

# MODERN SLAVERY STATEMENT

## Modern Slavery Act Statement 2021/22

Modern slavery is a form of organised crime in which victims are treated as commodities and exploited for criminal gain. The victims of modern slavery come from all walks of life and can be found all over the globe.

The most recent Global Slavery Index (2018) estimates that 40 million people globally are victims of modern slavery.

Reed & Mackay is committed to undertaking due care and diligence to ensure that it conducts its business in accordance with its obligations under Modern Slavery legislation in the territories in which it operates<sup>1</sup>. We recognise that in addition to a legal obligation we have an ethical responsibility to support this legislation and endeavour to ensure there are no Modern Slavery risks within our own business or our supply chains.

In that spirit, we publish this annual Modern Slavery Statement, made in compliance with legislation, in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it.

## Our Company Structure & Vision

Reed & Mackay was established in 1962 expanding into strategic travel management in 1988, with a view to specialising in travel management services for the professional services sector. In May 2021 we became a TripActions Company and continue to operate as a stand-alone business. The below trading entities are subsidiaries of Reed & Mackay Holdings Limited -

- UK - Reed & Mackay Travel Limited
- USA - Reed & Mackay Travel Inc
- UAE (Dubai) - Reed & Mackay Travel Management Services FZE
- Australia - Reed & Mackay Travel Australia Pty Limited
- Singapore - Reed & Mackay Travel Singapore Pte Limited
- France - Frequent Flyer Travel Paris SAS
- Germany - Reed & Mackay Deutschland GmbH
- Canada - Reed & Mackay Canada Inc
- India - Reed & Mackay Travel India Private Limited
- New Zealand - Reed & Mackay Travel New Zealand Limited

At Reed & Mackay, and as part of the TripActions Group, we power the in-person connections that move people, ideas and businesses forward.

At Reed & Mackay it is our vision to *be the most valued, recommended and entrepreneurial travel, advisory and events business in the world*. We recognise the role of travel in our clients' success and its critical place in their supply chain from a reputational standpoint.

<sup>1</sup> UK - Modern Slavery Act 2015 (MSA 2015); Australia - Modern Slavery Act 2018 (Cth) (Act)

Our values underpin the behaviours that make us who we are; a business with integrity and a business that cares.

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|  <p><b>Passion</b></p> <p>We love what we do. We are energetic, take responsibility and achieve extraordinary results. We inspire customers with our entrepreneurial spirit and are passionate about our exceptional levels of service.</p> |  <p><b>Care</b></p> <p>We treat others as we would want to be treated ourselves, demonstrating compassion and empathy, going out of our way to promote equal opportunity and protect the well-being of colleagues.</p> |
|  <p><b>Entrepreneurial Spirit</b></p> <p>We're not afraid to be different. We don't follow. We're dynamic, creative and we stand out from the crowd. We communicate without criticism and aim to change people's lives for the better.</p>  |  <p><b>Fun</b></p> <p>We enjoy what we do. We share stories and successes, engage with each other, laugh, and avoid taking ourselves too seriously. We keep smiling even when facing adversity.</p>                    |

In 2021, Reed & Mackay committed to the UN Global Compact to meet principles across the following four categories:

- Human Rights
- Labour
- Environment
- Anti-Corruption

By participating in the UN Global Compact, we are committing to create a culture of integrity across our business from strategy to operations, specifically:

- Operating responsibly, in alignment with universal sustainability principles
- Taking actions that support the society around us
- Committing to the effort from our organization's highest level, pushing sustainability deep into our DNA
- Reporting annually on our ongoing efforts
- Engaging locally where we have a presence

With the above in mind, we work with likeminded partners and suppliers whose values and ethos align with our own.

