissions by motivating office staff to act in an environmentally-friendly way in everyday tasks. CWT Finland renewed its Green Office certificate delivered by the WWF in 2017 and CWT Estonia uses European Green Office standards (see p51).



United Nations Sustainable Development Goals (SDGs)

The 17 SDGs agreed by all 193 UN Member States in 2015, call on society (including governments, businesses and civil societies) to work together to end extreme poverty, fight inequality and injustice, and protect our planet. Meeting the goals by 2030 will require an unprecedented effort and we have a responsibility to play our part.

We have selected six SDGs and supporting targets that we believe we at CWT are best positioned to address. As well as listing the specific actions we have done to target these in 2018, icons are featured throughout the report to show where we have targeted specific goals across our domains.



Sustainable Development Goals and Targets	Our contribution in 2018	The path ahead
<div data-bbox="129 791 315 979" data-label="Image"> </div> <p>SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</p> <p>Target 4.1 By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes.</p> <p>Target 4.4 By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.</p>	<p>Education is one of the 3Es of our community involvement strategy, which also supports projects relating to emergencies and essential needs. In addition it provides help to projects relating to anti-human trafficking and military veteran support.</p> <p>In 2018, our employees launched more than 100 3E community initiatives. In line with SDG 4 we continued to champion education and employability projects for young people (see p65).</p>	<p>We will continue to support the transfer of knowledge and skills from one generation to the next through our focus on educational projects.</p> <p>We will also continue to raise awareness of topics such as human rights, anti-human trafficking, ethics and the environment among our employees through educational training and development opportunities.</p>



Sustainable Development Goals and Targets Our contribution in 2018 The path ahead



SDG 5: Achieve gender equality and empower all women and girls

Target 5.1
End all forms of discrimination against all women and girls everywhere.

Target 5.2
Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation.

Target 5.5
Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.

In 2018, our Diversity and Inclusion Taskforce continued to promote equality across our organization. This included encouraging our leadership team and employees to sign the UN Women’s Empowerment Principles and drive change for gender equality (see p29).

In 2018, our Global Talent Acquisition team, supported by the RB team, organized non-discrimination training sessions for all CWT recruiters around the world.

In 2018, we ran a communications campaign to promote our updated Code of Business Ethics and Conduct, which addresses anti-harassment and other key topics. The campaign also encouraged employees to report any improper or inappropriate behavior, in accordance with local laws and regulations (see p19-20).

With the goal of reducing bias in the workplace, we offered unconscious bias training to our employees in 2018. The ‘Understanding Unconscious Bias’ training course helps employees identify where unconscious bias can show up in our everyday lives, what its impacts are and what can be done to address them.

Our anti-trafficking efforts are in support of organizations that fight to eliminate trafficking of women and girls such as ECPAT, World Childhood Foundation, Thorn, and The Orphaned Starfish Foundation.

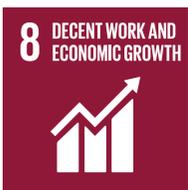
Our Diversity and Inclusion Taskforce, following the UN Women’s Empowerment Principles, will put in place additional measures to promote gender equality moving forward.

We will also continue to promote non-discrimination and unconscious bias training to ensure an inclusive workplace.

We will further reinforce our support to organizations fighting human trafficking.



Sustainable Development Goals and Targets Our contribution in 2018 The path ahead



SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

Target 8.5

By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.

Target 8.7

Take immediate and effective measures to eradicate forced labor, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labor, including recruitment and use of child soldiers, and by 2025 end child labor in all its forms.

Target 8.8

Protect labor rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.

We provide quality employment and contribute to economic growth through our human resources and human rights efforts as well as our business performance (see p18).

Driven by our Anti-Human Trafficking Taskforce, we pressed forward with actions to prevent human trafficking and modern slavery in all its forms. Through strong policies, processes and community action, we oppose all forms of slavery and human trafficking – without exception (see p44 and p67).

We will continue to uphold our commitment to external frameworks that promote human rights and equal opportunities such as the UNGC, the Women’s Empowerment Principles, ILO and Universal Declaration of Human Rights.

Our global Anti-Human Trafficking Taskforce will continue to reinforce our policies, increase awareness and education, and collaborate with stakeholders and public leadership.



SDG 10: Reduce inequality within and among countries

Target 10.2

By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.

Target 10.3

Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.

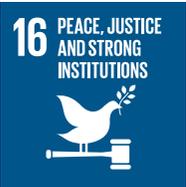
We strive to promote equal opportunities for all, regardless of ethnic and cultural backgrounds, age, gender, sexual orientation or disability.

In 2018, we published our vision, high-level objectives and principles in the form of a Global Diversity and Inclusion Charter. Our Charter was informed by the UN Global Compact and the UN Women’s Empowerment Principles (see p29).

We hold ourselves to high standards of conduct, and maintain a zero tolerance stance on any forms of discrimination or harassment. This included efforts to eliminate discrimination through unconscious bias training (see p32).

A key focus will be continuing to evaluate and further reinforce our internal processes to ensure diversity and inclusion for all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.



Sustainable Development Goals and Targets	Our contribution in 2018	The path ahead
 <p>SDG 13: Take urgent action to combat climate change and its impacts</p> <p>Target 13.2 Integrate climate change measures into national policies, strategies and planning.</p> <p>Target 13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.</p>	<p>Our global RB team continued to coordinate actions to reduce our environmental footprint and raise awareness of environmental challenges and opportunities within our business in 2018 (p49).</p> <p>Our Environmental Awareness Week focused on the topic of responsible meetings and events, and we continued to offset the carbon impact of several major events in 2018 (see p50).</p>	<p>Promoting an environmentally-conscious culture through awareness campaigns and targeted initiatives will remain a focus.</p> <p>Efforts will also continue to expand our environmental reporting measurement and further integrate environmental considerations to reduce our global footprint.</p>
 <p>SDG 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</p> <p>Target 16.2 End abuse, exploitation, trafficking and all forms of violence against and torture of children.</p> <p>Target 16.5 Substantially reduce corruption and bribery in all their forms.</p>	<p>Our Anti-Human Trafficking Taskforce continued to raise awareness of the topic and take positive action (see p44).</p> <p>In 2018, we worked in partnership with ECPAT International to launch digital anti-trafficking ads on myCWT portal, with the objective of creating awareness among travelers about reporting signs of sexual abuse and trafficking.</p> <p>We also continued to reinforce our collaboration with partners such as the World Childhood Foundation, ECPAT, Orphaned Starfish Foundation and Thorn to end abuse, exploitation and trafficking of children (see p67).</p> <p>Our anti-corruption policy outlines our zero-tolerance stance on bribery and corruption.</p>	<p>The fight to tackle human trafficking will remain a focus as we look to reinforce policies, create more awareness and build even stronger partnerships with stakeholders and leaders.</p>



Regional recognition

When our efforts are recognized by others, it helps us know we are on the right track – and challenges us to do more. Here are some of the regional awards and recognition we are proud to have received in 2018:



- CWT Hong Kong received an award from the Hong Kong Council of Social Service for its commitment to caring for the community, employees and the environment for the sixth year in a row.



- CWT Mexico was included as part of Súper Empresas 2018, a ranking promoted by Expansion Magazine that identifies the top companies to work for in Mexico based on their work environment, policies and programs.



- CWT Meetings and Events won a SITE Crystal Award for 'Most Impactful Effort Toward Corporate Social Responsibility as Part of an Incentive Program.' Considered the highest honor in the Incentive Travel industry, the recognition was awarded by the Society for Incentive Travel Excellence (SITE) during the SITE Crystal Awards Recognition Program at the 2018 SITE Global Conference in Bangkok.



- CWT Singapore was recognized for the second year in a row for its RB program at the 45th Annual General Meeting of the American Chamber of Commerce in Singapore. The AmCham CARES program recognizes American companies in Singapore that demonstrate a strong understanding of the link between business operations and society.



We said...



2020 Objectives

Assess our Living Responsible Business maturity and performance at global and local levels on an annual basis.

Deploy the Living Responsible Business program in functions and locations globally.

We did...



2018 Performance

- Improved our global reporting campaign by streamlining the process across our network and key internal stakeholders.
- Conducted a global RB network survey to obtain feedback from members and define tools/initiatives to further deploy the RB program across functions and regions.



- Partnered with members of the Executive Leadership Team to continue sponsoring our different RB initiatives.



We will...



2019 Goals

- Expand our global process for gathering information and further measure progress across geographies and functions.

- Further embed Responsible Business into our company culture and operations.
- Assist in deeper implementation of functional initiatives linked to RB.





Ethics and Business Behavior

We think...

“CWT has a vibrant culture anchored in incredibly strong values. Our approach to ethics and business behavior is all about translating these values into guidance for personal and business decision-making. The end result is greater trust and lower risk.

For our employees, 2018 saw implementation of training on key policies and processes, a highly successful internal awareness campaign around our newly-updated Code of Business Ethics and Conduct and Ethics Helpline. For our suppliers and purchasers, we updated our Supplier Code and raised internal awareness of our responsible purchasing principles. For our customers, we focused on making further improvements to our data privacy and information security policies and practices.”

Lauren Aste,
Executive Vice President and Chief Legal Officer

In this section, we address the following SDGs





We act...

...with ethics and integrity

We pride ourselves on our reputation as a world-class business travel management company, operating with the highest standards of ethical conduct. We have created a culture that promotes trust and protects the relationships we have with our stakeholders, including our clients and suppliers, by focusing on transparency and honesty.

Through our Ethics and Compliance program, as well as our alignment to internationally-recognized standards, we seek to conduct business in the right way. Business ethics and compliance, responsible purchasing, as well as data privacy and information security, represent key priorities of our program. Our process starts with implementing ethical business conduct through a robust governance structure – supported by dedicated policies and training.

The focus of our program in 2018 was on continuing to raise awareness of ethics and integrity among our employees and suppliers. We also encouraged individuals to stand up and speak out where there are instances of conflict with our values.

Ethics and compliance governance

Ethics and compliance are driven from the highest levels of the company. Our Compliance Committee is comprised of our CEO and other key members of the Executive Leadership Team. Supporting the Committee is a team of global lawyers and support staff who oversee the day-to-day management of the Compliance program, under the leadership of the Vice President of Global Compliance.

The Global Compliance team is responsible for deploying and updating policies and procedures and is also responsible for promoting and ensuring compliance with our Code of Business Ethics and Conduct (the Code). The Code outlines the ethical standards expected of our teams and contractors everywhere we do business.

We promote our standards through annual awareness training for all staff, topics include anti-bribery, anti-corruption, non-retaliation, gifts and entertainment. During the training, employees are required to read and understand all aspects of the Code, to ensure they are acting in line with our business ethics and strong stance on human rights.

Code of Business Ethics and Conduct

Our Code of Business Ethics and Conduct outlines and informs our day-to-day actions and behavior. It is the foundation of all CWT compliance policies and encourages discussions among our people to help address any ethical dilemmas we may encounter. Fundamentally, it helps us maintain the trust we have built with our employees, clients and suppliers.

The Code applies to every individual and contractor who works for, or represents us, worldwide. It outlines how we comply with applicable laws, treaties and regulations relevant to business conduct. It also includes guidance around workplace conduct and reinforces our values and principles clearly and comprehensively. There is a requirement for employees to acknowledge that they have read and approved the Code upon being hired. This ensures that these principles are instilled from day one.

Following a detailed review of the Code in 2017 to reflect the latest industry best practices and legislative trends, we launched our fully revised Code of Business Ethics and Conduct on 1 January 2018 on our website and through

key communications channels. The new Code includes refreshed content from key teams (including Human Resources, Internal Audit, Information Security, Responsible Business, Legal & Compliance, and Communications). Beyond this, it also contains practical advice and simplified language to make it more engaging and easy to act on. The Code is available in 16 languages and can be downloaded on [our corporate website](#).

To raise visibility and encourage employees to get to know the Code better, an internal awareness campaign took place in 2018 (see 'Training on the Code' on the next page for more).

Ethics and Business Behavior



Compliance Policy Manual

Our Compliance program is designed to detect and prevent violations of the law, respond to potential issues and proactively deter problematic behaviors and actions.

Our Compliance Policy Manual helps reduce the complexity of our policies by clearly articulating what is expected of our employees in a single, easy-to-use publication. It helps us in our mission to empower individuals to make smart, informed decisions and to maintain accountability for their actions, all while supporting our business strategy in a way that meets our ethics and compliance commitments.

All employees, contractors and any other individual working for or representing CWT are expected to follow the policies contained within the compliance manual. The manual was launched on 1 January 2018 alongside the new Code and contains the following policies*:

1. Protection of personal data

We understand the importance of holding the personal information provided by our travelers, employees, travel managers, clients and prospective clients carefully and securely. This policy explains how any employee or other individual representing CWT who processes personal information must protect and safeguard it in line with our Data Privacy Policy.

2. International Trade Compliance policy

We operate in numerous countries around the world and must comply with all applicable international trade laws such as trade embargoes, sanction screening and product export controls. Our International Trade Compliance policy sets out our processes and controls around how we deliver this.

3. Anti-corruption

We do not allow payment of bribes or the facilitation of corrupt behavior under any circumstances. Unfair business practices, such as kickbacks, facilitation payments and use of third parties to channel bribes are also strictly prohibited. Our anti-corruption policy outlines our zero-tolerance stance on bribery and corruption, and our adherence to legislation such as the US Foreign Corrupt Practice Act and the UK Bribery Act to ensure we meet global requirements.

4. Competitive Information policy

Many of the countries where we do business have competition, or antitrust, laws. These laws aim to ensure fair competition, which allows our clients and the public to buy goods and services at fair market prices. Competition laws prohibit agreements, practices and conduct which have a damaging effect on competition, such as improper agreements between competitors or abuse of market power.

5. Conflicts of Interest policy (including gifts and entertainment)

Our formal Conflict of Interest policy seeks to make all employees aware of CWT's rules about situations that could create a potential, real or perceived conflict between CWT's interest and CWT employees. Anyone acting on CWT's behalf must be free from conflicts of interest and/or appearance of conflicts of interest that could adversely influence their judgment, objectivity or loyalty to CWT.

6. Anti-money laundering

Under no circumstances may any CWT personnel or agent (independent sales representatives, distributors, consultants or agents) participate in or allow the commencement of any transaction involving CWT that involves any funds that the employee knows or suspects were illegally obtained.

The Compliance team has an appropriate due diligence process in place, which ensures alignment from the business to the expectations set out in the Compliance Policy Manual. A comprehensive compliance risk assessment process related to all compliance policies is also in place.

Additional existing key policies and processes include:

Fraud

Our formal internal fraud procedure seeks to outline the procedures to follow when a case of fraud has been identified or suspected and to establish the process to report, investigate, manage and share information about fraud with key CWT stakeholders and shareholders.

Fair marketing

We compete for client commitments, but never by sacrificing honesty and fairness. This is especially vital in all of our sales, marketing and advertising pursuits. All advertising and marketing claims must be substantiated and must include all information and disclosures necessary to make them accurate.

Training on the Code

Preventive measures implemented to ensure adherence to the Code include mandatory training and awareness programs driven by the Global Compliance team. Each year, we run mandatory training on the Code and its policies, both for new recruits and current staff – we achieved a 99% completion rate in 2018 (99% in 2017).

Employees can access training sessions wherever and whenever they are as part of our online learning management system. Our Compliance team has access to metrics on how our people

* The wording used to describe these policies has been taken from the Compliance Policy Manual.

Ethics and Business Behavior



are performing on each compliance topic, and benchmarking data that shows how we are performing as a business against our peers. We use this insight to determine if additional training is required.

In line with the update to our Code, we launched a campaign in 2018 to encourage employees to get up-to-speed with its features. The campaign provided clear information detailing how the Code helps us align to our values of Integrity, Leadership, Caring and Passion. As well as producing a series of videos focused on our values, we also encouraged people to speak out in instances where behaviors or actions conflicted with the Code by calling our dedicated Ethics Helpline or getting in contact with our Legal & Compliance business partners or the Global Compliance team.

Fighting bribery and corruption

As stated in our Code, we abide by all applicable laws, treaties and regulations that forbid bribery and corruption. In line with our commitment to conducting our business the right way, we maintain a zero-tolerance stance on bribery and corruption. This means that we will never bribe or receive bribes from any public or private third party, either directly or indirectly (such as through an agent) – even if it means losing business as a result.

