Think. Act. Live.

Annual Responsible Business Report | September 2020



Welcome to our Annual Responsible Business Report – September 2020.

This is our eighth annual report detailing our Responsible Business (RB) policies, performance and progress across our seven RB domains. It includes all RB activities during the 2019 calendar year as well as some perspective for 2020, 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 CWT businesses and joint ventures.

Please note that some of the programs mentioned in this report are currently suspended or delayed due to constraints related to the COVID-19 pandemic.



About CWT

Responsible Business: At the heart of all we do

- Q&A with Richard Carlson Gage, Chair, Carlson and Kurt Ekert, President & CEO, CWT
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About CWT

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Responsible Business:

at the heart of all we do



Richard Carlson Gage Chair, Carlson

3 on RB: Carlson and CWT's leaders weigh in on the forces facing responsible businesses today.

The COVID-19 pandemic has created unprecedented upheaval in all industries in recent months, including ours. It has also placed even more focus on responsible business (RB) and here, Richard C. Gage, Chair of Carlson, and Kurt Ekert, President & CEO of CWT, highlight its importance to Carlson, CWT and to the wider business travel industry. They see RB as a key strategy for overcoming the challenges of the pandemic, and one which will position us for a successful future. Questions asked by Françoise Grumberg, Vice President, Global Responsible Business.

What is the role of responsible business during the COVID-19 global pandemic and economic crisis?

Rick To navigate this crisis and serve customers successfully, organizations must be steered by their ethics. I was interested to learn about recent Accenture research revealing that two-thirds of consumers expect companies to commit to higher ethical standards and be increasingly responsible to employees, customers, greater society, and the environment in the wake of this pandemic. We know RB's role supporting strong external stakeholder relationships; but we see RB's power internally as well! Facing turbulent headwinds, employees move with confidence and skill if they have trust in their colleagues and the shared values that underpin responsible business.

At Carlson, we are committed to the values of integrity, leadership, caring and passion. For more than 80 years, our people have leaned into them in the best and worst of times. This kind of steadfastness allows us to pivot and evolve under challenging circumstances and help our customers and communities emerge from the crisis in a position of strength. In short, I see RB's role in crisis as a springboard to the future.

Kurt By their very definition, responsible businesses feel an urgent responsibility to be part of the solution. So, our role is fundamental, and our place is front and center. I'm proud to lead an organization that rises to the challenges of our time. Let me share a few examples.

CWT Solutions Group recently launched a new **responsible travel** consulting framework to help our customers build travel programs that not only manage costs, but also align with other important objectives: employee wellbeing, climate impact and organizational performance.

Through our relationship with the World Travel & Tourism Council, **CWT is calling on the G20 nations for international collaboration** to combat COVID-19, rescue the travel and tourism industry, and recover the millions of jobs lost.



Kurt Ekert President & CEO, CWT

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About CWT

A sustaining pride point for our people is CWT's **leadership on the issues that matter most**. As a signatory to the UN Global Compact, we continue to fulfill our commitments to the 10 principles in the areas of human rights, labor, environment and anti-corruption. This year, CWT's Responsible Business performance was rated 'Platinum' by EcoVadis, the top certification medal by the independent corporate social responsibility (CSR) rating agency.

Today, every dynamic of life as we know it is changing. While there is fear in the face of uncertainty, there is hope too. As leaders in responsible business, we must find opportunities to be a positive force for change in this new, emerging world.

You both have served as leaders in the fight against child exploitation and trafficking. 2019 marked major advancements in the struggle against this abhorrent crime. Tell us about one moment from last year that stands out.

Kurt Last year, CWT, Carlson, and the Carlson Family Foundation hosted the first Thorn Hackathon in Minnesota. This was a give-it-allyou've-got sprint against online child exploitation and trafficking. From sunrise to sundown, Minnesota's top software engineers and data scientists worked under one roof to tackle technical challenges and support Thorn's software and data analytics tools. Their mission: help Thorn and law enforcement identify child victims and traffickers, faster. Or more simply, they were in it to protect childhood itself. Reflecting on the experience, one of our technologists shared why he volunteered his weekend for the Hackathon: "As an uncle, I wanted to contribute to my own family's safety—but also as a citizen of the world to solve these real-world problems."

Rick Last year, there was significant development in research on this human rights crime.

The World Childhood Foundation released findings of a 40-country benchmarking index, representing 70 percent of the world's children. Conducted by The Economist Intelligence Unit, this index measured for the first time the response to sexual violence against children – 200 million victims every year – globally and country-by-country. This means that policymakers, the public, and partners in the fight will now have a clearer picture of this crisis so we can mobilize around global best practices or areas of greatest concern. The Carlson Family Foundation was proud to support this breakthrough research.

On a personal note, a few days before I left to go see Kurt's remarks at the UN around the launch of the Index, I was explaining to my kids where I was going and why. It resonated with them so much that they asked to come along to learn more and be a part of it. Their enthusiasm demonstrates how important it is for everyone to come up with ways to better leverage the energy, talent and creativity of the next generation to advance the cause of human rights for all. Let's ask ourselves the question: *How can we empower the young people in our lives to more fully participate in civic engagement and actively create a better world*? If you had to define responsible business in one word, what would it be?

Kurt Future.

Rick Hope.

Richard C. Gage is Chair of Carlson. He also serves on the Board of the World Childhood Foundation and the Carlson Family Foundation.

Kurt Ekert is President & CEO of CWT. He also serves on the Board of the Global Partnership to End Violence Against Children.

Every day...

...we help connect people to what matters:

our colleagues to their customers... our customers to their employees... our travelers to their destinations... and back home again. It's a breathtaking scope of work. Yet, we know it's our responsibility to do even more than this. CWT and Carlson values challenge us to forge connections beyond our walls in pursuit of a world we want to see.

About CWT

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About CWT

About CWT

Companies and governments rely on us to keep their travelers connected with a consumer-grade travel experience, combining innovative technology with our vast experience.



About CWT

What we do

36

100

workforce rotations per hour meetings and events per day

5 million

traveler calls each quarter

2 million

traveler emails per month

Service more than

33%

of the S&P 500 companies

Look after nearly

33%

of FTSE 100 companies

Transactions

- More than **800** daily registrations on myCWT mobile app
- myCWT mobile app rated an average of **4.5/5** on Android and Apple
- We process two transactions every second
- US\$25 billion in transaction volume in 2019

Our people

• Around **16,000** employees

5,600

per week

registrations to myCWT

- 70% women/ 30% men
- Around 145 countries
- Over **90** nationalities

Responsible business

Employees volunteered over 30,000 hours to community campaigns.

PLATINUM.

2020





Specialized services

- CWT Energy, Resources & Marine Travel management solutions for leading companies in the oil & gas, mining, offshore, marine and alternative energy industries
- CWT Meetings & Events Innovative and creative planning and logistics for meetings and events
- CWTSatoTravel Travel services for United States military and civilian government agencies
- CWT Solutions Group Specialist travel consultancy
- Roomit by CWT Hotel distribution services

Responsible Business Strategy and Governance

We think...

"We launched our Responsible Business (RB) strategy several years ago to create long-term value for all our stakeholders.

Having a clear strategy, supported by dedicated commitments across our seven Responsible Business domains, has helped guide our approach, focus our efforts and deliver consistently in what we set out to achieve.

Ensuring that we align to key global standards such as the United Nations Global Compact (UNGC) and the Sustainable Development Goals (SDGs) has also been a major enabler to becoming one of the best RB performing companies in our industry at a global level."

Françoise Grumberg

Vice President, Global Responsible Business and Diversity & Inclusion



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We act...

...to take action on the issues most important to our stakeholders

Responsible Business (RB) is our approach to living sustainably and acting with integrity. In 2019, we continued to align our RB activities to our vision and business strategy, across the seven domains, right. Responsible Business is central to how we think, act and live at CWT. The meaningful actions we have taken have positioned us as a leader in corporate social responsibility (CSR) around the world.

In 2019, we were rated Gold by EcoVadis, an independent and internationally-recognized rating agency. Our commitment to CSR was again recognized in 2020, when we received EcoVadis' newly introduced Platinum rating. This rating placed CWT among the top 1% of all companies evaluated worldwide, both within our industry and across all industries evaluated, for the fourth consecutive year.

Our Responsible Business domains

These seven RB domains form the basis of our program, guiding what we do and how we do it. We monitor our progress across the following:

- Responsible Business Governance: how we implement the RB strategy day-to-day.
- Ethics and Business Behavior: how we ensure we conduct business ethically, including within our supply chain.
- Human Resources: how we attract, develop, reward, retain and engage a diverse workforce.
- Human Rights: how we uphold human rights across all our operations and in our sphere of influence.
- Environment: how we minimize the environmental impacts of the company.

- **Responsible Products and Services:** how we integrate RB into our product and service offerings.
- **Community Involvement:** how we support the local communities in which we live and work.

Our process for identifying material issues

To ensure we are addressing the issues most relevant to our business and stakeholders, it is vital to have a robust materiality process based on stakeholder feedback and communication. We gather the perspectives of our employees, clients, external assessors, regulators and global sustainability partners, in order to take action on the areas that will leave the most positive long-term impact.

Our materiality assessment process comprises three key stages:

 Identifying relevant RB issues: we analyze a range of stakeholder perspectives from sustainability experts, regulatory guidelines and legislation. This includes global initiatives such as the United Nations Sustainable Development Goals (SDGs), the United Nations Global Compact's (UNGC) Ten Principles, as well as those of external assessors and other sources across the wider travel industry. 2. Collecting feedback from stakeholders:

having identified an extensive list of issues, we prioritize them by engaging with key stakeholders. Feedback mechanisms will vary by stakeholder. For example, for employees we use the results of our regular pulse surveys.

3. Reviewing issues according to their importance: we map issues deemed the most important to internal and external stakeholders against their importance to our business activities. The outcome forms the basis of our list of material issues.

Our last materiality assessment identified 17 topics that were grouped into our seven RB domains.

Responsible Business Strategy and Governance



We act...

...by setting long-term commitments

Since 2015, our dedicated **Responsible Business** (RB) commitments have guided our approach to taking sustainable action. Each is aligned to one of our seven domains and is supported by specific objectives that sharpen our focus.

RB domain	Priority	Long-term commitment	2015-2020 objectives	Progress
	Global Responsible Business Governance Page 14	Ensure progress transparency	 Assess our Living Responsible Business maturity and performance at global and local levels every year 	Achieved
Responsible Business Governance		Integrate RB into our activities	2. Deploy the Living Responsible Business program in functions and locations globally	In progress
Ethics and Business Behavior	Business Ethics and Compliance Page 25	Address compliance and ethics strategically worldwide. Conduct our business in line with our values, our Code of Business Ethics and Conduct, and the principles of the United Nations Global Compact	3. Further engage all employees and CWT partners through a global multi-year Ethics Training and Communication program	Achieved
		Spread the word to our key stakeholders about our ethics and zero-tolerance approach	 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 	In progress
	Privacy and Data Protection Page 30	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	In progress
	Diversity and Inclusion Page 35	Leverage diversity as one of CWT's major assets	 Deployment of our Global Diversity and Inclusion strategy through regional diversity and inclusion committees 	Achieved
Human Resources and Human			 Non-discrimination training of all recruiters and managers 	Achieved
Rights	Employee Engagement Page 43	Cultivate a highly-engaged workforce	8. Reach the level of best-performing companies while developing leaders to enhance employee engagement	In progress
	Human Capital Development Page 41	Establish workforce-readiness to deliver against future business needs	 Ensure delivery against future business needs by developing and selecting the right talent for the future and driving a culture of innovation 	In progress

Responsible Business Strategy and Governance



RB domain	Priority	Long-term commitment	2015-2020 objectives	Progress
Environment	Energy and Carbon Management Page 55	Develop an environmentally- responsible culture	10. Educate all our employees through eco-attitude campaigns and an environment training module translated into multiple languages	Achieved
			11. Empower the global environment network to drive local performance	In progress
		Measure our global carbon footprint	 Reduce our global greenhouse gas (GHG) emissions by 10% per employee versus 2015 	In progress
		Implement a global environmental strategy		Achieved
E	Responsible Portfolio Page 63	Contribute to our clients' Corporate Social Responsibility (CSR)/RB ambitions and promote	13. Further reinforce our RB products and services offering to our clients	In progress
Responsible Products		sustainability	14. Proactively propose carbon offsetting to our clients	In progress
and Services	Business Continuity Page 66	Ensure a robust Global Business Continuity Management system	15. Expand the scope of an ISO 22301-aligned Business Continuity Management system to include Crisis Management, Business Continuity Planning and Disaster Recovery	In progress
		Establish a best-in-class crisis management approach	16. Become the reference in terms of crisis management in the travel industry	In progress
Community Involvement	Corporate Community Involvement Page 71	Care for the communities where we live and work, and contribute to their development through our skills and expertise	17. Further deploy community action globally and measure CWT's impact in the 3E fields of action: Education, Emergencies and Essential needs	Achieved

We act...

...through strong governance and policy

Responsible Business (RB) is a business imperative. We adopt a comprehensive governance framework to ensure we integrate it into the way we do business every day. Global governance for RB is overseen by the Executive Leadership Team. The team receives regular updates on RB performance and strategy from the Vice President of Global Responsible Business and Diversity & Inclusion, who also updates the Board annually on RB plans and activities.

Our RB network is company-wide, encompassing all geographic regions and including members from nearly every business function within CWT. Drawing on the leadership of the Global RB team, as well as subject matter experts, RB ambassadors, RB country correspondents, and global taskforces, this diverse network of employees is critical for the successful deployment of the RB strategy globally.



Executive Leadership Team

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

RB Subject Matter Experts

Our experts own particular areas of RB domains and provide specialist advice and recommendations. They develop action plans to ensure CWT achieves its 2015-2020 objectives in each domain.

RB Ambassadors

Ambassadors help to deploy CWT's RB strategy and initiatives across the organization. Whether they are regional or functional, they collaborate to define key programs and initiatives, and identify specific areas for progress within their remit.

RB Country Correspondents

Our country correspondents develop, manage and implement programs in their respective countries, fostering an RB environment that brings together CWT's needs in local cultures. Their roles lie mainly in implementing local RB action plans, sharing best practices relevant to their country and facilitating and communicating RB initiatives.

Global RB Team

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

Responsible Business Strategy and Governance



We live...

...to act on key areas through our global taskforces

Global Diversity and Inclusion Taskforce

We aim to create and foster a workforce that reflects and contributes to the diverse, global community in which we do business. To deliver this consistently, our Global Diversity and Inclusion Taskforce is steering a multi-year strategy to engage all levels of the organization in promoting diverse and inclusive thinking across our policies, practices and processes.