## Governance

We have a Modern Slavery and Human Trafficking Policy which requires all staff to promptly report any concerns or suspicions of malpractice, and to avoid any activity that might lead to, or suggest, a breach of the policy. The policy is made available to all staff via the company intranet and to third parties on request. Failure to comply with the policy is investigated and may be treated as a disciplinary offence. We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

We continue to make sure that our employees are aware of Modern Slavery legislation, of the definitions of slavery and human trafficking and that they know what to do should they suspect a case of slavery or human trafficking. Modern Slavery awareness is included in our employee induction and our mandatory annual compliance training.

In line with our ISO certifications, we have a programme of regular internal and external audits to check compliance with all our policies and procedures.

## Our Employees

There are many aspects of Reed & Mackay's culture which go to make up our unique environment. Maintaining and strengthening the culture is part of our everyday working life and underpins much of our corporate ethos. We strive to create an enjoyable and safe working environment where staff can excel. We recognise our staff as our most important asset and employee welfare is a key objective that is linked to the company's unique culture and values. We do not tolerate discrimination, abuse or harassment of any kind and we expect the same of our suppliers. Our Employee Handbook identifies codes of conduct related to Health & Safety, Equality, Dignity at Work and Ethical Conduct, and there are management approved policies for Health & Safety, Equality & Diversity and Corporate Social Responsibility. All staff must adhere to our codes of conduct and company policies.

Our Recruitment policy ensures a fair and ethical practice for all external hires and internal promotions. This includes obtaining documented proof of an individual's right to work in the country in which they will be employed. Should a concern arise we operate an open-door communication policy and provide a protected disclosure facility should a staff member require confidentiality.

As a responsible employer Reed & Mackay offers competitive pay and benefits in all our markets, always paying at least the minimum wage rate applicable under local laws. We promote employee wellbeing through a range of benefits<sup>2</sup> including, an Employee Assistance Programme; Private Health Insurance; Group Income Protection; Short & Long-Term Disability Insurance; Pension; flexible Annual Leave allowance exceeding statutory entitlement; accommodation of flexible working requests.

Reed & Mackay is fully committed to the development of a diverse workforce which reflects the communities we work in. We provide equal opportunities for all employees and prospective employees through recruitment, training and promotions. Our Equality & Diversity Policy sets out our zero tolerance towards any form of harassment or bullying. We provide reasonable adjustments to ensure anyone with a disability has access to equal opportunities to develop their career. Our mix of office workers and home workers is an acknowledgement that it is not always possible for employees to be office based. This inclusivity ensures we attract and retain the best employees.

Reed & Mackay nominates an official charity each year to support through various fundraising activities that engage our employees, and our 'Day for a Day' policy allows employees to take a day of paid leave each year to volunteer with a charity or organisation which promotes positive social or environmental benefits.

## Our Supply Chain

We only work with reputable suppliers and endeavour to ensure our supply chain is free from slave labour. We will not work with a supplier before researching their business and we ensure they are appropriately licensed to carry out the service they are providing. Spend commitments are subject to internal Purchase Order approval and agreed legal contracts, and we do not pay cash for services. Our Anti-Bribery & Anti-Corruption Policy prohibits making, offering or accepting bribes, facilitation payments or kickbacks; and also prohibits making payments or giving anything of value in order to obtain or retain contracts or business, or to secure any other improper business advantage, with any entity or individual.

Prior to approval, suppliers undergo a due diligence process across a range of topics, including Modern Slavery/Child Labour, Ethical Business Practices, Equal Opportunities and Diversity, and in order to do business with Reed & Mackay all suppliers are required to comply with our Supplier Operating Principles on an on-going basis. These principles include adherence to all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions and set expectations around the adoption of standards regarding forced and compulsory labour; child labour; health, safety and hygiene; abuse and discipline; freedom of association and employee representation; remuneration; employment terms; working hours; equality of treatment; and community impact. Suppliers are monitored on an appropriate periodic basis

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<sup>2</sup> Precise benefits are dependent on the location of employees

through our supplier review process.