Our Corporate Audit function monitors existing and emerging risks relating to bribery and corruption. We perform a full risk assessment and risk ranking on an annual basis which identifies any ethical issues that may arise in the company and to take the appropriate action where applicable. As part of our methodology, we evaluate and rank how our countries are performing across criteria linked to the operations, context of the country and local control actions (audit, compliance, etc.). In line with our anti-corruption commitment, the Head of Audit reports directly to the Audit Committee which is a subcommittee of Carlson's Board and its members are all Board members.

We take a risk-based approach to due diligence of subcontractors and suppliers. The level of diligence is based on a number of factors, such as industry, location, services provided and beyond. As an example, this process applies to third parties who help CWT provide services to CWT clients, including destination management companies, corporate meeting networks, and other travel-related agencies, tour companies, visa and passport providers.

In addition to due diligence requirements, our supplier agreements obligate the supplier to abide by all laws, rules and regulations, including those related to anti-bribery and corruption. They must also adhere to CWT standards.

We live...

...to uphold ethical behavior through the Ethics Helpline

Our Ethics Helpline is one of several tools and policies in place to ensure that any instances of non-compliance are dealt with discreetly and fairly.

Available 24/7, our confidential Ethics Helpline connects callers (employees, clients and other third parties) to an experienced, independent operator who speaks their language. Concerns are logged by phone and/or through an online tool where they are addressed promptly. We also make use of a third-party provider to verify adherence to local privacy laws and reporting requirements.

The Compliance team reviews all cases and assigns an internal investigator based on the nature of the issue. In 2018, the Compliance

team updated our investigation manual and continued training a group of internal investigators to standardize the conduct of investigations. CWT treats the reported information in a confidential manner to the extent reasonably possible and allowed by law. We also have a strict non-retaliation policy.

The Compliance team develops metrics on cases submitted through the Ethics Helpline, such as the nature of the concern, what countries cases are reported in, and tracks how the cases are resolved. This information is then reviewed quarterly with the Compliance Committee, which oversees compliance at CWT.

Information on our Ethics Helpline is posted on our **corporate website** and is made accessible not only for our employees, but also for our clients, travelers, third-party vendors and partners to use as well.



We act...

...to build a responsible supply chain

We value ethical conduct and, because of this, we expect our partners in the supply chain to uphold the same rigorous standards that we do.

Our Responsible Purchasing program was launched in 2014 with the aim of mitigating ethical, social and environmental risks in our supply chain while creating stronger relationships with our supply chain partners. Our Responsible Purchasing program demonstrates our commitment to the United Nations Global Compact (UNGC) and to the ILO Declaration on Fundamental Principles and Rights at Work. The program has two main areas of focus:

1. Embedding Responsible Business into CWT's purchasing processes and practices

To date, we have implemented responsible purchasing processes that apply to non-trade suppliers*. Our Non-Trade Global Sourcing Policy sets out the rules and procedures that must be followed when making non-trade purchases. Included in our Non-Trade Global Sourcing Policy is the requirement that purchasers ask key non-trade suppliers to align to our Responsible Supplier Code. Processes also include corporate social responsibility assessments for key non-trade suppliers and the integration of RB criteria into non-trade Global Sourcing RFP (Request For Proposal) process.

2. Awareness and training for all employees

Another key area of our program is creating a responsible purchasing culture. We have rolled out training for employees to encourage them to get to know the Responsible Supplier Code, and we create continuous awareness on this

topic through campaigns and resources available on our intranet.

Our Responsible Supplier Code

To ensure that our non-trade suppliers observe CWT's high standards of ethical conduct, we expect them to adhere to the principles set out in our Responsible Supplier Code.

Available in seven languages**, the Responsible Supplier Code clarifies the minimum requirements CWT expects from non-trade suppliers in terms of ethics, compliance, human rights, social and environmental standards. We expect all our suppliers to operate in full compliance with the laws, rules and regulations to which they are subject. Our Responsible Supplier Code takes this a step further by drawing on internationally-recognized standards to advance social and environmental responsibility.

The Responsible Supplier Code covers the following broad topics:

- compliance and ethics;
- products and services;
- human rights, including working conditions, anti-human trafficking and the fight against modern slavery, child exploitation, diversity and inclusion;
- protection of the environment;
- occupational health and safety; and
- non-compliance, auditing and reporting issues.

A detailed review of the Responsible Supplier Code was initiated in 2017 to align it with industry-best practices and legislative trends. In accordance with CWT's commitment to the fight against human trafficking, and in line with the UK Modern Slavery Act, we reviewed the Responsible Supplier Code to reinforce our actions towards preventing the use of any forms of modern slavery in our supply chains. Beyond this, we also worked to simplify its content to make the review process for our stakeholders and suppliers easier. Our fully revised Responsible Supplier Code was published in May 2018 and can be downloaded on our [corporate website](#).

In 2018, our Legal team launched an online click-through form, making it easier for suppliers to sign and pledge their commitment to the Responsible Supplier Code.

In 2018, we also updated our internal guidelines for the Responsible Supplier Code. These internal guidelines offer practical support regarding its implementation and application scope, the roles and responsibilities of internal stakeholders in applying it, and the measures to take in case a supplier refuses to sign it. The new processes allow purchase requestors to assess the strength of non-trade suppliers' approach to responsible business and evaluate if their actions are in line with our standards.

* Non-trade suppliers are those that are not directly related to CWT's core businesses. Examples of non-trade suppliers include IT and services companies.

** English, French, German, Italian, Mandarin, Portuguese and Spanish.

Ethics and Business Behavior



The guidelines are available for all employees on our social intranet.

To ensure effective application of the Responsible Supplier Code, a video training module was rolled out in 2016. In 2018, we updated this training module to mirror the updated internal processes (as described above). The updated training was rolled out to teams directly affected by the updated purchasing processes and made available to all employees worldwide.

Annual supplier sustainability assessments

Ensuring that we are up-to-speed with our suppliers' performance is a fundamental part of our Responsible Purchasing program. Our key non-trade suppliers are independently evaluated by the rating organization EcoVadis on 21 sustainability criteria relating to:

- labor practices (including human rights);
- environment;
- sustainable procurement; and
- fair business practices (including business ethics).

Started in 2014, the annual supplier assessment campaign is organized by our Global RB and Global Sourcing teams, who work closely with EcoVadis to coordinate the campaign and explain its importance to suppliers.

Embedding RB criteria in our global sourcing processes

In 2018, we made significant improvements to our non-trade global sourcing processes which will embed responsible purchasing principles at the core of purchasing decisions. For example, we integrated RB criteria in requests for proposals and tenders sent to non-trade suppliers. Suppliers are now asked questions about how they address various CSR-related topics including compliance and ethics, human rights and labor conditions, environment and sustainable procurement.

We live...

...to raise awareness of responsible purchasing principles

We, along with our stakeholders, care about responsible purchasing. In recognition of the importance of this topic, we organized a global responsible purchasing awareness campaign for our employees in 2018.

The campaign aimed to create a cultural understanding of responsible purchasing and reminded employees to follow our Non-Trade Global Sourcing policy, which sets out clear standards for purchase decision making.

We provided online training for teams directly involved in purchasing processes. These online training sessions were dedicated to creating a deep understanding of Responsible Purchasing at CWT and of the updated processes put in place in 2018. In addition, the campaign focused on educating employees worldwide by providing them with handy tips on how to identify responsible suppliers and what to look for when it comes to responsible purchasing.



We act...

...to protect customers and their information

Our Information Security program gives our clients the confidence that the security of their travelers' information is protected at all times. We put significant investment into best-in-class tools, processes and people to ensure we are up-to-speed with requirements that keep information secure and data private.

We seek to embed information security within our culture in line with numerous industry standards (such as ISO – International Organization for Standardization, NIST – National Institute of Standards and Technology, PCI DSS – Payment Card Industry Data Security Standard, etc.). We do this by implementing effective policies and technical controls to safeguard our customers' information, wherever and wherever they are. In addition, we focus on data privacy and being transparent about how and where we are using customer data.

Information Security and Data Privacy governance

Our Chief Information Security Officer is responsible for our Information Security program and is supported by a Global Information Security team who report directly to our Chief Risk Officer. Beyond this, a Global Risk and Security Steering Committee, comprised of members from the CWT Executive Leadership Team, provides governance and oversight to facilitate the highest level of alignment, support and cooperation with global CWT security initiatives.

For data privacy, our Global Privacy Officer is responsible for the Data Privacy program. The Global Privacy Officer reports to the Vice President of Global Compliance and can draw on support from compliance and data privacy professionals located worldwide. Our CEO, executives, the Compliance Committee and Board of Directors receive regular updates and briefings on our performance in this area.

Our robust governance framework is supported by CWT's incident response system (**see iRespond** on the next page), which operates 24 hours a day, seven days a week. Our Business Resiliency program also tests and monitors for rapid response in case of business disruption, ensuring traveler data is protected and secured around the clock.

Our Risk and Security policies and standards

Our Risk and Security policies and standards form a robust framework by which CWT addresses physical and technical protection that ensure the confidentiality, integrity and availability of information. We review and update our policies and standards annually (or as often as necessary) in response to changes in technology, infrastructure, regulatory and regional requirements as well as potential threats and security incidents.

CWT Risk and Security policies and standards cover data protection and classification, comprehensive access controls, physical and environmental security, network and perimeter security, business resiliency, security management, security education and awareness, and also emerging new technologies (such as Global Cloud Security, DevOps, etc.). These also adhere to regulations and international standards such as the UK Data Protection Act, the EU General Data Protection Regulation (GDPR) and ISO 27001, among others.

We perform periodic internal and external independent audits on our products and services. These audits review compliance with information security and privacy policies, the National Institute of Standards and Technology (NIST) and the Payment Card Industry Data Security Standard (PCI DSS) requirements.



We live...

...to prevent information security incidents

We take all the precautions necessary to prevent data security incidents. However, if an incident does occur, we must mitigate any potential impact this has on our stakeholders and our business. iRespond is our digital tool for reporting suspected information security incidents and fraud within the company. Employees can anonymously report an incident and initiate necessary processes to address the issue.

In 2018, we improved the functionality of iRespond by embedding new informational prompts to help employees respond quickly and effectively. Our 24/7 incident response system supports this robust governance framework, while a Business Resilience program tests and monitors for rapid response in case of business disruption. iRespond and our Business Resilience program are strategically aligned and part of our wider Risk Management global program.

2018 highlights

The General Data Protection Regulation (GDPR) took effect on 25 May 2018 and outlines a new set of rules designed to give EU citizens full control over their personal data. It aims to harmonize and simplify the regulatory environment for business so that citizens and businesses can fully benefit from the digital economy. CWT has been preparing for GDPR since the regulation was enacted in 2016. We updated our global privacy program to meet GDPR standards and continuously update the program to meet evolving global privacy standards and regulations.

We continue to stay up-to-speed with industry, regulatory and client requirements by maintaining compliance to the PCI DSS program. We have also received a third-party clean report on the Services Organization Controls Accreditations 2 (SOC2, Type 2) Security Principle Report on Commercial Services.

Raising awareness – inside and outside CWT

Our Risk and Security program includes regular training in data privacy, and the administrative, technical and physical safeguards that provide guidance to users for securing their information. All our employees are required to complete this training upon hire and on an annual basis.

At any time, employees can access our Global Risk and Security policies, which are readily available on our social intranet site. We also publish regular communications on security topics throughout the year to keep our employees up-to-speed and conscious of information security requirements and best practices.

To raise awareness, we held an annual Cyber Security Awareness Week in 2018 with the theme of 'Cyber security is our shared responsibility.' The objective of the week was to remind our employees, contractors and contingent workers of their duty to protect client, employee and corporate information. Topics covered a broad range of security themes which included tips on how to secure information at home, keep children safe online, handle customer data and use iRespond.

As well as keeping our teams engaged on these complex and ever-changing risks, our Global Risk and Security team shares best practices with other businesses, governments and expert organizations. In 2018, members of the Global Risk and Security team participated in various industry advisory boards, conferences and committees to better understand key risks and share best practices.



We said...



2020 Objectives

Further engage all employees and CWT partners through a global multi-year Ethics Training and Communications program.

Deploy a robust external information campaign about our global policies and our best practice approach to ethics and compliance, as well as our Responsible Business Purchasing program.

Continue protecting employee and client data through leading-edge data privacy and information security policies and practices, while continually developing expertise through the organization.



We did...



2018 Performance

- Launched a campaign in 2018 to promote our newly-launched Code of Conduct.
- 99% of employees underwent training on our Code of Conduct in 2018.



- Updated our Responsible Supplier Code to align it with industry best practices and legislative trends, such as the UK Modern Slavery Act.
- Organized an internal Responsible Purchasing awareness campaign.
- Updated internal guidelines for our Supplier Code.
- Embedded Responsible Business criteria into our Global Sourcing processes.



- Full alignment to GDPR requirements.
- Continued to hold our annual Cyber Security Awareness Week.
- Continued to invest in cyber tools and technologies.
- Maintained PCI DSS and SOC 2 Type 2 certification.



We will...



2019 Goals

- Update training content and delivery related to the refreshed Code of Conduct.

- Further extend the scope and application of the Responsible Supplier Code to include even more suppliers.

- Continue to innovate by investing in people, processes, and new technologies to secure against ever-growing cyber threats.
- Maintain security compliance to ensure our people, processes and technology are effective and working as desired aligned with our strategy.



Human Resources and Human Rights

We think...

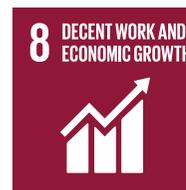
“People are the center of everything we do, from our employees and the communities we live and work in, to our customers and their traveling employees. People are fundamentally our greatest richness and our greatest responsibility.

Our approach begins by ensuring that we are upholding our principles of integrity and fairness by championing people in all their dimensions. We do this, for example, through our recently-launched Global Diversity and Inclusion Charter or through our efforts to promote women’s empowerment, non-discrimination and uphold human rights.

Beyond this, we aim to promote the wellbeing and employee experience of our people. We achieve this by recognizing their contribution and developing their skills, all while ensuring that they feel fulfilled in what they do.”

Catherine Maguire-Vielle,
Executive Vice President and Chief Human Resources Officer

In this section, we address the following SDGs





We act...

...to create a diverse and inclusive workplace

When people are free to be 100% themselves at work, they give 100% of their potential. Our focus on creating a culture that celebrates diversity and inclusion is one of the things that we are proudest of as a global business.

Diversity and inclusion are central to how CWT and our employees conduct business every day. Our approach focuses on fostering respect and a team spirit in the workplace, embracing and leveraging the multicultural essence of the company and providing equal opportunities to talented individuals. This is fundamental to the commitment we make to the Human Rights and Labor Principles of the UN Global Compact and the Universal Declaration of Human Rights (see p75).

Diversity and inclusion governance

In 2018, we continued to reinforce our commitment to diversity and inclusion through our global taskforce under the leadership of the Vice President for Global Responsible Business. Sponsored by the EVP and Chief Human Resources Officer, as well as the EVP and Chief Customer Officer, the role of the taskforce is to lead programs and initiatives that foster an inclusive work environment rooted in our values. The taskforce is made up of strong leaders from different regions and functions who are passionate about diversity and inclusion.

In 2018, two local diversity and inclusion committees were created, one in the UK and one in Costa Rica. The committees are guided by the global diversity and inclusion strategy. Both committees host a variety of activities and events throughout the year – from celebrating Pride Day to supporting women's empowerment initiatives.

Our policies

Our Code of Business Ethics and Conduct underlines our commitment to recognizing and respecting the diversity and inclusion of people and ideas, and to ensuring and promoting equal opportunity (see p19). It outlines our zero-tolerance stance on subjecting employees or applicants to any form of harassment, intimidation, threats, coercion or discrimination because they have engaged in filing a complaint, assisted or participated in an investigation, compliance review, hearing or any other activity in relation to local laws.

In 2018, we published our vision, high-level objectives and principles in the form of a Global Diversity and Inclusion Charter. Launched on the 70th anniversary of the Universal Declaration of Human Rights, the Charter outlines what diversity and inclusion mean to us and what our key objectives are. Our Charter was informed by the UN Global Compact and the UN Women's Empowerment Principles (see p29). The Charter is available in six languages on [our corporate website](#).

We encourage vigilance in monitoring any inappropriate workplace conduct, and our employees are encouraged to promptly report (according to local laws and regulations) any inappropriate behavior to their manager, HR representative or our Ethics Helpline (see p21).