Sponsored by the Chief Human Resources Officer, as well as the President, Traveler Experience & Customer, and led by the Vice President of Global Responsible Business and Diversity and Inclusion, the Taskforce leads programs and initiatives that foster an inclusive work environment rooted in our values. Passionate leaders from across the organization drive initiatives which include promoting non-discrimination through local and global activity. The Taskforce is also responsible for upholding and enforcing CWT's Global Diversity and Inclusion Charter, which can be downloaded **here**.

Key objectives:

- Supporting the United Nations Global Compact and the United Nations Women's Empowerment Principles by making them part of our day-to-day operations
- Ensuring an inclusive work environment that is free of discrimination at all stages of the employment life cycle
- Providing education and training to drive inclusive behaviors and foster gender equality
- Improving the diversity mix of CWT's workforce, especially among the leadership population
- Applying an inclusive approach when thinking of business and product development
- Ensuring our leaders are role models for diversity, and building an inclusive culture
- Reviewing measurable objectives and actively monitoring progress on an annual basis.



Responsible Business Strategy and Governance

Global Anti-Human Trafficking Taskforce

Human trafficking is not only a violation of human rights, it is a significant threat to the safety and security of our travelers. We recognize that this issue is too big for one organization to solve, which is why Carlson and CWT have taken a leadership position to raise awareness externally, engage employees internally, develop historic partnerships with organizations and embed it as a central focus of our Responsible Business (RB) activities.

Sponsored by the Chief Human Resources Officer and the Chief Legal Officer, the Global Anti-Human Trafficking Taskforce is led by the Carlson Senior Director of Corporate Affairs and by our Vice President of Global Responsible Business and Diversity and Inclusion. The Taskforce includes passionate CWT representatives from all regions and key functions.

Key objectives:

- Reinforcing our commitment to fighting human trafficking at all levels of our operations and within the travel industry
- Taking steps to influence our business partners and our supply chain
- Actively supporting the United Nations Global Compact by upholding the Ten Principles focused on human rights, labor, the environment and anti-corruption as well as the International Labour Organization's Fundamental Labour Principles and Rights at Work
- Reporting our progress annually
- Collaborating with stakeholders to drive change
- Taking a public leadership position in combating human trafficking in all its forms.

Global Climate Taskforce

Our colleagues and customers have been voicing increasing expectations for CWT to continue to improve our environmental footprint and support our clients and suppliers in further reducing theirs. Launched in early 2020, our Global Climate Taskforce's purpose is to help drive CWT's long-term environmental strategy.

Key objectives:

- Help with implementing CWT's long-term environmental objectives
- Proposing and leading initiatives to reduce our environmental impact at global and local level – in line with CWT's long-term objectives
- Further reinforcing our offering of responsible products and services to help our customers meet their own environmental objectives
- Collaborating on environmental topics with stakeholders throughout CWT's sphere of influence.

Global Responsible Purchasing Taskforce

Our stakeholders expect us to monitor RB practices within our supply chain. This helps us to reduce risks, strengthen our relationship with suppliers and clients, and enhance our own responsible business performance.

Launched in 2014, our Global Responsible Purchasing Taskforce provides strategic input to drive progress in ensuring that we are strengthening our purchasing decisions, while enhancing the visibility we have on our suppliers sustainability practices. In 2019, we expanded the scope of the Taskforce to cover our trade suppliers. The Taskforce is sponsored by our Chief Legal Officer. It is overseen by our Global Responsible Business team in collaboration with our Global Sourcing, Global Supply Management, Meetings & Events, and RoomIt teams.

Key objectives:

- Providing guidance on our purchasing strategy and operational support for the Responsible Purchasing program
- Collaborating with key internal and external stakeholders to drive continuous progress
- Promoting and championing responsible purchasing throughout CWT.





We act...

...to align to global principles and standards

It is essential that our Responsible Business (RB) strategy is guided by the wealth of respected evidence and thinking relating to sustainable behavior in all its forms. We have therefore aligned RB to globally-recognized principles and standards.

United Nations Global Compact (UNGC)

The UNGC is central to RB; indeed, we have been a signatory since 2012 and remain committed to operating in a way that nurtures respect, dignity and sustainability. More importantly, we are proud of how this has translated into action: in 2019, our annual Communication on Progress (COP) reached the UNGC Advanced Level for a second consecutive year for demonstrating the integration of Global Compact Principles in our core business and strategy.

As the world's largest CSR initiative, we support the UNGC's Ten Principles on Human Rights, Labor, Environment and Anti-Corruption. We are also taking action to advance broader social goals such as the United Nations Sustainable Development Goals (SDGs – see next page). Our UNGC correspondence table can be found on page 85.

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 Annual Responsible Business Report is prepared in accordance with the GRI Standards Reporting Guidelines. Core options and our full GRI index can be found on page 80.

CDP

Another long-standing affiliation, we have been reporting our environmental performance to CDP since 2013. CDP provides a global disclosure system for organizations to measure, disclose, manage and share key environmental information. Due to the impact of the COVID-19 crisis, we unfortunately cannot report our 2019 emissions to CDP in 2020.

ISO standards

ISO 26000 is the international standard against which companies 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 United Kingdom sites (recertified 2019) and all offices in Spain (recertified 2018).

In 2018, CWT Meetings & Events Italy obtained ISO 20121:2013 certification for 'Event sustainability management systems' (see page 63 for more information). CWT Italy and CWT Spain continue to meet ISO 9001:2015 certification for 'Quality management'.

EcoVadis

This environmental and social performance rating agency assesses over 60,000 businesses against 21 CSR criteria covering environment, labor, fair business and sustainable procurement. In 2020, CWT was rated 'Platinum' for our Responsible Business program, scoring in the top 1% among 60,000 companies assessed for the fourth consecutive year.

International Labour Organization (ILO)

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

Green Office certifications

WWF Green Office is an environmental management system developed by the WWF. It helps offices to reduce their ecological footprint and greenhouse gas emissions by motivating office staff to act in an environmentally-friendly way in everyday tasks. CWT Finland renewed its Green Office certificate for all our offices in 2019, and CWT Estonia uses European Green Office standards, which they have recertified in 2019 (see page 58 for more information).



Responsible Business Strategy and Governance

United Nations Sustainable Development Goals (SDGs)

The 17 SDGs agreed by all 193 UN Member States in 2015 represent a global call to society (including governments, businesses and civil societies) to work together to end extreme poverty, fight inequality and injustice, and protect our planet. The aim is to meet these goals by 2030 and we are determined to play our part. We have selected six SDGs and supporting targets that we believe CWT is best positioned to address. As well as listing below the specific actions we have taken to target these, we feature relevant SDG icons throughout this report to show where we have 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.

Our contribution in 2019

During 2019, we continued to champion education and employability for young people as part of our 3E Community Involvement strategy. See page 73 to view all the educational initiatives we conducted.

The path ahead

See our 3E Community Involvement commitments on page 78.

5 GENDER EQUALITY

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. By the end of 2019, nearly 69% of our employees were women. Women accounted for half of our Executive Leadership Team and 47% of all director-level roles and above.

In line with our commitment to gender equality, CWT fully endorses the UN Women's Empowerment Principles which are signed by our Executive Leadership Team.

See page 35 for more on how we are promoting gender equality.

See our Diversity and Inclusion commitments on page 52.

Sustainable Development Goals and Targets

Our contribution in 2019

8 DECENT WORK AND ECONOMIC GROWTH

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.

In 2019, more than a thousand training sessions were made available. Topics spanned leadership and self-development, job skills and CWT corporate training. In total, more than 97,000 training hours were logged globally.

See page 41 for more on how we are helping our people grow and thrive; page 44 on how we are creating a safe place to work; and, page 49 on how we are upholding Human Rights principles in all that we do.

The path ahead

See our Human Resources commitments on page 52.

10 REDUCED INEQUALITIES

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.

Respecting diverse ethnic and cultural backgrounds, genders, opinions, diversity of thoughts, sexual orientations, physical capabilities and talents is paramount to the way in which we operate.

In 2019, we undertook actions to continue to fight all forms of discrimination. See page 39 for more information.

See our Human Rights commitments on page 52.

Sustainable Development Goals and Targets

and its impacts

strategies and planning.

Target 13.2

Target 13.3



13 CLIMATE

A globally recognized climate crisis is now facing us. At CWT we are committed to identifying and mitigating climate-related risks for our customers, our employees, communities and the planet.

As well as continuing to reduce our direct environmental impacts, see page 58 for more information, we also continued to work with our clients to help them manage their own environmental impacts, see page 56.

See our Environmental commitments on page 60.

The path ahead



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

SDG 13: Take urgent action to combat climate change

Integrate climate change measures into national policies,

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

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.

In partnership with Carlson, we continued to actively raise awareness, engage employees and work with others to combat the issue of human trafficking and modern slavery in 2019, see page 48 for more information.

In addition, we continued to uphold strong standards of ethics and integrity within our business, see page 25, within our supply chain, see page 28, and to protect our customers and secure their information, see page 31.

See our Ethics and Compliance targets on page 32.

We act...

...and receive regional recognition

It is always gratifying to see our actions recognized by our peers and colleagues. It tells us that we are on the right track – and challenges us to do more. Here are some of the regional awards and recognitions we are proud to have received in 2018 and 2019.



• CWT was named winner of the Responsible Business of the Year category at the IN PACT Asia 2019 awards. The conference's inaugural Awards Program honors Asia's best purpose-driven organizations.



• CWT was shortlisted for five awards in the 2019 Business Travel Awards, including categories such as the Best Corporate Social Responsibility Programme, and the Best New Travel Technology Product.



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



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



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



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

Responsible Business Strategy and Governance

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We said	We did	We will
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2015-2020 Objectives	2019 Performance	2020 Goals
Assess our Living Responsible Business maturity and performance at global and local levels on an annual basis.	 CWT receives EcoVadis Platinum rating. Creation of a new Global Climate Taskforce. Continued leadership of the Global Responsible Purchasing, Anti-Human Trafficking and Diversity and Inclusion Taskforces. 	 Further embed Responsible Business into our company culture and operations.
Deploy the Living Responsible Business program in functions and locations globally.	 Partnered with members of the Executive Leadership Team to continue sponsoring our different RB initiatives. 	



Our milestones at a glance

2015

2016

- Launched Living Responsible Business program, aimed at all employees and further embedding Responsible Business (RB) into the fabric of the company. We placed significant emphasis on the program, engaging with every employee to get involved.
- Rolled out a Responsible Supplier Code and launched a Global Responsible Purchasing Taskforce.

- Achieved a EcoVadis Silver rating for our RB performance in 2015.
- Creation of two new global taskforces on Diversity and Inclusion and Anti-Human Trafficking, sponsored by members of the Executive Leadership Team.

2017

• Achieved EcoVadis' Gold rating for • CWT receives a second EcoVadis our achievements in 2016, ranking in the top 1% of all companies worldwide for RB practices across all industries.

2018

- Our annual Communication on Progress (COP) reached the UNGC Advanced Level for demonstrating integration of Global Compact Principles in our core business and strategy.
- Gold rating for our RB performance in 2017.

2019

- CWT receives a third EcoVadis Gold rating for our achievements in 2018, the best rating possible at the time, before receiving a Platinum rating at the beginning of 2020.
- Creation of a new Global Climate Taskforce.
- Extended membership of our Global Responsible Purchasing Taskforce to leaders in charge of relationships with trade suppliers as part of our work to extend our Responsible Purchasing program to include trade suppliers (see page 16 for more information).



Ethics and Business Behavior

Ethics (and Business Behavior We think...

"An organization can only celebrate success if its achievements have been gained ethically. Behaving with integrity and honesty therefore sits at the heart of everything we do.

To keep it that way, our Ethics and Compliance program is our guiding light. It governs how we behave, and what we do and don't do. This mission is further enhanced by requiring our supply chain partners to join us.

Therefore, if suppliers wish to do business with us, we ask that they also subscribe to the same standards that we do. Up until 2019, this applied to our non-trade partners, and in 2019 we made a significant step to start bringing our trade suppliers on board as well."

Lauren Aste Chief Legal Officer









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We act...

...to uphold strong standards of ethics and integrity

To be a world-class business in any sector, a company must be founded on the highest standards of ethical conduct. We have created a culture that promotes trust and nurtures relationships by focusing on transparency and honesty. The right way of conducting business is the clear focus of our Ethics and Compliance program, and the reason we are fully aligned to internationally-recognized standards. Key priorities of the program are business ethics and compliance, responsible purchasing, data privacy and information security. Our process starts with implementing ethical business conduct through a robust governance structure – supported by dedicated policies and training.

Pivotal to the success of this program is communication, and in 2019 we continued to raise awareness, remind and educate our employees and suppliers on the subject of ethics and integrity. As importantly, we also encouraged anyone who feels something isn't right to speak up so that we can take action.

Ethics and compliance governance

Ethics and compliance are driven from the highest levels of the company. Our CEO and other key members of the Executive Leadership Team sit on the Compliance Committee. In turn, they have the support of a team of lawyers and professionals who oversee the day-to-day management of the Compliance program, under the leadership of the Chief Compliance Officer.

The Global Compliance team is responsible for deploying and updating policies and procedures and promoting and ensuring compliance with our Code of Business Ethics and Conduct.

Code of Business Ethics and Conduct

Our Code of Business Ethics and Conduct ('the Code') defines how we act and behave every day. It is the foundation of all CWT compliance policies and encourages discussions among our people to help address any ethical dilemmas they may encounter. Fundamentally, it helps us maintain the trust we have built with our employees, clients and suppliers.

The Code outlines the ethical standards we expect of our teams and contractors wherever we do business, and this is reinforced through annual awareness training covering topics such as anti-bribery, anti-corruption, non-retaliation, gifts and entertainment. During the training, every employee must read and understand all aspects of the Code to ensure they are acting in line with our business ethics and our strong stance on human rights.

The Code outlines how we comply with applicable laws, treaties and regulations relevant to business conduct. It also includes guidance around workplace behavior and reinforces our values and principles clearly and comprehensively. It applies to every individual and contractor who works for, or represents us worldwide. Necessarily, every new joiner must read the Code and agree they will abide by it. For suppliers, we have a dedicated Responsible Supplier Code which serves a similar function. The Code, which was refreshed in 2018, can be downloaded on our **corporate website**. To raise visibility and encourage employees to get to know the Code better, an internal awareness campaign took place in 2019 (see 'Training on the Code of Business Ethics and Conduct' on the next page for more information).

