

Think. Act. Live.

Annual Responsible Business Report

June 2018 – Detailed edition



What's inside?

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Welcome to our Annual Responsible Business Report June 2018 – Detailed edition.

This is our sixth annual report detailing our Responsible Business (RB) policies, performance and progress across our seven RB domains. It includes all RB activities during the 2017 calendar year, and has been written in accordance with the Global Reporting Initiative (GRI) Standards (core option).

The scope of this report covers all Responsible Business activities across wholly-owned Carlson Wagonlit Travel (CWT) businesses and joint ventures. This includes business travel and business activities throughout our four specialized services: *Energy, Resources & Marine, Meetings & Events, Solutions Group* and *RoomIt by CWT*.

For a condensed summary of key performance highlights, case studies and overview of progress against our long-term commitments, download our Annual Responsible Business Report June 2018 – Highlights please click the link below:



Thank you to the numerous people who helped create this report; the content owners, the entire RB Network, and all CWT employees for bringing Responsible Business to life in our organization.

Contents



Responsible Business Strategy and Governance

We think and we act ... across seven Responsible Business domains	6-7
– How we identify our material issues	7
We act ... by making long-term commitments	8
– Our 2020 commitments	8
We act ... through robust governance and transparent policy	10
– Our governance framework	10
We act ... to apply widely-recognized global principles and standards	11
– United Nations Global Compact (UNGC)	11
– Global Reporting Initiative (GRI)	11
– CDP	11
– ISO Standards (ISO 26000, ISO 14001)	11
– EcoVadis	11
– International Labor Organization (ILO)	11
– Green Office Certification	11
– United Nations Sustainable Development Goals (SDGs)	12
We said ... We did ... We will ...	15
We live ...	
– to improve governance through our global taskforces	10



Ethics & Business Behavior

We think and we act and integrity	16-17
– Ethics and Compliance governance	17
– Code of Business Ethics and Conduct	17
– Compliance Policy Manual	18
– Training on the Code	19
– Fighting bribery and corruption	19
We act ... to build a responsible supply chain	20
– Our Responsible Supplier Code	20
– Supplier sustainability assessments	20
We act ... to protect customers and their information	21
– Information Security and Data Privacy governance	21
– Our policies and standards	21
– 2017 Highlights	22
– Raising awareness – inside and outside CWT	22
We said ... We did ... We will ...	23
We live ...	
– to uphold ethical behavior through the Ethics Helpline	19
– to provide training and awareness on the Responsible Supplier Code	20
– to prevent data security incidents	22



Human Resources and Human Rights

We think and we act ... to enable employees be 100% themselves at work	24-25
– Diversity and inclusion governance	25
We act ... to promote diversity and inclusion at global and local levels	26
– Our stance on discrimination and harassment	26
– Promoting equal rights (gender, ethnicity, disability, sexual orientation, age)	26
– Examples of local initiatives to promote diversity and inclusion	28
We act ... to nurture and develop talent	29
– Training and development	29
– Performance development	29
– Recruitment	29
We act ... to value and recognize talent	30
– Recognizing strong performance	30
We act ... on employee feedback	31
– Pulse survey purpose and topics	31
– Face-to-face dialog	31
– Our social intranet	31
– Travel Counselor feedback	31

We act ... to create safe, healthy workplaces	32
– Health and safety governance	32
– Creating a safe and secure place to work	32
– Global commitment; local implementation	32
– Training and awareness	33
– Working conditions	33
We act ... to uphold Human Rights and provide decent work	34
– Our position on Anti-Slavery and human trafficking	34
– Our policies and procedures	35
– Actions to fight human trafficking	36
– Ensuring fair labor practices	37
We said ... We did ... We will ...	38
We live ...	
– to support the UN Women’s Empowerment Principles	26
– to celebrate International Women’s Day	27
– to support the UN Cultural Diversity Day for Dialog and Development	27
– to provide safe travel for our employees	32
– to promote workplace health	33
– to combat human trafficking	35

Contents



Environment

We think and we act ... to protect our planet	39-40
We act ... to measure, report and reduce emissions	41
– Our 2017 carbon footprint (by Scope)	41
– Reducing our carbon footprint	42
We act ... to create an environmentally-responsible culture	43
– Environmental Awareness Week	43
– Raising awareness with stakeholders	43
We act ... to promote global and local environmental actions	44
– Promoting responsible offices	44
– Encouraging waste management and recycling	44
– Offsetting our emissions	45
– Encouraging employee-led environmental action	45
We said ... We did ... We will ...	46
We live ...	
– to enhance our greenhouse gas emissions reporting	42
– to encourage our employees to commute responsibly	43
– to reduce paper usage	44
– to improve lives through carbon offsetting	45



Responsible Products and Services

We think and we act ... to offer safe travel experiences	47-48
– Products that inform and connect	48
– Always improving the customer experience	49
We act ... to maintain business-as-usual, whatever happens	50
– Risk Management Governance	50
– Business continuity planning	50
We said ... We did ... We will ...	51
We live ...	
– to improve travel safety	48
– to raise awareness of child exploitation	49
– to encourage employee innovation	49
– to keep teams safe when disaster strikes	50



Community Involvement

We think and we act ... to make a difference in the communities where we live and work	52-53
– Tools to promote 3E activities	54
We act ... on education	55
We act ... to secure essential needs, and provide support when emergency hits	56
– Providing support when disaster strikes	56
– Helping to provide essential needs	56
We act ... in partnership with Carlson	57
– Anti-trafficking initiatives and support	57
– Employee giving campaign	58
– Focus Area Grants	58
We said ... We did ... We will ...	59
We live ...	
– to celebrate 3E initiatives around the world	54
– to secure future talent through the Global Travel and Tourism Partnership	55

Appendix

Global Reporting Initiative (GRI) Table	60
United Nations Global Compact (UNGC) Ten Principles Table	63

“CWT is honored to be a signatory to the United Nations Global Compact. Our work is guided by its Ten Principles on the environment, labor, human rights and combating corruption. We report annually on our programs, which are closely aligned with these principles.”

Diana L. Nelson,
Chair of Carlson’s Board

“Since 2012, CWT has embraced the Ten Principles of the United Nations Global Compact, which alongside the Sustainable Development Goals, have helped inspire our 2020 Responsible Business objectives.”

Kurt Ekert,
President & CEO, CWT



About CWT

Companies and governments rely on us to keep their people connected. We provide their travelers with a consumer-grade travel experience, combining innovative technology with our vast experience. Every day, we look after enough travelers to fill over 260 Boeing 787s and around 100,000 hotel rooms, and handle more than 105 corporate events.

Our offer blends innovative technology with the expertise of over 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 97% and, in 2017, we posted total transaction volume of just over US\$23 billion.

Spanning around 150 countries, our corporate travel management business is complemented by four specialized services, all of which delivered notable successes during 2017:

CWT Energy, Resources & Marine: delivers specific travel needs for clients operating in the oil and gas, mining, maritime and alternative energies industries.

 www.cwt-energy-resources-marine.com

CWT Meetings & Events: helps clients with creating and managing meetings and events while enabling them to control and reduce their related expenditures. In 2017 the team organized almost 38,500 meetings and events – around 105 each day.

 www.cwt-meetings-events.com

CWT Solutions Group: helps deliver travel procurement efficiencies through innovations in supplier sourcing, data intelligence, traveler management and mobility. In 2017 notable developments included the launch of a Mandarin version of *CWT AnalytIQs*, the proprietary business intelligence and reporting product for travel managers.

 www.cwt-solutions-group.com

RoomIt by CWT: provides access to hotel rooms, rates, amenities, and personalized promotions, while helping organizations control their budget and improve travel oversight. Following its formal launch in July 2017, RoomIt has already gained clients independent of CWT's business travel offering.

 www.carlsonwagonlit.com/roomit/en/home

Our vision is to be the world leader in digital business travel, hotel distribution and event management.

The Digital Difference

Our new corporate strategy is about creating an unbeatable customer experience and offering increasing value to our clients and partners. This means easy-to-use solutions and best-in-market hotel and data offerings. To deliver, we are increasing our investments in technology and people in areas such as our digital platform, hotels and data.

Our strategy focuses on the three priorities:

- delivering consumer-grade traveler experiences;
- optimizing travel programs; and
- bringing smart innovation to corporate travel.

Driven by a culture of performance, innovation and empowerment

2017 was the first full year of our Digital Difference strategy. As we adapted our business to the new dynamics of business travel, we wanted to make sure that the foundations of our culture were strong. After surveying over 2,000 employees and holding 19 focus groups and nearly 50 one-to-one interviews over the course of several months, we introduced four refreshed core values in 2017:

- **Integrity:** we do what is right for our customers, suppliers, co-workers, local communities, and the planet.
- **Leadership:** every one of us, regardless of role, contributes towards our success, takes ownership, and is a responsible and empowered leader.
- **Caring:** we care about each other and our customers. We make every decision with the customer in mind. We celebrate diversity, are inclusive, and stand as one team.
- **Passion:** we are energized by what we do and we deliver results by being bold, learning every day, taking risks, and daring to win.

These values underpin all of our activities and are embedded in the recruitment, onboarding and personal development of each employee. The refreshed values were well received by employees and are a source of ongoing dialog: the question 'which value resonates the most with you and why?' was the most viewed and commented content on our social intranet in 2017.



Responsible Business Strategy and Governance

We think ...

"I am confident that the commitment and passion of our people will help us achieve our Responsible Business ambitions, and add real value to our business."

Françoise Grumberg, Vice President, Global Responsible Business



We act ...

... across seven Responsible Business domains

Our approach to Responsible Business (RB) is closely aligned to our vision and to our Digital Difference strategy. It covers seven domains and includes 2020 targets that focus on the areas of most importance to our business and our stakeholders.

In recent years, we have seen a growing interest from clients and other stakeholders in sustainability, and we use their feedback to guide our approach and inform our strategy. Our substantial efforts have enabled us to make strong progress and adopt a leadership position in corporate social responsibility.

In April 2018, we were rated Gold for the second 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 Responsible Business domains form the basis of our program:

1. **Responsible Business Governance:** how we implement the RB strategy day-to-day.
2. **Ethics & 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.

How we identify our material issues

By assessing challenges from the point of view of employees, clients, external assessors, regulators, and global sustainability partners, among others, we gain an insight into what matters most, and we can map our findings by their importance to our stakeholders and to our business. In doing so, we create a picture of material issues that we need to address in our global RB strategy and governance.

To understand which sustainability topics to prioritize, our last materiality assessment identified 20 topics that were grouped into the seven RB domains listed on this page. The assessment comprised three key steps:

1. **Identify the relevant RB issues:** we analyzed a range of stakeholder perspectives from sustainability experts, regulatory guidelines and legislation, global initiatives such as the United Nations Sustainable Development Goals, the United Nations Global Compact's 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 engaged with key stakeholders to prioritize them. Feedback mechanisms varied 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:** for the issues deemed most important to internal and external stakeholders, we map them against their importance to our business activities. The outcome of this final step is a list of material issues.



We act by making long-term commitments

To help us continually monitor, improve and sustain our impact over the long term, we've set Responsible Business commitments to 2020. Each is aligned to a domain and supported by objectives.