We live...

...to raise awareness through our Diversity and Inclusion Week

This year's Diversity and Inclusion Week coincided with both Zero Discrimination Day (1 March) and International Women's Day (8 March). To participate, we challenged our people to reflect and act in supporting CWT's commitment to diversity and inclusion. From sharing selfies and testimonials, to organizing events and individually signing the UN Women's Empowerment Principles, employees pledged their commitment to making CWT a diverse and inclusive place to work (see next page for more).

Human Resources and Human Rights



Promoting gender equality

By taking concrete actions to further reinforce gender equality, we will make CWT even more competitive, meet our RB commitments, provide greater economic and social opportunities for both women and men, and foster sustainable development in the countries where we operate.

By the end of 2018, nearly 72% of our 18,000 employees were women (compared to 68% in 2017). Women accounted for one-third of our Executive Leadership Team (44% in the first quarter of 2019) and 47% of all director-level roles and above. 41% of the senior-most level of executives are women.

In 2018, the Chair of Carlson's Board and our Executive Leadership Team signed the UN Women's Empowerment Principles. The Principles outline seven steps that businesses can take to promote gender equality in the workplace and in society. In signing them, our leaders are putting our values into action and demonstrating strong support for advancing gender equality.

We monitor our wage equality approach at a country and regional level in accordance with local laws and regulations. The annual requirement to report on our Gender Pay Gap in the UK, for example, gives further impetus for businesses such as CWT to take a careful and objective look at the progress being made in leveling the gender playing field.

On 8 March 2018, we celebrated International Women's Day with activities in Minneapolis, China, Paris, London, Manila and many other locations. Highlights included:

- **Minneapolis:** CWT employees attended a Women in Leadership panel discussion curated by several senior CWT female leaders. The discussion touched on critical career challenges faced by women and included topics such as unconscious gender bias, work-life balance and female mentorship.
- **Paris:** we hosted a breakfast to share CWT's progress on its diversity and inclusion initiatives. Purple ribbons were distributed for all employees to show their support for gender equality.
- **London:** activities included a Women's Day quiz and office decorations such as posters with quotes from inspiring women from around the world.
- **China:** a series of activities were held across five offices, including symbolic gifts that were distributed to female employees to show our appreciation for their career achievements.

We live...

...to champion the UN Women's Empowerment Principles

In 2018, we reinforced our commitment to diversity and inclusion by having the Carlson Board Chair, CWT's President and CEO, and the entire CWT Executive Leadership Team sign the UN Women's Empowerment Principles on International Women's Day.

To further display commitment at all levels of our organization, we are encouraging functional leadership teams, country leadership teams and even individual employees to sign up to the Principles through an electronic form available on our social intranet.



Diversity and inclusion at CWT

Governance



Creation of a **Global Diversity and Inclusion Taskforce**



Publication of a **Global Diversity and Inclusion charter in 6 languages**



CWT Executive Leadership Team and Carlson Board Chair signed the **UN Women's Empowerment Principles (WEPs)**

75%

Functional Leadership teams signed the **WEPs**

All

Regions are represented in the **Global Diversity and Inclusion Taskforce**

Training and awareness

All

Executive Leadership Team members followed **unconscious bias training**

90%

Executive Leadership Team direct reports took **unconscious bias training**

100%

Global Talent Acquisition team trained on **non-discrimination**

100%

Employees have access to tools to **avoid unconscious bias**

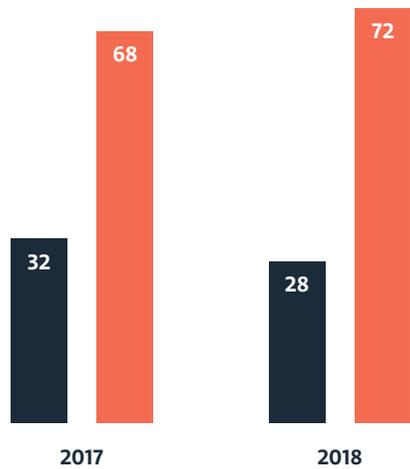
100%

Human Resources Leadership team members completed **unconscious bias training**

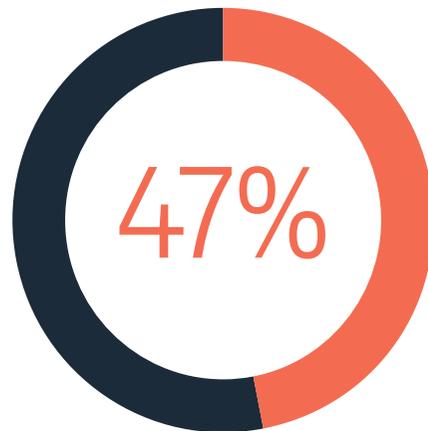


Gender representation

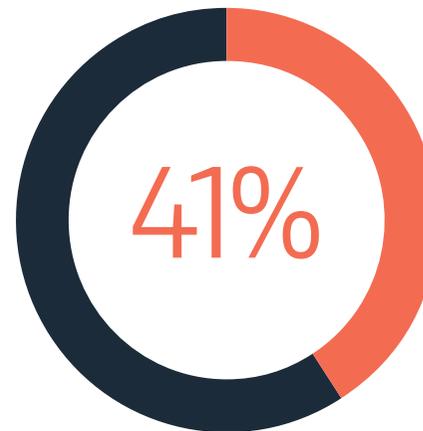
■ Men
■ Women



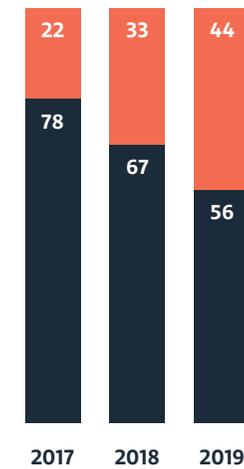
Total employee population (%)



Women director & above (2017 & 2018)



Women direct reports of ELT* in 2018



Women in ELT* (%)

* Executive Leadership Team



We act...

...to eliminate discrimination

We believe that respecting diverse ethnic and cultural backgrounds, genders, opinions, diversity of thoughts, sexual orientations, physical capabilities and talents creates a strong workforce and enables us to connect with our global stakeholders.

These values are expressed in our commitment to equal employment opportunities, as well as fair treatment and consideration in each of our hiring and promoting practices. At CWT, we are employed and promoted based on our abilities, achievements and experience, and in accordance with local laws.

Discrimination and harassment

As stated in our Code of Business Ethics and Conduct, everyone at CWT is held to high standards of conduct, and any behavior that constitutes discrimination or harassment will not be tolerated at any level of the company. In 2018, we ran a communications campaign to promote our new Code, which addresses anti-harassment and other key topics. The campaign also encouraged employees to report any improper or inappropriate behavior, in accordance with local laws and regulations.

Non-discrimination in recruitment

Our commitment to diversity is reflected in our recruitment processes, which outline that company policies regarding non-discrimination, equal opportunity and recruitment by competency are to be respected. A diverse workforce is better able to innovate, connect with our customer base, and ensure that we continue to attract the best talent.

In 2018, our Global Talent Acquisition team, supported by the RB team, organized non-discrimination training sessions for all CWT recruiters around the world. The objective of the training was to prevent and avoid discrimination in recruitment and to create awareness of discrimination relating to multiculturalism with hiring managers during the recruitment process. The training will ensure that we continue to attract, select and retain diverse talent based on merit and aptitude.

In the US, we actively monitor the diversity of our hiring and set goals annually to track our progress through Affirmative Action Planning. We also partner with external agencies that share our focus on diverse hiring and placement. In Canada, for example, we include specific language in our job postings to accommodate individuals with disabilities throughout the recruitment and onboarding process. This includes sending a welcome letter to all new employees on their first day of work and reinforcing our commitment to providing reasonable accommodations to support specific needs.

We live...

...to raise awareness of unconscious bias

With the goal of reducing bias in the workplace, we offered unconscious bias training to our employees in 2018. The 'Understanding Unconscious Bias' training course helps employees identify where unconscious bias can show up in our everyday lives, what its impacts are and what can be done to address them. This training was mandatory for certain key populations in the workforce, including HR teams, our Talent Acquisition team, all Executive Leadership Team members and their direct reports, as well as Legal & Compliance teams.

A set of materials was also developed to offer employees easy to use tools to avoid unconscious bias at work. This included a set of tips on how to build a more inclusive workplace, as well as supporting videos.

Human Resources and Human Rights



Disability

In accordance with local laws and regulations, we have mechanisms in place to help managers and HR professionals give employees the confidence to disclose a disability and provide support to those who do. In the US, for example, in 2018 we once again ran a National Disabilities Employer Awareness Month campaign. We also continued to train our managers on disability awareness and created an Americans with Disabilities Act Amendments Act (ADAAA) policy and procedure guide. On completion of the campaign, we launched an anonymous disability survey to gauge its effectiveness. In total, 600 employees responded.

In the UK and in the US, we implement reasonable adjustments in the workplace for those with physical and mental health conditions. We utilize a number of specialist resources including sit-stand desk solutions, ergonomic equipment, dyslexia assessments and adaptive technology for visual and hearing-impaired employees.

Sexual orientation

We are proud to foster a workplace that is open to employees regardless of sexual orientation. Throughout the year, employees attended national events such as UK Pride and the Costa Rica Pride Parade. In October 2018 Carlson and the Carlson Family Foundation supported the HRC (Human Rights Campaign) event in Minneapolis, Minnesota, to advocate and promote LGBTQA rights.

Age

Our success is also based on intergenerational cooperation. In the APAC region, a group of Chief Millennial Officers was established in 2017 to create an exchange between different generations and to provide millennials with an opportunity to share their feedback with the regional leadership. This group also created a platform for millennials to collaborate and develop new skills. This initiative considers a millennial view when reviewing business decisions and thus collectively drives CWT's success through collective representation. In 2018, a mentoring program called CWT Guru was launched in Singapore to help young professionals raise their profile, expand their perspective and learn from CWT leaders.

We also put in place local considerations for older employees based on their circumstances. For instance, six months before an employee reaches statutory retirement age in Singapore, the HR team reaches out to discuss re-employment and whether this suits the individual's circumstances. The employee is also invited to attend a job counseling session and course called READY™, or Re-employment: Equipping and Developing Yourself, covering the benefits of staying employed and active.

We live...

...to support the UN Cultural Diversity Day for Dialogue and Development

In celebration of the United Nations World Day for Cultural Diversity for Dialogue, we spotlighted cultural diversity at CWT in 2018. This year we encouraged employees to share their culture by being creative and sharing selfies or videos. Our employees once again rose to the occasion with an overwhelming response showing their commitment to fostering cultural diversity at CWT.

Human Resources and Human Rights



Examples of local initiatives to promote diversity and inclusion in 2018

Australia and New Zealand

- **Parental leave:** in addition to the government's mandatory unpaid parental leave period for either parent of a child born or adopted into a family, we offer an additional week of pay for the primary and secondary carer of the child.
- **Crisis and compassionate leave:** we give our employees access to compassionate crisis leave relating to significant incidents such as domestic violence, house fires or medical emergencies.

Canada

- **Discrimination and harassment training policy:** we have a comprehensive policy in place addressing workplace discrimination and harassment and offer training for all new employees.
- **Accessibility for Ontarians with Disabilities Act (AODA):** we have a multi-year plan in place for Ontario to address barriers in the workplace for individuals with disabilities. This supports customers, candidates and the needs of our employees.
- **Individual accommodation plan process (IAPP):** to comply with the AODA, we implemented an IAPP in Canada, which clearly outlines the roles of the employee, manager and HR in establishing accommodation plans that are unique to each individual's needs.

France

- **Mentoring program:** for the third year in a row, CWT in Paris participated in a mentoring program for women organized by the Women's Committee of the American Chamber of Commerce (AmCham), of which CWT is an active member. The purpose of the program is to help women advance in their careers by providing them with a mentor whose company is a member of AmCham.

India

- **Promoting female empowerment:** a platform for learning and development for women at work was launched through sessions conducted by senior female leaders in and outside of CWT. As part of International Women's Day 2018, celebrations took place where senior leaders spoke about the importance of gender equality. We also held a certified workshop for 'Women's Self-Defense' conducted at all six locations in India.
- **Harassment policy:** an anti-sexual harassment policy is in place, and open sessions are conducted to ensure employees have a collective understanding of the policy and its execution.
- **Cultural diversity:** we celebrate the festivals of the various races and religions that work for CWT to promote diverse culture and bring harmony to the workplace.

Philippines

- **Pulmonary tuberculosis and HIV/AIDS policies:** the purpose of these policies is to reduce the stigma attached to PTB, HIV/AIDS and to ensure the worker's rights against discrimination brought about by the disease/s. In 2018 we partnered with a local agency to hold a talk to raise awareness of HIV/AIDS among colleagues.

Singapore

- **Promoting inclusive support schemes:** we have various inclusive support schemes in place such as offering marriage leave for newlyweds, paternity leave and gifts for employees with new-born babies, as well as religious sensitivity procedures.

The US

- **Gender pay equity:** our annual pay equity compliance training continues to take place every year in line with legislation for all US-based people managers.
- **Supporting military personnel:** we ran a veterans recognition campaign where a video was created to highlight and recognize CWT US employees who are military veterans and how their service has positively impacted the skills they bring to their jobs. This was communicated in November in line with Veterans Day. Since we are also obligated as a federal contractor to track and measure the percentage of our employees who are veterans, we launched a self-ID survey in November.



We act...

...to attract, integrate and reward talent

A key part of our employee experience is related to joining the company and being recognized for individual and collective contribution. Accordingly, we offer onboarding and recognition incentives that show our people how much we value them.

Recruitment and onboarding

As a responsible employer, we employ on equal and fair grounds as outlined in our approach to non-discrimination in recruitment (see p32).

Our Global Talent Acquisition strategy seeks to responsibly source and select the best candidates to match the needs of our business by finding top-performing and diverse talent that aligns with CWT's core values. We educate and train our staff involved in the selection process to assess potential candidates effectively, and we ensure new employees have the tools and skills required to do their job successfully once they have joined through a clear onboarding process.

In 2018, we launched CWT EMBARK to further enhance our employee onboarding experience. It is designed to offer a personal welcome, speed up the learning process and facilitate connections to the right tools and people.

At a regional level, CWT France was recognized as one of the Top 50 employers for Digital Talent Communication in the Potentialpark 2018 assessment. The ranking reflects the performance of employers in attracting talent through areas such as the careers website, the online application process, social media communication and mobile.

Recognizing strong performance

The Carlson Fellows awards recognize those who have demonstrated consistently strong performance and are role models for our organization, especially in the areas of customer experience, growth and operational excellence. Nominations are reviewed by our Executive Leadership Team and Diana Nelson, Carlson's Board Chair. In 2018, ten winners were selected from 20 finalists.

In addition to these group-wide awards, many of our country offices and individual teams hold their own awards and recognition initiatives. These include:

- **Legal & Compliance:** holds quarterly legal and compliance awards called 'The Luminaries' to recognize achievements and best practice.
- **Meetings & Events:** recognizes and rewards colleagues who embody company values through the Ambassador's program.
- **Customer Organization:** pays tribute and thanks outstanding performance through the 'Star Performer' recognition program.
- **Military & Government:** encourages staff members to nominate fellow Military & Government colleagues for outstanding achievement and performance through the 'Spotlight on Service Award'.

- **Product & Technology:** celebrates innovation through the quarterly 'Product & Technology Awards'.
- **RoomIt:** acknowledges individuals for accomplishments that support our strategy on a quarterly basis through the 'RoomIt Rockstars Awards'.

In 2018, we continued to use peer-to-peer Buzz Bravo Badges, a simple, yet visible way for anyone to give a 'shout out' to a colleague. Dozens of badges continue to be awarded daily across the organization for actions where our employees have gone the extra mile.



We act...

...to offer best-in-class development opportunities

Our success depends upon the skills, capabilities and engagement of our people. To bring out their best, and to respond to the changing needs of customers and travelers, we are continuously investing in learning and development.

Training and development

We support individual and organizational growth through learning that will strengthen our corporate culture and help our people to understand the ethics and values under which we operate. We have applied the 70/20/10 learning model that states: 70% of learning comes from on-the-job experiences; 20% comes from mentoring and coaching; and 10% comes from formal classroom-based learning.