Compliance Policy Manual

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

To help everyone understand what is required and keep up to speed, our Compliance Policy Manual distills our policies into a single, easy-to-use publication. This helps us to empower our people to make smart, informed decisions and be accountable for their actions, in a way that also meets our ethics and compliance commitments.

The manual was launched beginning of 2018 alongside the refreshed Code and contains the following policies:



1. Protection of personal data

Like any business we need to gather and hold personal data, which in our case is provided by our travelers, employees, travel managers, clients and prospective clients. This policy explains how any employee, or individual representing CWT, who processes personal information must protect and safeguard it in line with our Data Privacy policy.

2. International Trade Compliance policy

As a global company we must be aware of, and comply with, all applicable international trade laws such as trade embargoes, sanction screening and product export controls. Our International Trade Compliance policy sets out our processes and controls around how we deliver this.

3. Anti-corruption policy

Making or accepting bribes, or facilitating any kind of corrupt behavior, is forbidden across CWT. We also strictly prohibit any unfair business practice, such as kickbacks, facilitation payments or channeling bribes through third parties. Our Anti-corruption policy outlines our zero-tolerance stance on bribery and corruption, and our adherence to relevant legislation such as the United States Foreign Corrupt Practices Act and the United Kingdom 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 and we adhere to them in letter and spirit. 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 can distort healthy 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 describes how to handle situations that could create a potential, real or perceived conflict between CWT's interest and CWT employees. Anyone acting on CWT's behalf must be free from conflicts of interest and/or appearance of conflicts of interest that could adversely influence their judgment, objectivity or loyalty to CWT.

6. Anti-money laundering

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

The Global Compliance team has an appropriate due diligence process in place, which ensures the business aligns with the expectations set out in the Compliance Policy Manual. A comprehensive compliance risk assessment process related to all compliance policies is also in place. Additional existing key policies and processes include:

Fraud

If a case of fraud is identified or suspected, our formal internal fraud procedure outlines the process to follow, and how 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 important in our sales, marketing and advertising campaigns and material. If we make a claim, we must be able to substantiate it, and include all information and disclosures necessary to make our marketing accurate and transparent.

Training on the Code of Business Ethics and Conduct

We take preventive measures to ensure that everyone understands and adheres to the Code. These include mandatory training and awareness programs driven by the Global Compliance team. Each year, we run compulsory training on the Code and its policies, both for new recruits and current staff. In 2019, we achieved a 100% completion rate.

Employees can access the training wherever and whenever works for them because the sessions are part of our online learning management system. Our Global Compliance team has access to metrics on how they are performing on each compliance topic, and benchmarking data compares our performance as a business against our peers. We use this insight to determine if additional training is required.

Throughout the Code of Conduct training period in 2019, our Global Compliance team published a series of articles related to the real life application of CWT's Code of Business Conduct and Ethics. The team shared these stories on our social intranet so that colleagues around the world could better understand how the Code is applied in their day-to-day work.

Following the introduction of a new online Gifts & Entertainment reporting tool in 2018, which is now integrated into our social intranet, the Chief Compliance Officer published a series of blogs exploring common questions. These covered the topic of compliance and how we do business in line with our Code as well as core values of integrity and leadership, by asking questions such as "Is asking for a freebie an issue?" and "What's the difference between a gift and a bribe?". Employees were also encouraged to share their own questions that the Global Compliance team could then address in their future posts.

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Fighting bribery and corruption

As stated in our Code, we abide by all applicable laws, treaties and regulations that forbid bribery and corruption. In line with our commitment to conduct our business in the right way, we have a zero-tolerance stance on bribery and corruption. This means that we prohibit bribes in any form from any public or private third party, either directly or indirectly (such as through an agent) – even if it means losing business as a result.

CWT actively monitors existing and emerging risks relating to bribery and corruption. Every year, we perform a full risk assessment and risk ranking which identifies any ethical issues that may arise within the company and allows us to take the appropriate action if needed. 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 (such as audit and compliance). In line with our anti-corruption commitment, the Chief Compliance Officer reports directly to the Audit Committee which is a subcommittee of Carlson's Board and is comprised of all Board members.

When it comes to dealings with subcontractors and suppliers, we take a risk-based approach to due diligence. The level of diligence is based on a number of factors, such as industry, location, services provided, and beyond. As an example, there is an advanced due diligence process applied to certain categories of third parties who help provide services to CWT clients, such as destination management companies, tour companies, and visa and passport providers.

We live...

...to raise concerns through the Ethics Helpline

Being able to speak up and raise concerns or questions is vital in making sure we behave ethically – and, if we don't, that the issue is dealt with fully and professionally. Available 24/7, our confidential **Ethics Helpline** connects callers (employees, clients and other third parties) to an experienced, independent operator in their own 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 Global Compliance team reviews all cases and, depending on the nature of the issue, may assign an internal investigator. In 2019, the team updated our Investigation Manual and continued training a group of internal investigators to standardize the conduct of investigations. Where reasonably possible and allowed by law, CWT treats all information reported as confidential. We also have a strict non-retaliation policy against anyone who calls with concerns.

The Global Compliance team also develops metrics on the nature of concerns and their country of origin and tracks how the cases are resolved. This information is then reviewed quarterly with the Compliance Committee, which oversees compliance at CWT.

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



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We act...

...to create a sustainable supply-chain

Just as we uphold strong business ethics, we require our suppliers to maintain the same rigorous standards that we do. Responsible Purchasing makes clear business sense. It helps companies meet the expectations of their clients and stakeholders, build trust and reduce the risk of unethical behavior in the supply chain.

CWT's Responsible Purchasing program was launched in 2014 with an initial focus on non-trade suppliers*. In 2019, we started to expand the scope of this program to trade suppliers and will be adapting this program to them over the coming years. The program demonstrates our commitment to the United Nations Global Compact (UNGC) and to the ILO Declaration on Fundamental Principles and Rights at Work.

Responsible Purchasing governance

Governance for our Responsible Purchasing program is ensured by the Responsible Purchasing Taskforce, which provides strategic input and drives progress. This Taskforce is led by the Global Responsible Business team in collaboration with the Global Sourcing, Global Supply Management, Legal, Meetings & Events and RoomIt teams, and is sponsored by the EVP General Counsel, who is part of the Executive Leadership Team.

See page 16 to read more about the Taskforce and its key activities in 2019.

Responsible Purchasing program

Our Responsible Purchasing program consists of two main areas of focus: creating a responsible purchasing culture within the company through awareness-raising activities and embedding Responsible Business throughout the purchasing cycle.

1. Awareness and training for all employees

We continue to build a responsible purchasing culture. A training module, readily available on our online learning platform encourages our people to learn how to apply the Responsible Supplier Code. In addition, further information and resources about the program are available to all employees on our intranet website.

2. Embedding Responsible Business criteria throughout our purchasing processes

One of the best ways to improve our responsible purchasing performance is for us to embed Responsible Business across the whole purchasing cycle: from the moment non-trade suppliers are selected, to the moment when contracts are signed and products or services are exchanged.

a. Responsible Business questions in requests for proposals (RFPs) Since 2018, Responsible Business criteria have been integrated in official requests for proposals sent to non-trade suppliers. We ask suppliers how they address various CSR-related topics including compliance and ethics, human rights and labor conditions, environment and sustainable procurement. This is an important feature that allows us to embed responsible purchasing principles right at the outset of a relationship with our suppliers.

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

Available in seven languages**, the **Responsible Supplier Code** clarifies the minimum requirements CWT expects from non-trade suppliers in terms of ethics, compliance, human rights, social and environmental standards. We naturally expect all our suppliers to operate in full compliance with the applicable laws and regulations, but the Responsible Supplier Code goes further requiring them to attain internationallyrecognized standards to advance social and environmental responsibility.

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

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

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The Responsible Supplier Code covers the following broad topics:

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

Our Responsible Supplier Code contributes to CWT's fight against human trafficking and is aligned with industry-best practices and legislative trends such as the United Kingdom Modern Slavery Act. The Responsible Supplier Code reinforces our actions towards **preventing the use of any forms of modern slavery** in our supply chains. It can be downloaded on our **website** and it is also available as an online click-through form, making it easy for suppliers to sign and pledge their commitment to the Responsible Supplier Code.

To make sure we apply the Responsible Supplier Code effectively, a video training module is available to all employees. In addition, we have internal guidelines offering practical support regarding its implementation and application scope, the roles and responsibilities of internal stakeholders in applying it, and the measures to take should a supplier refuse to sign it.

c. Annual supplier sustainability assessments

Making sure we are up to speed with our suppliers' performance is fundamental to our Responsible Purchasing program. Key non-trade suppliers are evaluated by an independent CSR rating agency on 21 sustainability criteria relating to:

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



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We act...

...to secure our customers and their data

We need to hold sensitive information about our travelers, including passport information, payment details, itinerary and insurance details. Our **Information Security** program gives our clients confidence through our best-in-class tools and processes that are compliant with all applicable regulations and requirements to keep information secure and private.

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

Information security and data privacy governance

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

For data privacy, our Global Privacy Officer is responsible for leading the Data Privacy program and driving its implementation. This Officer chairs our data governance group for privacy operationalization, reports to the Chief Compliance Officer, and draws on support from compliance and data privacy professionals located worldwide. Our CEO, members of the Executive Leadership Team, the Compliance Committee and Board of Directors receive regular updates and briefings on our performance in this area.

This robust governance framework is supported by an equally vigilant incident response system (see iRespond in the We Live section on the next page), which operates 24/7. Our Business Resiliency program also tests and monitors our ability to respond rapidly in the event of business disruption, ensuring that our travelers' data is protected and secured around the clock.

Our Risk and Security policies and standards

At the heart of our data security are the physical and technological protections that ensure the confidentiality, integrity and availability of information. These are mandated by our Risk and Security policies and standards that form CWT's robust security framework.

We review and update our policies and standards every year (or as often as necessary) in response to changes in technology, infrastructure, new learnings, regulatory and regional requirements, as well as potential changes to the threat landscapes and security incidents. For example, in 2019 we revised our Global Data Classification policy to contain data element descriptions that makes the policy much more comprehensive. We also made additions to reflect recent changes in global privacy regulations. These policies and standards cover data protection and classification, comprehensive access controls, physical and environmental security, network and perimeter security, business resiliency, security management, security education and awareness, and emerging new technologies (such as Global Cloud Security, DevOps, and others). These also adhere to regulations and international standards such as the 1998 United Kingdom Act, the 1978 French Act, the 1988 Australian Act, the 2012 Philippines Act, US state laws, the EU General Data Protection Regulation (GDPR) and ISO 27001, among others.

Of course, the journey to security has no end-point as threats and technology evolve constantly. We therefore perform periodic internal and external independent audits on our products and services to 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.

2019 highlights

In 2019, CWT successfully retained the Payment Card Industry (PCI) Report on Compliance and Attestation of Compliance from our Qualified Security Assessor (an independent third-party assessor certified by the PCI Standards Organization). This is the result of an ongoing initiative by multiple cross-functional internal teams to ensure that the way we do business complies with the security standards that our customers expect from us.

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While we have maintained our compliance from previous years, we also expanded its scope to include systems and operations for our Military & Government business unit.

We continue to stay up to speed with industry, regulatory and client requirements by maintaining compliance to the PCI DSS program. We have also received a third-party clean report on the Services Organization Controls Accreditations 2 (SOC 2, Type 2) Security Principle Report on Commercial Services and are fully compliant with General Data Protection Regulation (GDPR) requirements as well as evolving global privacy standards and regulations.

In 2019, we also implemented a secure cloud solution that meets CWT's security standards and allows for improved speed and agility to bring products to the market. This Security as a Code (SaaC) solution is a collaborative effort supported by all the Product & Technology leaders and their teams, which will continue to contribute greatly to CWT's future success.

Raising awareness – inside and outside CWT

Policies are only as effective as the people who implement them and adhering to our Risk and Security policies and standards is fundamental to CWT's security program. We require all employees to review and be familiar with them, and for clarity they are available in eight languages.

They can access them at any time on our social intranet. We also publish regular communications on security topics throughout the year to keep our teams fully up to speed with evolving information security requirements and best practices.

Our Risk and Security program includes regular training in data privacy, and the administrative, technical and physical safeguards to users for securing their information. All our employees and contractors must complete this Annual Security Awareness training, which is based on our policies and standards, when they first join us and every year thereafter.

A central part of this training is the ever-growing threat of cyber-attacks and the logistical, reputational, and financial damage this can cause. Because our employees are our first line of defense in protecting client, employee and corporate information, we have an annual Cyber Security Awareness Week. In 2019, under the banner of 'Cyber security is everyone's business', the global campaign continued to elevate the critical importance of cyber security and ensure all CWT employees and contractors/contingent workers are informed and secure, both at work and at home. A broad range of security themes that the week-long campaign covered included Identity and Access Management; tips on how to detect and prevent phishing attempts and travel fraud; and a reminder of the importance to use iRespond to identify potential threats, and contain/limit any impact to our clients and CWT.

Our Global Risk and Security team also shares best practices with other businesses, governments and expert organizations. In 2019, the team participated in various industry advisory boards, conferences and committees to better understand key risks and share best practices.

We live...

...to prevent information security incidents

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

In 2019, iRespond was expanded to allow for reporting of data privacy issues in line with GDPR requirements. Our 24/7 incident response system supports our robust governance framework, while a Business Resilience program tests and monitors for rapid response in case of business disruption. iRespond and our Business Resilience program are strategically aligned and part of our wider Global Risk Management program.



We said	We did	We will
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2015-2020 Objectives	2019 Performance	2020 Goals
Further engage all employees and CWT partners through a global multi-year Ethics Training and Communications program.	 100% of employees underwent training on our Code of Conduct in 2019. Updated our processes in line with the Payment Card Industry (PCI) requirements. 	• Further engage employees and CWT partners through a Global Ethics Training and Communications program.
Deploy a robust external information campaign about our global policies and our best practice approach to ethics and compliance, as well as our Responsible Purchasing program.	 Extended the membership of our cross-functional Global Responsible Business Taskforce. Started to extend our Responsible Purchasing program to include trade suppliers. 	 Continue protecting employee and client data through leading-edge data privacy and information security policies and practices, while continually developing expertise throughout the organization.
Continue protecting employee and client data through leading-edge data privacy and information security policies and practices, while continuously developing expertise through the organization.	 Alignment to GDPR requirements. Continued to hold our annual Cyber Security Awareness Week. Continued to invest in cyber tools and technologies. Maintained PCI DSS and SOC 2 Type 2 certification. 	