RB domain	Priority	Long-term commitment	2020 objectives
Responsible Business Governance	Global Responsible Business Governance	Ensure progress transparency	1. Assess our Living Responsible Business maturity and performance at global and local levels on an annual basis
	Page 10	Integrate Responsible Business into our activities	2. Deploy the Living Responsible Business program in functions and locations globally
Ethics & Business Behavior	Business Ethics and Compliance	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	3. Further engage all employees and CWT partners through a global multi-year ethics training and communication program
	Page 17	Spread the word to our key stakeholders about our ethics and zero-tolerance approach	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
	Privacy and Data Protection	Maintain a secure business environment for a global data and privacy protection program	5. Continue protecting employee and client data through leading-edge data privacy and information security policies and practices, while continually developing expertise throughout the organization
Page 21			



RB domain	Priority	Long-term commitment	2020 objectives
Human Resources and Human Rights	Diversity and inclusion <u>Page 25</u>	Leverage diversity as one of CWT's major assets	6. Deployment of our global diversity and inclusion strategy through regional diversity and inclusion committees 7. Non-discrimination training of all recruiters and managers
	Employee Engagement <u>Page 31</u>	Cultivate a highly engaged workforce	8. Reach the level of best-performing companies while developing leaders to enhance employee engagement
	Human Capital Development <u>Page 29</u>	Establish workforce readiness to deliver against future business needs	9. Ensure delivery against future business needs by developing and selecting the right talent for the future and driving a culture of innovation
Environment	Energy and Carbon Management <u>Page 40</u>	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 <u>Page 48</u>	Contribute to our clients' Corporate Social Responsibility (CSR)/ Responsible Business ambitions and promote sustainability
Business Continuity <u>Page 50</u>		Ensure a robust Global Business Continuity Management system Establish a best-in-class crisis management approach	15. Expand the scope of an ISO 22301-aligned Business Continuity Management system to include Crisis Management, Business Continuity Planning and Disaster Recovery 16. Become the reference in terms of crisis management in the travel industry
Community Involvement	Corporate Community Involvement <u>Page 53</u>	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 **robust governance** and transparent policy

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

Global governance for Responsible Business 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. The VP of Global Responsible Business also updates the Board annually on Responsible Business plans and activities.

The RB Network totals 80 people and is composed of the Global RB Team, RB Subject Matter Experts, RB Ambassadors and RB Country Correspondents. It is wide-reaching and diverse, spanning 35 countries and including members from nearly every function within CWT. The RB Network supports projects such as:

- Carbon Offsetting
- Community Involvement
- Ethics and Compliance
- Environmental Performance
- Data Protection
- Diversity and inclusion
- Real Estate
- Responsible Products and Services
- Responsible Purchasing
- Talent Management



Executive Leadership Team

Chaired by the President & CEO, the Executive Leadership Team has oversight of CWT's RB strategy, supports the overall delivery of the RB program and sponsors key RB 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 and whose missions are to advance and cascade CWT's Responsible Business ambition, 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 improve governance through our global taskforces
In 2017 we launched two new global taskforces on diversity and inclusion and anti-human trafficking. Their purpose is to define priorities, ensure alignment and set objectives. Led by our VP of Global Responsible Business, the taskforces are comprised of passionate CWT employees and select members of our Executive Leadership Team. Through collaboration and regular meetings, the teams share their expertise and ideas to implement best-practice strategies that improve CWT's overall governance and performance in these important areas.



We act to apply widely-recognized global principles and standards

We align our approach to widely-recognized international principles and standards. In doing so, we are confident that 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.

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 [page 12](#)). Our United Nations Global Compact correspondence table can be found on [page 63](#).

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 [page 60](#) 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. You can find our environmental data on [page 41](#).

ISO Standards (ISO 26000, ISO 14001)

ISO 26000 is the international standard that serves as a reference for companies to effectively 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 2015), all offices in Spain (recertified 2016), and one site in Germany (certified in 2017). See [page 44](#).

EcoVadis

This environmental and social performance rating agency assesses over 25,000 businesses against 21 CSR criteria covering environment, labor, fair business and sustainable procurement. In April 2018, we were rated Gold for Corporate Social Responsibility (CSR) for a second successive year, placing us in the top 1% of all companies evaluated worldwide by EcoVadis both within our industry and across all industries. We were also rated in the top 1% for Fair Business Practices and Ethics & Compliance.

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 Certification

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 (see [page 44](#)).



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 society) 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 can best address. As well as listing the specific actions we have done to target these in 2017 below, icons are featured throughout the report to show where we have targeted specific goals across our domains.



Sustainable Development Goals and Targets



SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

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.

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.



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.

Our contribution in 2017

Beyond our focus on providing support in Emergencies and Essential needs, our 3E community involvement strategy seeks to promote Educational projects through teaching, training and research.

Obtaining a quality education is the foundation to improving people's lives, which is why we continued to run several educational initiatives in communities around the world in 2017.

See [pages 53, 55](#).

We promote gender equality and equal opportunities for all through our own actions, and in partnership with our stakeholders. In 2017 we created a new global diversity and inclusion taskforce comprised of passionate individuals from around the organization.

As well as supporting global events and initiatives such as International Women's Day, we also put in place measures to boost gender equality in the workplace. This included becoming a signatory to the UN Women's Empowerment Principles on International Women's Day in 2018.

See [pages 25, 26, 34, 57](#).

The path ahead

Through our 3E community involvement strategy, we will continue to support the transfer of knowledge and skills from one generation to the next.

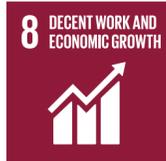
As part of our business activities, we will also raise awareness of key topics such as Human Rights, ethics and the environment among our employees through training and development opportunities.

Our diversity and inclusion taskforce will focus on putting in place measures to further promote gender equality moving forward.

Our efforts will include providing non-discrimination training for recruiters and managers, as well as unconscious bias training for employees in 2018.



Sustainable Development Goals and Targets



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.



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.

Our contribution in 2017

Decent work and economic growth are key pillars to global prosperity. We aim to provide quality employment and contribute to economic growth in the countries in which we operate through our Human Resources and Human Rights efforts and business performance.

We comply with the International Labor Organization (ILO) Fundamental Principles and we respect the Universal Declaration of Human Rights as set out in our Code of Conduct.

In 2017 we created two new global taskforces on Diversity and Inclusion and anti-human trafficking to take further action on these topics.

See [pages 25, 26, 32, 34, 57](#).

All of us at CWT must hold ourselves and our colleagues accountable to CWT's high standards of conduct, and must maintain a zero tolerance stance to any forms of discrimination or harassment.

Our Human Resources and Legal and Compliance teams run non-discrimination campaigns for all employees through our social intranet. This year's campaign included information on how to report cases of workplace harassment.

See [pages 17, 26](#).

The path ahead

We will continue to put in place measures to promote equal and fair employment opportunities for all.

Our anti-human trafficking taskforce will roll out strategies and put in place initiatives to fight this crime. This will include continuing to add travel alerts in itineraries to destinations where there is a prevalence of sex trafficking.

Evaluating and further reinforcing our internal Human Resources processes to ensure diversity and inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status, will remain a key focus in the future.



Sustainable Development Goals and Targets



SDG 13: Take urgent action to combat climate change and its impacts

Target 13.2

Integrate climate change measures into national policies, strategies and planning.

Target 13.3

Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.



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

Target 16.2

End abuse, exploitation, trafficking and all forms of violence against and torture of children.

Target 16.5

Substantially reduce corruption and bribery in all their forms.

Our contribution in 2017

We extended our environmental reporting campaign in 2017 to improve how we calculate our emissions and raise advocacy through our Environmental Awareness Week.

We also continued to encourage local and global environmental actions such as promoting environmentally-friendly offices, encouraging waste management and recycling and offsetting emissions from key events.

See [pages 40, 41, 43](#).

Our Code of Ethics states our zero-tolerance stance on bribery and corruption, and that we adhere to all local and regional regulations required.

In 2017 we ramped up efforts to tackle the challenges of human trafficking. As well as creating a dedicated anti-human trafficking taskforce, we continued to contribute to charities, speak at events and global conferences to raise awareness.

See [pages 17, 34, 57](#).

The path ahead

Promoting an environmentally-conscious culture through awareness campaigns and targeted initiatives will remain a focus.

Efforts will also continue to strengthen environmental reporting processes and further integrating environmental considerations to reduce our global footprint.

We continue to uphold our zero-tolerance stance on bribery and corruption. Our employees will carry on following annual training on our Code of Ethics.

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.



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 ...

2017 performance



Conducted a global reporting campaign across our network and main internal stakeholders to assess progress.



Worked with our Responsible Business Ambassadors to deploy the RB program in their specific functions and regions.

We also partnered with members of the Executive Leadership Team to sponsor our diversity and inclusion and anti-human trafficking initiatives.



We will ...

2018 goals

Further improve our global processes for gathering information and measuring progress across all geographies and functions.

Further reinforce partnerships with functions, to help them embed RB in their daily activities.





Ethics & Business Behavior

We think ...

“Even with the best policies, protocols and systems in place, a culture of integrity is ultimately about behaviors – therefore we link up closely with Human Resources when delivering our program of ethics training.”

Lauren Aste, Chief Legal Officer & General Counsel



We act with ethics and integrity



At CWT, we pride ourselves on our reputation as a world-class company operating with the highest standards of ethical conduct. We have built a culture that earns trust and protects the relationships we have with our stakeholders, including our clients and suppliers, by acting in an open and honest way at all times.

Through our internal ethics and compliance program, as well as external 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 hands-on training.

Ethics and Compliance governance

Ethics and Compliance is overseen at the highest levels of the company. Our Compliance Committee includes our President and CEO and other members of the Executive Leadership Team. Supporting the Committee is a team of global lawyers and support staff who oversee implementation, and report progress to the Vice President of Global Compliance.

The Global Compliance team is responsible for the deployment and updating of various policies and procedures and 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 our staff, topics include anti-bribery, anti-corruption, non-retaliation, gifts and entertainment, Human Rights and ethical behavior. We also run a dedicated sustainability assessments for our key non-trade* suppliers.

Code of Business Ethics and Conduct

Our Code of Business Ethics and Conduct helps to inform our day-to-day decision-making. It is the foundation of all CWT policies and encourages discussions on Ethics and Compliance among our people to empower us to handle 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 CWT 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 clearly and comprehensively.

In 2017, we carried out a detailed review of the Code to reflect the latest industry best practices and legislative trends. The process involved refreshing and updating the content from key internal groups (including Human Resources, Internal Audit, Information Security, Responsible Business, Legal and Compliance and Communications) as a first step. Beyond this, we also worked to simplify the language of the Code to make it more engaging and readable for our stakeholders. Our fully revised Code of Business Ethics and Conduct was launched on January 1, 2018, is in the public domain and can be downloaded [here](#).

* 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.



Compliance Policy Manual

With the aim of updating, clarifying and summarizing our compliance standards, we consolidated our numerous compliance policies into a single, easy-to-use Compliance Policy Manual in 2017.

The Compliance Policy Manual will help reduce the complexity of our processes by clearly articulating what is expected of our employees. It will also help us in our mission to empower individuals to make smart, informed decisions easily and to maintain accountability, all while supporting our Digital Difference strategy in a way that meets Ethical and Compliance standards.

Each of our employees, contractors and any other individual working for and representing CWT is expected to follow the policies contained within the Manual. The Manual was launched on January 1, 2018 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 embargos, 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

The laws and regulations of many countries where CWT operates prohibit money laundering in any form. 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.