We provide a global Learning & Development portal that makes learning programs accessible and empowers employees towards self-driven learning. Our portal gives employees access to online training courses and opportunities for enrollment to webinars and classroom courses.

In 2018, a total of 1,677 training sessions were made available. Of these, 1,046 were instructor-led training sessions and 631 online courses. Topics spanned leadership and self-development, job skills and CWT corporate training.

In 2018 we formed a global Learning Community, comprised of CWT professionals around the globe who regularly come together virtually to share insights, best practices, current trends and collaborate on learning programs. We designed and rolled out specific training for teams and individuals throughout the organization. This included:

Foundational Leadership program

In 2018, we launched the Foundational Leadership program to equip new people managers with the skills and insight needed to drive higher performance for their teams. The two-day modular based program is targeted at new managers or those new to a management role, and three pilot sessions were held in APAC and Europe. The program is built around the subject areas of leadership focus, leading teams, coaching and feedback. The program and all three modules are subsequently being rolled out to all regions in 2019.

Solution-based Selling training

Launched in 2017 to drive a high performing sales culture and arm the sales and program management teams with the required knowledge, skills and behaviors to Solution-based Selling approach putting client needs at the forefront. In 2018 we offered our Solution-based Selling training to over 637 employees, through 36 sessions delivered across the globe.

Product & Technology LinkedIn training

In 2018, we analyzed key areas of training required for our Product & Technology teams. To provide a rounded training platform, CWT took part in a LinkedIn Learning pilot to offer the team a series of monthly training courses focused on developing workforce skills and capabilities. The training content covered modules such as personal development, budget planning, team and relationship building, as well as living values and planning for the year ahead.

Legal & Compliance shadowing program

Our 'Day in the Life' training encourages Legal & Compliance team members to get to know an area of the business better by shadowing colleagues in other departments. The objective of the program is to give our Legal & Compliance team colleagues a chance to 'dare forward' by getting to know other areas of the business and gain cross-functional visibility about our products, technologies and services provided to our customers. It allows the team to then apply their learnings with a more well-rounded and commercial focus.

Responsible Business (RB) training

Around 700 customer-facing staff were trained in RB in 2018. Our customer-facing teams benefited from WebEx courses (in English, Spanish, French and German) to update them on our sustainability progress and ways in which they can contribute to our RB program.

Human Resources and Human Rights



Performance development

We employ an everyday performance development approach, to match our people-centric focus and understanding of the importance of timely conversations to foster growth. In addition to formal milestones (such as goal setting, mid-year reviews and year-end reviews), managers and team members have regular one-to-one meetings to keep progress on track, identify and anticipate challenges and share regular feedback. This process holds both managers and employees accountable to co-own performance and set development plans to ensure their success.

More than a performance philosophy, we want this approach to be anchored in our management practices. This is why our priority has been to provide managers and employees with the resources they need to better coach their teams, develop competencies, hold quality conversations, and collaborate more efficiently. We regularly release toolkits, e-learning modules and other materials covering a vast range of performance development topics, giving ongoing support to keep discussions meaningful and future-oriented.

By the end of 2018, we integrated all functions to our global performance development modules including travel counselors. This has driven consistency across the globe and ensured that our people managers are aligned and committed to performance development for their teams. Moving forward, we will continue to reinforce our development culture and provide tools to help our people grow and develop to meet short-term and long-term career aspirations.

Strategic talent planning

With constantly changing roles and skills requirements for our industry, it is important to ensure that employee development and future talent identification are the center of our overall talent management strategy. We installed a Quarterly Talent dialogue (Strategic Talent Planning) to further strengthen our talent pipeline and to identify career development opportunities for our high potentials.



We act...

...to address employee feedback

It is vital that we listen to our people and act on their feedback. We therefore carry out regular pulse surveys that provide leaders with quick and valuable feedback to track progress against our strategy.

Pulse Survey purpose and topics

In 2018, three Pulse Surveys were distributed. Employees, spanning a broad range of grades, levels, countries and functions, responded to these surveys, answering questions on topics including: strategy, customer experience, employee engagement, performance development, empowerment and accountability, innovation and enablement, our culture and our brand attributes.

As the name implies, Pulse Surveys enable us to check the heartbeat of employee opinion at CWT on a real-time basis throughout the year, rather than only in one large annual survey. This approach supports our Digital Difference strategy and drives alignment by assessing employee understanding, commitment and trust in strategy and leadership.

The results tell us what we're doing well and what needs improving. Based on this, deep-dive surveys can also be conducted to dig deeper into certain topics. These efforts help us gauge how employees are responding to change. They give leaders valuable feedback to track progress on our strategy and help identify improvements. Each time, results are shared with leaders and employees to facilitate discussions about what is going well and where our opportunities are to better deliver on our strategies and priorities.

Face-to-face dialogue

Senior leaders continued to meet and engage with employees around the world regularly, in town hall meetings, skip level meetings, informal 'lunch and listen' gatherings, and online via virtual coffee chat sessions.

Our social intranet

Buzz – our award-winning social intranet – continued to go from strength to strength in 2018. We measure online engagement by tracking the percentage of users who are active on Buzz on a daily basis. In 2018, this number rose from just over one in four employees in 2017 to more than one in three. This improved engagement reflects the vibrancy of the community, which has transformed the way global teams collaborate and converse across borders, time zones and functions. The most popular content are discussions, which are used by teams across the business to gather feedback and engage in dialogue covering a wide range of business topics.

Travel counselor feedback

Making up the majority of our workforce and being the daily interface with the customer, it is particularly important that we monitor satisfaction levels of our travel counselors, so that we can support them where needed.

To achieve this, we set up the Counselor Advisory Group in early 2018. The group is composed of front-line travel experience employees and support staff from around the world who meet monthly to discuss prominent issues and opportunities identified through conversations with their teammates. Group members serve as representatives of their area of the business or region and raise team members' questions, concerns and feedback.

Following travel counselor training on new software conversion in 2018, we sought feedback on our approach to ensure it meets the requirements of the individuals using it. The feedback was analyzed and shared with our Executive Leadership Team and Core Project teams. An action plan was generated off the back of the feedback to make improvements to the content, communication and training methods used.



We act...

...to create safe, healthy workplaces

We are committed to maintaining the highest standards of safety and employee protection. CWT is a signatory of the United Nations Global Compact (UNGC) and thereby is committed to adhering to its Ten Principles, including supporting and respecting the protection of internationally proclaimed Human Rights, and notably providing safe and healthy working conditions.

Health and safety governance

Our Global Health and Safety Charter ensures we conduct our business in accordance with applicable health and safety laws and regulations in the jurisdictions in which we operate, and to providing a working environment that will contribute to the wellbeing of employees, clients, suppliers and contractors. While our commitment to health and safety is global, a regional Environmental, Health and Safety Manager was appointed in 2017 to cover our European, Middle Eastern and African operations. In addition, each country is responsible for implementing and maintaining health and safety policies and procedures that ensure compliance with local legislation and the Global Health and Safety Charter. Some examples include:

- **Chile:** has a Health and Safety Committee responsible for raising awareness of safety issues, as well as identifying and dealing with workplace risks.
- **France:** has a Health and Safety Committee for each division, covering 100% of the workforce.
- **Italy:** has a Safety Representative (RLS) in each location, nominated by the workforce.
- **Sweden:** has a Safety Officer that is selected by the union in each location.

A copy of our Global Health and Safety Charter and our Code of Business Ethics and Conduct, which cover our commitment to health and safety, can be downloaded from [our corporate website](#).

Creating a safe and secure place to work

Our global Real Estate team developed Workplace 3.0, a program that optimizes our office spaces in line with our digital difference strategy. The overall objective is to create spaces that bring people together and bring out their best, using technology to harmonize the employee experience.

Workplace 3.0 provides employees with a workplace experience that is able to cater to their needs while remaining financially and environmentally efficient. Policies and processes that guide this include:

- Work from home rules to improve work-life balance while reducing the environmental impact of traveling into the office.
- Systems that allow employees to book workspaces and meeting rooms. This enables employees to move around the office and secure space without occupying more space than required.
- Construction contractors are requested to provide health and safety reports to ensure all individuals on our sites are receiving due care and attention when it comes to their health and wellbeing.

In 2018, the following Workplace 3.0 concepts were rolled out within our regional operations:

- **Singapore:** our Singapore team moved into a new workplace in 2018. The space was designed having in mind the feedback and requests from employees on how they would like to work. The office includes flexible work spaces, huddle zones for quick collaboration discussions, modern meeting rooms with telepresence and expandable walls, lounge areas and an employee pantry for socializing.
- **Madrid:** our new Madrid office space is infused with natural light, focused on collaboration and teamwork and allows for more telecommuting to help improve work-life balance and reduce carbon emissions.
- **Minneapolis:** our Minneapolis workplace undertook a utilization study in 2018 to assess how well space is used in the building. With survey responses from over 92% of our employees, we are due to remodel the workplace, align it more clearly to our brand and update it with more collaborative concepts in 2019.
- **Paris:** we decided to optimize our workplace by reducing the number of floors CWT occupies and redesigning our spaces to better represent our culture and the way we need to work together.



We live...

Employee Assistance programs (EAPs)

The EAPs offer a range of services including information, advice, assessment, counseling, prevention and treatment for issues faced by employees that prevent them from being able to perform their best at work. The scope of services addresses the primary sources of stress for employees in the workplace, covering everything from fatigue and burnout to addiction, family and personal issues, and life circumstances. Examples of the EAPs include:

- **Canada:** offers a voluntary, confidential counseling and information service for CWT employees, and HR posts monthly features covering a range of health, wellbeing and work-life balance topics.
- **France:** provides telephone support, face-to-face consultations and confidential advice for employees throughout the year.
- **Germany and Austria:** offers life coaching and homecare for elders and children in case of need, as well as additional services.
- **Switzerland:** supports colleagues through telephone support and face-to-face counseling with trained professionals to help employees work through difficulties.

...to provide safe travel for our employees

As a global travel business, the safety of our traveling employees is vitally important. We continue to work in partnership with International SOS, a leading provider of emergency medical, travel and security assistance worldwide, to offer extended medical and safety/security protection to employees whenever and wherever they travel – whether internationally for business or for personal reasons. International SOS services include a mobile app that provides country guides, safety/security information, as well as the latest medical advice before and during their journeys. In 2018 CWT Employee Traveler itineraries in myCWT mobile began receiving CWT Alerts about safety, security and medical advice to keep employees aware and alert when on business travel.

Global commitment; local implementation

Each country and office is responsible for implementing and maintaining its own health and safety policies and procedures, and for training their teams in the most locally-appropriate ways. Here are some of the regional highlights from 2018:

- **Repetitive strain injury (RSI):** local teams have mechanisms in place to identify, support and rehabilitate anyone affected by RSI. From ergonomic office furniture to enabling employees to work from home, we deploy systems that ensure our people are able to work efficiently and effectively. For example, in Canada, an ergonomic guide helps people set up and use equipment in ways that prevent RSI, while in the UK and Ireland our display screen equipment assessors review self-assessments and assist individual needs. In Germany, Mexico, Belgium and Luxembourg we offer ergonomic furniture and regular ergonomics guidance. We also offer occupational healthcare services and training in Finland.
- **Stress management:** our teams around the world are working on ways to combat stress in the workplace. In our Belgium, Luxembourg and Sweden offices, 'chill rooms' are set up for employees to take time away from their desks, while our UK and Ireland offices have their own stress and wellbeing policy. A supporting self-assessment survey is currently being remodeled to reflect the HSE management

standards stress indicator tool and is set to be relaunched in 2019. In Germany in Düsseldorf FSC, massages are offered once a week. In Italy, regular stress management and prevention assessments take place. In Spain, employees are entitled to 50% discount for various gyms and health providers.

- **Noise reduction:** as an office-based company, it is important that our employees work under conditions that enable them to complete their day-to-day tasks in a quiet and peaceful environment. For example, in Belgium, separation boards were installed between benches and investment was made in noise reduction materials for wall insulation to keep noise to a minimum.
- **Wellbeing:** we put in place measures to promote work-life balance and employee wellbeing. For example, in France, our 'Quality of life at work action plan' offers a variety of measures to improve work-life balance. This includes implementing a 'listening cell' where employees can seek professional support and a contact address for collaborators to ask questions or make any sensitive situations known in confidence. In 2018, we held a 'Quality of life at work' day in our Kinetik-based office in France where 18 workshops were held to focus on relaxation, mindfulness and workplace ergonomics.



We live...

- **Work-life balance:** we introduced a pilot in North America that offered a series of flexible work options called 'Flexing 4U', based on feedback from our people and the needs of our customers. The focus of the program is to offer flexible work including flexible hours, locations, schedules and teams in consideration of changing requirements and expectations of our colleagues. Plans to roll out the program globally are being evaluated.

Training and awareness

Although we take a global approach to health and safety governance, training is managed at a local level to focus on local priorities. Here are some of the training activities that we continued to conduct in 2018:

- **Canada:** as part of the onboarding process, all employees are provided with emergency and evacuation procedures. Additionally, building management requires all employees to participate in an annual fire drill.
- **The UK:** across all UK locations there is a bespoke health, safety, security and environment (HSSE) welcome presentation sent to all new starters. Refresher training was also delivered as part of our ongoing program for key roles such as fire wardens and HSSE coordinators.
- **Benelux:** annual training takes place for health and safety advisors, including refresher training for first aid.
- **Philippines:** annual training on first aid and basic life support training.

...to reward healthy living

Our CWT Singapore office looks to promote health excellence by empowering all employees to take ownership of their health. To facilitate this, a dedicated Workplace Health program promotes efforts to encourage employees to stay healthy by eating well and exercising regularly. As part of the program, all travel consultants, staff and support positions are given a financial incentive for their efforts to stay healthy with minimal leave.



We act...

...to uphold Human Rights principles

As a responsible citizen, we respect all conventions and standards relating to human and labor rights. This is central to the commitments we make to the United Nations Global Compact (UNGC), the International Labor Organization (ILO) and the Universal Declaration of Human Rights.

We uphold individual human rights across all operations and we expect the same from each of our business partners. This means, in part, that we respect the regulations related to the number of working hours and fair wages for those who work on our behalf. CWT does not tolerate the use of child or forced labor, human trafficking, or any action that lacks integrity. Likewise, we do not condone and will never knowingly facilitate adult or child sex tourism. We take all reasonable steps to eradicate these practices globally and never knowingly do business with a supplier or any other business partner who uses these practices.

We are committed to combating modern-day slavery through the development of proactive measures to educate employees and encourage our partners and the broader business community to take a stand against human trafficking.

Ensuring fair labor practices

CWT, as a signatory of the UN Global Compact, is committed to respecting the principles related to human rights and labor and the International Labor Organization Fundamental principles. CWT upholds individual human rights in all of our operations, and we expect the same from all our business partners. We strive to promote equal opportunities for all regardless of ethnical and cultural backgrounds, age, gender, sexual orientation or disability.

In 2018, additional strategic importance was placed on labor relations. In January, we created a new Labor Relations leadership role with a focus primarily on the EMEA region. The role was expanded in November to Vice President Global Employee & Labor Relations (ELR), with the task of driving the HR operating plan at country level in a transparent and cooperative manner with labor organizations and local workforces. Their focus is on:

- partnering with HR Business Partners and the CWT business functions to develop a labor strategy that helps the business and workforce adapt to the changing market landscape;
- strengthening our relations with works councils. This is especially important in light of the way our customers are changing the way they transact with CWT. Our overall objective is to create constructive dialogue built on transparency and trust;
- evolving the capabilities of country HR teams. The HR landscape continues to evolve, and it is essential that our local HR teams have the skills, capabilities and organization needed to deliver value;
- values-driven workforce adjustments. Evolving our workforce needs to be handled with care and sensitivity, while ensuring alignment and coordination across all functions. It has an impact on those who leave and those who stay. In both cases, it is an opportunity to demonstrate our values and people-focus; and

- aligning global labor relations practices. Labor relations needs to be handled consistently worldwide while maintaining full compliance with local requirements. The objective is to ensure that ELR teams operate to the same high standards worldwide (through training, coaching, etc.) and are strong advisors and supporters of the business.

The job of the VP Global Employee & Labor Relations builds on an already extensive framework of practices in this domain. In addition to complying with local and international labor laws in the countries where we operate, we have collective agreements in many countries that are more favorable than the law requires. This is a sign of our commitment to dialogue between the company and the employees, and to being a leader in the way we address labor standards in countries where we are based.