Our milestones at a glance

2015

2016

• Launched our Responsible Supplier Code, laying out clearly the standards CWT expects of its suppliers and other partners.

- Cyber Security Awareness Week was launched as an annual initiative to educate employees and deliver training materials.
- Video training module on the CWT Responsible Supplier Code rolled out to all CWT senior management.
- Updated Data Privacy policy was launched.
- Our Code of Business Ethics and Conduct was reviewed in detail to reflect the latest industry best practices and legislative trends. Our fully revised Code of Business Ethics and Conduct was launched on January 1, 2018.

2017

• Numerous compliance policies consolidated into a single, easy-to-use Compliance Policy Manual.

- 2018
- Fully revised Responsible Supplier Code – in accordance with CWT's commitment to the fight against human trafficking, and in line with the United Kingdom Modern Slavery Act – was published in May 2018.
- Launched an online click-through form, making it easier for suppliers to sign and pledge their commitment to the Responsible Supplier Code.

2019

- 100% of employees underwent training on our Code of Conduct.
- Updated our processes in line with the Payment Card Industry (PCI) requirements.
- Expanded the scope of our Responsible Purchasing program to include trade suppliers.



Human Resources and Human Rights

Human Resources and Human Rights We think...



"At CWT, we strongly support human rights, diversity, inclusion and ethical behavior – these areas are part of our values in action and sit at the very heart of our culture.

Our employees are our strongest asset – and it is the responsibility of all to ensure we create a culture that promotes respect for all regardless of their background, origins, gender, color, age or sexual orientation. To this end, we live by our Global Diversity and Inclusion Charter to ensure we uphold our principles of integrity, non-discrimination and fairness.

Equally, we feel the same obligation to look beyond our walls and see how we can protect society more widely. With our leadership position comes responsibilities, and we are committed to deliver them."

Catherine Maguire-Vielle Chief Human Resources Officer





5 GENDER EQUALITY

8 DECENT WORK AND ECONOMIC GROWT

10 REDUCED
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We act...

...to promote diversity and inclusion

We seek to promote an all-inclusive workforce that celebrates diversity and inclusion. In doing so, we contribute to shared success and create a workplace that thrives. Diversity and inclusion are core to how we conduct business every day. Our approach looks to foster respect and create a team spirit in the workplace that embraces and leverages the multicultural essence of the company and provides equal opportunities to talented individuals. This is fundamental to the commitment we make to the Human Rights and Labor Principles of the United Nations Global Compact and the Universal Declaration of Human Rights (see page 17 for more information).

Diversity and inclusion governance

We continued to reinforce our commitment to diversity and inclusion through our Global Diversity and Inclusion Taskforce in 2019. Sponsored by the Chief Human Resources Officer, as well as the President, Traveler Experience & Customer Officer, the Taskforce leads programs and initiatives that foster an inclusive work environment rooted in our values. The Taskforce is made up of strong leaders from different regions and functions who are passionate about diversity and inclusion.

In 2019, our local diversity and inclusion committees continued their work at a regional/country level. This included hosting a variety of activities and events throughout the year – such as promoting celebrations around International Women's Day and LGBTQ month, and adding new members to continue to enhance their impact.

Our policies

Our commitment to recognizing and respecting the diversity of our people and ideas is set out in our Code of Business Ethics and Conduct ('the Code', see page 25 for more information). The Code outlines our zerotolerance stance on subjecting employees or applicants to any form of harassment, intimidation, threats, coercion or discrimination as a result of having engaged in filing a complaint or assisting or participating in an investigation, compliance review, hearing or any other activity in relation to local laws.

Our Global Diversity and Inclusion Charter, which was published in December 2018, outlines what diversity and inclusion mean to us and what our key objectives are. Our Charter is informed by the United Nations Global Compact and the United Nations Women's Empowerment Principles (see page 27 for more information). The Charter is available in six languages on our **corporate website**.

Beyond our policies, we encourage vigilance in preventing any inappropriate workplace conduct. Our employees are encouraged to promptly report (according to local laws and regulations) any inappropriate behavior to their manager, HR representative or our Ethics Helpline (see page 27 for more information).

Promoting gender equality

By the end of 2019, nearly 69% of our 17,155 employees were women (compared to 72% in 2018). Women accounted for half of our Executive Leadership Team and 47% of all director-level roles and above (47% in 2018). 43% of the senior-most level of executives are women (compared to 44% in 2018).

In line with our commitment to gender equality, CWT fully endorses the United Nations Women's Empowerment Principles, which outline seven steps businesses can take to promote gender equality in the workplace and in society. In addition to the CEO Statement of Support from our CEO Kurt Ekert, the entire Executive Leadership Team has signed these principles including our new Chairman of the Board, Rick Gage, thereby putting our values into action and demonstrating strong leadership support for advancing gender equality.

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Celebrating International Women's Day

We continued to celebrate women in the workplace on International Women's Day (IWD) in March 2019. In line with this year's theme, we interviewed different leaders about their experiences, challenges, strategies and suggestions to 'Better the Balance, Better the World'. Colleagues and teams joined the conversation, sharing pictures in various poses depicting balance on our social intranet. Activities were also organized in many locations, demonstrating just how deeply embedded the principles of diversity and inclusion are in the core of CWT's culture.



Highlights from our IWD celebrations included:

- United States, Minneapolis HQ: Two of our female Executive Leadership Team members hosted a session to discuss how we are embracing gender equality at CWT, as well as the ways we can promote it in our daily lives.
- France, Paris HQ: A panel of four Executive Leadership Team members discussed diversity and inclusion, hosted a quiz, and held a Q&A session where the panelists shared stories, advice and aspirations on gender equality at CWT and beyond.
- India, Pune: Female employees celebrated IWD and the Better the Balance theme in an environmentally-friendly way by planting tree saplings.
- Philippines, Manila: Our Traveler Experience team (TX CARE) shared words from empowered women on our social intranet outlining their experience as female employees of CWT.
- Egypt: Women at our Head Office used the day to dress uniformly to symbolize that despite our differences we always have something in common.
- Women of the Traveler Experience

 (TX) team: To keep the conversation going, our President, Traveler Experience Officer & Customer celebrated the inspiring women of TX throughout the month of March in a series of articles. 11 talented women shared their thoughts on being successful role models in a diverse workplace.



We live...

...to advance gender equality in our industry and beyond

As a business with a prominent place in our industry, it's vital we show leadership by using our platform to promote diversity, inclusion and equal opportunities. In 2019, we held several events to encourage dialogue on diversity and inclusion around the world.

- In Asia, our APAC manager spoke on a panel to discuss diversity and inclusion in the workplace at an event themed 'Demographics, diversity and corporate destiny in Asia,' hosted by The Economist.
- In the United Kingdom, our Chief Technology Officer spoke on the importance of promoting diversity in IT at the Women in Telecoms and Technology Travel Trends evening in London.
- In the Netherlands, our Chief Legal Officer and General Counsel participated in the General Counsel Diversity & Inclusion Group comprised of heads of legal from several large multinational companies.

Gender representation (as of Q1 2020)



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We live...

...to support the United Nations World Day for Cultural Diversity for Dialogue and Development

Industry research tells us that safety is the number one concern for female travelers. So, in celebration of the United Nations World Day for Cultural Diversity for Dialogue and Development, we launched a dedicated tool to help our colleagues offer useful advice: the 'Travel Safety Tips for Women (and Men too!)' guidelines. Covering everything from travel security to travel health tips, the guide acts as a useful checklist for travelers on how to stay safe, secure and healthy on their trips.

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We act...

...to eliminate all forms of discrimination

Respecting diverse ethnic and cultural backgrounds, genders, opinions, diversity of thoughts, colors of skin, sexual orientations, physical capabilities and talents is paramount to the way in which we operate. This approach is reinforced through our commitment to equal employment opportunities, as well as fair treatment and consideration in our hiring and career advancement practices. At CWT, we are employed and promoted based on our abilities, achievements and experience, and in accordance with local laws.

Discrimination and harassment

Our Code of Business Ethics and Conduct holds everyone at CWT to the highest standards of conduct, and any behavior that constitutes discrimination or harassment is not tolerated at any level of the company. In 2019, we ran a communications campaign to further promote our Code of Business Ethics and Compliance, which addresses anti-harassment and other key topics (see page 39 for more information). We also conducted several local activities in 2019 to promote Our Code of Business Ethics and Conduct across our business:

- **CWT Italy:** Signed a local collective agreement to recommit to tackling all instances of sexual harassment and violence in the workplace.
- **CWT India:** Launched a comprehensive Discrimination and Harassment policy and provided timely refresher sessions to reiterate the message to existing employees and new hires.

Non-discrimination in recruitment

Our commitment to diversity is embedded right from the beginning of the recruitment process: that company policies regarding non-discrimination, equal opportunity and recruitment by competency are to be respected. A diverse workforce is better able to innovate, connect with our customer base, and ensure we continue to attract the best talent.

In 2018, our Global Talent Acquisition team, supported by the Responsible Business team, organized non-discrimination training sessions for all CWT recruiters around the world. The objective of the training was to prevent and avoid discrimination in recruitment and to create awareness of discrimination relating to multiculturalism with hiring managers during the recruitment process. Following the training, a guide was created and made available to our global recruiters and new recruiters to ensure consistency in our approach.

United States

• We actively monitor the diversity

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

Hong Kong

• Promoting inclusive support schemes: we have various inclusive support schemes in place such as offering marriage leave for newly married employees, maternity leave, paternity leave and gifts for employees with newborn babies. A breast-feeding room was also set up in the office.

India

• Promoting female empowerment:

a platform for learning and development for women at work was launched through sessions conducted by senior female leaders in and outside of CWT. As part of International Women's Day 2018, celebrations took place where senior leaders spoke about the importance of gender equality. We also held a certified workshop for 'Women's Self-Defense' conducted at all six locations in India.

- Harassment policy: an anti-sexual harassment policy is in place, and open sessions are conducted to ensure employees have a collective understanding of the policy and its execution.
- **Cultural diversity:** we celebrate the festivals of the various races and religions that work for CWT to promote diverse culture and bring harmony to the workplace.

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Italy

 Parental leave: a local collective agreement was signed in which we added one additional day off work for employees in the event of illness of their child up to one year of age, going above and beyond the legal requirements.

Philippines

• Pulmonary tuberculosis (PTB) and HIV/ AIDS policies: the purpose of these policies is to reduce the stigma attached to PTB and HIV/AIDS and to ensure the worker's rights against discrimination brought about by the diseases. In 2018, we partnered with a local agency to hold a talk to raise awareness of HIV/AIDS among colleagues. Part of our Annual Physical Exam covers the PTB examination for all employees, in partnership with our local agency.

• Anti-Sexual Harassment policy:

the policy was drafted in compliance with a National Act declaring sexual harassment unlawful in employment, education and training environments, and for other purposes. The policy also covers our strict stance on discrimination in the workplace.

Singapore

- **Promoting inclusive support schemes:** we have various inclusive support schemes in place, such as offering newlywed leave, paternity leave and gifts for employees with newborn babies, as well as religious sensitivity procedures.
- Celebrating cultural diversity: we celebrate the festivals of the various races and religions that work for CWT, to bring harmony to the workplace and celebrate unity (this includes celebrations such as the Chinese New Year, Deepavali and Hari Raya).

United Kingdom

• **Celebrating cultural events:** the Canary Wharf office runs events throughout the year, including the celebration of Diwali.

United States

• **Gender pay equity:** our annual pay equity compliance training continues to take place every year in line with legislation for all United States-based people managers. In 2019, we also conducted a Pay Equity study based on gender and ethnicity – the results of which are now being analyzed and acted upon.

• Discrimination and harassment training:

a mandatory training course aimed at preventing discrimination and harassment was rolled out to over 3,800 colleagues in 2019. The course supports our commitment to our values of integrity and caring by teaching colleagues on how to identify instances of harassment and discrimination, speak up and report claims. The training was also offered to our non-US employees, where nearly 600 colleagues participated.

 Supporting military personnel: in 2019, we joined forces with an organization called 'Mission 22' and ran a donation campaign called 'Hotel Bookings for Veterans'. Mission 22 provides mental health resources to veterans suffering from PTSD and traumatic brain injury as well as raising awareness about veteran suicide. CWT, in partnership with some of our hotel vendors, donated US\$0.20 a room per night with the goal of raising US\$20,000 for Mission 22.
 We exceeded our goal by raising almost US\$28,000 in total.

We live...

...to prevent discrimination and harassment

We are committed to combating all discrimination and harassment in our workplace and beyond.

In our Asia Pacific (APAC) region, we launched a Workplace Discrimination and Harassment policy in 2019. The policy commits to maintaining a workplace that is safe and free from discrimination and harassment – where all employees are treated with courtesy, dignity and respect. The policy is available to all employees in our APAC region.

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We act...

...to attract, recognize and reward talent

From onboarding, to training and recognizing talent, to rewarding great work: the experience of our employees is key to our success. Accordingly, we offer onboarding and recognition incentives that show our appreciation.

Recruitment and onboarding

As a responsible employer, we employ on equal and fair grounds as outlined in our approach to non-discrimination in recruitment (see page 38 for more information).

Our Global Talent Acquisition strategy seeks to select the best candidates to match the needs of our business, by finding topperforming and diverse talent that aligns with CWT's core values. We educate and train our staff in the selection process so that they are able to assess potential candidates effectively. We also ensure that new employees have the tools and skills required to do their job effectively through a clear onboarding process.

In 2018, we launched CWT EMBARK to further enhance our employee onboarding experience. The page, featured on our social intranet, seeks to facilitate connections between new hires and our company culture, tools and people. In 2019, we increased the reach of EMBARK by including documents that guide new hires and hiring managers through the steps they need to follow – we also updated the page by including prominent information such as our values and ethics, our training and how to avoid unconscious bias.

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

Recognizing strong performance

The Carlson Fellows Awards recognize those who have demonstrated consistently strong performance and are role models for our organization, especially in the areas of customer experience, growth and operational excellence. It's the highest honor a CWT employee can receive, and winners are celebrated at a dedicated annual award ceremony in Minneapolis, Minnesota. In 2019, ten outstanding colleagues were selected by Carlson and CWT leadership from nearly 150 nominations. The 2018 Carlson Fellows were all recognized for their extraordinary performance – for living the values that enrich our culture and drive business success.