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.

The CWT Compliance Team has in place an appropriate due diligence process allowing the business to be aligned with the expectations set out under this Manual. There is also a comprehensive compliance risk assessment process related to all compliance policies.

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



Training on the Code

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

Preventive measures implemented 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 2017. We also run Responsible Purchasing training for those working with our suppliers (see [page 20](#)).

Employees can access training sessions wherever and whenever as part of our online Learning Management System. Our Compliance team has access to metrics on how employees 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.

We live ...

... to uphold ethical behavior through the Ethics Helpline

Our policies and tools ensure that any instances of non-compliance are dealt with discreetly and fairly. This includes our confidential Ethics Helpline.

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 2017, the Compliance team created an investigation manual, identified and trained a group of internal investigators to further build skills internally and to standardize the conduct of investigations. CWT treats the reported information in a confidential manner to the extent reasonably possible and allowed by law and has 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.

Ethics Helpline information 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.

 [More information can be found here.](#)

Fighting bribery and corruption

As stated in our Code of Business Ethics and Conduct, we abide by all applicable laws, treaties, and regulations that forbid bribery and corruption. As part of 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 this means we will lose business as a result.

Our Corporate Audit function monitors existing and emerging risks around bribery and corruption. We perform a full risk assessment and risk ranking on an annual basis which allows us to identify any ethical issues that may arise in the company and to take the appropriate action. 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 sub-committee of the 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, our visa and passport providers are required to complete a third-party due diligence process and follow our visa and passport procedures document.

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 act to build a responsible supply chain

Our clients and stakeholders tell us how important it is to them that we work with suppliers who share our commitment to Responsible Business. 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.

At CWT, business opportunities will never take priority over our reputation, our Code and the law. That's why we launched our Responsible Purchasing Program in 2014. The program helps us to mitigate ethical, social and environmental risks in our supply chain.

It has two main areas of focus: the CWT Responsible Supplier Code, which defines standards we ask our non-trade suppliers* to meet and an annual Supplier Corporate Social Responsibility (CSR) Assessment Campaign for key non-trade suppliers.

Our Responsible Purchasing Program demonstrates our commitment to the United Nations Global Compact (UNGC) and to the ILO principles and rights.

Our Responsible Supplier Code

To ensure that our non-trade suppliers observe CWT's high standards of ethical conduct, we expect our suppliers to adhere to the principles set out in our Responsible Supplier Code. The Responsible Supplier Code forms part of our Global Non-Trade Procurement Policy, which sets out the rules and procedures

that must be followed when making non-trade purchases (those not directly related to CWT's core business).

Available in six languages, CWT's 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, and our Responsible Supplier Code goes further, drawing upon internationally recognized standards to advance social and environmental responsibility.

CWT's Responsible Supplier Code covers the following broad topics:

- Compliance and Ethics;
- Human Rights, including anti-human trafficking and the fight against modern slavery;
- working conditions; and
- protection of the environment.

In 2017, a review of the Responsible Supplier Code was initiated 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 commitment towards preventing the use of any forms of modern slavery in our supply chains. The updated version of the Responsible Supplier Code will be published in 2018.

* 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.

We live ...

... to provide training and awareness on the Responsible Supplier Code

To ensure effective application of the Responsible Supplier Code, a video training module is available on our internal learning platform. This module was rolled-out in 2016 to all of CWT's senior management, representing most potential buyers of non-trade products and services. Internal guidelines on how to apply the Responsible Supplier Code are also available for all employees on our social intranet.

Supplier sustainability assessments

Ensuring that we keep up-to-speed with our supplier's 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 Responsible Business and Global Sourcing teams, who work closely with EcoVadis to coordinate the campaign and explain its importance to suppliers.



We act ...

... to protect customers and their information

As a world-class travel management partner, we provide state-of-the-art travel services to our clients. We do this within a comprehensive information security program which gives clients assurance around the security of their traveler's information as well as their own.

Not only are we transparent about how we are using our customers' data, we've also put in place effective policies and technical controls to safeguard our customers' information, whoever and wherever they are.

Our Information Security program embeds information security within our culture and is closely aligned to numerous industry standards (such as ISO, NIST, PCI DSS, etc.). We put significant investment into best-in-class tools, processes and people to ensure that we are up-to-speed with the latest regulatory and best-practice requirements.

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 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 co-operation with global CWT security initiatives.

For data privacy, our Global Privacy Officer is responsible for the Data Privacy program. The Global Data Privacy Officer reports to the Vice President of Global Compliance and are supported by 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 page 22](#)), 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 policies and standards

Our 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 materially necessary) in response to changes in technology, infrastructure, regulatory and regional requirements as well as potential threats and security incidents.

CWT Information Security policies and standards cover data protection, comprehensive access controls, physical and environmental security, network and perimeter security, business resiliency, security assessments, security education and awareness. These also adhere to international regulations and standards such as the UK Data Protection Act, the EU Directive and General Data Protection Regulation (GDPR) and ISO 27001, among others.

We perform periodic internal and external 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 data security incidents

We take all the precautions necessary to prevent data security incidents. However, if an incident does occur, we must minimize the impact to our business and our stakeholders. In line with our Risk Management and Business Continuity Planning (BCP) processes, 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. Our 24/7 incident response system supports this robust governance framework, while a Business Resiliency program tests and monitors for rapid response in case of business disruption to ensure that traveler data is protected and secured around the clock.

2017 Highlights

The General Data Protection Regulation (GDPR) takes effect on 25 May 2018. GDPR 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 both citizens and businesses can fully benefit from the digital economy. CWT has been preparing for GDPR since the regulation was first announced in 2016. The company has been updating its Global Privacy program to meet GDPR standards and is well-positioned to achieve compliance with GDPR when it goes into effect and becomes enforceable.

Following the creation of a new EMEA data center in Madrid in 2016, responsible for hosting master traveler records, we expanded the data center's compliance to PCI requirements. We also received a clean opinion on the Services Organization Controls Accreditations (SOC) 2 type 2 Security Principle Report on Commercial services. These reports were completed by an American Institute of Certified Public Accountants firm on controls at a service organization relevant to security, availability, processing integrity, confidentiality or privacy.

Raising awareness – inside and outside CWT

Our Information 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 users are required to complete this training on an annual basis.

At any time, employees can access our global Information 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 2017 with the theme of 'Cyber Security is Everyone's Business'. The objective of the event was to provide tips and tricks for protecting business and personal information both at work and at home. Topics covered included everything from password protection to social engineering attacks and top tips on device security.

As well as keeping our teams engaged on these complex and ever-changing risks, our Compliance and Data Privacy team share best practices with other businesses, governments and expert organizations. In 2017, this included participating in the Global Business Travel Association's symposium on challenges specific to travel management in the energy, resources, and marine industries, the annual conference of the Society of Corporate Compliance and Ethics, and summits of the Privacy & Data Protection Officers, and Chief Financial Officers.



We said ...

2020 objectives

Further engage all employees and CWT partners through a global multi-year ethics training and communication 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 Purchasing program.

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



We did ...

2017 performance

We achieved a 99% completion rate for our Code of Conduct training.

We shared best practices with businesses, governments, and expert organizations by participating in symposiums and conferences on ethics, compliance and data privacy.

We updated the Responsible Supplier Code to reinforce our commitment towards preventing any forms of modern slavery in our supply chain.

We redesigned our program on data privacy, including updates to our policy in line with General Data Protection Regulation (GDPR). We also received System and Organization Control (SOC) accreditation and Payment Card Industry (PCI) compliance for our EMEA data center in Madrid.



We will ...

2018 goals

Conduct regional compliance training at leadership conferences and develop subject-specific compliance training based on exposure to risk.

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

Maturing the Information Security program by maintaining our PCI and SOC compliance. PCI expansion to various key service centers along with aligning the program to meet regulatory requirements such as GDPR.





Human Resources and Human Rights

We think ...

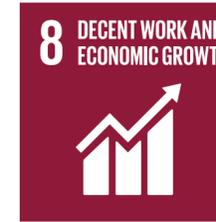
“In a business as diverse and global as ours, our values unite us. Whatever the geography or business function, the same four values are omnipresent, from personal development plans to the way we interact on our social intranet.”

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



We act ...

... to enable employees to be **100% themselves at work**



When people are free to be 100% themselves at work, they give 100% of their potential. CWT strives to create an environment that promotes diversity, inclusion and equal opportunities for all regardless of ethnical and cultural backgrounds, age, gender, sexual orientation or disability.

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.

We have a workforce of around 18,000 employees.

Diversity and inclusion governance

In 2017, we reinforced our commitment to diversity and inclusion by creating a multi-national and multi-disciplinary taskforce under the leadership of the Vice President for Global Responsible Business. Sponsored by the EVP & Chief Human Resources Officer and the EVP & 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.

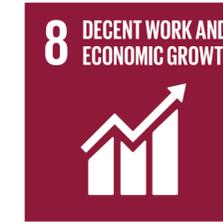
Our Code of Business Ethics and Conduct underlines our commitment to recognizing and respecting the diversity and inclusion of people and ideas, to ensure and promote equal opportunity. It outlines our zero tolerance stance on subjecting employees or applicants to any form of harassment, intimidation, 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.

We encourage vigilance in monitoring any inappropriate workplace conduct and our employees are encouraged to report (according to local laws and regulations) any inappropriate behavior to their manager, their HR representative or our Ethics Helpline promptly (see [page 19](#)).



We act ...

... to promote **diversity and inclusion** at global and local levels



CWT promotes non-discrimination through various global and local initiatives. Our diversity and inclusion efforts take into account the cultural diversity and legal and regulatory frameworks of the different countries where we operate.

Our stance on discrimination and harassment

As stated in our Code of Conduct, everyone at CWT is held to the highest standards of conduct, and any behavior that constitutes discrimination or harassment will not be tolerated at any level of the company. Our Legal and Compliance team therefore runs campaigns on anti-harassment – as was done in 2017 – on our social intranet. The campaign includes information on how to report workplace harassment.

Non-discrimination in recruitment

Our commitment to diversity is reflected in our recruitment processes, which outlines that company policies regarding non-discrimination, equal opportunity and recruitment by competency are 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 the US, we actively monitor the diversity of our hiring and set goals annually that are reviewed at the highest local levels to monitor our progress through Affirmative Action Planning. We also partner with external agencies that share our focus on diverse hiring and placement. In Canada, we have specific language in our job postings offering accommodation to individuals with disabilities throughout the recruitment and onboarding process.

Gender equality

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

Ensuring we put in place measures to promote wage equality in the workplace is also an important focus for us. We monitor our approach at a country and regional level in accordance with local laws and regulations. Annual Gender Pay Gap reporting requirement 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 – this is something we welcome.

By the end of 2017, nearly 68% of our 18,000 employees were women (compared to 72% in 2016). Women also accounted for 22% of our Executive Leadership Team (33% in the first quarter of 2018) and 47% of all director-level roles and above.

We live ...

... to support the UN Women's Empowerment Principles
To step up our commitment to gender equality, our Carlson Board Chair and our President and Chief Executive Officer, and the entire CWT Executive Leadership Team signed the UN Women's Empowerment Principles on International Women's Day in 2018.

The UN Women's Empowerment 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 in action and demonstrating strong support for advancing equality between women and men.