Beyond this, we strive to protect our employees' personal data and information in line with the requirements set out in the General Data Protection Regulation (GDPR) (see p25). We have a dedicated working group to deal with this topic for Human Resources which includes a rigorous process to manage and improve how we handle all employee information.



Human Resources and Human Rights

In accordance with our Code of Business Ethics and Conduct, employees are encouraged to report (according to local laws and regulations) inappropriate labor-related conduct to their manager, their HR representative and/or our Ethics Helpline (see p21). CWT strictly prohibits retaliation for all reports made in good faith or that contribute to an investigation into a possible violation of law.

Working conditions

We adopt the global principles of decent working conditions set by the UN Global Compact and ILO. As with our wider approach to human resources and human rights, we target our impact at a local level, complying with all country labor laws and regulations, and focusing on the issues pertinent to the region.

Collective bargaining arrangements

We respect the rights of our employees to join labor unions, workers' councils or other collective bargaining organizations. This is enshrined in the commitment we make to the freedom of association as set out by the ILO and as a signatory to the UN Global Compact. The CWT European Works Council (EWC), the official body for information and consultation, represents all CWT European employees in the European Union. In compliance with European legislation, the EWC represents the interests of employees at a European level in dialogue with CWT's European Management team.

EWC members are consulted by CWT management on the progress of the business and any significant decision that will likely affect employees at a transnational level. The EWC is committed to informing its members about advances made and collectively identifying priorities moving forward. For example, topics include the economic and financial situation of the company, jobs and employment situation and development, proposed transnational changes in the organization, health and safety, and training. The EWC was renewed in late 2018 and new members had a one-day training session to hand over their responsibilities. A new dedicated intranet page was also launched to simplify information sharing, support transparency of communications and help promote the EWC actions in the various member countries.

As a leader in the travel industry, we encourage our employees and HR leaders to be active in the Travel Industry Associations at national level in their countries, when possible or appropriate.



We act...

...to combat human trafficking and slavery

The travel business has an important role to play in combating human trafficking. We are in a unique position to make a difference among our employees and travelers, and we team up with partners to combat this pressing issue.

The travel industry is often an unwitting participant to the crime of human trafficking and slavery. Human traffickers use air travel, hotels and even international events to facilitate their illegal activity. Human trafficking is not only a violation of human rights, it also presents a great risk for the safety and security of our travelers. We recognize that this issue is too big for one organization to solve alone, which is why Carlson and CWT raise awareness, engage employees, partner with others and integrate it as part of our RB focus.

Our policies and procedures

In response to the UK Modern Slavery Act (2015), CWT published a global statement on anti-slavery and human trafficking that was updated in 2018 (download it on [our corporate website](#)). It includes the actions taken over the year to fight against slavery and human trafficking in our operations, and states clearly that:

- we oppose all forms of slavery and human trafficking – without exception;
- we are committed to taking steps to influence our business partners and supply chains; and
- we actively support the Ten Principles of the UNGC focusing on the core areas of human rights, labor, the environment and anti-corruption as well as the International Labor Organization’s (ILO) Fundamental Labor standards; and we will report annually on progress against these principles.

In 2018, we continued to reinforce our commitment to fighting against human trafficking through reinforced policies, increased awareness and education, and closer collaboration with stakeholders and public leadership. The Carlson Senior Director of Corporate Affairs co-leads the Global Anti-Human Trafficking Taskforce with our VP Global Responsible Business. The taskforce is sponsored by the EVP Chief Human Resources Officer and the EVP Chief Legal Officer and includes CWT representatives from all regions and key functions.

In accordance with CWT’s commitment to fight against human trafficking, and in order to meet requirements of the UK Modern Slavery Act, we include specific language in our Responsible Supplier Code to prevent the use of any forms of modern slavery in our supply chains (see p22).

Partnering to combat human trafficking

Human trafficking and modern-day slavery are intolerable and highly complex issues. As with much of our RB work (and our commitment to SDG 16 – p15), we count on partnerships to make a targeted, scalable impact. Working in collaboration with Carlson and the Carlson Family Foundation (see p67), partnerships in this area include:

ECPAT: for 15 years, Carlson has supported **ECPAT**, a nonprofit organization working to protect children from trafficking, sexual

exploitation and online abuse. In 2004, Carlson was the first North American travel and hospitality company to sign ECPAT’s Tourism Code of Conduct to Protect Children (The Code). With contributions to its global study on sexual exploitation of children in travel and tourism and funding from the Carlson Family Foundation for its sector-wide training on these issues, the partnership is delivering change beyond our own business. In 2018, CWT provided expert guidance to ECPAT-USA in developing a new e-learning training for travel management professionals, corporate travel managers and those in the meeting and events industry about how to identify and stop human trafficking. Carlson’s Senior Director of Corporate Affairs sits on the board of ECPAT USA.

World Childhood Foundation: Carlson’s commitment to protecting at-risk children dates back to 1999 when the Carlson Family Foundation accepted an invitation from Her Royal Majesty Queen Silvia of Sweden to become a co-founder of the **World Childhood Foundation**. The World Childhood Foundation supports more than 100 projects in 17 countries that are focused on preventing abuse and exploitation of children, including trafficking. Carlson and Carlson Family Foundation trustees provide leadership on various World Childhood Foundation Boards of Directors, including those in Sweden, Brazil and the United States. Our EVP and Chief Legal Officer is on the Board of World Childhood USA.



We live...

Thorn: we work closely with **Thorn**, an organization which builds technology to defend children from sexual abuse, thus resonating with our own digital strategy. The organization fills a critical gap in anti-trafficking operations by developing and providing tools to law enforcement to rescue sex trafficking victims and arrest perpetrators. In 2018, Thorn received continued grant support from the Carlson Family Foundation.

The Orphaned Starfish Foundation (OSF): **OSF** works in 27 countries to help orphans, victims of abuse and trafficking, and at-risk youth to break cycles of abuse and poverty through computer-based education, job training and job placement assistance. CWT continues to grow local partnerships and volunteerism with several OSF supported organizations across the globe, and CWT employees made financial contributions to assist in this work. Our Chief Information Officer sits on the Board of the organization.

...to shed light on the issues

The Carlson Family Foundation, alongside the Oak Foundation, supported research undertaken by the Economist Intelligence Unit to benchmark and measure countries' response to child sexual exploitation. The **'Out of the Shadows Index'** launched by the World Childhood Foundation covers 40 countries and 70% of the world's children, across four key categories for how countries are addressing the issue. The Index seeks to raise global awareness of child sex abuse and exploitation and highlights areas for improvement if governments are to meet UN Sustainable Development Goal 16.2 to end all forms of violence against children by 2030.

Human Resources and Human Rights



Awareness and education

Raising awareness and education on the topic of human trafficking and slavery is an important area of focus. In 2018, we worked in partnership with ECPAT International to launch digital anti-trafficking ads on the myCWT portal with the objective of creating awareness among travelers about reporting signs of sexual abuse and trafficking (see p59). We also continued to offer training to our employees through Businesses Ending Slavery and Trafficking (BEST) Employers Alliance. The training helps raise awareness of these issues among our people, by enabling them to recognize the signs of human trafficking and sexual exploitation and know what measures to put in place to address it.

Collaboration with stakeholders

As well as partnering with leading organizations, our teams collaborate with key stakeholder groups to take decisive action. For instance, in 2018, our Legal & Compliance and RB teams partnered with ACC (the Association of Corporate Counsel in Europe) to organize a forum to discuss the challenge of human trafficking on the 12th EU Anti-trafficking day in October 2018. ACC members and CWT employees learned about ECPAT actions and best practices in the private sector to contribute to the global fight against human trafficking.

Carlson played a key role in developing the Anti-Sex Trafficking plan for the 2018 Super Bowl in the United States. A Carlson representative was a leader on the event's Anti-Sex Trafficking Committee, and the Carlson Family Foundation funded the plan which can also be used for future large-scale events.

Our Legal & Compliance team also continued to partner with TrustLaw throughout 2018. TrustLaw provides pro-bono legal advice to not-for-profit organizations that fight modern slavery and human trafficking, among other things, around the world. We raised significant financial contributions from employees to support partner nonprofits such as TrustLaw through our annual community giving campaign in the US and other fundraisers across the globe.

We live...

...to speak out about the issues

Our senior leaders participated in many speaking events in 2018 to raise awareness of the role the private sector can play in combatting human trafficking – particularly in the travel industry. Highlights included several of our senior colleagues speaking at events such as the International Summit on Child Protection in Travel and Tourism in Bogota, the Trust Conference, and the UN where our CEO spoke alongside the World Childhood Foundation USA (WCF) (see p3).

Our CEO is on the Board of the Global Partnership to End Violence Against Children, a unique collaboration established by the UN to achieve this Sustainable Development Goal by 2030. In 2018, discussions put a spotlight on the urgent problem of child sexual abuse and the critical need to develop effective solutions. A panel of experts from the public and private sector, non-governmental organizations and law enforcement agencies discussed the work that still needs to be done.



We said...



2020 Objectives

Deployment of our global diversity and inclusion strategy throughout regional Diversity and Inclusion Committees.

Non-discrimination training of all recruiters and managers.

Reach the level of best performing companies while developing leaders to enhance employee engagement.

Ensure delivery against future business needs by developing and selecting the right talent for the future and driving a culture of innovation.

We did...



2018 Performance

- Published our vision and high-level objectives in our Global Diversity and Inclusion Charter.
- Created two local Diversity and Inclusion Committees in the UK and Costa Rica.
- Conducted diversity and inclusion activities across offices around the world.



- All of our recruiters took non-discrimination and unconscious bias trainings.



- Foundational Leadership Program was piloted to help new people managers drive high-performing teams and learn about our culture (if new to CWT).



- Introduced a strategic talent planning model to identify future skills, priorities and key talent through cross-functional talent meetings.
- Integrated all functions to our everyday performance development approach.
- Launched in five countries, our onboarding tool EMBARK.



We will...



2019 Goals

- Strengthen our Diversity and Inclusion Governance by having all regions and functions represented in the Global Diversity and Inclusion Taskforce.
- Support the creation of local Diversity and Inclusion committees.

- Continue assigning these trainings to new recruiters.
- Unconscious bias training to be available in additional languages so more employees and in particular managers can take this training.

- Roll out Foundational Leadership Program globally.

- Continue our strategic talent planning model to identify future talent need priorities.
- Reinforce our everyday performance development approach.
- Continue rolling out Embark to more countries.



Environment

We think...

“Climate change is the most critical global challenge we face. At CWT we recognize that the business community plays a vital role in providing effective solutions to address it. As a signatory to the United Nations Global Compact (UNGC), we are committed to undertaking initiatives that promote greater environmental responsibility.

Through our Responsible Business program we educate and empower each employee to help us make a difference. By creating a culture that promotes environmental responsibility, we encourage our people to take positive climate action so that we, collectively, achieve our objectives.

Beyond measuring and minimizing our own carbon footprint, we see it as our responsibility to help our clients reduce their environmental impact. We continue to offer reporting solutions that enable them to reduce their footprint by making more informed choices.”

Françoise Grumberg,

Vice President, Global Responsible Business and Diversity & Inclusion

In this section, we address the following SDG





We act...

...to protect our planet

As a signatory of the United Nations Global Compact (UNGC) we are committed to respecting its Ten Principles. To uphold its Environmental Principles (seven through nine), we proactively measure and manage our carbon footprint, while creating a culture that raises awareness of environmental responsibility and encourages action at a local level to make a global impact.

As stated in our Global Environmental Charter (download it on [our corporate website](#)): 'environmental stewardship is part of our core strategy, culture and day-to-day activities.' The Charter aligns with the commitments we make as a signatory to the UNGC's environmental principles of:

- supporting a precautionary approach to environmental challenges;
- undertaking initiatives to promote greater environmental responsibility; and
- encouraging the development and diffusion of environmentally-friendly technologies.

We act to protect our planet by:

- measuring, reporting and reducing emissions; and
- creating an environmentally-responsible culture:
 - through awareness-raising; and
 - by promoting global and local actions that improve our environmental footprint.

Thanks to a dedicated network of local correspondents, we pull together and voluntarily report greenhouse gas emissions data every year. We organize global environmental awareness campaigns and encourage global and local initiatives to help improve our environmental footprint. Beyond this, we assist clients with their own efforts by providing information that enables them to measure and reduce their environmental impact.

Our Environmental Charter commitments outline how CWT:

- actively engages in positive environmental practices;
- conducts our business in accordance with environmental laws in all the countries in which we operate, and aims to exceed the requirements when possible;
- recognizes our responsibility as an employer to provide a safe, healthful working environment for all employees in an environmentally-sustainable manner;
- incorporates environmental practices into our operations such as reducing greenhouse gas emissions, managing energy consumption, preserving natural resources and reducing and recycling waste;
- regularly reviews environmental performance and shares progress with our stakeholders;
- fosters environmental awareness among stakeholders;
- communicates this charter to all employees, provides them with the necessary information to fulfill commitments, and encourages them to adopt an eco-friendly attitude; and
- assesses and reviews the content of this Charter on a regular basis under the leadership of the Global Responsible Business team.

Environment



We act...

...to create an environmentally-responsible culture

We seek to create a culture where environmental responsibility becomes second nature by delivering awareness-raising initiatives.

Environmental Awareness Week

The best way to consistently improve our environmental performance is to create a culture that promotes environmental responsibility internally. Every year since 2015, a global week-long campaign is organized to raise awareness on the ways in which employees can contribute to our environmental objectives.

In 2018, our Environmental Awareness Week focused on the topic of responsible meetings and events. In recognition of the sizable impact bringing people together can have on the environment, the goal was to increase awareness among employees on the actions they can take to create more sustainable meetings.

As part of the week's activities, all employees were provided access to a handbook outlining the step-by-step approach for hosting meetings and events in an environmentally friendly and socially responsible way. The campaign also provided valuable tips to attendees to take responsible action when attending meetings, and underlined that even small individual actions can make a big collective impact.

Local events were also organized to celebrate Environmental Awareness Week, including:

- **Paris:** a breakfast conference discussed ways of making meetings and events more environmentally responsible, including through carbon offsetting.
- **London:** a roundtable discussion was held to raise awareness of the environmental impact of meat consumption and encourage team members to partake in 'Meat-free Mondays.' Employees were also able to participate in a 'pledge roulette', where they picked at random a pledge to show their commitment to managing their environmental impact during the week. Examples included cycling or walking to work, and not using disposable bags or coffee cups.

Raising awareness with stakeholders

Beyond creating an environmentally-responsible culture as part of how we operate, we also offer reporting tools to help our clients make more informed choices when it comes to travel.

Some of the tools mentioned on p58 for traveler safety also feature environmental elements. For example, CWT AnalytIQs analyzes CO₂ emissions so that travel managers can track and adapt their travel plans accordingly. We also continued to improve our CWT AnalytIQs data sources in 2018 by updating the Department for Environment, Food and Rural Affairs (DEFRA) emissions factors used in the software.

We live...

...to organize sustainable events

In line with our focus on responsible meetings and events, which are increasingly important to our clients, CWT Meetings & Events Italy took the initiative to certify to ISO 20121: 2013 for Sustainable Events. With this certification – which addresses all stages of an event's supply chain – CWT Meetings & Events Italy is able to offer tailored sustainable meetings and events solutions to our clients to manage the social, economic and environmental impact of any event.



We act...

...to promote global and local environmental actions

As well as raising awareness, we promote initiatives that improve the environmental footprint of our processes and day-to-day activities. From creating more responsible office spaces to improving our waste management processes and even offsetting the carbon emissions of certain internal events, we continued to roll out local initiatives to make a global impact.

Promoting responsible offices

To streamline and improve CWT's use of office space, and ensure a pleasant working environment for all employees, our Real Estate team launched its Workplace 3.0 strategy in 2017. As part of the program's focus, several offices were restructured or moved to a new location as part of this multi-year plan. In 2018, this included moves and changes to our Madrid, London Heathrow, Rome, Singapore and Paris offices. These remodeled and new offices incorporate improvements to sustainability and the overall working environment.