In addition to this group-wide award, many of our teams hold their own awards and recognition initiatives. These include:

- Legal & Compliance: holds quarterly legal and compliance awards called 'The Luminaries' to recognize achievements and best practice. Categories include the 'Collaboration Luminary' and the 'Innovation Luminary' where employees are awarded for their ingenuity and team-spirit.
- Customer Organization: pays tribute and thanks outstanding performance through the 'Star Performer' recognition program. In 2019, our President, Traveler Experience Officer & Customer awarded this not only to remarkable individuals, but to the whole M&E France team for their outstanding performance. The collective award was given in recognition of the team's efforts for holding a phenomenal employee event that

was awarded the prestigious Heavent Award in France.

- Meetings & Events: recognizes and rewards colleagues who embody company values through the Ambassador's program.
- Military & Government: encourages staff members to nominate fellow Military & Government colleagues for outstanding achievement and performance through the 'Spotlight on Service Award'.
- Product & Technology: celebrates innovation through the quarterly 'Product & Technology Awards'.
- Finance: recognizes employees who demonstrate CWT values and finance expertise through their twice annual Finance Awards.
- RoomIt: acknowledges individuals for accomplishments that support our strategy twice annually through the 'RoomIt Rockstars Awards'.
- Strategy & Commerce: the quarterly Celebrate and Elevate program recognizes the members of the Strategy & Commerce team who are living the CWT values in the way they work.

In 2019, we also continued to use peer-to-peer Buzz Bravo Badges, a simple, yet visible way for anyone to give a 'shout out' to a colleague. Dozens of badges continue to be awarded daily across the organization for actions where our employees have gone the extra mile.

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We act...

...to help our people grow and thrive

Our success depends on honing the skills, capabilities and passion 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.

Learning and development

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

We provide a Global Learning & Development portal that makes learning programs accessible and empowers employees towards self-driven learning. Our portal gives employees access to online training courses and opportunities for enrollment to webinars and classroom courses. Additionally, we provide various resources to support people in their learning, such as models and processes for key activities such as team leadership, time management and so on.

In 2019, a total of 1,280 training sessions were made available. Of these, 749 were instructorled training sessions and 531 online courses. Topics spanned leadership and selfdevelopment, job skills and CWT corporate training. In total, 97,098 training hours were logged globally. We also designed and rolled out specific training for teams and individuals throughout the organization. This included:

Foundational Leadership program

The Foundational Leadership program aims to equip new people managers with the skills and insight needed to drive higher performance for their teams. The one-day modular-based program is targeted at new managers or those new to a management role. The program is built around key subject areas of leadership, leading teams, coaching and feedback. Throughout 2019, sessions were presented in Paris, London, Warsaw, Minneapolis and Singapore with more than 100 of our leaders taking part.

Pluma coaching

In late 2019, we started a pilot program using Pluma, a mobile executive coaching platform that offers digital executive-level coaching. Each participant in our pilot undergoes a 360 review and is paired with a coach on a 6-month engagement, where meetings are held virtually, every two weeks.

Solution-based Selling

Launched in 2017 to drive a high performing sales culture and arm the sales and program management teams with the required knowledge, skills and behaviors to Solutionbased Selling approach, putting client needs at the forefront. In 2019, we continued to offer our Solution-based Selling training to new sales and program management joiners, holding a total of 67 training sessions for over 1,100 participants.

Skills for all

In 2019, we introduced short 45 minute virtual training sessions to develop essential competencies for all CWT employees. The training includes Managing Workplace Conflict, Effective Communication Skills and Intrinsic Motivation. The training offerings will continue to be expanded in 2020.

Responsible Business (RB) training

Around 700 customer-facing staff were trained in RB in 2018. Our customer-facing teams benefited from Webex courses (in English, Spanish, French and German) to update them on our sustainability progress and ways in which they can contribute to our RB program. In 2019, the training session was made accessible to all employees.

Zero to Hero webinars

In 2019 we launched our 'Buzz Zero to Hero' interactive webinars to help us all collaborate better on our social intranet site. After 43 sessions, we had nearly 1,500 employees actively participate. In 2020, we will offer local language sessions to the existing English offering.

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Performance development

At CWT, performance development is a continuum of moments that matter for all our people. This is why we expect our three formal milestones (goal setting, mid-year review and year-end review) to be punctuated by regular conversations between managers and employees, to discuss goals, achievements and barriers. This helps keep feedback timely, so that challenges are discussed and milestones are celebrated as they happen – and the formal discussions do not come as a surprise, or as a purely administrative task, but a natural framing to those ongoing conversations. We call this approach Everyday Performance Development.

Starting in 2019, all of our functions consistently follow and use the same performance review process and platform. We have worked to keep the process simple and effective – providing guides, toolkits and e-learning training modules to support managers, and their teams have clarity on the expectations from them at every step of the performance development journey.

Strategic talent planning

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



We live...

...to provide safe travel for our employees

As a global travel business, the safety of our traveling employees is vitally important. We continue to work in partnership with International SOS, a leading provider of emergency medical, travel and security assistance worldwide, to offer extended medical and safety/security protection to employees whenever and wherever they travel - whether internationally for business or for personal reasons. International SOS services include a mobile app that provides country quides, safety/security information, as well as the latest medical advice before and during their journeys. In 2019, we implemented an automated Program Messenger for all of our international travelers that directs them to download the International SOS app before traveling and instructs how to use it when on the road.

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We act...

...to encourage two-way dialogue

We actively listen to our people and act on their feedback, thanks to regular pulse surveys that provide leaders with valuable feedback to track progress against our strategy.

Pulse Survey purpose and topics

In 2019, two Pulse Surveys were distributed. Employees, spanning a broad range of grades, levels, countries and functions, responded to these surveys, answering questions on topics including: strategy, employee engagement, performance development, empowerment and accountability, enablement, our culture, learning and development, workplace and work-life balance. We also introduced open-text questions relating to workplace, culture and engagement to enable us to better understand what is on people's minds on a day-to-day basis.

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

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

Face-to-face dialogue

Senior leaders continued to meet and engage with employees around the world regularly, in town hall meetings, informal 'lunch and listen' gatherings and coffee chats, and online huddles. We also hold regular Webex meetings, often cross-functional, to keep teams updated and motivated.

Buzz: Our online employee community

Our award-winning social intranet site, Buzz, continued to be widely used by our colleagues in 2019. Analytics show that more than one in three employees were active on Buzz on a daily basis. This consistent engagement reflects the vibrancy of the community, which has transformed the way global teams collaborate and converse across borders, time zones and functions.

The most popular content are discussions, which are used by teams across the business to gather feedback and engage in dialogue covering a wide range of business topics. Members of the community can choose to share or collaborate through a number of different channels including: blogs, discussion threads, videos and groups to name a few.

This year also saw the launch of a specific group for our ever-growing homeworkers community to collaborate and share best practice.

Travel counselor feedback

Making up the majority of our workforce and being the daily interface with the customer, it is particularly important that we have a network of counselors to help build the future at CWT. To achieve this, we created the Workforce Evolution (WE) Counselor Advisory Teams in September 2019. The teams are composed of front-line travel counselors from around the world who meet monthly to discuss and provide feedback on the design of new employee programs, new technologies being deployed or upcoming counselor communications for effectiveness. Counselor Advisors do this by networking with their peers, asking questions and gathering responses which are then collated and discussed as a team ensuring their unified voice is reflected for the business. Following our feedback sessions, we engage Core Project teams to provide Counselor Advisor feedback and create action plans to make improvements. Counselor Advisors have successfully helped drive change in our organizational approach in areas like our EPIC Leader and Counselor growth programs, Counselors Rewards program, and communications around the vision for our new technology suite.

Exit surveys

In 2019, we expanded our exit survey approach across the entire organization. Exit surveys help to inform engagement and retention strategies as well as future business decisions about the employee experience strategy. Each employee who voluntary leaves the organization is invited to answer an online exit survey focusing on their decision behind leaving, their overall employment experience and thoughts on CWT's employer brand reputation. Results are shared at local and functional levels, so that we are able to improve retention and our employee experience.

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We act...

...to create a safe and secure place to work

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

Health and safety governance

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

- **Canada:** has a Health and Safety Committee comprised of management and employee representatives to ensure each location complies with provincial requirements.
- Chile: has a Health and Safety Committee responsible for raising awareness of safety issues, as well as identifying and dealing with workplace risks.
- Estonia: has an offer of regular medical check-ups provided by ESMED Medical Center. Every employee undergoes a health check-up every three years, or annually if recommended by a doctor.
- France: has a Health and Safety Committee for each division, covering 100% of the workforce.

- India: has a process to extend various benefits to employees via employee medical insurance plans (including family members) to cover them in case of any unfortunate incidents at work or otherwise.
- Italy: has a Safety Representative (RLS) in each location, nominated by the workforce.
- Sweden: has a Safety Officer that is selected by the union in each location.
- United Kingdom and Ireland: have implemented an Occupational Health & Safety Management System (OHSMS), as a move towards a harmonized EMEAwide system.

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

Workplace 3.0

Our Global Real Estate team developed Workplace 3.0 in 2017, a program that optimizes our office spaces in line with our digital difference strategy. The overall objective is to create spaces that bring people together and bring out their best, using technology to harmonize the employee experience.

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

We live...

...to reward healthy living

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

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

In 2019, the following Workplace 3.0 concepts were rolled out within our regional operations:

- Minneapolis: after a utilization study to assess how well space is used in the building in 2018, we remodeled and downscaled the workplace by 25,000 square feet, aligned it more clearly to our brand and updated it with more collaborative break-out spaces in 2019. The work included replacing LED lighting and installing more energy efficient AC equipment and light sensors. A wellness room was also incorporated as well as height adjustable desks with acoustic panels to mask sound and enable our colleagues to work more effectively.
- Paris: we optimized our workplace by reducing the number of floors CWT occupies and redesigning our spaces to better represent our culture and the way we need to work together. This included installing flexible desks, conference room facilities as well as cloud-booking technology (see page 58 for more information).

Employee Assistance programs (EAPs)

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

- Australia: provides counseling support for employees covering personal and work-related issues, legal assistance, family plans, money management services, nutritional advice and various other guidance to support employees.
- **Canada:** offers a voluntary, confidential counseling and information service for CWT employees, and HR posts monthly features covering a range of health, wellbeing and work-life balance topics.
- France: provides telephone support, face-to-face consultations and confidential advice for employees throughout the year.
- Germany and Austria: offers life coaching and home care for elders and children in case of need, as well as additional services.
- Switzerland: supports colleagues through telephone support and face-to-face counseling with trained professionals to help employees work through difficulties.
- United Kingdom and Ireland: covers counseling, legal, medical and personal tax advice.

Global commitment; local implementation

Each country and office is responsible for implementing and maintaining its own health and safety policies and procedures, and for training their teams in the most locally-appropriate ways. Here are some of the regional highlights from 2019:

• **Repetitive strain injury (RSI):** local teams have mechanisms in place to identify, support and rehabilitate anyone affected by RSI. From ergonomic office furniture to enabling employees to work from home, we deploy systems that ensure our people are able to work efficiently and effectively. For example, in **Canada**, an ergonomic guide helps people set up and use equipment in ways that prevent RSI, while in the United Kingdom and Ireland our display screen equipment assessors review self-assessments and assist individual needs. In Germany, Mexico, the Netherlands, Belgium and Luxembourg we offer ergonomic furniture and regular ergonomics guidance. We also offer occupational healthcare services and training in Finland.

We live...

...to reduce workplace stress

Our teams around the world are working on ways to prevent stress and to promote ways to manage it. For example, in 2019, United Kingdom and Ireland offices organized an event around the International Stress Awareness Week. The 2019 theme of the week was 'Resilience – the power to succeed' which aimed to raise awareness of stress prevention and the importance of knowing where to go for advice. A document shared on our social intranet provided tips to avoid and reduce stress as well as a direct link to the countries' specific helplines.

- Stress management: our teams around the world are working on ways to combat stress in the workplace. In our Belgium, Luxembourg and Sweden offices, 'chill rooms' are set up for employees to take time away from their desks, while our United Kingdom and Ireland offices have their own stress and wellbeing policy. In Germany at the Düsseldorf FSC, massages are offered once a week. In Italy, regular stress management and prevention assessments take place. In **Spain**, employees are entitled to 50% discount for various gyms and health providers. In **the** Netherlands, HR initiated 'clear your mind' tools to reduce levels of stress hormones via a desk bike and sit ball. This way employees can combine a healthy life style during the working day by exercising.
- Noise reduction: as an office-based company, it is important that our employees work under conditions that enable them to complete their day-to-day tasks in a quiet and peaceful environment. For example, in **Belgium**, separation boards were installed between benches and investment was made in noise reduction materials for wall insulation to keep noise to a minimum. **The Netherlands** has also invested in noise reduction materials to keep noise to a minimum so employees can work under pleasant conditions.
- Wellbeing: we put in place measures to promote work-life balance and employee wellbeing for all employees. For example, in **France**, our 'Quality of life at work action plan' offers a variety of measures to improve work-life balance. This includes

implementing a 'listening cell' where employees can seek professional support and a contact address for collaborators to ask questions or make any sensitive situations known in confidence. In **Shanghai** and **India**, we continued Workplace Yoga to bring increased productivity, reduced stress, and overall wellness to local employees. In **Germany** we organized a health day in our Eschborn offices, in **Belgium** and **Luxembourg** we provide fresh fruit and bike facilities, and in **the Netherlands** we offer a shuttle bus in winter to local train stations to keep employees safe.

- Healthy living: CWT expanded its compensation offer related to health at our Estonia offices. Here, sports clubs and swimming pool membership tickets were reimbursed to support healthy behavior.
- Work-life balance: we introduced a pilot in North America in 2018 that offered a series of flexible work options called 'Flexing 4U', based on feedback from our people and the needs of our customers. The focus of the program is to offer flexible work including flexible hours, locations, schedules and teams in consideration of changing requirements and expectations of our colleagues.

Training and awareness

Although we take a global approach to health and safety governance, training is managed at a local level to focus on local priorities. Here are some of the training activities that we continued to conduct in 2019:

- **Benelux:** annual training takes place for health and safety advisors, including refresher training for first aid.
- **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.
- Italy: all employees take part in the annual health & safety training program (e-learning course) as well as refresher training for fire wardens and first aid roles.
- **Philippines:** annual fire and earthquake drills take place for both sites in Manila that involve all employees.
- United Kingdom and Ireland: the content of the health, safety, security & environment (HSSE) welcome presentation was reviewed and expanded in 2019 to further enhance the information provided to new starters. A program of refresher training was delivered across all key roles as part of the implementation of the new H&S management system.





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We not only uphold individual human rights across all our operations but expect the same from each of our business partners. This means, in part, that we all respect the regulations relating 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. This therefore means that we do not condone and will never knowingly facilitate adult or child sex tourism. We take all reasonable steps to eradicate any such practices globally, and never knowingly do business with a supplier or any other business partner involved in these areas.