At our Paris Head Office, CWT participates in a mentoring program for women organized by the Women’s Committee of the American Chamber of Commerce in Paris (AmCham), of which CWT is an active member. The primary purpose of this program is to help women advance in their careers by providing them with a mentor whose company is a member of AmCham.

We live ...

... to celebrate International Women’s Day

On March 8 2017, we celebrated International Women’s Day with activities around the world:

- Paris: our Chief Legal Officer & General Counsel, and our VP Country Director France, hosted a breakfast to celebrate the day.
- UK: #BeBoldForChange dominated our social intranet with thoughts and inspirations on women at work.
- Australia: women and their male counterparts at Jobs in Travel Online (JITO) heard from inspirational and motivational speakers, including travel industry speakers and female CWT leaders.

Ethnicity

With employees from around 150 countries all over the world, we are proud to employ people from diverse cultures and communities. In the US, our Employee Partner Networks (EPNs) seek to build on the strength of ethnicity by bringing people together. For instance, the Latinos Unidos Network Association in the US supports the personal and professional development of our Latino and Hispanic colleagues, while enhancing our attractiveness as an employer. Similarly, our African American Travel Professionals group seeks to increase visibility and professional development both at work and in the broader community.

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, we trained over 500 People Managers, and provided the training materials to all employees. Additionally, we launched an anonymous disability survey to gauge the effectiveness of our Disability Awareness Campaign. Over 1,000 employees and managers participated in the survey and they were asked to self-identify whether they have a disability. The results of the survey showed a significant increase in self-disclosure over the previous year’s participation.

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.

We live ...

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

In 2017, we celebrated the UN Cultural Diversity Day for Dialog and Development by inviting our employees around the world to share their personal experiences of diversity and inclusion at CWT. They showcased their cultures, nationalities, faiths, languages, sexual orientations, and cuisines, as well as personal stories of how they experienced and appreciated inclusiveness within the company.

A number of local events took place in celebration of the day, which included an unconscious bias conference in Paris.



Sexual orientation

We are proud to foster a workplace that is open to employees regardless of sexual orientation. In the US, Employee Partner Networks (EPNs) seek to connect people who share a common interest and have passion for diversity and inclusion. In 2017, our US-based EPN for Lesbian, Gay, Bisexual, Transgender, Queer and Allies colleagues went global by launching its own social intranet group and holding meetings. Members also attended events such as Costa Rica Pride and a few marched in their local Marcha de la Diversidad ('Pride Parade'). In September 2017 CWT and Carlson also sponsored a table at the HRC (Human Rights Campaign) dinner in Minneapolis, Minnesota, to support 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 taking business decisions and thus collectively drives CWT's success.

We also put in place local considerations for elderly employees based on their circumstances. For instance, six months before an employee reaches statutory retirement age in Singapore, the Human Resources 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.

Examples of local initiatives to promote diversity and inclusion

• 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, CWT Australia and New Zealand 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.

Unconscious bias and diversity training: cultural awareness training is required as part of our 'Reconciliation Action Plan'. In June 2017, we ran a diversity exercise with our top 45 leaders across Australia and New Zealand to kickstart our cultural awareness training program.

• Canada

Discrimination and harassment training policy: CWT Canada has a comprehensive policy in place addressing workplace discrimination and harassment and offers 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 Human Resources in establishing accommodation plans that are unique to each individual's needs.

• 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.

Harassment policy: India has an anti-sexual harassment policy 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 policy: a policy on pulmonary tuberculosis (PTB) and HIV/AIDS in the workplace was developed. 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.

• Singapore

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

• 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.

Embracing different cultures: we embraced cultural differences in the US by, for example, celebrating the National Hispanic Heritage month in 2017.



We act to nurture and develop talent

Our success depends upon the skills, capabilities and dedication 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 seek to support individual and organizational growth through learning that will strengthen our corporate culture, so that our people understand the ethics and values under which we operate worldwide. To achieve this, we believe in applying the 70/20/10 learning model that says 70% comes from on-the-job experiences; 20% comes from interactions; and 10% comes from courses and reading.

We provide a global learning platform that makes learning accessible and empowers employees towards self-driven learning. Our online platform My Learning gives employees access to online training courses and opportunities for enrollment to webinars and classroom courses. In 2017, a total of 2,169 training opportunities were made available. Of these, 1,483 were instructor-led training sessions and 686 online courses. Topics spanned leadership and self-development, job skills and CWT corporate training.

Solution-based selling

Designed to develop customer relationship skills and behaviors among our people, in 2017 we structured our solution-based selling training with a total of over 1,150 employees participating. This included 108 sessions for people managers and individual contributors.

In 2017, we also created a Learning and Development page on our social intranet to offer a virtual environment for discussions on important learning topics. There is also a dedicated group on the site that contains all the tools managers need for development and coaching of employees.

87,198 total training hours provided in 2017 (including instructor-led training and online courses).

Around 700 customer-facing staff trained in Responsible Business.

Our customer-facing teams benefited from WebEx courses (in English and Spanish) to update them on our sustainability progress and ways in which they can contribute to our Responsible Business program.

Performance Development

Performance Development is a key driver for employee engagement. It plays an essential part in how we help our employees to be successful and give them the required support in their professional growth. It is an ongoing process of feedback, support and communication throughout the year.

Our process is structured around an annual cycle that starts with goal-setting and includes mid-year development conversations and annual reviews.

In 2017, we refreshed our process to evolve towards an Everyday Performance Development approach. This approach changes the way managers and employees talk about performance by moving from bi-annual discussions to ongoing, regular conversations. While formal meetings should still happen, timely and regular performance check-ins are the best way to measure progress, provide support, adjust goals as needed and drive future-focused performance.

In 2018, we are focused on reinforcing these conversations by providing managers and team members with the tools and resources they need. By supporting a culture of coaching and development, we create an employee experience centered on growth, purpose and alignment with CWT's values and priorities.

Recruitment

Our global Talent Acquisition strategy seeks to match the needs of our business with the pool of available talent. It does so by translating business needs into skills, competencies, and experiences; then ensuring our brand image gives potential new employees a compelling reason to come and work for us. We train managers to assess potential candidates and support us in recruiting and onboarding local talent.

We also seek to employ on equal and fair grounds as outlined in our approach to non-discrimination in recruitment (see [page 26](#)).



We act ... **... to value and recognize talent**

Talented individuals deserve to be recognized and rewarded for the contribution they make to our success. Therefore, we offer incentive programs, awards and other initiatives to remind people that they are valued and appreciated.

Recognizing strong performance

The Carlson Fellows Awards recognizes 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 Board Chair. In 2017, five winners were selected from 23 finalists.

In 2017 we introduced peer-to-peer Bravo Buzz Badges, a simple, yet visible way for anyone to give a 'shout out' to a colleague. Dozens of badges are awarded daily across the organization. In addition to these group-wide awards, many of our country offices and individual teams hold their own awards and recognition initiatives.



We act on employee feedback

It is important for our people to feel listened to – and that we 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. We also digitally track satisfaction levels among our customer-facing Travel Counselors.

Pulse survey purpose and topics

In 2017, six pulse surveys were sent to different samples of employees and each employee was surveyed at least three times during the year. Employees, spanning a broad range of grades, levels, countries and functions, responded to our pulse surveys on the topics of: strategy, customer experience, employee engagement, performance management, empowerment and accountability, innovation and enablement, our values, diversity and Inclusion and our brand attributes.

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

The survey tells us what we're doing well and what needs improving. Based on the results, deep-dive surveys are also held to dig deeper on 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 it helps us identify needed improvements and how we should adjust based on an updated information. Each time, results are shared with leaders and employees to facilitate discussions about what is going well and where our opportunities are in delivering on our strategies and priorities.

Face-to-face dialog

Senior leaders regularly meet and engage with employees around the world, both in person when they visit locations, and online via virtual coffee chat sessions.

Our social intranet

In 2017, we launched 'Jive', our social intranet to over 18,000 CWT users across nearly 50 countries. In just three months, we had achieved a 75% adoption rate, and received an Excellence in Employee Engagement award at the JiveWorld17. Christened 'Buzz' by the users, the tool helps employees stay informed, connect and collaborate and has quickly become our global digital community.

"Last year, CWT implemented a strategic digital transformation plan in its quest to become the world leader in digital business travel, hotel and event management. This bold vision required an internal cultural shift to drive employee empowerment and accountability – all with an eye on improving the customer experience and fostering innovation."

Jive Awards jury

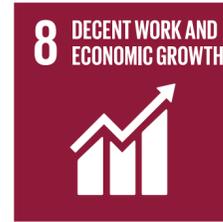
Travel Counselor feedback

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. In 2017, we continued to gather daily feedback from our Travel Counselors. By responding to a simple prompt that uses emoticons, employees can express their mood. These responses are used as the basis for manager meetings, where specific concerns are addressed.

A total of 33,506 responses were collected over the year, with approximately 79% being either 'Happy' or 'Very happy' faces compared to 75% in 2016.



We act to create safe, healthy workplaces



CWT is committed to maintaining the maximum standards of safety and employee protection. CWT is a signatory of the United Nations Global Compact 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, 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.

In 2017, we appointed our first regional Environmental, Health and Safety Manager to cover Europe, the Middle East and Africa. The main priorities for this position include ensuring that EHS management systems are compliant in each country, and in line with customer expectations.

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

We live ...

... to provide safe travel for our employees

As a global travel business, the safety of our own employees when traveling is vitally important. We 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 also include a mobile app that provides country guides, safety/security information as well as the latest medical advice before and during their journeys – see [page 48](#).

Creating a safe and secure place to work

Our global Real Estate team is rolling out Workplace 3.0, a program to optimize and refresh our office spaces in line with the Digital Difference strategy. The overall aim is to create spaces that bring people together and bring out their best, using technology where it will help. We are trying to instill a sense of place that reflects our brand and reinforces our culture.

Global commitment; local implementation

Each country and office is responsible for implementing and maintaining its own policies and procedures, and for training their teams in the most locally-appropriate ways. Here are some of the regional highlights from 2017:

Repetitive strain injury (RSI): local teams have mechanisms in place to identify, support and rehabilitate anyone affected by RSI. Whether it is ergonomic office furniture or enabling employees to work from home, we deploy whatever system that ensures our people are able to return to work quickly and back to normal. For instance, 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, and in Belgium and Luxembourg we offer ergonomic furniture to those suffering from RSI.



Stress management: our teams around the world are working on ways to prevent stress and to promote ways to manage it. Examples include Belgium, Luxembourg and the Netherlands, who have their own 'chill room' for employees to take time away from their desks, while the UK and Ireland has its own stress and wellbeing policy and self-assessment survey which mirrors the HSE Management Standards Stress Indicator Tool. In Canada, our Employee Assistance Program is a voluntary, confidential counseling and information service for CWT employees and families. CWT India conducts regular yoga sessions and in France employees experienced 20-minute massages during work hours to prevent stress.

We live ...

... to promote workplace health

We received a certificate of Recognition at the **Singapore HEALTH Awards** for our efforts to promote workplace health and enhance the wellbeing of employees. Activities included everything from encouraging our employees to stay healthy by eating well and doing regular exercise, through to rewarding employees who did not take medical leave over the course of the year with additional annual leave.

Noise reduction: as a predominantly office-based company, it's 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.