Our vision around sustainable workplaces focuses on enhancing the physical environment through energy-saving initiatives, avoiding the heating and cooling of unused spaces, and focusing on improved building space, design and location. These considerations align with our sustainable workplace principles, which concentrate on streamlining efforts to reduce our overall environmental impact through:

- Reducing the number of offices which will lower our carbon footprint. It is more efficient to have employees working from home and/or commuting to one central hub, rather than running numerous mid-sized offices with daily attendance.
- A policy of leasing more modern, energy efficient buildings. This has the added benefit of enabling us to house more desks on average as the systems, toilet facilities and fire escape routes are better able to accommodate a greater density.

- Hot-desking and the ability for employees to work from home to reduce emissions from commuting.
- Incorporating facilities to encourage recycling within office design.
- A printer strategy that reduces the overall number of printers and uses 'follow me' printing to ensure that documents are not printed until the employee collects them by swiping their access badge.
- Offering shower facilities to encourage responsible commuting by bike.

In 2018, we implemented space utilization initiatives across several offices which generally lowered our utilities consumption and improved our environmental profile:

- **Paris, Singapore and Madrid:** completed space utilization surveys to better understand how efficiently we are using our office spaces and put in place actions to address this.
- **Rome:** reduced space and moved to a more modern and efficient building. The office is conveniently located next door to the metro station to simplify commuting for employees.
- **London Heathrow:** reduced in size and expanded home working to accommodate a 24-hour schedule.
- **Several other sites:** roles moved to home working for better space utilization and scheduling demands.

Beyond the buildings themselves, locations such as Spain and the UK have robust environmental management systems in place, including ISO 14001 accreditation.

Environmental certifications like these are selected based on the local context – for example, CWT Finland adopts the **WWF Green Office** certificate, while CWT Estonia uses European Green Office standards. In addition to this, our German and Finnish offices consumed 100% green electricity in 2018.

We live...

...to work in sustainable offices

Following the move of CWT Spain's Madrid office in 2018, we are reaping the benefits of a reduced office space size (by approximately 30%) and more efficient building features. The new site incorporates modern systems, fixtures and fittings to reduce our environmental impacts, lower costs and create an overall better working environment for our people. Additionally, a new paperless policy has been introduced at the site to reduce storage space and the use of printed paper.

Prior to the move, we donated the proceeds from selling our old office furniture to a local charity, Asociación Española contra el Cáncer, while avoiding sending useable furniture to landfill.

Environment



Encouraging waste management and recycling

We encourage waste management and recycling in our offices around the world. At a local level, many offices have their own recycling programs, depending on local infrastructure. Here are some examples from 2018:

- **France:** in our HQ in Paris, we work with Greenwishes – an organization that provides monthly recycling reports – to better measure how we are performing and taking action to reduce waste where we can. In 2018, we recycled over 4.5 tons of waste and shared the results with colleagues to encourage them to continue their recycling efforts.
- **Sweden:** in our Stockholm office, we recycled 2.6 tons of batteries, glass, plastic, computers, metal, electronics, wood, paper and cardboard in collaboration with our recycling partner SMART RECYCLING AB.
- **India:** we continued to partner with Greenobin, an organization that collects paper waste and credits one point against every kilogram of paper waste collected. In 2018, CWT Bangalore also launched a 'Say no to plastic' initiative to remove the use of single-use plastic across our Indian offices and around the globe.
- **Spain:** we launched a survey to explore how much plastic waste is generated in the Spanish offices. In addition, tips were shared on how to reduce plastic use in the office.
- **The US:** our Minneapolis HQ joined the Medonta Heights office to support the Freshpack recycling movement in 2018. The initiative ensures that all Freshpacks (an individual serving size packet of coffee or tea) avoid disposal via landfill. The leftover coffee or tea inside the Freshpack is composted and the packaging is recycled into new products.
- **Thailand:** we set up a DIY upcycling contest where employees utilized waste materials from the office to make something new and useful.
- **Hong Kong:** a local NGO taught three CWT employees how to transform recycled paper into toy cars. The NGO then coordinated a site visit for six CWT volunteers to teach this process to a local family and donate all the recycled toy cars they made.

We live...

...to do without disposables

RoomIt by CWT is CWT's hotel distribution division. In 2018, a survey was conducted among our RoomIt employees to identify their usage of disposable items. Through the results we determined that we collectively use over 300,000 single-use disposable items that are ultimately sent to landfill each year.

In response, the RoomIt team launched a 'doing without disposables' campaign, with the goal of cutting disposable waste. A large focus of the campaign was to encourage behavioral change, by inspiring employees to think about how to avoid waste: from purchasing fewer takeout meals to using reusable mugs and tumblers and avoiding the use of straws.



We live...

...to improve lives through carbon offsetting

We continued to make several of our client and internal events in 2018 carbon neutral. We again supported the Carbon for Water™ project, as well as three new carbon offsetting projects:

- **Carbon for Water™ project (Kenya):** a total of 1,672 tons of carbon dioxide equivalents (tCO₂e), were offset. As a result, CWT enabled delivery of 66.5 million liters of clean and safe drinking water to more than 35,000 Kenyans over a three-year period.
- **Gandhi project (India):** the purchase of 64 carbon credits will generate 75 MWh of renewable electricity to cover the annual electricity requirements for 69 Indian households.
- **ChinaStoves project (China):** 191 carbon credits were purchased to enable 76 people to benefit from fuel cost savings, faster cooking times and improved indoor air quality, thanks to the distribution of 22 stoves fueled by 100% renewable sources.
- **Madre de Dios project (Peru):** 50 carbon credits will preserve more than 8,000 m² of forest area and over 2,300 tropical trees in the Peruvian Amazon that are in danger from illegal logging for one year.

Encouraging employee-led environmental action

In addition to the environmental initiatives implemented across our sites and offices around the world, our people proactively gathered in many cities to show their support for protecting and preserving the environment. In 2018, employees banded together to support actions including:

- **India:** in Mumbai, employees partnered with the local NGO 'Hariyali' to plant around 20 trees. A similar drive took place at our HQ in Gurgaon in partnership with NGO 'I am Gurgaon' to focus on making the city greener.
- **Costa Rica:** a group of volunteers rallied together with coastal ecosystem charity 'Costas Verdes' to plant trees along the coast. Another excursion brought volunteers on a day-long mission to clean up the local beach.
- **Finland:** employees once again participated in the cycling event 'Kilometrikisa' (which translates to 'kilometer competition'). Kilometrikisa is a fun-filled competition between companies focused on increasing cycling to reduce carbon emissions. As part of the challenge, our 45-strong team of racers cycled a collective 23,997 kilometers to save 1,679 liters of gas and 4,197 kilograms of carbon emissions.

Offsetting our emissions

In line with our commitment to reduce our overall GHG emissions, we offset the carbon impact of several internal and client events in 2018. We continued to support the Carbon for Water™ project and contributed to three new carbon offsetting projects to compensate our own impacts and support local communities. In 2018, we offset 1,977 tCO₂e* to make a total of ten events carbon neutral. The events, ranging in size from big client events to small team meetings, represent savings to the equivalent of more than 2,200 round trips from Paris to New York in economy class, or the manufacture of more than 430 million sheets of paper.

* tCO₂e = tons of carbon dioxide equivalents.



We act...

...to measure, report and reduce emissions

Climate change is one of the biggest threats to the longevity of the planet and requires collective and concerted action from all leaders to combat. We seek to understand – and reduce – our own impacts and minimize our environmental footprint.

We have been measuring and voluntarily reporting our emissions every year since 2013. We collect data on business travel, commuting, building energy consumption, purchased goods and services, and waste management in key locations. The campaign to calculate our 2018 emissions included 23 countries across three regions*.

We calculate our greenhouse gas emissions in accordance with the Greenhouse Gas Protocol, based on emission factors provided by the UK Department for Environment, Food and Rural Affairs (DEFRA). We voluntarily report our Scope 1, 2 and 3 emissions in this Responsible Business report every year. In addition, we report our emissions and those of the clients who request it of us through the CDP Supply Chain program every year.

Due to a change in our environmental reporting cycle in 2018, our environmental performance figures will be available mid-2019.

They will be featured in the RB section of our corporate website when available. The figures included below relate to our 2017 carbon emissions**.

Our 2017 carbon footprint (by Scope)

At 2,208 tCO₂e***, our Scope 1 emissions slightly decreased in 2017, mainly due to the reduction in owned and leased company vehicles in the 22 countries that were part of our reporting scope in 2017.

Our Scope 2 emissions were 3,492 tCO₂e which represents a decrease in 2017. This can be explained by the closure of certain offices, as well as missing building energy data in certain countries.

Our Scope 3**** emissions in 2017 were 29,858 tCO₂e, which represents an increase compared to 2016 levels. This can be explained by the addition of hotel night stays in this reporting cycle. Hotel nights accounted for 1,098 tCO₂e, which represents 6% of our Scope 3 emissions in 2017.

Scope 1

2,208 tCO₂e

Direct emissions from our buildings in key locations (heating oil and gas) and a portion of business travel (fuel for CWT's vehicle fleet).

Scope 2 (location-based method)

3,492 tCO₂e

Indirect emissions from energy supplied to offices in key locations, such as electricity or urban heating.

Scope 3****

29,858 tCO₂e

Indirect emissions from business travel**, commuting, waste management, purchased goods and services.

* If no specific cities are mentioned, the whole country was included in the scope, excluding implants: Australia: CWT Sydney office only; Austria: CWT Vienna office only; Belgium; Brazil; Canada; Chile: CWT Santiago office only; China: CWT Beijing office only; Costa Rica: Service Center only; Denmark: CWT Copenhagen office only; Finland; France; Germany; India: CWT Gurgaon office only; Ireland; Italy: CWT Rome office only; Luxembourg; Mexico: CWT Mexico City office only; the Netherlands; Spain: CWT Barcelona, Bilbao, Madrid and Seville offices only; Singapore; Sweden: CWT Stockholm office only; the UK; the US.

** Additional information on the methodology: Emissions are calculated in line with the Greenhouse Gas Protocol and based on emission factors provided by the UK Department for Environment, Food and Rural Affairs (DEFRA). The figures in this year's report account for the data collected as of 28 May 2018. Business travel includes global air and rail travel, global commuting, and global hotel night stays as well as local car-related travel (employee personal cars, owned and leased vehicles, rented cars and taxi) in the following locations (if no specific cities are mentioned, the whole country was included in the scope, excluding implants): Australia: CWT Sydney office only; Austria: CWT Vienna office only; Belgium; Brazil: CWT São Paulo office only; Canada; Chile: CWT Santiago office only; China: CWT Beijing office only; Costa Rica; Denmark: CWT Copenhagen office only; Finland: CWT Helsinki, Oulu, Tampere and Turku offices only; France; Germany; India: CWT Gurgaon office only; Ireland; Italy: CWT Rome office only; Luxembourg; Mexico: CWT Mexico City office only; the Netherlands; Spain: CWT Barcelona, Bilbao, Madrid and Seville offices only; Sweden: CWT Stockholm office only; the UK; the US.

*** tCO₂e = tons of carbon dioxide equivalents.

**** Excluding emissions from use of sold products and services, which represent more than 90% of our Scope 3 emissions. Emissions from our data centers are not calculated.



We live...

...to commute responsibly

Our Commuting Survey is a global survey sent to all employees annually to find out the modes of transportation they used during the last year to go to and from the office. In 2018, the survey on 2017 commuting habits was launched on International Mother Earth Day and more than 38% of our total global workforce responded.

According to the results, commuting emissions decreased by 9% compared to 2016. While part of the difference can be due to uncertainty from data received, this difference also stems from an increase in the number of home-based employees and a reduction in the use of cars reliant upon fossil fuels.

To continue to reduce our footprint, we re-shared our tips on how to 'reboot your commute' to encourage employees to take additional steps to further reduce our collective environmental footprint when commuting.

Reducing our carbon footprint

By measuring our emissions, we are better able to identify key areas of focus so that we can take appropriate action to reduce our environmental footprint.

Business travel* was our greatest source of emissions at 60% of our total emissions in 2017**. While we know that business travel is a key element pertaining to business growth for CWT and our clients, it is vital that we continue to balance our travel needs and costs with environmentally-friendly choices, covering the frequency and type of travel, hotel property selection and car rental options.

Employee commuting was our second largest source of emissions in 2017, accounting for 24% of our total emissions**. In 2018, we took a number of steps across the world to raise awareness among our people on the impact of their commute.

Finally, with building energy representing 14% of our total emissions in 2017, in 2018 we continued to take actions which optimized the efficiency of our real estate while expanding our environmental reporting scope (see p54).

To further reduce Scope 3 emissions, we select responsible suppliers to help us reduce our carbon footprint. For example, one of our main data centers operates with 100% renewable energy and in 2018 received a certificate for retiring 1,698 geothermal and solar renewable energy credits.

We live...

...to enhance our greenhouse gas emissions reporting

To further improve the accuracy and completeness of our reporting, and in particular of our Scope 3 emissions, we added a new data category to our reporting in 2017: hotel nights. We use DEFRA's emission factors for hotel night stays where available. For countries for which DEFRA does not provide an emission factor for hotel night stays, we used the average between the lowest emissions figure and the highest as a proxy factor.

Additionally, in 2018 we extended our environmental reporting scope by adding data centers and our Singapore office.

* Additional information on the methodology: Emissions are calculated in line with the Greenhouse Gas Protocol and based on emission factors provided by the UK Department for Environment, Food and Rural Affairs (DEFRA). The figures in this year's report account for the data collected as of 28 May 2018. Business travel includes global air and rail travel, global commuting, and global hotel night stays as well as local car-related travel (employee personal cars, owned and leased vehicles, rented cars and taxi) in the following locations (if no specific cities are mentioned, the whole country was included in the scope, excluding implants): Australia: CWT Sydney office only; Austria: CWT Vienna office only; Belgium; Brazil: CWT São Paulo office only; Canada; Chile: CWT Santiago office only; China: CWT Beijing office only; Costa Rica; Denmark: CWT Copenhagen office only; Finland: CWT Helsinki, Oulu, Tampere and Turku offices only; France; Germany; India: CWT Gurgaon office only; Ireland; Italy: CWT Rome office only; Luxembourg; Mexico: CWT Mexico City office only; the Netherlands; Spain: CWT Barcelona, Bilbao, Madrid and Seville offices only; Sweden: CWT Stockholm office only; the UK; the US.

** Excluding emissions from use of sold products and services, which represent more than 90% of our Scope 3 emissions. Emissions from our data centers are not calculated.



We said...



2020 Objectives

Educate all employees through eco-attitude campaigns and an environmental training module translated into several languages.

Empower the global environment network to drive local performance.

Reduce our greenhouse gas (GHG) emissions by 10% per employee against 2015 levels.

We did...



2018 Performance

- Environmental Awareness Week focused on responsible meetings.
- 38% of our total workforce participated in our annual commuting survey.
- Continued to share best practice on environmental initiatives throughout the year via our social intranet.



- Dozens of local activities were initiated and organized by employees across the world, from office recycling to environmental initiatives and activities, including beach cleanups and tree plantings.



- Continued to put in place initiatives to reduce our emissions, as well as environmental awareness campaigns.
- Expanded the scope and strengthened our reporting process to improve the accuracy of environmental measurement.



We will...



2019 Goals

- Continue to promote an environmentally-conscious culture through awareness and targeted initiatives.

- Further strengthen collaboration with local correspondents to improve environmental reporting processes by streamlining them and expanding the network of correspondents.
- Continue to encourage employee-driven environmental initiatives.

- Further expand our environmental reporting scope and strengthen the impact measurement of our environmental initiatives.





Responsible Products and Services

We think...

“We care for our customers’ traveling employees, while protecting them and their organizations from unnecessary risk. To achieve this, we have in place a rigorous approach to risk management, to maintain business-as-usual even during the most trying circumstances.

We work around the clock to ensure that the journeys we provide are as safe, stress-free and sustainable as possible. For us, this means focusing on keeping travelers secure through cutting-edge tools and technology, such as CWT Alerts, powered by International SOS.

In addition, we keep travelers informed through digital products, such as the myCWT app, to provide travel itinerary information on the go. This ensures that our customers can be confident that their traveling employees are well-informed.”

Kathy Orner,
Vice President and Chief Risk Officer

In this section, we address the following SDG





We act...

...to provide safe travel experiences

Today's traveler is increasingly discerning when it comes to safe, sustainable and responsible travel. In an ever-changing world, it is vital that we protect our stakeholders by keeping them aware of travel risks, while reducing the stress and environmental impacts associated with travel.