In the same spirit, we are committed to combating modern-day slavery through developing proactive measures to educate employees and encourage our partners and the broader business community to take a stand against human trafficking.

Ensuring fair labor practices

CWT, as a signatory of the United Nations Global Compact, is committed to respecting the principles related to human rights and labor, and to the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO). CWT upholds individual human rights in all of our operations, and we expect the same from all our business partners. We strive to promote equal opportunities for all, regardless of ethnic and cultural backgrounds, age, color of skin, gender, sexual orientation or disability. The role of the Vice President of Global Employee & Labor Relations builds on an already extensive framework of practices in this domain. In addition to complying with local and international labor laws in the countries where we operate, we have collective agreements in many countries where we go further than the law actually requires. This is evidence of our commitment to care and dialogue between the company and our employees, and to show enlightened leadership in addressing labor standards wherever we operate.

Beyond this, we strive to protect our employees' personal data and information in line with the requirements set out in the General Data Protection Regulation (GDPR). This includes delivering employee notices in local languages to inform them about how their personal data is stored. We have a dedicated working group to deal with this topic for Human Resources, and a rigorous process to manage and improve how we handle all employee information. This group is also available to employees for any queries they may have.

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 27 for more information). CWT strictly prohibits retaliation against anyone who makes a report in good faith and/or which contributes to an investigation into a possible violation of law.

Working conditions

We adopt the global principles of decent working conditions set by the United Nations 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.

More broadly, our Workplace 3.0 strategy focuses on efforts to create healthier, more effective workspaces. Through our refurbishment program we are assessing the size of our offices, physical footprint, as well as guidelines around flexible working and ergonomic processes. The program is also an opportunity for us to mitigate our environmental impact by reducing direct commuting (see page 44 for more information).

Collective bargaining arrangements

We respect the rights of our employees to join labor unions, workers' councils or other collective bargaining organizations. This is enshrined in the commitment we make to the freedom of association as set out by the ILO, and as a signatory to the United Nations Global Compact.

The CWT European Works Council (EWC), the official body for information and consultation, represents all CWT European employees in the European Union. In compliance with European legislation, the EWC represents the interests of employees at a European level in dialogue with CWT's European Management team.

On a quarterly basis, EWC members are consulted by CWT management on the progress of the business and any significant decision that is likely to affect employees at a transnational level. The EWC is committed to informing its members about advances made and collectively identifying priorities moving forward. For example, topics include the economic and financial situation of the company, jobs and employment situation and development, proposed transnational changes in the organization, health and safety, and training.

The EWC was renewed in late 2018 and members can have a two-day training session every year to hand over their responsibilities. A dedicated intranet page was also launched to simplify information-sharing, support transparency of communications and help promote EWC actions in the various member countries.

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

We act...

...to combat human trafficking and slavery

The travel industry has the opportunity to counter the activities of human traffickers. We are in a unique position to make a difference through our employees and travelers, and we team up with partners to combat this pressing issue. It is a sad truth that human trafficking and slavery depends in part on using the travel industry. Our sector can get caught up unwittingly in the traffickers use of air and sea travel, hotels and even international events to facilitate their illegal activity. In addition to violating human rights with appalling consequences, trafficking poses a safety and security risk to our bona fide travelers. To combat this worldwide challenge, Carlson and CWT are actively raising awareness, engaging employees, partnering with others externally, and integrating the issue as part of our Responsible Business (RB) focus.

Our policies and procedures

In response to the United Kingdom Modern Slavery Act (2015), CWT published a global statement on anti-slavery and human trafficking that was updated in 2019. It is available to download on our **corporate website** and covers some of the actions we have taken to fight against slavery and human trafficking in our operations. It states clearly that:

- we oppose all forms of slavery and human trafficking without exception;
- we commit to taking steps to influence our business partners and supply chains to take the same uncompromising stance; and
- we actively support the Ten Principles of the United Nations Global Compact focusing on the core areas of human rights, labor, the environment and anti-corruption as well as the International Labour Organization's (ILO) Fundamental Labor standards. We will report annually on progress against these principles.

In accordance with our commitment, and in order to comply with the United Kingdom Modern Slavery Act, we include specific language in our Responsible Supplier Code to prevent the use of any forms of modern slavery in our supply chains (see page 29 for more information).

Global Anti-Human Trafficking Taskforce

In 2019, we continued to reinforce our commitment to this fight through reinforced policies, increased awareness and education, and closer collaboration with stakeholders and public leadership.

The Carlson Senior Director of Corporate Affairs co-leads the Global Anti-Human Trafficking Taskforce with our VP of Global Responsible Business and Diversity & Inclusion. The Taskforce is sponsored by the Chief Human Resources Officer and the Chief Legal Officer and includes CWT representatives from all regions and key functions (see page 16 for more information).

Partnering to combat human trafficking

The fight against human trafficking will not be won by operating alone. As with much of our RB work (and our commitment to Sustainable Development Goals 16 – see page 20 for more information), we count on partnerships to make a targeted, scalable impact. Working in collaboration with Carlson and the Carlson Family Foundation (see page 75 for more information), some of the most prominent partnerships in this area during 2019 include:

We live...

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...to speak up

We are passionate about raising the profile of an issue that should have particular resonance in our industry, which can become an innocent partner through our daily business of arranging travel.

Our senior leaders therefore continued to speak at multiple events in 2019. Highlights included a human trafficking workshop led by our Chief Legal Officer during a first-of-itskind workshop hosted by INTERPOL. Joined by leaders from the tech, finance, travel and hospitality industries, this session focused on transportation trends and threats related to human trafficking.

Our CEO is on the Board of the Global Partnership to End Violence Against Children, a unique collaboration established by the United Nations to achieve this Sustainable Development Goal by 2030.

CWT's Chief Legal Officer and our Chief Human Resources Officer, also attended a conference solely dedicated to this topic and which was organized by the AMCHAM in Paris. They explained CWT's commitment to fighting trafficking and the sexual exploitation of children through the training of our employees, the implementation of strengthened internal and external policies, and the awareness and collaboration of our stakeholders.

World Childhood Foundation

Carlson's commitment to protecting at-risk children dates back to 1999 when the Carlson Family Foundation accepted an invitation from Her Royal Majesty Queen Silvia of Sweden to become a co-founder of the World Childhood Foundation. This organization supports projects in 17 countries that are focused on preventing abuse and exploitation of children, including trafficking. Carlson and the Carlson Family Foundation's trustees provide leadership on various World Childhood Foundation boards, including those in Sweden, Brazil and the US. Our Chief Legal Officer is on the Board of World Childhood USA.

To commemorate the 20th Anniversary of Childhood in 2019, CWT initiated a number of awareness and fundraising programs, internally and externally. This included a global campaign from RoomIt pledging to contribute US\$1 for each hotel booking made during the month of August, up to US\$100,000. RoomIt achieved this milestone through the support of 651 participating clients and the campaign included 2.7 million messages to CWT travelers about the work of Childhood.

ECPAT

For more than 15 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. With contributions to its global study on sexual exploitation of children in travel and tourism and funding from the Carlson Family Foundation for its sector-wide training on these issues, the partnership is delivering change beyond our own business. Carlson's Senior Director of Corporate Affairs sits on the board of ECPAT USA.

Of course, trafficking needs to be identified before it can be stopped. To this end, CWT recently provided expert guidance to ECPAT-USA to develop new e-learning training for travel, events and meetings professionals to recognize danger signs and take action. We then incorporated this training into our internal Learning Management System and offered it in four languages to all CWT employees.

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We act...

...to uphold human rights principles

We pledge to uphold human rights, inside and outside our company. This is enshrined in the commitments we make to the United Nations Global Compact (UNGC), the International Labour Organization (ILO) and the Universal Declaration of Human Rights.

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Thorn

In keeping with our own digital strategy, we know that digital tools have a crucial role to play. We work closely with Thorn, a builder of technology to defend children from sexual abuse. The organization develops and provides tools to law enforcement to rescue sex trafficking victims and arrest perpetrators.

To know more about the Hackathon please see the 'We Live' box on page 51.

The Orphaned Starfish Foundation (OSF)

OSF works in 29 countries to help orphans, victims of abuse and trafficking, and at-risk youth to escape the downward spiral of abuse and poverty. This material help includes computer-based education, job training and job placement assistance. CWT continues to grow local partnerships and volunteering with several OSF-supported organizations across the globe, and CWT employees donate to assist in this work. Our Chief Technology Officer sits on the board of the organization.

In 2019, two partner organizations of OSF were nominated and voted by employees to be recommended for an Employee Choice Grant. Through funding from the Carlson Family Foundation, these illustrate a high level of employee support since each nomination required at least one community involvement activity with the organization. These grants are a significant help to furthering its work, and will continue to strengthen the relationship with our colleagues in those communities.

Awareness and education

Raising awareness and education about human trafficking and slavery is crucial. In 2019, we continued our partnership with ECPAT International to launch digital anti-trafficking ads on the myCWT portal, aiming to encourage travelers to look for and report signs of sexual abuse and trafficking (see page 65 for more information). Throughout the year, we displayed more than 580,000 of these impressions for travelers on myCWT.

We continued to offer ECPAT training to our employees, enabling them to recognize the signs of human trafficking and sexual exploitation and know how to address it. We also continued to keep the issue front of mind by periodically sharing additional information, stories, and tools from our NGO partners through our internal communications platforms.

CWT colleagues joined this fight in every geographic region by hosting local NGOs and business partners for informational sessions about the issue. These included events in the United Kingdom, India, Poland, Egypt, France, the Philippines, Costa Rica, and the United States, and featured past partners as well as learning sessions for groups new to our networks. In India, for instance, we forged vital connections to help protect women and children by holding an awareness-raising event with Kranti School in our Mumbai office. In the United Kingdom, we hosted Odanadi, a South Indian NGO at our Canary Wharf office. In France we participated at a conference organized by the American Chamber of Commerce (AMCHAM) to promote our fight against sex exploitation of children and stakeholder dialogue.

We live...

...to shed light on the issues

Supported by the World Childhood Foundation and the Oak Foundation, with additional support from the Carlson Family Foundation, The Economist Intelligence Unit (EIU) has developed a benchmarking index to cast a spotlight on how 60 countries are addressing sexual violence against children. This report leverages key findings from the index model, which was published in May 2019, as part of a broader exploration of the barriers to progress in fighting sexual violence against children, while highlighting strategies that have proven effective. See more at: https://outoftheshadows.eiu.com/

Developed by The EIU, the benchmark will help to measure progress toward reaching the United Nations Sustainable Development Goal target 16.2: ending abuse, exploitation, trafficking and all forms of violence against, and torture of, children.

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Collaboration with stakeholders

As well as partnering with leading organizations, our teams collaborate with key stakeholder groups. For instance, in 2019, CWT co-founded a global human trafficking taskforce within the World Travel and Tourism Council (WTTC). With development funding from the Carlson Family Foundation, this taskforce of travel industry members will focus on prevention, protection, action and support, with the goal of preventing trafficking and providing a forum for collective action across the sector.

We also joined Carlson, WTTC, ECPAT and other leaders in 2019 in the Independent Experts Group on Child Protection in Travel and Tourism. As well as sharing information and comparing models across countries, this group also led the global launch of the 'Don't Look Away' reporting platform. This three-year project involves 16 members of the ECPAT network, co-funded by the EU, and aims to promote new ways to combat the sexual exploitation of children.

Throughout 2019, our Legal & Compliance team also continued to partner with TrustLaw, which provides pro-bono legal advice to not-for-profit organizations that fight modern slavery and human trafficking, among other things, around the world. Our employees also raised significant funds to support our partner non-profit organizations, such as through our annual community giving campaign in the United States, and other fundraisers across the globe.



We live...

...to develop digital solutions to stop trafficking

Just as digital technology brings threats from trafficking, it must also be harnessed to defend against it. In 2019, our Chief Technology Officer partnered with Carlson, the Carlson Family Foundation, and local corporations to develop a Thorn 'Hackathon' at the Carlson headquarters in Minnesota. This summit of many of the region's most skilled technologists and computer engineers was created to find effective solutions to keep children safe.

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We said	We did	We will
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2015-2020 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.

2019 Performance

- Reinforced our Culture program with the creation of a Culture Committee and a network of Culture Ambassadors.
- Celebrated gender equality all year round.
- Deployed a training course aimed at preventing discrimination and harassment.
- Held our Global Diversity and Inclusion Taskforce every quarter.
- Continued our Carlson Fellows Awards to recognize strong performance and role models.
- Deployed a Foundational Leadership program.
- Launched our 'Buzz Zero to Hero' interactive webinars to help reinforce collaboration on our social intranet site.
- Continued our regular Pulse Surveys to check the heartbeat of employee opinion throughout the year.

2020 Goals

- Further advance women's rights, gender equality and non-discrimination.
- Continue to hold our Global Diversity and Inclusion Taskforces.
- Further deploy the unconscious bias training globally.
- Create a Global Wellbeing and Disability forum for all employees.
- Publish a Charter for Working from Home.
- Continue our fight to combat human trafficking and hold our Global Anti-Human Trafficking Taskforce.

Our milestones at a glance

2015

2016

- We went live with our new HR tool, HR Connect, and opened two of the three new CWT HR Service Centers, one in the Philippines and another in Costa Rica.
- We published our Global Health and Safety Charter which serves as an umbrella policy to local policies and procedures and complements our Code of Business Ethics and Conduct.
- Organized four first aid training sessions in partnership with the French Red Cross, for employees in our Paris office following terrorist attacks in the city.

- Transitioned to an innovative new learning management system, 'My Learning'
- Moved to Pulse Surveys as a regular approach to gathering feedback by targeting specific topics and employees more frequently throughout the year.
- Launched two new career websites (one internal, one external) to complete our set of integrated recruitment tools.
- Non-discrimination training for all CWT employees was initiated.

• In APAC, creation of a group of Chief Millennial Officers

2017

- Launched our social intranet, BUZZ, to over 18,000 CWT users across 50 countries.
- Published externally a global statement on Anti-Slavery and Human Trafficking.
- Carlson and CWT teams took the 'Walk the World Together' challenge in support of ECPAT International, a non-profit organization working to protect children from trafficking, sexual exploitation and online abuse.

- 2018
- Published our vision, objectives and principles in a Global Diversity and Inclusion Charter, and organized D&I events including a D&I week.
- All employees were granted access to unconscious bias training materials.
- Our Carlson Board Chair and our President & Chief Executive Officer, together with the entire CWT Executive Leadership Team, signed the UN Women's Empowerment Principles on International Women's Day.