Our Partner Operating Principles set the same expectations on our global partner network. In addition to this, our contractual agreements with partners require their compliance with Modern Slavery legislation, and that they take reasonable steps to ensure that their business and supply chain remains free of slavery, servitude, human trafficking, forced or compulsory labour, and/or child labour.

We visit all our partner offices, and where appropriate and practical, we visit our suppliers. This helps us become familiar with how they operate and the safeguards they have in place to reduce, remove and prevent the use of slave or forced labour in their organisations and in their supply chains.

Our Commercial and Partner Solutions department maintain close relationships with the travel industry service providers who supply air travel, ground travel, hotels and ancillary services to our clients. Understanding the business practices of these service providers helps ensure that our clients make appropriate choices about their travel.

Our standard client contract includes a mutual clause on compliance with Modern Slavery legislation and prevention of Modern Slavery in the business and supply chain.

Our Corporate Risk Management Framework specifically identifies “Supply Chain” as a category of risk and, as such, risks within this category, including any related to Modern Slavery, are regularly reviewed and mitigated. Risks previously identified in this area have resulted in the development of our Supplier and Partner Operating Principles, and enhancements to both our supplier due diligence and our supplier review process.

### Our Recent Activities & Future Plans

Our Modern Slavery & Human Trafficking Policy has been strengthened to align to our commitment to the UNGC Guiding principles for Human Rights.

Our employee inductions and mandatory compliance training are both undergoing review and update.

In 2021 we made our first annual submission to the Ecovadis sustainability rating platform, attaining a “Bronze” rating (top 13% of travel industry sector) and, having published our first Sustainability & Responsible Business Report in February 2022 we aim to improve our rating to “Silver” with our 2022 submission.

We are working on enhancing our diversity reporting by improving the tracking of minority group statistics and gender balance throughout the business; and are developing discrimination and harassment training for all staff. We have increased our ratio of home workers to office workers and launched an Agile Working Policy in recognition that such working practices help support employees to carry out their role, whilst at the same time enabling them to balance work and life demands.

To reinforce our on-going commitment to our employees and their wellbeing our HR department have developed objectives in the areas of Human Rights; Talent Development; Wellbeing and Employee Engagement. More information on these can be found in our [Sustainability & Responsible Business Report](#).

In 2021 we trained a number of employees as Mental Health First Aiders and published a set of employee mental health guidelines and information to raise awareness of mental health issues are encourage our people to take personal actions and to look after each other. We are looking to launch additional mental wellbeing support through our private health provider.

We are in the process of reviewing our recruitment policy and our employee background checks to ensure a consistent approach across the globe, and will enhance both of these in 2022.

Reed & Mackay is in the process of refreshing its Corporate Social Responsibility programme.

We strengthened our Anti-Bribery and Anti-Corruption risk assessment and as a result updated both our Anti-Bribery & Anti-Corruption Policy and our Supplier Operating Principles to include clauses covering Conflicts of Interest, Politically Exposed Persons, Sanctions and Anti-Competitive Activity.

We have also strengthened the link between the principles and our supplier on-boarding process.

We are undertaking a review of our Partner due diligence and Partner Operating Principles and our International Development department are developing a set of training materials, including Modern Slavery training, for our partner network.

Our Modern Slavery risk assessment process will be developed in due course to reflect recent changes in the business, the travel industry and global Modern Slavery risk profile.

More details on these and any other relevant activities will be shared in future Modern Slavery statements as appropriate.

Reed & Mackay maintain a commitment to conducting its business in an ethical way and preventing Modern Slavery and will continue to operate a zero-tolerance policy in this regard.

This statement is reviewed and updated annually. Reed & Mackay's financial year runs from 1<sup>st</sup> February - 31<sup>st</sup> January and, as required, the organisation publishes its Modern Slavery statement within 6 months of the financial year end.

In accordance with Modern Slavery legislation this statement has detailed the actions taken during the financial year ending 2022.

Approved by Fred Stratford, Group CEO, Reed & Mackay, 27th July 2022.