Digital technology is connecting people like never before, transforming the way we think, live, work and travel. This change spans every market and sector – increasing supply and demand, while driving higher customer expectations and an unrivaled level of choice. This shifting landscape creates new opportunities in our industry, with technology enabling us to tailor travel experiences better than ever.

Our customers and their traveling employees demand the same levels of service, choice and personalization they experience as consumers. As a result, we seek to adapt to deliver a total experience that satisfies everyone.

Products that inform and connect

We continued to promote our portfolio of travel apps and products in 2018. Many of these include effective reporting tools so travel managers can make informed decisions about safety, security and carbon impact. Examples of these innovative solutions include:

- **CWT Alerts, powered by International SOS:** in collaboration with our long-term partner, International SOS, we provide travel managers and security officers with email updates and notifications of disruptions and crises relating to destinations and travel plans. CWT Alerts within myCWT web and mobile make travelers aware of key events that may affect their trip, so they are better prepared to manage or avoid disruptions. Alerts include providing information on events that pose health threats or increase their safety and security. The alerts also

provide updates on relevant situations, such as severe weather, transportation strikes and epidemics. In 2018, 7,919 alerts were issued to inform travel managers and travelers of events that might impact them.

- **myCWT platform:** updates itinerary information on-the-go and sends timely alerts on flight delays, cancellations and gate changes. We are committed to making the myCWT web and mobile technology platform usable by all people, regardless of circumstance and ability. We aim to comply with best practices and standards defined in the Web Content Accessibility Guidelines 2.0 (WCAG), published by the World Wide Web Consortium (W3C) to provide services in a way that is more user friendly to everyone. We work with an independent agency to periodically assess and verify the accessibility of the CWT Platform.
- **Trip disruption services:** available globally via myCWT mobile, our highly rated app by users provides itinerary based safety alerts and trip disruption notifications. For example, travelers receive notifications about any safety issues that may be occurring specific to their itinerary, trip cancellations, and delays. Additionally, if a traveler does need to reach a CWT counselor, they may do so directly from myCWT mobile.
- **CWT AnalytIQs and CWT Answer IQ:** our business insights platforms offer a safety and security feature that makes it easy for clients to track down travelers anytime, anywhere, even during disruptions. The tool allows travel managers and security officers to view

travelers on a map, monitoring security risks, medical risks, or map-view only (for environmental features of this tool see p50).

- **Crisis communications:** whenever a serious incident occurs involving known or potential injuries or fatalities, our 24-hour Service Center activates a crisis communication protocol. This procedure updates subscribers via email and SMS and enables us to report on all major incidents. In 2018, we activated the protocol for 18 incidents, mostly related to terror attacks and other emergencies affecting hotels and flights.
- **CWT Meetings & Events security services:** we are the first corporate meetings and events agency to include an integrated safety and security offering, powered by International SOS. Clients have access to one of two tiers of security services. The first, Complimentary Core Services, offers medical and security destination briefings, safety and security checklists, an online self-assessment tool and other benefits. The second, Event Membership (coordinated by International SOS), provides 24/7 support and destination-relevant communications to clients as well as support or health event planning and medical advice. These services help our clients lower costs while decreasing risk and stress for their travelers' trips.



We live...

...to keep client travelers safe in partnership with International SOS

We extended our referral partnership with one of the best travel risk management providers in our industry and long-term partner – International SOS. By extending it to our Global Partner Network in 2018, the process ensures our clients and partners have access to expert advice to interpret travel information, communicate with travelers when incidents arise, and send medical support and travel security assistance when required.

Beyond additional support for our clients and partners, we co-hosted webinars with International SOS across our three regions aimed at small to medium businesses (SMEs). This work focused on dispelling the misconception that SMEs don't need to implement travel risk management, as well as providing an overview of the services we provide and how to respond to crisis situations.

Always improving the customer experience

As a customer-focused organization, we are passionate about creating great experiences for our customers – and we run several programs and initiatives to gather feedback and improve our customer experience.

In 2018, we continued to gather feedback from our clients through quarterly travel manager satisfaction surveys designed to keep us up-to-speed with how the travel managers we serve are thinking and feeling, so that we are able to improve our responsiveness to their needs. Additionally, our CWT Listens survey has been redesigned to understand the experience travelers have not only at the point-of-sale but throughout their end-to-end experience with us. This is complemented by an on-demand reporting platform to help our employees understand customer feedback and experiences, and to keep improving our offer.

In October 2018, we continued to participate in the 'Customer Experience Day' (CX Day) by sharing some of the great comments received from our customers throughout the year on a dedicated page on our social intranet. The page is also used to offer tips and tricks on how we can get even better at providing exceptional traveler experiences.

We live...

...to raise awareness of child exploitation

Eliminating human trafficking is an area that has long been a focus for CWT. Since 2012, we added travel alerts to electronic tickets issued in the US to destinations where there is a prevalence of sex tourism. The alerts notify users on how to report suspected cases of child sexual exploitation. In partnership with ECPAT International, Carlson and CWT launched digital anti-trafficking ads on the browser version of myCWT in 2018 to create awareness among travelers to report suspected sexual abuse and trafficking. The campaign led with a clear call to action: report it. Since its launch in October 2018, the campaign had 125,000 ad impressions and we expect an average of 50,000 impressions per month in 2019.



We act...

...to maintain business-as-usual, whatever happens

From staff shortages and technical disruptions to terrorism and natural disasters, our proactive approach to risk means we are ready to protect our customers at all times and maintain business continuity, even during a crisis.

At CWT, we view risk management as a systematic process. As a first step, we look to identify, assess and prioritize potential areas of risk. Then, we develop risk mitigation plans to reduce the probability of occurrence and impact. These plans are then formally integrated into a Business Continuity Plan (BCP), which embeds risk management into CWT's daily organizational practices. When things unexpectedly do go wrong, our 24/7/365 crisis management process helps our company to respond quicker and recover faster from unplanned business disruptions. This step-by-step, preventative approach minimizes the impact of crises whenever they occur by ensuring a robust and proactive response.

Risk management governance

Our Crisis Management function is overseen by our Executive Vice President and Chief Technology Officer (CTO) and our Chief Risk Officer. Together, formal updates are provided to our Chief Executive Officer at regular intervals.

We also extended the remit of our Global Security Steering Committee to include risk. Meeting quarterly, the Committee is chaired by our Chief Risk Officer and includes our CEO, Chief Technology Officer, Executive Vice President of Traveler Experience, Executive Vice President and Chief Legal Officer, Executive Vice President and Chief Customer Officer, Executive Vice President and Chief Financial Officer, as well as our Data Privacy and Chief Information Security Officer. To expand the remit of risk management in a responsible way, a dedicated data governance oversight subcommittee was created. Supported by our data governance working group, the subcommittee provides

consistent, efficient and harmonized oversight of CWT's global data governance policies and practices pertaining to data availability, usability, integrity and security.

Business resiliency at CWT

Despite rigorous governance of risk, managing it daily is the responsibility of each and every one of us. That is why it is vital that we all understand and buy into the approach of risk preparedness, prioritization and rapid response.

At CWT, we have implemented an enterprise Business Resiliency program to strategically align enterprise business continuity, disaster recovery and crisis management capabilities.

We also implemented enhancements to our risk management system in 2018 across all stages of the system. As an example, a 'site risk assessment' campaign was performed across 100% of our wholly-owned sites, with the objective of identifying risks and developing mitigation plans to reduce the impact of these risks.

Once key risks have been identified, our BCP helps to ensure that any disruption to our day-to-day operations is minimized. The BCP is a methodology followed by everyone in our organization to ensure effective and efficient response to unplanned disruptions of all types whenever and wherever they occur. All BCP activations are logged, monitored, reviewed and a post-mortem is documented in our online business continuity database. Metrics analyzing BCP activations are published every six months to identify vulnerability trends and implement corrective actions. In 2018, we expanded our Business Continuity online

database to incorporate all locations where CWT employees are servicing clients (including implants and partner offices).

CWT offices are required to update their office BCP documentation twice per year and undertake two annual drills to test the effectiveness of their location's BCP. Carried out by regional BCP owners, the drills cover fire-based scenarios and another drill chosen by the BCP Steering Committee. To supplement this, all BCP owners, new hires, operations managers and those identified as backup BCP owners, are required annually to complete internally developed online training.

In addition to our BCP, our Disaster Recovery program ensures that our core systems and IT capabilities are available at all times. To test out our systems and processes, the Business Resiliency team runs annual integrated functional tests designed to measure the resiliency of our core technologies.

The Business Resiliency team also coordinates annual crisis management exercises. In 2018, we led two crisis drills with our Executive Leadership Team and a backup team to enhance preparedness and improve the effectiveness of crisis response. What we learn from the scenarios shapes our BCP, so that we are even better prepared to respond to any major future disruptions. This combination of risk assessments, crisis drills, business continuity training, and disaster recovery solutions ensures we are prepared for – and able to effectively respond to – any risks we face.



We said...



2020 Objectives

Further reinforce our responsible business products and services offering to our clients.

Proactively propose carbon offsetting to clients.

Expand the scope of an ISO 22301-aligned Business Continuity Management system to include Crisis Management, Business Continuity Planning and Disaster Recovery.

Become the reference in terms of crisis management in the travel industry.

We did...



2018 Performance

- Launched CWT Alerts in myCWT mobile to ensure travelers receive updates while traveling.
- Raised additional awareness on anti-human trafficking through customer communications via our myCWT portal.



- Continued our internal carbon offsetting efforts to build experience in this field.
- Explored possibilities to integrate carbon offsetting into our service offerings.



- Implemented an Enterprise Business Resiliency program to align enterprise business continuity, disaster recovery, and crisis management strategies.
- Created a dedicated data governance subcommittee to streamline oversight of global data policies.



We will...



2019 Goals

- Further embed social and environmental criteria in our various service offerings to clients.

- Continue to explore possibilities to integrate carbon offsetting into our service offerings.

- Further enhance our 24/7 capabilities using new technologies.
- Risk management will remain key to aligning governance of risk for risk-based decision making.
- Optimize our technology resiliency and better position the organization to leverage cloud-based capabilities.





Community Involvement

We think...

"The benefits of engaged employees are tremendous for CWT, our customers and our communities. CWT is a global community of employees that has a strong history of being engaged for causes beyond just work.

That is why we provide community involvement programs that welcome and rely on the participation of our employees. With the help of a Responsible Business Network spanning all geographic regions and business functions, our colleagues are empowered to develop projects and partnerships that support communities close to their heart and their home.

In 2018, our people continued to focus on initiatives with a focus on the 3Es of Education, Emergencies, Essential needs, and fighting human trafficking."

Françoise Grumberg,
Vice President, Global Responsible Business and Diversity & Inclusion

In this section, we address the following SDGs



Community Involvement



We act...

...to make a difference in the communities where we live and work

With a global reach, we recognize the importance of utilizing the talent, expertise and insight of our people to contribute to local communities worldwide. In 2018, our employees launched more than 100 3E community initiatives, partnering with dozens of charities and organizations around the world.

From financial and in-kind donations to employee volunteering, the impact of our 3E Community Involvement strategy continues to grow year-over-year. Our 3E initiatives around the globe are also helping contribute to the delivery of the UN Sustainable Development Goals (SDGs) (see p12).

Our Community Involvement strategy focuses on targeting the 3Es of:

- **Education:** supporting the transfer of knowledge and skills from one generation to the next through teaching, training and research.
- **Emergencies:** providing support and resources to those experiencing urgent humanitarian disasters or ongoing global crises harming lives and livelihoods.
- **Essential needs:** supporting initiatives that help provide the building blocks of human dignity, such as protection from poverty and exploitation, access to clothing, healthcare, food, water, shelter and a safe environment.

We actively encourage volunteering and have formal policies in place in the UK, Belgium, the Netherlands, Luxembourg, Canada and across the Asia-Pacific region. In countries that do not have a volunteering policy, local teams offer employees volunteering time to contribute to community projects in their location. In addition to the 3Es, we also support projects with a focus on anti-human trafficking, military veterans and workforce development.

In 2018, teams of employees from CWT and Carlson volunteered their time, organized fundraising events and created awareness for important causes. These activities addressed efforts such as improving living conditions for families, donating food to those in need, providing education, financing health research and much more.

Partnering with the Carlson Family Foundation

We continue to work closely with the Carlson Family Foundation on our community involvement efforts. The Foundation provides employee matched contributions, as well as significant grant support for many of our 3E global partners and those helping us to combat human trafficking around the world (see p67).

Tools to promote 3E activities

To further raise awareness of 3E, our 3E Guidebook outlines our strategy and approach. Available in seven languages, it shows our 3E aims and objectives, and gives guidance to employees who want to get involved in local initiatives. Alongside the Guidebook, an interactive 3E map is accessible to all employees to plot their own initiatives and help us track progress on the impact we are having in local communities.

We live...

...to celebrate Global Community Giving

In honor of Carlson's 80th anniversary, the Carlson Family Foundation offered eight US\$10,000 grants to nonprofits and charitable organizations recommended by our people around the globe in 2018. To select the recipients of these employee choice grants, colleagues were asked to nominate organizations based on the difference they are making within their community and their alignment with Carlson and CWT's RB priorities.



Community Involvement

In honor of Carlson's 80th anniversary, the Carlson Family Foundation offered US\$10,000 grants to organizations chosen by CWT employees

We received dozens of nominations and an amazing number of votes from our employees to help choose the finalists. The winners, and their areas of focus, were:

Organization name	Location	Focus area	Description
Associação Vida Jovem	Brazil	Education	This organization offers a stable home environment for children deemed unable to live with their families, and provides them with professional skills training in computer maintenance, web design, and administration.
Charities Aid Foundation	India	Emergencies	CAF India is a registered charitable trust providing strategic and managerial support to enhance impact in the areas of health and sanitation, education, disaster management, child welfare, women's empowerment, community development, livelihood and skills development.
ECPAT	The UK and France	Anti-human trafficking	ECPAT International is a growing network of over 100 civil society organizations across 90 countries working to end the sexual exploitation of children worldwide. Teams in the UK and France work at all levels, from supporting shelters for survivors to influencing Heads of State and partnering with organizations to create a positive impact.
Food for Hungry Minds School	Philippines	Education	Provides education by creating schools for disadvantaged children in the poorest areas of the world – giving them an opportunity to succeed academically through Philippine basic education.
Freedom Service Dogs	The US	Essential Needs/Military Veteran Support	Transforms shelter dogs into custom-trained, life-changing assistance dogs for people in need. Clients include children, veterans and active duty military, and adults with disabilities including autism, traumatic brain injury, cerebral palsy, spinal cord injuries, muscular dystrophy, multiple sclerosis, and post-traumatic stress disorder.
Medicos Sin Fronteras (Doctors without Borders)	Spain	Emergencies	Is an international medical and humanitarian organization that helps the victims of natural or human disasters and armed conflicts, without discrimination based on race, sex, religion, philosophy or politics.
Willing Hearts	Singapore	Essential Needs	Provides daily meals and other support services to the underprivileged, the needy, and other marginalized members in Singapore. It also assists and guides individuals towards rehabilitation and reinstating their role in society.



We act...

...on education

Obtaining a quality education is the foundation to improving people's lives and sustainable development, according to Goal 4 of the UN SDGs. During 2018, we continued to champion education and employability for young people as part of our 3E strategy.

Acting on education involves supporting the transfer of knowledge and skills from one generation to the next through teaching, training and research provision. Below are just a few of the ways in which we improved educational and employability outcomes during the year:

- **Helping students build work experience in the US: Genesys Works** provides pathways to career success for high school students from low income families through skills development and work experience. The program involves eight weeks of training the summer before a student's senior year of high school, and offers professional and technical training, as well as college and career coaching. After the summer training program, students work for a corporate partner, such as CWT, for a year-long paid internship experience. In 2018, we brought in five Genesys Works interns to assist with IT projects at our HQ.
- **Providing IT solutions to educate children in need in Colombia:** local employees visited **Nuevo Futuro**, a housing project for abused and neglected children. The Carlson Family Foundation helps fund the project and the children it shelters through its partnership with the Orphaned Starfish Foundation. Support focuses on providing the vocational and life skills required for successful adulthood. It also focuses on enhancing access to technology to develop these skills. Employees delivered messages of support from their colleagues, learned more about the program, and toured the

computer lab that has been funded in part by the Carlson Family Foundation. An additional grant of US\$10,000 was awarded to continue its successful growth.