2019

- Refreshed our global public Modern Slavery Statement
- Hold quarterly Diversity and Inclusion and Fight Against Human Trafficking global Taskforces
- Organized regular Diversity and Inclusion celebrations
- Continued to partner with global leaders and local stakeholders to fight human trafficking
- Co-founded a global human trafficking taskforce within the World Travel and Tourism Council (WTTC)



CWT Annual Responsible Business Report September 2020

Environment

Environment

We think...

"The world has moved on from simply talking about climate change. It is now globally recognized that we face nothing less than a climate crisis.

The environmental expectations we must meet have never been higher. Clients rightly ask us questions about how we conduct our business responsibly and, increasingly, how we can help them meet their own environmental objectives.

In response, we created CWT's Global Climate Taskforce in 2019. It is comprised of leaders from key functions across our business, with the clear goal to chart and then implement a climate roadmap for our business and clients."

Françoise Grumberg

Vice President, Global Responsible Business and Diversity & Inclusion



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We act...

...to preserve our planet

We are now facing a globally recognized climate crisis. At CWT we are committed to identifying and helping mitigate climate-related risks for our employees, our customers, and the planet.

Acknowledging the travel industry's responsibility

Travel brings numerous social, economic and cultural benefits to the world. Equally, we acknowledge that the travel sector is contributing to carbon emissions. Through collaboration and partnership, there has been a concerted focus towards adopting more sustainable global practices – and recognition that the entire industry must work together to make a meaningful impact.

Over recent years we have seen positive progress. Supply chain initiatives have been an important start, including the hotel industry aiming to eliminate single-use plastics and invest in more eco-certified buildings, and airlines investing in fuel-efficiency initiatives and new technologies. But we acknowledge that this is just the beginning.

CWT has a clear role to play, not only by collaborating with our colleagues in the sector but also by listening closely to strong demand from clients. They want more visibility of the impact of their travel and Meetings & Events programs; more granular details of where those impacts arise; and, above all, to know how to reduce them.

This also shows in the fact that 100% of global requests for proposals include questions on sustainability.

Our global environmental strategy

As we state in our **Global Environmental Charter**, CWT is committed to environmental stewardship.

Our approach aligns with the commitments we make as a signatory to the United Nations Global Compact's environmental principles and focuses on three core priorities:

- voluntarily measuring, reporting and reducing emissions;
- creating an environmentally-responsible culture:
 - through awareness-raising campaigns;
 - by promoting global and local actions that improve our environmental footprint; and
 - by encouraging employee-led environmental actions and initiatives; and
- supporting our clients in implementing environmentally responsible solutions to tackle climate-related issues (see page 65 for more information).

To ensure our strategy is consistently delivered, our global cross-functional Climate Taskforce drives the strategy forward (see page 16 for more information).



We act...

...to measure and reduce our carbon footprint

We seek to understand our own impacts by measuring, comparing and analyzing them. Only then can we be effective in reducing them. We subscribe to the philosophy that it's the things that get measured that get improved.

Indeed, we have been voluntarily measuring and reporting our emissions every year since 2013, progressively increasing the accuracy and completeness of our reporting over the years. We collect data on data center energy and cooling agent consumption, business travel, fuel consumption of company cars, employee commuting, energy consumption of buildings, purchased goods and services, and waste management in key locations.

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

The 2019 campaign to calculate our 2018 emissions included 23 countries across three regions, representing 80% of our revenue. The results were published on our **Annual Responsible Business Report website**. In 2020, due to the COVID-19 crisis, we were unable to collect the data necessary to calculate and publish our 2019 emissions in time for publication in this report.

We live...

...to promote global environmental leadership

Leaders from across CWT continued to make pledges and commitments towards making their leadership team meetings more responsible and carbon neutral in 2019.

Our Global Leadership Conference, Human Resources and Strategy & Commerce leadership teams all ran carbon neutral meetings in line with this commitment.

These efforts align with our group-level objective to have 100% of our leadership team meetings organized responsibly and made carbon-neutral by the end of 2023.

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We act...

...to promote environmental responsibility

We seek to create an environmentally conscious culture through awareness raising activities and encouraging direct change through employee-led actions and initiatives.

Environmental Awareness Week: 'Meet with Positive Impact'

Every year since 2015, we organize a week-long global campaign to raise awareness of the ways in which every employee can contribute to our environmental objectives.

In 2019, the theme was 'Meet with Positive Impact', building on momentum that first started the year before. The theme recognized the sizable environmental impact that bringing people together can have.

Choosing the most sustainable venues and locally-sourced and produced food and drinks; avoiding and properly recycling waste; ensuring that activities leave a positive legacy in the destination; or even offsetting unavoidable emissions – we provided step-bystep content to help our people to create more sustainable and socially responsible meetings and events.

The campaign also provided valuable tips for event participants to take responsible action when attending meetings, and underlined how even small individual actions can make a big collective impact.

Three online training sessions were provided and 158 employees participated, raising their awareness and understanding on the topic. The recording of the training session is available on our social intranet so employees have access from wherever and whenever they want. To be able to meet the increasing expectations and demands from our clients, we also created content that can be shared with our other external stakeholders.

Carbon offsetting

Planning our internal meetings and events responsibly is a clear way for us to improve our environmental footprint. Since 2016, the Global Responsible Business team has collaborated with organizers of internal meetings and events to ensure that key meetings and events are planned in ways that keep emissions to a minimum.

Going one step further, we have also made several key events carbon neutral. Although delivering actual reductions in carbon emissions is the clear priority, offsetting is a useful mechanism for reducing net carbon emissions and is an accessible way for us to make an additional, tangible difference.

After an initial pilot in 2016 to make four key events carbon neutral, we subsequently ramped up our efforts to make responsible meetings and events the new internal standard. We identify key internal gatherings and client events that are scheduled for the year and reach out to their organizers to help them plan these events in the most environmentally and socially conscious way possible. In 2019 alone, we offset more than 1,400 tCO_2e^{1} to make some of our internal meetings and events carbon neutral. They ranged in size from big events with clients to small team meetings and represented the equivalent of more than 1,570 round trips from Paris to New York in economy class.

To make our internal meetings and events carbon neural, we supported three certified carbon offsetting projects throughout 2019, which allowed us to create the following impact:

- Madre de Dios project, Peru: preservation of more than 214,000m² of forest area and over 63,380 tropical trees in the Peruvian Amazon that are in danger from illegal logging.
- Gandhi project, India: generation of 73MWh of renewable electricity to cover the annual power requirements for 67 Indian households.
- Sichuan Biogas project, China: construction of 21 biogas units fueled by 100% renewal sources, benefiting 24 Chinese households from fuel cost savings and improved indoor air quality.

¹ tons of carbon dioxide equivalents.

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We act...

...to take action in our offices

Every day is an opportunity to lessen our impact. We achieve this in numerous ways, from creating more responsible office spaces to improving our waste management processes and encouraging local environmental action.

Promoting responsible offices

It's a double win when you can reconfigure your offices to make them better places to be and work, while optimizing their use, space and energy consumption. To achieve this, our Real Estate team launched its Workplace 3.0 strategy back in 2017. As part of the program's multi-year focus, office space will be reduced, underutilized offices merged and offices upgraded to more energy-efficient solutions.

Our vision for sustainable workplaces includes energy-saving initiatives, avoiding the heating and cooling of unused spaces, and putting the emphasis on improved buildings, design and location.

Some examples implemented in local offices:

- reducing the number of offices and thereby lowering our carbon footprint. It is more efficient to have employees working from home and/or commuting to one central hub, than running multiple mid-sized offices.
- a policy of leasing more modern, energy-efficient buildings. This typically has the added benefit of enabling us to accommodate more desks as the systems, toilet facilities and fire escape routes are better able to accommodate a greater density.
- hot-desking and enabling employees to work from home to reduce emissions from commuting.

- incorporating facilities that encourage recycling within office design.
- reducing the overall number of printers and using 'follow me' printing to ensure that documents are not printed until the employee collects them by swiping their access badge.

In 2019, we pursued the rollout of this strategy with significant updates to both of our HQs:

- Paris: following a utilization survey in 2018, we reduced our office footprint by removing two floors of underutilized office space. Most desks are flex-desks, so that we maximize the office space. After a successful pilot in our London Canary Wharf office, a cloud booking tool was introduced for employees to book their desks; this also applies to car parking so that we are able to maximize space and reduce our impact.
- Minneapolis: we reduced the number of floors in our United States HQ and modernized 25 meeting rooms by installing fully-equipped video conferencing facilities.

Beyond the buildings themselves, locations such as Spain and the United Kingdom have robust environmental management systems in place, including ISO 14001 accreditation. The particular certifications are selected and based on the local context – for example, CWT Finland adopts the WWF Green Office certificate, while CWT Estonia uses European Green Office standards.

Effective 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. Some examples include:

- **Costa Rica (2019):** upgraded its recycling program by implementing bins of different colors to make it easier for employees to identify different kinds of waste for recycling.
- Egypt (2019): our Egyptian office partnered with 'Go Green', a local recycling company, to recycle waste for a cash reward that is partially donated to local communities.
- France: in our HQ in Paris, waste is managed by Greenwishes – an organization that collects recyclable waste for treatment. Greenwishes provides monthly recycling reports which help us better measure how we are performing. In 2019, we recycled over 7.6 tons of waste – an increase on previous years due to waste generated from the reduction of our global office space.
- India: we continued to partner with Greenobin, an organization that collects paper waste, and credits one point against every kilogram of paper waste collected.

• Sweden: in our Stockholm office, we

recycled 2.6 tons of batteries, glass, plastic,

computers, metal, electronics, wood, paper

and cardboard in 2018 in collaboration with

our recycling partner Smart Recycling AB.

In 2019, we invited them for a lunch event

to talk to employees about the recycling

process and show how small actions

• United Kingdom (2019): following staff

feedback during a senior management

town hall, enhancements were made to

• United States: our Minneapolis HQ joined

the recycling facilities at one of our offices

the Medonta Heights office in its recycling

efforts which included strategically placing

recycling bins around the office and using

reusable cups and water bottles.

can make a big difference.

in London.

Environment

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We live...

...to dispose of disposables

In a world that throws away 500 billion plastic cups every year, RoomIt (CWT's hotel distribution division) decided to conduct some research. In 2018, they surveyed RoomIt employees to identify and quantify their usage of disposable items, ranging from shampoo and water bottles to plastic bags and microwave food trays. The results showed that, collectively, they used over 300,000 single-use disposable items that are ultimately sent to landfill.

In response, the RoomIt team launched a 'doing without disposables' campaign, with the goal of cutting disposable waste. A major focus of the campaign was to encourage behavioral change, by inspiring employees to think about how to avoid waste; from purchasing fewer takeout meals to choosing reusable mugs and tumblers and avoiding the use of straws. This initiative continued into 2019, where they made significant progress. In June, the RoomIt Responsible Business team launched another survey to identify the barriers to eliminating disposables, and then stepped in to help lower them. Subsequently, the number of disposable items used per RoomIt employee decreased, including cups, lunch containers, plastic cutlery and plastic bags. They also saw an increase in the number of people who had cut out disposables completely from being more aware of the impact of their actions.

Employee-led environmental action

Commitment and passion count for a great deal and CWT people have found many ways to keep sustainability front-of-mind and high-profile. Just a few examples from around our network in 2019 included:

• China: on the occasion of the United Nations World Environment Day, with the theme of 'Beat Air Pollution', our Chinese offices celebrated with the #MaskChallenge. Besides wearing various masks, they turned off the lights for one hour in the office and motivated fellow colleagues to go the extra mile by commuting responsibly during Environmental Awareness Week.

- Finland: promoted responsible eating by encouraging employees to reduce their consumption of red meat and promoted exercise through outdoor activities.
- Indonesia: partnered with a local university to teach elementary students about the dangers and impacts of plastic waste. We also encouraged them to reduce waste by using reusable tumblers and lunch boxes.
- The Philippines: the Travel Experience team organized an initiative to collect plastic bottles and create awareness of environmental protection. Partnering with NGO Haribon, employee volunteers performed a coastal clean-up in the southern part of Manila and segregated the waste. They have also made a conscious effort to avoid the use of plastic.
- **Singapore:** employees participated in a 10km eco-run to raise awareness for a zero-waste lifestyle.
- United Kingdom: as part of our 'Make a Difference' volunteering scheme in the United Kingdom, volunteers performed various community tasks, contributing to environmental causes such as tree planting and nature reserve conservation.



2015-2020 Objectives

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

Empower the global environment network to drive local performance.

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

2019 Performance

- Created a cross-functional Climate Taskforce with key leaders from all of our functions globally to help further develop CWT's long-term climate strategy.
- We trained employees globally on how to organize meetings and events responsibly.
- 46% of our total workforce participated in our annual Commuting Survey on 2018 commuting habits.
- Continued to share best practices on environmental initiatives throughout the year via our social intranet and online webinars.
- Multiple local activities were initiated and organized by employees across the world, from office recycling to environmental initiatives and activities.

2020 Goals

- Continue to promote an environmentally-conscious culture through awareness and targeted initiatives.
- Through the Climate Taskforce, define CWT's climate roadmap to further reduce our own environmental footprint, and further help our customers reduce theirs through an enhanced environmentally-friendly product and service offering.
- Continue to encourage employee-driven environmental initiatives.

Initiated In progress

Our milestones at a glance

2015

2016

- Deployed a global online environmental reporting and monitoring tool for reporting all environmental data across 19 countries and three regions.
- Launched an online training module for all employees which included training on environmental trends and how CWT is responding.
- Launched our inaugural worldwide environmental campaign on World Earth Day to raise awareness on ecoattitudes for employees.

- Conducted audits to strengthen our environmental data collection process.
- Extended the scope of our environmental reporting tool to 22 countries which, collectively, represented 80% of CWT's revenue.
- Piloted carbon offsetting for four large CWT events.
- Global Commuting Survey was launched to all employees for the first time to learn more about our commuting habits.

2017

- Added a new data category to our reporting: 'hotel nights', to improve the completeness of our carbon reporting (Scope 3 emissions).
- Dedicated the annual Environmental Awareness Week to the theme of 'Responsible Commuting'.

2018

- Environmental Awareness Week focused on hosting meetings and events in an environmentally-friendly and socially-responsible way.
- We ramped up our efforts to make our internal meetings and events more responsible and offset nearly 2,000 tons of carbon emissions.
- Real Estate team launched its Workplace 3.0 strategy. Remodeled and new offices now incorporate improvements to sustainability and the overall working environment.