Work-life balance and 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 an email address for collaborators to ask questions or make any sensitive situations known in confidence. Employee wellbeing is managed globally in part by our Development and Performance Management process through the Everyday Performance conversations held across the organization.

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 activities that we conducted in 2017:

- **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.
- **UK:** in all of our UK locations there is a bespoke Health, Safety, Security and Environment (HSSE) Welcome presentation sent to all new starters. Refresher training was delivered as part of our ongoing program for key roles such as fire wardens and Health and Safety coordinators.
- **Benelux:** annual training takes place for Health and Safety advisors, including refresher training for first aid.
- **Singapore:** the Breast Cancer Foundation came into our offices to deliver an awareness talk. We also participated in the Health Promotion Board's Screen for Life Program to organize mammogram screening for female employees aged 50 and above.

- **Australia and New Zealand:** our offices dedicated a month to looking at how we manage physical safety at CWT. Part of the initiative, 'Safety in September', was also used to get to know the safety team to understand more about risks and how to manage them.

Working conditions

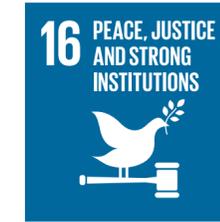
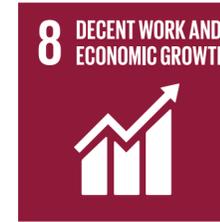
We adopt the global principles of decent working conditions set by the UN Global Compact and ILO. As with our wider approach to Human Resources and Human Rights, we target our impact at a local level, complying with all country labor laws and regulations, and focusing on the issues pertinent to the region.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

- **Europe, the Middle East and Africa (EMEA):** in 2017, CWT EMEA introduced flexible work arrangement pilots across the business. Targeted primarily at our Travel Counselors to ensure that they are available at the right time and able to deliver greater services to customers as a result, the pilots rolled out in 2017 proved to be a huge success.



We act ...

... to uphold **Human Rights** and provide decent work



As a responsible corporate citizen, we respect all conventions and standards relating to Human Rights and labor. 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.

At CWT we believe that showing respect for diverse ethnic and cultural backgrounds, genders, opinions, sexual orientations, physical capabilities, and talents allows us to work as a strong team and connects us to our global stakeholders.

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

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.

Beyond this, we uphold individual Human Rights in all of our operations and we expect the same from all 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. Our company will take all reasonable steps to help eradicate these practices globally and will not knowingly do business with a supplier or any other business partner who uses these practices.

Our position on Anti-Slavery and human trafficking

Our sector has an important role to play in combating human trafficking because traffickers use air travel, hotels and even international events to facilitate their illegal activity. For almost 20 years, Carlson, our parent company, has been working to combat this issue, including efforts to defend the rights of children, and create better living conditions and opportunities for vulnerable and exploited children. In response to the **UK Modern Slavery Act (2015)**, CWT published a global statement on **Anti-Slavery and human trafficking** in 2017. It 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;
- 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 Fundamental Labor standards; and
- we will report annually on progress against these principles.



Our policies and procedures

Over the last year, we stepped up our fight against human trafficking through reinforced policies, increased awareness and education, and closer collaboration with stakeholders and public leadership. We also created an anti-human trafficking global taskforce led by our VP Global Responsible Business, sponsored by the EVP & Chief Human Resources Officer and the Chief Legal Officer & General Counsel that includes CWT representatives from all regions and key functions.

In 2017 we launched a review of the Responsible Supplier Code in order to align it with industry-best practices and legislative trends. In accordance with CWT's commitment to fight against human trafficking, and in order to meet requirements of the UK Modern Slavery Act, we added specific language to the Responsible Supplier Code that prevents the use of any forms of modern slavery in our supply chains.

We live ...

... to combat human trafficking

Human trafficking and modern day slavery are intolerable, yet highly complex issues. As with much of our Responsible Business work (and our commitment to SDG 16 – see [page 14](#)), we count on partnerships to make a targeted, scalable impact. Working in collaboration with the [Carlson Family Foundation](#), these are some of our key non-profit partnerships:

ECPAT: for 14 years, Carlson has supported [ECPAT](#), a non-profit 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). From contributing to its Global Study on Sexual Exploitation of Children in Travel and Tourism to providing foundation funding of its sector-wide training on these issues, this partnership is bringing about change beyond our own business. In 2017, Carlson and CWT teams took the Walk The World Together challenge in support of ECPAT International.

World Childhood Foundation: Carlson's commitment to protecting children at-risk dates back to 1999 when 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 Childhood Boards of Directors in Sweden, Brazil and the United States and our Chief Legal Officer & General Counsel is on the Board of the US entity.

Thorn: we work closely with [Thorn](#), which builds technology to defend children from sexual abuse, thus resonating with our own digital strategy. In 2017, in addition to grant support from the Carlson Family Foundation, CWT experts attended a two-day 'Hackathon' where over 100 engineers worked together on technical challenges to help rescue and protect children from exploitation.

The Orphaned Starfish Foundation (OSF): [OSF](#) helps orphans, victims of abuse and trafficking, and at-risk youth break their cycles of abuse and poverty through computer-based education, job training and job placement assistance. Our Chief Information Officer sits on the Board, CWT has built local partnerships with several OSF supported organizations, and CWT employees have made significant financial contributions to assist in this work.

In addition to these partnerships, our CEO is on the Board of the United Nations General Assembly Global Partnership to End Violence Against Children. For more on our work in this area see [page 57](#).



Actions to fight human trafficking

Here are some of the other activities we undertook during the year in the fight to end human trafficking and modern slavery:

- Offered a Businesses Ending Slavery and Trafficking (BEST) Employers Alliance training to help employees better understand the issue, recognize the signs of human trafficking and sexual exploitation, and know what they can do to address it.
- Created continuous awareness through a dedicated page on human trafficking and modern-day slavery on our social intranet and held a conference with our partner ECPAT in our Paris and London offices.
- Legal and Compliance team began a new partnership with TrustLaw – an organization that provides pro bono legal advice to not-for-profit organizations that fight modern slavery and human trafficking, among other things, around the world.
- Launched the ‘Walk The World Together’ global challenge for all employees to support ECPAT International. This campaign to collectively walk 24,901 miles (the circumference of the Earth) increased awareness and financial support to tackle human trafficking.
- Participated in the 3,000-mile ‘Race Across America’ in support of ECPAT International to raise awareness and funds to fight human trafficking.
- Carlson served on the Super Bowl LII Anti-Trafficking Committee. Marilyn Carlson Nelson was the co-chair of the Super Bowl Host Committee, and given its expertise on the issue, Carlson played an important role in the development of the anti-sex trafficking plan for the event. The Carlson Family Foundation was a significant funder of the plan, and for the development of a replicable plan to be used for future large-scale events. Carlson and CWT joined more than 100 community leaders from business, law enforcement, government, and non-profit agencies in the Super Bowl LII Anti-Sex Trafficking Committee – with its Director of Corporate Affairs serving as the co-chair of the Business sub-committee.
- Raised significant financial contributions from employees to support partner non-profits through our annual Community Giving Campaign in the US and other fundraisers across the globe.
- Participated in various high-level speaking platforms in which our senior leaders called on all stakeholders to take action. CWT’s Chief Legal Officer & General Counsel represented CWT and Carlson at the World Tourism Organization (UNWTO) meeting on the fight against child sexual exploitation in the tourism sector. CWT’s CEO spoke at a UN meeting on ‘Achieving the Sustainable Development Goals for Children’.



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.

In 2017, additional strategic importance was placed on labor practices with the creation of a new position, Vice President Labor Relations, which reports directly to the EVP & Chief Human Resources Officer. For the first time this role is responsible for Labor Relations at a global level and focuses on:

- Proactive partnerships with CWT business functions in order to develop a labor strategy that is fully aligned with and supports our business strategies and plans.
- Strengthening our partnerships with Works Councils. This is especially important as we shape our workforce to meet the needs of our Digital Difference strategy. Our overall objective is to create constructive dialog 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-based workforce adjustments. The reorganization of our workforce needs to be handled with care and sensitivity, while ensuring alignment and coordination across all involved functions. It has an impact on those who leave and those who stay. On both cases, it is an opportunity to act according to our values.
- Aligning global Labor Relations practices. Labor relations matters need to be handled consistently worldwide and in full compliance with local requirements. The objective is to make sure that Labor Relations teams have the same high standards worldwide (through training, coaching, etc.) and work closely with country HR teams, who are strong advisors and support to the business.

These priorities were developed following a labor relations assessment done in 2017 to see how is CWT performing in this area and where can we improve, in light of the deployment of our Digital Difference strategy. The survey covered Germany, Italy, France and the Netherlands. It found that while the way CWT managed labor relations is on par with its peers, enhancements could be made to improve the quality and speed of implementation for projects which have a labor relations impact.

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

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 Work 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 dialog with CWT's European management team.

EWC members are also 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, economic and financial situation of the company, jobs and employment situation and development, proposed transnational changes in the organization, health and safety and training. Moreover, 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.

Finally, 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 [page 19](#)). CWT strictly prohibits retaliation for all reports made in good faith or that contribute to an investigation into a possible violation of law.



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 ...

2017 performance

We created a global diversity and inclusion taskforce composed of leaders from different regions and functions, to work on and deploy our diversity and inclusion strategy.

Our diversity and inclusion taskforce started working on a global training for recruiters.

We implemented employee pulse surveys to get faster feedback and a better understanding of employee engagement levels.

We strengthened our Talent Acquisition team around the world with specialized talent. We introduced a workforce planning model to ensure we were prepared to meet the needs of the organization.



We will ...

2018 goals

Deploy a diversity and inclusion strategy and action plan to address identified global priorities such as non-discrimination and gender equality.

We aim to launch non-discrimination training for all recruiters, as well as unconscious bias training for employees and managers.

We will continue to improve our listening platforms by implementing new and improved mechanisms for gathering frequent and actionable employee feedback.

We will focus on evolving our talent review and succession planning model. This will include providing additional tools to ensure that managers are well-equipped to make informed hiring decisions. We will also further enhance our talent acquisition tools and processes by creating an onboarding team to streamline our process for new hires.





Environment

We think ...

“Climate change mitigation is an ongoing journey for us. It was great to enhance the scope of our carbon reporting during 2017 to get a better understanding of how we can effectively tackle our impacts.”

Françoise Grumberg, Vice President, Global Responsible Business



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 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 and global scale.

As stated in our Global Environmental Charter: '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 from across 22 countries. 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 enable them to 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 (GHG) 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.



We act to measure, report and reduce emissions



Climate change is one of the greatest challenges of our time, and it requires collective and concerted action. We do our best to understand – and reduce – our own impacts and minimize our carbon 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 2017 emissions included 22 countries across 3 regions, representing approximately 80% of our revenue*.

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 Annual 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.

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 are part of our reporting scope.

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

Our Scope 3*** emissions 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.

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.

* 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 May 28, 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; Netherlands; Spain: CWT Barcelona, Bilbao, Madrid and Seville offices only; Sweden: CWT Stockholm office only; UK; 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.