- **Setting education in motion, Philippines:** for two years, colleagues in Manila have supported the Food for Hungry Minds School through its Movie Night for a Cause project. Proceeds from the two movie nights helped fund Education in Motion – an educational field trip for students, attended by CWT volunteers – and the Feed a Hungry Mind feeding program for students. Before the start of the 2018 school year, we invited 75 students to our office and gave them 'Tools for School', consisting of art materials, school supplies and a hygiene kit. The 'tools' were gathered from our employees' in-kind donations.
- **Children's village of Mbigili, Tanzania:** for more than a decade, CWT employees in our German offices have given financial support to an orphaned child in a Tanzanian village. Through this relationship, they have now helped an HIV-positive girl complete her school education and mature into a young woman with a bright future.

We live...

...to secure future talent through the Global Travel and Tourism Partnership (GTTP)

We have supported GTTP for the last six years and our VP of Global Responsible Business sits on its Advisory Board.

We sponsor a program that trains primary and secondary-aged students in 14 countries on how to pursue a career in the travel and tourism industry. GTTP has had over two million graduates since 1996 and, in 2018, reached new horizons to support over 700,000 students. GTTP curriculum introduces our industry's basic structure through three in-depth courses: Passport to the World, Passport to Sustainability and Passport to Customer Service.

The Sustainability Competition originated in 2017 with a grant from the Carlson Family Foundation, and is an online competition promoting sustainable travel ideas. The 2018 first prize was shared by two students. One winning idea promotes sustainable practices at a school in rural Kenya, and the other a restaurant in Hong Kong where everything is linked to sustainability. Students presented their projects at the annual student-teacher research conference, which was sponsored by CWT and other Global Partners.



We act...

...to secure essential needs and provide support when an emergency hits

As well as tackling global education, we lend a helping hand to ensure basic human needs, including providing clothing, food, water, shelter and medical care, are met as part of our 3E strategy. With our global reach, we also seek to provide support when crises such as natural disasters or outbreaks of disease occur.

Providing support when disaster strikes

In the US, the Carlson Cares Employee Assistance Fund is available for those facing hardship as a result of unforeseen circumstances beyond their control. Started with seed funding from the Carlson Family Foundation, the fund is supported through employee contributions and direct donations from CWT (see p64 to read more about Carlson and the Foundation's activities in 2018).

Helping to provide essential needs

We ran numerous initiatives around the world in 2018 focused on providing essential needs. Some of these included:

- **Australia:** employees in our Melbourne office volunteered their time to raise money and awareness for the Cancer Council's 'Daffodil Day' in aid of cancer research, prevention, support services and advocacy.
- **Brazil:** more than 60 CWT team members from our São Paulo office participated in a park run to donate to a local NGO that cares for over 70 residents with intellectual disabilities. Our employees donated around 300 cleaning supplies to keep the NGO clean and running efficiently for its residents.
- **France:** during the annual holiday season party, colleagues were invited to participate in a winter clothes collection. The donations supported La Pièce Solidaire, which helps provide clothing for people with serious illnesses, physical or mental disabilities, the homeless or the severely disadvantaged.
- **The Netherlands:** employees participated in NLdoet– the biggest annual national volunteering event in the Netherlands. As part of the day, employees volunteered on projects of their choice, covering everything from making lunch for the elderly in a nursing home to supporting community gardening projects.
- **Singapore:** Rainbow Airlines is CWT Singapore's Responsible Business initiative. Each month a team member volunteers to push an airline trolley around the office loaded with snacks, beverages and airline merchandise to raise money for a charity of the volunteer's choice. The merchandise is supplied by airline partners and the money raised is donated to worthwhile causes throughout the year.
- **The US:** nearly 150 employees helped Habitat for Humanity build a home for a family in need. This was our eighth year of support for this program, as our employees continue to rush to fill these spots and provide a sense of stability that a home provides to these families.



We act...

...in partnership with Carlson

Carlson and the Carlson Family Foundation continued to provide strong support for many of CWT's community involvement projects in 2018, including matched giving contributions, anti-trafficking partnerships and our first-ever global Employee Choice Grants.

Anti-trafficking initiatives and support

The fight to stop and prevent human trafficking and sexual exploitation around the world has long been a priority for Carlson, and one that is increasing in prominence at CWT. A leader in this fight, Carlson was, among other things, the first major North American company to sign ECPAT's Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (**The Code**), a founding member of the **Global Coalition Against Human Trafficking (gBCAT)**, and a signatory to the **United Nations Global Compact**.

CWT is proud to continue this leadership, and has continued to make great strides to expand awareness and activity among its employees across the globe. Grants from the Carlson Family Foundation in 2018 and projects supported included:

- **ECPAT (End Child Prostitution, Child Pornography and Trafficking)** was provided funding from the Carlson Family Foundation to develop employee training modules specific to travel management and meeting and events companies worldwide. CWT experts provided guidance in the development of this first-of-its-kind training for travel professionals to better identify and stop human trafficking.
- **World Childhood Foundation:** the Carlson Family Foundation has long-partnered with the World Childhood Foundation to support local agencies that work with homeless youth and those at-risk of being homeless to prevent trafficking. Most recently, the Carlson Family Foundation supported the development and launch of the '**Out of the Shadows Index**', a ground-breaking research and benchmarking tool to measure countries' response to child sexual exploitation (see p45).
- **Thorn** fills a critical gap in anti-trafficking operations by developing and providing tools to law enforcement to assist in rescuing sex trafficking victims and arresting perpetrators. In 2018, this included continued grant support from the Carlson Family Foundation.
- **Orphaned Starfish Foundation (OSF)** is another grantee receiving support from CWT employees. OSF works in 27 countries to help orphans, victims of trafficking and at-risk youth to break the cycle of abuse and poverty through computer-based education, job training and job placement assistance. CWT continues to grow local partnerships and volunteerism with several OSF supported organizations across the globe. CWT employees also made significant financial contributions through our 2018 community giving campaign.
- **Super Bowl LII** was held in Minneapolis, CWT's headquarter city in February 2018. Carlson and CWT joined more than 100 community leaders from business, law enforcement, government, and non-profit agencies on the Super Bowl LII Anti-Sex Trafficking Committee, where our Senior Director of Corporate Affairs served as co-chair on the business sub-committee. The Carlson Family Foundation was a critical patron for an anti-sex trafficking plan for the event – a plan that can also be replicated for future large-scale events. Additionally, CWT employees contributed significant volunteer hours with regional service partners such as **The Link**.



Community Involvement

Community Giving Campaign

In only its second year as a US-wide initiative, the 2018 Community Giving Campaign set new local and national records in CWT participation and funds contributed. This annual employee giving campaign also features on and off-site volunteer activities for employees across the country and is supported by matching grants from the Carlson Family Foundation.

With over 1,700 employees logging donations and volunteer hours, the 2018 campaign saw a 25% increase in CWT US employee participation over last year. This included a 20% increase in financial contributions and a 22% increase in individual donors contributing US\$1,000 or more. Because of our generous employees and the support of the Carlson Family Foundation, our communities received more than US\$525,000 in contributions.

Volunteerism once again played a major role in the Community Giving Campaign, as more than 500 employees donated their individual volunteer hours for the year, recording an extraordinary 25,000 hours of volunteerism to hundreds of nonprofits. Additionally, the final two weeks of the campaign featured our annual Habitat for Humanity build, in which nearly 150 employees assisted in constructing a home for a regional family in need.

Lastly, with support from the Carlson Family Foundation, this year's campaign featured a new global component to help celebrate the 80th anniversary of Carlson. These are the US\$80,000 in Employee Choice Grants mentioned previously, to support eight local charities in our worldwide regions with US\$10,000 grants.

Focus Area Grants

In addition to anti-sex trafficking (see p59), the Carlson Family Foundation also worked closely with CWT to support grantees in the areas of military and veterans, and workforce development. The following are examples of organizations that received these Focus Area Grants as well as significant support from CWT volunteers:

- **Soldiers Angels** provides aid and comfort to the men and women in the US military forces and their families. For many years, our employees have volunteered and provided donations through such activities as organizing and sending care packages for troops overseas and veterans in hospitals. In 2018, the Carlson Family Foundation once again accompanied this support with a significant grant.

- **The Mission Continues** is a nationwide organization that empowers veterans to apply their unique insight to community challenges. In addition to being a partner organization in the Community Giving Campaign, the Carlson Family Foundation awarded them a multi-year grant and was named a lead sponsor for service platoons in St. Paul and Washington DC. Multiple large-scale volunteer projects with CWT and CWT Sato employees took place in both cities, to the benefit of schools and nonprofits throughout the regions.
- **Student mentorship** continued in 2018, with CWT employee volunteers contributing to both the Big Brothers Big Sisters 'Beyond School Walls' program and Best Prep's eMentoring program. Both organizations are supported by the Carlson Family Foundation and are longstanding partners of CWT. This year, dozens of employees contributed hundreds of hours to support at-risk youth by providing mentoring, guidance and friendship through the programs.



Community Involvement

We said...



2020 Objectives

Further deploy globally and measure our impact in the 3E* fields of action.

* Education, Emergencies, Essential needs.

We did...



2018 Performance

- More than 100 3E initiatives organized by employees worldwide.
- Community Giving Campaign went global for the first time.



We will...



2019 Goals

- Strengthen alignments across all CWT regions for even greater impact.
- Further improve processes and measurement tools for deeper tracking of our involvement.



Appendix

Global Reporting Initiative (GRI) Table

GRI Standard	Disclosure	Location
Organizational profile		
GRI 102-1	Name of the organization	Front cover
GRI 102-2	Activities, brands, products, and services	About CWT – page 5
GRI 102-3	Location of headquarters	Online – Paris Minneapolis Singapore
GRI 102-4	Location of operations	Online – Office locations
GRI 102-5	Ownership and legal form	Online – Company ownership
GRI 102-6	Markets served	About CWT – page 5-7
GRI 102-7	Scale of the organization	About CWT – page 5-7
GRI 102-8	Information on employees and other workers	About CWT – page 5 Human Resources and Human Rights – page 28-39
GRI 102-9	Supply chain	Ethics and Business Behavior – page 22-23
GRI 102-10	Significant changes to the organization and its supply chain	About CWT – page 5-7 Ethics and Business Behavior – page 23
GRI 102-11	Precautionary Principle or approach	Responsible Products and Services – page 60
GRI 102-12	External initiatives	Responsible Business Strategy and Governance – page 11-15
GRI 102-13	Membership of associations	Responsible Business Strategy and Governance – page 11-15 Community Involvement – page 67-68

Appendix

GRI Standard	Disclosure	Location
Strategy		
GRI 102-14	Statement from senior decision-maker	Chair's statement – page 2 President & CEO's statement – page 3
GRI 102-15	Key impacts, risks, and opportunities	Responsible Business Strategy and Governance – page 8-9 We said/We did/We will – page 17, 26, 47, 56, 61, 69
Ethics and integrity		
GRI 102-16	Values, principles, standards, and norms of behavior	Ethics and Business Behavior – page 19-20
GRI 102-17	Mechanisms for advice and concerns about ethics	Ethics and Business Behavior – page 19-21
Governance		
GRI 102-18	Governance structure	Page 10, 19, 30
GRI 102-19	Delegating authority	Page 10, 19, 30
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	Responsible Business Strategy and Governance – page 10
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics	Responsible Business Strategy and Governance – page 7
GRI 102-22	Composition of the highest governance body and its committees	Online – our people
GRI 102-25	Conflicts of interest	Ethics and Business Behavior – page 20
GRI 102-26	Role of highest governance body in setting purpose, values, and strategy	Responsible Business Strategy and Governance – page 10
GRI 102-32	Highest governance body's role in sustainability reporting	Responsible Business Strategy and Governance – page 10

Appendix

Global Reporting Initiative (GRI) Table continued

GRI Standard	Disclosure	Location
Stakeholder engagement		
GRI 102-40	List of stakeholder groups	Responsible Business Strategy and Governance – page 7
GRI 102-41	Collective bargaining agreements	Human Resources and Human Rights – page 43
GRI 102-42	Identifying and selecting stakeholders	Responsible Business Strategy and Governance – page 7 Human Resources and Human Rights – page 38
GRI 102-43	Approach to stakeholder engagement	Responsible Business Strategy and Governance – page 7
GRI 102-44	Key topics and concerns raised	Responsible Business Strategy and Governance – page 7, 8, 9
Reporting practice		
GRI 102-45	Entities included in the consolidated financial statements	Online – Financial statements
GRI 102-46	Defining report content and topic boundaries	Responsible Business Strategy and Governance – page 7
GRI 102-47	List of material topics	Responsible Business Strategy and Governance – page 8, 9
GRI 102-48	Restatements of information	About CWT – page 4,5
GRI 102-49	Changes in the reporting period	No significant changes from previous reporting periods
GRI 102-50	Reporting period	About CWT – page 5
GRI 102-51	Date of most recent report	About CWT – page 5
GRI 102-52	Reporting cycle	About CWT – page 5
GRI 102-53	Contact point for questions regarding the report	responsiblebusiness@carlsonwagonlit.com
GRI 102-54	Claims of reporting in accordance with the GRI Standards	Responsible Business Strategy and Governance – page 11
GRI 102-55	GRI content index	Page 70-74
GRI 102-56	External assurance	None

Appendix

GRI Standard	Disclosure	Location
Economic		
GRI 205-1	Operations assessed for risks related to corruption	Ethics and Business Behavior – page 21
GRI 205-2	Communication and training about anti-corruption policies and procedures	Ethics and Business Behavior – page 20, 21 Human Resources and Human Rights – page 44
Environmental		
GRI 302-1	Energy consumption within the organization	Environment – page 54, 55
GRI 302-2	Energy consumption outside the organization	Environment – page 54, 55
GRI 305-1	Direct (Scope 1) GHG emissions	Environment – page 54
GRI 305-2	Energy indirect (Scope 2) GHG emissions	Environment – page 54
GRI 305-3	Other indirect (Scope 3) GHG emissions	Environment – page 54
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	Ethics and Business Behavior – page 22, 23

Appendix

Global Reporting Initiative (GRI) Table continued

GRI Standard	Disclosure	Location
Social		
GRI 403-1	Workers representation in management – worker health and safety committees	Human Resources and Human Rights – page 39, 40, 41
GRI 404-1	Average hours of training per year per employee	Human Resources and Human Rights – page 36, 37
GRI 404-2	Programs for upgrading employee skills and transition assistance programs	Human Resources and Human Rights – page 36, 37
GRI 405-1	Diversity of governance bodies and employees	Human Resources and Human Rights – page 31
GRI 408-1	Operations and suppliers at significant risk for incidents of child labor	Ethics and Business Behavior – page 22 Human Resources and Human Rights – page 42-46
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Ethics and Business Behavior – page 22 Human Resources and Human Rights – page 42-46
GRI 412-2	Employee training on human rights policies or procedures	Human Resources and Human Rights – page 42 Ethics and Business Behavior – page 20
GRI 413-1	Operations with local community engagement, impact assessments, and development programs	Community Involvement – page 62-69
GRI 414-1	New suppliers that were screened using social criteria	Ethics and Business Behavior – page 22-23 Human Resources and Human Rights – page 44-46

Appendix

United Nations Global Compact (UNGC) Ten Principles

CWT signed the UN Global Compact in 2012, formally pledging to align its operations and strategies to the Ten Principles, and signaling the company's determination to further operate in a way that nurtures respect, dignity and sustainability.

UNGC Ten Principles	Principles	CWT RB Chapters	Pages
Human Rights	<p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights</p> <p>Principle 2: Make sure that they are not complicit in human rights abuses</p>	Human Resources and Human Rights	Page 27-47
Labor Principles	<p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining</p> <p>Principle 4: The elimination of all forms of forced and compulsory labor</p> <p>Principle 5: The effective abolition of child labor</p> <p>Principle 6: The elimination of discrimination in respect of employment and occupation</p>	Human Resources and Human Rights Ethics and Business Behavior	Page 27-47 Page 18-26
Environment Principles	<p>Principle 7: Businesses should support a precautionary approach to environmental challenges</p> <p>Principle 8: Undertake initiatives to promote greater environmental responsibility</p> <p>Principle 9: Encourage the development and diffusion of environmentally friendly technologies</p>	Environment Responsible Products and Services	Page 48-56 Page 57-61
Anti-Corruption Principle	<p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery</p>	Ethics and Business Behavior	Page 18-26



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