Reducing our carbon footprint

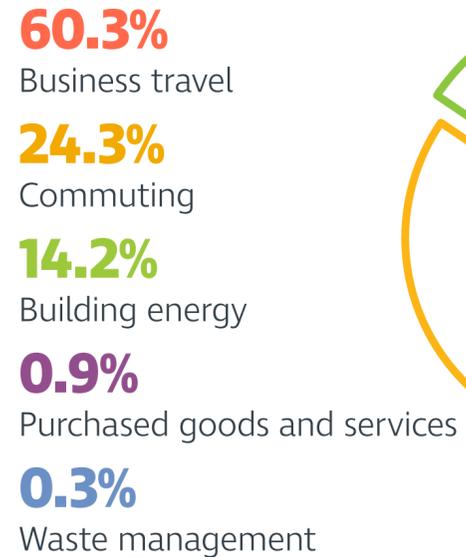
By measuring our emissions, we are better able to identify key areas of focus so that we can take appropriate action to reduce our environmental footprint.

Business travel* was our greatest source of emissions at 60% of our total emissions in 2017***. To address this, in 2017 we installed telepresence suites in Paris, London and Minneapolis. This virtual meeting technology has a triple-win of reducing carbon, costs and employee time, with additional wellbeing benefits.

Employee commuting is our second largest source of emissions, accounting for 24% our total emissions in 2017***. Across the world, we took a number of steps to raise awareness among our people on the impact of their commute (see [page 43](#)).

Finally, with building energy representing 14% of our total emissions, we continue taking actions to optimize the efficiency of our real estate (see [page 44](#)).

Our footprint by size



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.

* 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 May 28, 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; Netherlands; Spain: CWT Barcelona, Bilbao, Madrid and Seville offices only; Sweden: CWT Stockholm office only; UK; 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 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 ways employees can contribute to our environmental objectives.

In 2017, our Environmental Awareness Week focused on the topic of responsible commuting. This theme recognized the fact that commuting significantly contributed to our overall carbon footprint in 2016 – and is an issue that we all need to work on to reduce our collective environmental impact. A global communications campaign – available in seven languages – was organized, and included smart tips on how to ‘Reboot your commute’.

We live ...

... to encourage our employees to commute responsibly

Every year, a commuting survey is sent to employees to better understand how they commuted to and from work the previous year. The data collected from the survey is used to help us calculate our annual greenhouse gas emissions.

As part of the 2017 Environmental Awareness Week, the scope of our annual commuting survey was broadened to include all employees worldwide for the first time. More than 40% of our total global workforce responded. To encourage participation in our commuting survey, a global challenge was organized: the country with the highest response rate would receive a corporate donation towards an environmental project of their choice.

The joint winners were CWT Hungary, Lithuania and Romania who chose ‘Clean Water for Rural Villagers in Burkina Faso’ as the recipient of the donation. This project is a partnership organized by the BARKA Foundation to help villagers secure access to clean water, improved sanitation and hygiene education.

During the campaign, additional local initiatives took place at CWT offices around the world, including:

- **Egypt:** a carpooling option was organized for employees to arrive at an annual business event.
- **France:** a competition was arranged to encourage employees to take up more sustainable commuting habits, and share their stories on our social intranet. The winner received a cash prize to contribute to the purchase of a bicycle.
- **Singapore:** employees turned lights off in their offices during their lunch break to save energy.
- **Spain:** a second-hand market was organized in the Madrid, Seville and Barcelona offices to donate clothes and books. The money raised was donated to an environmental NGO.

Raising awareness with stakeholders

Beyond creating an environmentally-responsible culture internally, we offer reporting tools to help our clients make more informed choices.

Some of the tools mentioned on [page 49](#) for traveler safety also have environmental features – for example, *CWT AnalytIQs* analyzes CO₂ emissions so that travel managers can track and adapt their travel plans accordingly. In 2017, we improved our *CWT AnalytIQs* data sources for air and rail, using Department for Environment, Food and Rural Affairs (DEFRA) emissions factors.



We act ...

... to promote **global and local environmental actions**

Beyond measuring our environmental impact and raising awareness, our Global Responsible Business team coordinates initiatives that improve the environmental footprint of our processes and day-to-day activities. These efforts are supported by our colleagues all over the world, who initiate local actions to reduce our collective impact or further raise awareness.

This work involves everything from reducing our environmental footprint in our offices through initiating environmentally-conscious activities such as local beach cleanups.

Promoting responsible offices

Locations such as Germany, Spain and the UK have robust environmental management systems in place, including ISO 14001 accreditation. Certifications and accreditations 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, Germany became the latest market to follow our Finnish and Norwegian offices by moving to 100% green electricity in 2017.

In order to streamline and improve CWT's use of office space, and ensure a pleasant working environment for all employees, our Real Estate team has launched a Workplace 3.0 strategy. Several offices are being restructured as part of this multi-year plan, first of which are the Helsinki and Singapore offices, which have been moved into new, energy-lean buildings situated close to public transportation.

We live ...

... to reduce paper usage

US teams have rolled out print login functionality to avoid accidental printing and to encourage print collection. In addition to the positive impact this will have on paper and energy waste reduction, this initiative has led to significant savings, including reducing print costs by 42%.

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:

- **Australia:** we help the environment by recycling coffee pods in our Melbourne offices.
- **France:** we work with Greenwishes – an organization that provides monthly recycling reports – to better measure how we're performing and take actions to reduce our waste where we can. In 2017 we recycled over two tons of waste, and shared the results with our colleagues to keep them up to speed.

- **Hong Kong:** we ran an on-site guided tour of T-PARK, a futuristic waste treatment facility, to understand more about the concept of waste-to-energy.
- **India:** we partner with Greenobin – an organization that collects paper waste and credits one point against every kilogram of paper waste collected. These points are equivalent to 1 INR, and we are entitled to redeem recycled products against the collected points.
- **Netherlands:** we donate printer cartridges to Stichting AAP, an organization that rescues primates and exotic mammals from the pet trade or entertainment industry. The foundation is able to exchange the cartridges with a recycling partner in exchange for cash.
- **Singapore:** during a move to a new office, we donated unused laptops and computers to charity to avoid waste, while giving back to the community.
- **UK and Ireland:** we launched 'Going Green!' – a list of helpful tips outlining what can and cannot be recycled.
- **US:** our Mendota office ensures that freshpacks are collected and sent to a recycling center for processing. The remaining tea and the coffee inside the packs are composted and the packaging is recycled.



Offsetting our emissions

After the success of our 2016 pilot, we continued to offset the carbon impact of some major events in 2017. Once again we supported the Carbon for Water™ project in a bid to compensate our own impacts, while supporting local community projects. In 2017, we offset 515 tCO₂e* to make our Global Leadership Conference (for senior managers) and the 'Global Exchange Singapore 2017' (client event) carbon neutral. This is the equivalent of 77.35 million internet requests, or the manufacturing of 223,900 reams of paper (a ream of paper is 500 sheets of paper), or 51 world tours in a 6CV diesel car.

We live ...

... to improve lives through carbon offsetting

In 2017, Carbon for Water™ was our designated carbon offsetting project for the second year in a row. The project distributes water filters to rural families in Kenya – by eliminating the need to boil water to make it potable, the project avoids the emissions associated with burning wood. Thanks to our efforts in 2017, 1,155 water filters were distributed, providing drinking water for roughly 10,945 beneficiaries.

Encouraging employee-led environmental action

In addition to the environmental initiatives that have been implemented in certain sites to help reduce CWT's impact, employees proactively gathered in many cities across the world to show their general support for the environment.

- In Mumbai, India, employees set out to clean a long stretch of Chowpatty Beach.
- In Costa Rica, a day-long excursion was organized to clean Guacalillo beach, resulting in more than 30 bags of trash collected, most of it plastic.
- In China, a poetry competition was launched in celebration of World Environment Day, encouraging employees to share their favorite environmental verses.

* tCO₂e = tons of carbon dioxide equivalents.



We said ...

2020 objectives

Educate all our employees through eco-attitude campaigns and an environment 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 ...

2017 performance



Our annual Environmental Awareness Week focused on responsible commuting. The annual commuting survey was extended to all employees worldwide for the first time. We also continued sharing best practices 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, environmental management system implementations to awareness activities, and beach cleanups.



We put in place various initiatives to help reduce our emissions, from our environmental awareness campaign to applying the highest standards for environmental management in our offices.

We also strengthened our reporting processes to improve the accuracy of our environmental measurement.



We will ...

2018 goals

Continue to promote an environmentally-conscious culture through awareness campaigns 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 integrate environmental considerations into certain internal processes to reduce our global environmental footprint.





Responsible Products and Services

We think ...

“Behind the scenes, each one of us is expected to continually monitor for – and reduce – any risks that would negatively impact our customers or expose business operations to unplanned disruption.”

Kathleen Orner, Chief Risk & Information Security Officer



We act ...

... to offer safe travel experiences

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

In 2017, we commissioned an independent **Connected Traveler survey**¹ based on the theme of 'staying connected to work and home while on the move' to understand business travel trends, including any challenges or fears that travelers face.

In total, two-thirds (67%) of the 1,900 business traveler respondents said they believe travel is safer today than in the past. However, nearly half (46%) remain concerned about their safety. The study also revealed that travelers on average carry four types of technology (mobile phone, tablet, laptop, etc.) with the smartphone being the one 'travel tool they can't live without', as more than 80% of travelers rely on their phone to conduct business.

¹ Survey data was collected from more than 1,900 business travelers between the ages of 25-65 from the Americas (Brazil, Canada, Chile, Mexico and the US), EMEA (France, Germany, Italy, Spain, Sweden and the UK) and APAC (Australia, China, India, Japan and Singapore). To participate in the study, business travelers were required to have made more than four business trips within the past 12 months.

The results of the survey are consistent with other trends we review as part of our ongoing responsible product development process. The outcomes will be used to inform our continuous approach to product development.

Products that inform and connect

We further improved our portfolio of travel apps and products in 2017, some of which include reporting tools so that travel managers can make informed decisions about safety, security and carbon impact. Examples of these include:

- **CWT Alerts, powered by International SOS.** In partnership with International SOS, we provide travel managers and security officers with updates and notifications of disruptions and crises relating to destinations and travel plans. *CWT Alerts* enable them to assess and succinctly summarize any threat or incident and quickly identify, and monitor significant and relevant situation which help them better anticipate, communicate and assist with information to let them know whether an incident will impact travelers in a specific location and act quickly.

In 2017:

- 7,538 travel security special advisories alerts were issued, notifying of incidents which pose a clear, immediate or direct threat to safety or security; and
- 651 medical alerts were issued, informing travelers of events that may impact them from a medical standpoint, such as infectious disease outbreaks or disasters caused increased risk for illness.

We live ...

... to improve travel safety

In 2017, we worked with International SOS to launch our **Top 10 tips for Safe Travel infographic** – a guide to help travelers prepare for their business trips effectively, helping them stay safer. Also with International SOS, we co-hosted webinars on 'Keeping your people safe', which welcomed 300 people from all three regions (approximately 50% customers, 50% employees), and a 'Hotel Safety' event, which saw 400 global registrations.



We live ...

... to raise awareness of child exploitation

Ending human trafficking is an area that has long been a focus for CWT. Since 2012, we have added approximately 595,000 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 past years the number of alerts increased due to the increasing number of at-risk countries (from 96,000 in 2012 to 106,000 in 2016).

- **CWT To Go™.** This travel app updates itinerary information on the go and sends timely alerts on flight delays, cancellations and gate changes.
- **Trip disruption services.** This service, only available in North America, monitors subscribers' itineraries for disruptions such as cancellations, missed connections, diversions and delays. Affected travelers automatically receive SMS alerts and new instructions (such as flight departure time or gate), or they are contacted by a travel counselor offering alternative travel solutions.
- **CWT AnalytiQs.** We make it easy to be able to track down travelers anytime, anywhere, even during disruptions, thanks to this business intelligence and reporting tool. The tool allows travel managers to view travelers on a map based on three different perspectives – security risks, medical risks or map-view only. With a simple click of a button, a travel manager can zoom in on a particular location by clicking on the marker on the traveler tracking map, which narrows the data in the full detail listing to just the filtered information desired (for environmental features of this tool see Environment [page 43](#)).

- **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 2017, we activated the protocol for 31 incidents, mostly related to terror attacks, earthquakes and hotel fires.
- **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 and an online self-assessment tool among other benefits. The second, Event Membership (co-ordinated 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.

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 2017 we rolled out a new global approach to our travel manager survey by introducing quarterly pulse surveys designed to keep up-to-speed with how the travel managers we serve are thinking and feeling, so that we're able to improve our responsiveness to their needs. In addition, our *CWT Listens* survey is designed to understand the experience travelers have at the point-of-sale. This is complemented by an on-demand reporting platform to help our employees understand customer feedback and experiences, and to keep improving our offer.

Beyond this, in October, we participated 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 encourage employee innovation

As well as listening to our customers and clients' thoughts and views, our employee crowdsourcing platform CWT Spark supports the organization by encouraging employees to use their expertise and insight to solve key challenges. In 2017, we encouraged employees to generate new ideas on how we can improve the traveler experience. In total, 250 ideas were voted on, of which 25 rose to the top. Of these, 15 were selected for further consideration, before committee members ultimately decided on five finalists.



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 that we are prepared to protect our customers and that we 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. Following this, we develop risk mitigation plans to reduce both the probability of occurrence and impact of these risks. These plans are then formally integrated into a Business Continuity Plan (BCP) which embeds risk management into daily organizational practices. This step-by-step, preventative approach minimizes the impact of disruptions and crises whenever they occur by ensuring a robust and proactive response.

Risk Management Governance

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

In 2017, we 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 CTO, our EVP Traveler Services, Chief Legal Officer & General Counsel, EVP & Chief Strategy and Commerce Officer and our Data Privacy and Chief Information Security Officers.

Business continuity planning

Despite rigorous governance of risk, managing it daily is the responsibility of each and every one of us. That's why it's vital that we all understand and buy into the approach of risk preparedness, prioritization and rapid response. We continued to implement enhancements to our Risk Management system in 2017 across all stages of the system. As an example, a 'Site Risk Assessment' campaign was performed by our 19 largest global partners with the objective of identifying prominent risks and developing mitigation checklists to reduce prospective risk impacts.

Once key risks have been identified, our BCP helps to ensure that these risks do not occur again in our day-to-day operations. The BCP is a methodology followed by everyone in our organization to ensure effective and efficient response to unplanned disruptions when and where they occur – covering everything from unexpected shortfalls in staff to major events and technical errors.

In 2017, the BCP process was improved by creating an office information database, which delivers a more effective way to share, validate and provide information updates.

CWT offices are required to undertake two annual drills to test the effectiveness of our Business Continuity program. Carried out by regional BCP owners, the drills cover fire-based scenarios and another drill chosen by the BCP Steering Committee. This is supplemented by annual training received by all BCP owners, new hires, operations managers and those identified as backup BCP owners.

To test out our systems and processes, we run annual crisis management exercises. In 2017, the exercise was undertaken by our Executive Leadership Team and included a hypothetical terrorist attack, cyber-attack, and a kidnapping. What we learn from these scenarios directly shapes our Business Continuity Planning, so that we are even better prepared to respond to major disruptions. This combination of risk assessments, crisis drills and business continuity training helps us to continuously refine how we prepare for – and respond to – the risks we face.

We live ...

... to keep teams safe when disaster strikes

Planning for, and managing risk goes to the heart of the commitments we make to our people and clients, and to our license to operate in around 150 countries. This was put to the test in September 2017 when a 7.1 magnitude earthquake hit Mexico.

At our office in the capital, we immediately activated our BCP and a crisis team of 12 prepared and trained employees stepped in to ensure our people and property were safe. Experts were brought in to assess site safety (prompting us to temporarily close the office), while the team prepared our backup sites for operations. No employees were injured during the earthquake and its aftermath, and interruptions to our operations were minimal.



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 Community 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 ...

2017 performance

Updated the emissions reporting methodology used in *CWT AnalytIQs*.

We continued our internal carbon offsetting efforts to build experience in this field, and collaborated with various carbon offsetting agencies to answer requests from customers regarding carbon offsetting.

CWT's Business Resiliency Strategy identified sequenced workflows for Crisis Management, Business Continuity and Disaster Recovery. Our Executive Leadership Team completed a crisis exercise. And CWT's Business Continuity Plan was activated in Mexico after an earthquake.



We will ...

2018 goals

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

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

Implementation of sequenced workflows for Disaster Recovery. Continue to perform a bi-annual business resilience and risk management business review. We will also expand the number of crisis team members and further align our crisis management plan to our Digital Difference strategy.





Community Involvement

We think ...

Our Community Involvement strategy continues to grow year-on-year, and we are proud of the fantastic contributions from our employees all over the world.



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



With a worldwide presence, we recognize the importance of utilizing the talent, expertise and insight of our people to contribute to local communities worldwide. In 2017 alone, we launched more than 100 3E community initiatives, partnering with 79 charities and organizations around the world.

From financial and in-kind donations, to employee volunteering, the impact of our 3E Community Involvement strategy has grown significantly over recent years. Our 3E initiatives around the globe are also helping contribute to the delivery of the UN Sustainable Development Goals (SDGs) (see [page 12](#) for a list of the goals we focus on).

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 some countries with no volunteering policy, local teams offer employees volunteering time to contribute to community projects in their location.

All through 2017, teams of employees from CWT and Carlson volunteered their time, organized fundraising events and created awareness for great causes. These activities addressed efforts such as improving living conditions for families, donating food to the hungry, supporting the homeless, 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 significant grant support for many of our global partners in our effort to increase our focus on combating human trafficking across the globe (see [page 57](#)).



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 that 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 3E initiatives around the world

In 2017, employees were invited to organize local initiatives and plot their activities online via our 3E map. Our annual 'liking' contest was launched on our social intranet, where employees clicked to vote on their favorite 3E initiatives from their region. Three winners were selected based on the total number of votes (one per region), and the organizations associated with each received a corporate donation. The winners in 2017 were:

Americas (including Latin America, North America):

eyeglass collection for Lions Clubs International 'Recycle for Sight' program. CWT colleagues throughout the US and Canada collected and donated over 600 pairs of used and old eyeglasses to Lions Clubs International 'Recycle for Sight' program, based in Chicago. Lions Clubs International volunteers delivered the donated eyeglasses to regional Lions Eyeglass Recycling Centers where volunteers cleaned, sorted by prescription strength, and packaged the glasses. Finally, the recycled glasses were redistributed to low and middle-income countries to those in need.

Asia Pacific region: humanitarian response for fellow citizens affected by floods. In collaboration with Charities Aid Foundation, CWT India made a donation to provide humanitarian assistance to the victims of the floods in the Galahad District. A relief support kit was provided to affected families with immediate needs. 95 families and 471 beneficiaries received the kit, composed of items such as mosquito nets, medicine kits, food baskets, and water storing kits.

Europe, Middle East and Africa region: Great company Run in Poland. In June 2017, our Warsaw-based CWT team participated in the Great Company Run with the aim of raising money for the treatment and rehabilitation of local children in need. For the second year in a row, their participation won the team a corporate donation for the Everest Foundation. The Great Company Run is a charity relay created for employees of companies in Poland and is organized by the Everest Foundation to promote healthy lifestyles, integration and cooperation between companies while raising funds for the local community.



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 2017, we continued to champion education and employability for young people around the world 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 acted to improve education and employability outcomes during the year:

- **'Career Day' with United Way, France:** United Way has partnered with companies, non-profits and institutions to reduce youth unemployment in Paris since 2014. In 2017, we supported United Way Tocqueville's 'Opportunities to All' program in partnership with the Carlson Family Foundation. Organized by United Way and Passeport Avenir, we provided 120 middle-school students the opportunity to learn from CWT employees and professionals from different industries as part of Career Day.
- **Celebrating young entrepreneurship with 'Junior Achievement', Singapore:** we have been supporting Junior Achievement over several years in its goal to help educate local students on topics such as entrepreneurship, work readiness and financial literacy. In 2017, seven Singapore colleagues volunteered in local schools to share 'real world' insight into the world of businesses, goods and services.

- **Setting Education in Motion, Philippines:** colleagues in Manila supported the organization Food for Hungry Minds in its school feeding program, which aims to ensure that youngsters start the day with a decent meal. The team also supported the 'Education In Motion' project which enables field trips outside of the classroom for disadvantaged students. In 2017, CWT employees took 75 students on a field trip to the Museo Pambata and the National Museum.
- **Continuing our longstanding partnership with Seeds of Peace summer camp, Maine, US:** with its goal to inspire a new generation of leaders from communities divided by conflict, we provided another annual donation to the camp in 2017, and continued to coordinate travel for students from around the world. Seeds of Peace now has more than 6,000 graduates from the Middle East, South Asia, Europe and the US, and CWT's Director of Global Business Development sits on its Global Leadership Council.

We live ...

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

We have been a strong supporter of GTTP for the last five years. We sponsor an exciting program that trains young people in 14 countries about careers in travel and tourism. The program, the Global Travel & Tourism Partnership (GTTP), currently works with 650,000 students in secondary and tertiary schools around the world and has had over two million graduates since its launch in 1996.

The GTTP curriculum introduces students to the basic structure of our industry through three in-depth courses: Passport to the World, Passport to Sustainability and Passport to Customer Service. An essential aspect of the program is introducing students to businesses and employees in our industry. Currently, over 1,300 local businesses provide financial support, in-kind donations and provide internships to support students keen to enter the tourism industry.

In 2017, GTTP held an annual 'Student Research Competition', where 2,000 promising tourism professionals debated how business and leisure trips can both be simultaneous and sustainable ('Bleisure travel').

"UNWTO, as the United Nations Specialized Agency for Tourism, would like to congratulate the Global Travel and Tourism Partnership for the immense contribution it has made over the last 20 years to tourism development by educating youth around the world on the potential of a career in tourism."

Taleb Rifai, former Secretary-General,
World Tourism Organization



We act ...

... to secure **essential needs**, and provide support when **emergency hits**

As well as tackling global education, we lend a helping hand to ensure basic human needs including clothing, food, water, shelter and medical care are met as part of our 3E strategy. With our global reach, we also look 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 [page 57](#) to read more about Carlson and Carlson Foundation activities in 2017).

Following the devastating hurricanes of 2017, CWT committed US\$25,000 to the fund, which helped to raise awareness and support the record number of employee requests for assistance. For the year, nearly US\$70,000 was distributed through the Assistance Fund.

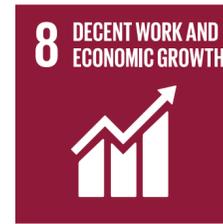
Helping to provide essential needs

We ran numerous initiatives around the world in 2017 which focused on providing essential needs. Some of these included:

- **Australia:** employees in our Melbourne office volunteered their time to help raise money and awareness for the Cancer Council's 'Daffodil Day' in aid of cancer research, prevention, support services and advocacy.
- **France:** employees in our head office collected a total of 44 kilograms of chocolate and candy to sweeten this year's festive season for families in need. As a result, Les Restaurants du Coeur was able to distribute the treats to 134 families in need in the region of Boulogne-Billancourt.
- **Philippines:** we organized 'Jam to Rescue', a concert to raise funds for the organization Called to Rescue Philippines, which rescues children from sex trafficking, violence and abuse.
- **Singapore:** teams hit their US\$10,000 fundraising target for Willing Hearts, a local charity that provides 5,000 meals a day for those in need.
- **US and Canada:** nearly 100 employees helped **Habitat for Humanity** build a home for a family in need under the theme: 'Together we can Build Better Communities'.



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 2017, ranging from matched giving contributions to anti-trafficking partnerships.

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 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 made great strides to expand awareness and activity among its employees across the globe. Grants from the Carlson Family Foundation in 2017 included the following:

- **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 is an active participant in helping develop this training. Additionally, CWT employees participated in a 3,000-mile ECPAT 'Race Across America' and the 'Walk the World Together' challenge to raise money and awareness of the organization's work – CWT and the Carlson Family Foundation also donated to the cause.
- **World Childhood Foundation** the Carlson Family Foundation has long-partnered with Childhood to support local agencies that work with homeless youth and those at-risk of being homeless to prevent trafficking. Over the years of this partnership, Carlson and the Carlson Family Foundation have provided funding and have also helped encourage additional contributions from other companies and funders during this time.
- **Thorn** fills a critical gap in anti-trafficking operations through developing and providing tools to law enforcement to assist in rescuing sex trafficking victims and arresting perpetrators. In addition to Carlson Family Foundation grant support, CWT experts recently attended a two-day 'Hackathon' to solve technical challenges and improve Thorn's tools and platforms.

- **Orphaned Starfish Foundation** is another grantee building strong relationships and support from CWT employees. OSF works in 27 countries to help orphans, victims of trafficking and at-risk youth to break their cycles of abuse and poverty through computer-based education, job training and job placement assistance. In 2017, our SVP Chief Information Officer joined the board of this important organization, employees volunteered hundreds of hours across the globe, and we made significant financial contributions through the 'Block Screening for a Cause' in the Philippines, and the 2017 '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 on the Super Bowl Anti-Sex Trafficking Committee, and were the leaders in developing the anti-sex trafficking plan for the event. The Carlson Family Foundation provided generous funding for this critical work. CWT employees also contributed financially through the 2017 Community Giving Campaign, and volunteered for regional service partners such as **The Link**.



Employee giving campaign

Historically, the headquarters of CWT and Carlson in Minneapolis hold an annual employee giving campaign, in which employees financially contribute to non-profit organizations across the globe. Matching grants are offered by the Carlson Family Foundation to a select group of partner organizations, and both on and off-site volunteer activities are coordinated for employees in the region.

In 2017, this Community Giving Campaign was expanded to include all employees in the US, and we highlighted past and new partner organizations who focused on our Anti-Sex Trafficking and military and veterans efforts. With 1,400 employee participants, the campaign reached record results in CWT participation at the Minneapolis headquarters and across the US. This included a 60% increase in individual donors contributing US\$1,000 or more. Because of our generous employees, our communities received more than US\$500,000 in contributions.

Volunteerism became an even greater component of the Community Giving Campaign in 2017, as employees were allowed to input their individual volunteer hours for the year, as well as participate in the group activities coordinated across the country. As a result, 380 employees recorded nearly 20,000 hours of volunteerism to roughly 500 organizations in the US. Additionally, the final week of the campaign featured our seventh year of a Habitat for Humanity build, in which nearly 100 employees assisted in constructing a home for a regional family in need. This was a powerful way to end the 2017 campaign, themed 'Together we can Build Better Communities'.

Focus Area Grants

In addition to anti-sex trafficking (see [page 57](#)), 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 receiving these focus area grants and significant support of 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 put together care packages for troops overseas and veterans in hospital. In 2017, the Carlson Family Foundation provided a significant grant to support this work.
- **The Mission Continues** is a nationwide organization that empowers veterans to apply their unique insight to community challenges. The charity was added as a partner organization in the Community Giving Campaign, and initial plans were laid for multiple large-scale 2018 volunteer projects with CWT and CWT Sato employees. The Carlson Family Foundation also awarded them a multi-year grant, and was named a lead sponsor for service platoons in St. Paul and Washington DC.
- **Student Mentorship** continued in 2017, 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.



We said ...

2020 objectives

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

*Education, Emergencies, Essential needs.



We did ...

2017 performance



More than 100 3E initiatives organized by employees worldwide and shared on the 3E map.

Expanded the Employee Giving Campaign to include all employees in the US and new partner organizations were also added.



We will ...

2018 goals

Further improve the measurement and tracking of our impact in local communities.



Initiated



In Progress



Completed

Global Reporting Initiative (GRI) Table

GRI Standard	Disclosure	Location
Organizational profile		
GRI 102-1	Name of the organization	What's inside – P1
GRI 102-2	Activities, brands, products, and services	About CWT – P5
GRI 102-3	Location of headquarters	Online: Paris , Minneapolis and 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 – P5
GRI 102-7	Scale of the organization	About CWT – P5
GRI 102-8	Information on employees and other workers	About CWT – P5 Diversity and inclusion – P25, 26
GRI 102-9	Supply chain	Responsible supply chain – P20
GRI 102-10	Significant changes to the organization and its supply chain	About CWT – P5
GRI 102-11	Precautionary Principle or approach	Maintain business-as-usual – P50
GRI 102-12	External initiatives	Global principles and standards – P11, 12, 26, 34
GRI 102-13	Membership of associations	Global principles and standards – P11 Memberships and foundings – P35, 36, 55, 57

GRI Standard	Disclosure	Location
Strategy		
GRI 102-14	Statement from senior decision-maker	Chair of Carlson's Board and CWT's CEO quotes – P4 Highlights Report : Chair of Carlson's Board statement – P3 Highlights Report : President & CEO statement – P4
GRI 102-15	Key impacts, risks, and opportunities	Responsible Business domains – P7 We said, we did, we will – P15, 23, 38, 46, 51, 59
Ethics and integrity		
GRI 102-16	Values, principles, standards, and norms of behavior	About this report – P5
GRI 102-17	Mechanisms for advice and concerns about ethics	Ethics and compliance program – P17-20
Governance		
GRI 102-18	Governance structure	Governance bodies – P10, 17, 21, 25, 35, 37, 50
GRI 102-19	Delegating authority	Governance bodies – P10, 17, 21, 25, 35, 37, 50
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	Responsible Business Governance – P10
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics	How we identify our material issues – P7
GRI 102-22	Composition of the highest governance body and its committees	Governance bodies and committees – P10, 17, 21, 25, 35, 37, 50

Global Reporting Initiative (GRI) Table

GRI Standard	Disclosure	Location
Governance (continued)		
GRI 102-25	Conflicts of interest	Conflicts of Interest Policy and due diligence – P18
GRI 102-26	Role of highest governance body in setting purpose, values, and strategy	Responsible Business Governance – P10
GRI 102-32	Highest governance body's role in sustainability reporting	Responsible Business Governance – P10
Stakeholder engagement		
GRI 102-40	List of stakeholder groups	How we identify our material issues – P7
GRI 102-41	Collective bargaining agreements	Ensuring fair labor practices – P37
GRI 102-42	Identifying and selecting stakeholders	How we identify our material issues – P7 Responsible Supply Chain – P20
GRI 102-43	Approach to stakeholder engagement	How we identify our material issues – P7 Employee feedback – P31 Fair labor practices – P37 Customer experience – P49
GRI 102-44	Key topics and concerns raised	How we identify our material issues – P7 Long-term commitments – P8-9

GRI Standard	Disclosure	Location
Reporting practice		
GRI 102-45	Entities included in the consolidated financial statements	Online: Financial statements
GRI 102-46	Defining report content and topic boundaries	How we identify our material issues – P7
GRI 102-47	List of material topics	How we identify our material issues – P7 Long-term commitments – P8-9
GRI 102-48	Restatements of information	What's inside – P1
GRI 102-49	Changes in the reporting period	No significant changes from previous reporting periods
GRI 102-50	Reporting period	What's inside – P1
GRI 102-51	Date of most recent report	What's inside – P1
GRI 102-52	Reporting cycle	What's inside – P1
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	What's inside – P1
GRI 102-55	GRI content index	GRI Index – P60
GRI 102-56	External assurance	None

Global Reporting Initiative (GRI) Table

GRI Standard	Disclosure	Location
Economic		
GRI 205-1	Operations assessed for risks related to corruption	Fighting bribery and corruption – P18, 19
GRI 205-2	Communication and training about anti-corruption policies and procedures	Fighting bribery and corruption – P18, 19
Environmental		
GRI 302-1	Energy consumption within the organization	Measuring, reporting and reducing emissions – P41, 42
GRI 302-2	Energy consumption outside the organization	Reducing our carbon footprint – P41, 42
GRI 305-1	Direct (Scope 1) GHG emissions	Measuring, reporting and reducing emissions – P41
GRI 305-2	Energy indirect (Scope 2) GHG emissions	Measuring, reporting and reducing emissions – P41
GRI 305-3	Other indirect (Scope 3) GHG emissions	Measuring, reporting and reducing emissions – P41
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	Responsible Supply Chain – P20

GRI Standard	Disclosure	Location
Social		
GRI 403-1	Workers representation in management – worker health and safety committees	Health and safety governance – P32
GRI 404-1	Average hours of training per year per employee	Nurture and develop talent – P29
GRI 404-2	Programs for upgrading employee skills and transition assistance programs	Nurture and develop talent – P28, 29
GRI 405-1	Diversity of governance bodies and employees	Diversity and inclusion – P26
GRI 408-1	Operations and suppliers at significant risk for incidents of child labor	Responsible supply chain – P20 Human Rights – P34
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Responsible supply chain – P20 Human Rights – P34
GRI 412-2	Employee training on human rights policies or procedures	Training on the Code – P19 Human Rights – P34, 36
GRI 413-1	Operations with local community engagement, impact assessments, and development programs	Fair labor practices – P37 Community Involvement – P53-58
GRI 414-1	New suppliers that were screened using social criteria	Responsible supply chain – P20 Human Rights – P34, 36

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>	<p>Responsible Business Strategy and Governance</p> <p>Ethics & Business Behavior</p> <p>Human Resources and Human Rights</p> <p>Community Involvement</p>	<p>7, 9, 11, 12-14</p> <p>17-20</p> <p>25-28, 32-37</p> <p>53-58</p>
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>	<p>Responsible Business Strategy and Governance</p> <p>Ethics and Business Behavior</p> <p>Human Resources and Human Rights</p>	<p>7-9, 11-14</p> <p>17-20</p> <p>25-37</p>
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>	<p>Responsible Business Strategy and Governance</p> <p>Environment</p>	<p>7, 9, 11, 14</p> <p>40-45</p>
Anti-Corruption Principle	<p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery</p>	<p>Responsible Business Strategy and Governance</p> <p>Ethics and Business Behavior</p>	<p>7, 8, 14</p> <p>17-20</p>



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