2019

- Created a cross-functional Global Climate Taskforce with key leaders from all of our functions to help further develop CWT's long-term climate strategy.
- We trained employees globally on how to organize meetings and events responsibly.



CWT Annual Responsible Business Report September 2020

Responsible Products and Services

Responsible Products and Services We think...



"Many factors contribute to excellence in business travel and meeting and event management, and we address them all on behalf of our customers employees.

In addition to safety, we are noticing an increased appetite from clients for products and services that will help them better manage their own CSR performance. And these requests cover a range of topics from the environmental impact of business travel, to traveler wellbeing, to more inclusivity and diversity.

We are committed to further embedding environmental and social considerations into our product offering, whether it be equipping travel managers with CWT AnalytIQs, a tool to track the CO_2 emissions of every planned trip, providing consulting to help clients design employee-focused, reduced-emission travel programs, offering responsible events, informing our customers of travel updates CWT Alerts, or working to combat human trafficking."

Patrick Andersen President, RoomIt & Commercial





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We act...

...to help our customers meet their environmental objectives

As responsible actors, our role in the industry is focused on providing our clients with the right tools and services so buyers can measure and manage their emissions through reporting, and our customers can build more responsible travel programs. CWT is committed to helping our clients reduce the environmental impact of their travel programs. Our efforts include:

Responsible travel consulting: our consulting branch, Solutions Group assists Travel and Procurement teams in bringing better visibility to their Corporation's supply chain (air, lodging, car and rail) and the impact travel has on employee wellbeing, climate and organizational performance. Enhanced sourcing capabilities, data/reporting on CO₂ emissions and travel policy insight powered by passionate industry experts will ensure strategies of travel programs strike the right balance between environmental, social, and cost performance for their organization.

Emissions reporting: is crucial in order to measure and manage emissions and set meaningful targets. AnalytlQs, our business intelligence platform and reporting tool analyzes CO_2 emissions and provides travel managers with environmental data that can then be shared with travelers to raise their awareness and drive their future behaviors. These post-trip reporting services enable clients to calculate carbon emissions for air and rail created by the individual traveler, a business unit (hierarchy) or country. The report metrics are based on methodology from the United Kingdom's Department for Environment Food & Rural Affairs (DEFRA). CWT also offers annual emissions reporting for clients who request it of us through the CDP Supply Chain Program.

Messaging for travelers: our Program Messenger tool allows us to send customized messages to travelers. We can work with clients to program messages to raise awareness among their travelers around various aspects of the environmental impact of their travel purchasing decisions.

Responsible Meetings & Events:

CWT Meetings & Events Italy attained ISO 20121: 2013 for Sustainable Events in 2018. This certification addresses all stages of an event's supply chain, illustrating that our business is able to offer tailored sustainable meetings and events solutions to our clients to manage the social, economic and environmental impact of any event.

We live...

...to help our clients design more sustainable travel programs

Ethical, social and environmental responsibility represents a growing focus for companies across the world, with consumers and employees overwhelmingly choosing to partner with organizations that demonstrate a strong responsible business mindset. In turn, more of our clients are publicly committing to responsible business practices.

Companies can no longer ignore the environmental impact of travel, which is one of the top drivers of carbon emissions. Responsible Travel Practice by CWT Solutions Group enables our customers to maximize their employee satisfaction while minimizing their impact on the climate and driving their organizational goals.

CWT Solutions Group has the expertise to optimize responsible travel programs through:

- **Strategy:** helping clients set their strategy and ensuring their travel policies meet their responsible business goals.
- Data and insights: determining the drivers of our clients' carbon footprint, while providing the benchmarks and measurement needed to address it.
- Supply chain sustainability: ensuring clients partner with sustainable suppliers.
- Implementation: communicating and promoting responsible travel programs.

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We act...

...to deliver products that ensure traveler wellbeing and safety

In an uncertain world, we protect our stakeholders by keeping them aware of risks, while reducing the stress associated with travel and ensuring the wellbeing of travelers. In 2019, we continued to enhance the CWT travel app and other products in our portfolio. Many of these include effective reporting tools so travel managers can make informed decisions about safety, security, and wellbeing. Innovative examples include:

- CWT Alerts, powered by International SOS: in collaboration with our long-term partner International SOS, we provide travel managers and security officers with email updates and notifications of disruptions and crises relating to destinations and travel plans. CWT Alerts, within myCWT, makes travelers aware of key events that may affect their trip, so they are better prepared to manage or avoid disruptions. In 2019, we issued 10,035 alerts to inform travel managers and travelers of events that might impact them.
- myCWT web and mobile app: an oracle of on-the-go information and sends timely alerts on flight delays, cancellations and gate changes. This information is made as accessible as possible, across all devices – from web to mobile, offline and online. We aim to comply with best practices and standards defined in the Web Content Accessibility Guidelines 2.0 (WCAG), published by the World Wide Web Consortium (W3C). We also work with an independent agency to periodically assess and verify that the myCWT web and mobile app is user-friendly for everyone.

- Direct access to an expert: as well as the information and notifications above, the myCWT mobile app gives direct access to the expert advice of a CWT counselor.
- Tracking people: CWT AnswerIQ offers a safety and security feature that makes it easy for clients to track down travelers anytime, anywhere, even during disruptions. The tool allows travel managers and security officers to view travelers on a map, monitoring security and medical risks.
- Crisis communications: if 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 2019, we activated the protocol following 16 incidents, mostly related to terror attacks and other emergencies affecting hotels and flights.
- CWT Meetings & Events security services: our integrated safety and security offering, powered by International SOS, provides clients with access to 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. The second, Event Membership, provides 24/7 support and destinationrelevant communications to clients as well as support or health event planning and medical advice.

• The Travel Stress Index: CWT Solutions Group launched results from a study that includes data from 15 million business trips booked and recorded by CWT over a one-year period. The outcomes of the study, published in the Travel Stress Index: The Hidden Cost of Business Travel, revealed that a staggering 6.9 hours are lost per trip due to stress.

To address this, CWT have developed an industry-first algorithm that identifies the specific triggers of travel-related stress and anxiety, and to measure its monetary and non-monetary impact on an organization. We believe this tool will become a standard within the travel industry and a pioneering way to reduce travel-related stress and positively influence employee productivity.



We live...

...to organize sustainable events

The increasing interest and demand of our clients for sustainability is also reflected in the requests we receive in our Meetings & Events division. One example was a request from a customer to fully organize an environmentally responsible event. Held at the beginning of 2020, the event welcomed hundreds of participants.

To ensure we met the conditions required for a sustainable event, we worked with hotel brands that are certified and apply sustainable actions in their properties. Alongside responsible catering, even the stage was recycled. We carefully selected a supplier that allowed us to rent metal structures that were used for previous events and therefore we only had to create a customized fabric for our client's event.

Additional solutions included:

- a water station to avoid bottled water (to create a 100% plastic-free event);
- QR codes for registration (to avoid the use of plastic lanyards);
- certified compostable cutlery and cups;
- an impact study on the efficiency of transfers which resulted in most attendees either walking to the event or using public transport; and
- an organized team building activity which resulted in a donation to a foundation.

This highly successful event also produced multiple ideas and learnings to take forward as we continue to deliver more sustainable solutions for our clients.

...to raise awareness of child exploitation

For a considerable time now, CWT has taken a leadership position on eliminating human trafficking. Back in 2012, we added travel alerts to electronic tickets issued in the US to destinations where sex tourism is prevalent. The alerts invite users to be vigilant on these trips and show them how to report any concerns they may have.

Carlson and CWT, in partnership with ECPAT International, also launched digital anti-trafficking ads on myCWT in 2018, similarly raising awareness about sexual abuse and trafficking. The campaign led with a clear call to action: report it. Through the month of April 2019 alone, the campaign was displayed more than 250,000 times to our travelers.

In 2019, RoomIt by CWT also launched its first global campaign in support of the World Childhood Foundation, which works to prevent and address sexual abuse, exploitation and violence against children. The campaign brought together 652 CWT clients who donated US\$1 for every hotel booking made globally during the month of August, up to US\$100,000. Amazingly, we were able to nearly double that goal in bookings. As a result, the charity hosted a gala where they gave a special thanks to RoomIt for its contribution.

Improving through listening

We are committed to delivering exceptional experiences for our customers, and this is informed by programs and initiatives to gather feedback that we can address with creativity and know-how.

In 2019, much of this listening and learning came from our ongoing quarterly travel manager satisfaction surveys. Additionally, our CWT Listens survey has been redesigned to understand the experience of travelers not only at the point-of-sale but their end-to-end experience with us. This is complemented by an on-demand reporting platform to help our employees understand customer feedback and experiences, and to keep improving our offer.

In October 2019, we continued to gather direct feedback through our '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.

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We act...

...to manage risk

Risk affects any industry, and our sector is not immune to factors such as staff shortages, technical disruptions, terrorism or natural disasters. However, we proactively manage travel risks to minimize their impact. At CWT, we take a proactive, systematic approach to risk management. As a first step, we look to identify, assess and prioritize potential areas of risk. Then, we develop risk mitigation plans to reduce both the probability of a risk occurring and the magnitude of prospective impact. These plans are then formally integrated into a Business Continuity Plan (BCP), which embeds risk management into CWT's daily organizational practices.

When the unexpected occurs, our 24x7x365 crisis management process helps our company respond more quickly and recover faster, minimizing the impact of any crisis event we face.

Risk management governance

Our Crisis Management function is overseen by our Chief Technology Officer and our Chief Information Security Officer. Together, formal updates are provided to our CEO at regular intervals.

Additionally, our Global Risk and Security Steering Committee meets quarterly to discuss a broad range of risks. A dedicated data governance oversight subcommittee also provides consistent, efficient and harmonized oversight of CWT's global data governance policies and practices pertaining to data availability, usability, integrity and security.

Business resiliency at CWT

Despite rigorous risk governance, managing it every day is the responsibility of each and every one of us at CWT. We therefore make it a priority that all our people understand and buy into the approach of risk preparedness, prioritization and rapid response. Our enterprise Business Resiliency program leads our business continuity, disaster recovery, and crisis management capabilities across our global organization.

In 2020, we performed our biennial risk assessment, to identify and prioritize risks such as natural disaster exposure and business continuity impact, as well as health and safety at work. We also shifted our resiliency processes online to transition our processes and documentation from manual to digital, and migrated our Business Continuity online database to a cloud service to ensure accessibility anytime, anywhere.

Our Business Continuity Plan (BCP) helps to ensure that any disruption to our day-to-day operations is minimized. Our BCP methodology is designed to ensure effective and efficient response to unplanned disruptions of all types, whenever and wherever they occur. Global BCP activations are logged and monitored, and a detailed review is documented in our proprietary online business continuity database. We publish metrics analyzing BCP activations every six months to identify vulnerability trends and implement corrective actions. Each CWT office is required to update their location's BCP documentation twice per year and to perform two annual drills to test the effectiveness of their location's BCP. Carried out by regional owners, the drills cover fire-based scenarios and a further drill chosen by the BCP Steering Committee based on relevance and applicability, which meets every three weeks. To supplement this, all BCP owners, new hires, operations managers and backup owners are required to complete internally developed online training once every year.

CWT's Disaster Recovery program ensures that our core systems and IT capabilities are highly available. CWT annually tests enterprise disaster recovery plans. The Business Resiliency program coordinates disaster recovery testing, partnering with key internal resources and third-party vendors to ensure that adequate technology recovery capabilities are in place.

CWT also recently completed our bi-annual Executive Business Impact Analysis, which helps identify and prioritize critical business services across our entire organization, to ensure that these services are adequately resilient.

We live...

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

Safety and security have been at the forefront of most travel managers' minds in recent years. Storms, strikes, security incidents and viruses happen irrespective of itineraries. Even the best laid plans can require immediate changes based on sound, live information.

To raise awareness of these unexpected challenges and to keep travelers safe, RoomIt teamed up with International SOS and IHG Group to create a dedicated Hotel Safety and Security ebook. The book provides various travel tips, from how to select lower risk accommodation, to tips for female travelers and general safety. The book was also supplemented with a hotel safety checklist aimed at business travelers.



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We said	We did	We will
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2015-2020 Objectives	2019 Performance	2020 Goals
Further reinforce our responsible business products and services offering to our clients.	 Launched Travel Manager Advocacy Boards and The Traveler Community to encourage two-way dialogue between us and our customers. Raised additional awareness on anti-human trafficking through customer communications via our myCWT portal. 	 Further embed social and environmental criteria in our various service offerings to clients.
Proactively propose carbon offsetting to clients.	 Continued our internal carbon offsetting efforts to build experience in this field. Explored possibilities to integrate carbon offsetting into our service offerings. 	• Continue to explore possibilities to integrate carbon offsetting into our service offerings.
	 Implemented an Enterprise Business Resiliency program to align enterprise business continuity, disaster recovery, and crisis management strategies. Created a dedicated data governance subcommittee to streamline oversight of global data policies. 	 Further enhance our 24/7 capabilities using new technologies. Risk management will remain key to aligning governance of risk for risk-based decision making. Optimize our technology resiliency and better position the organization to leverage cloud-based capabilities.

Our milestones at a glance

2015

2016

2017

• Completed an ISO 22301 gap analysis and action plan.

- Refreshed our Business Continuity Plan (BCP) Awareness Training module which was rolled out to all employees worldwide as mandatory training.
- Activated a crisis drill with the Corporate Crisis team. 889 participants were involved in the training program, with a 97% pass rate.
- 100% of new hires received training for BCP awareness.
 BCP owners, operations managers and backup owners underwent dedicated training.
- A new crisis management scenario was added to our BCP.
- A 157 Site Risk Assessment campaign took place.
- Worked with International SOS to launch our infographic on Top 10 tips for Safe Travel – a guide to help travelers prepare and stay safe.
 BCP process was improved
- BCP process was improved by creating an office information database – a more effective way to share, validate and provide information updates.
- A Site Risk Assessment campaign was performed by our 19 largest global partners to identify prominent risks and plans.

- 2018
- Carlson and CWT, in partnership with ECPAT International, launched digital anti-trafficking ads on the browser version of myCWT to encourage traveler vigilance and reporting of suspected sexual abuse and trafficking.
- Launched CWT Alerts in the myCWT mobile app to ensure travelers receive updates while traveling.
- Implemented an Enterprise Business Resiliency program to align enterprise business continuity, disaster recovery, and crisis management strategies.
- CWT Meetings & Events Italy attained ISO 20121: 2013 certification for Sustainable Events, which addresses social, economic and environmental impact of any event at all stages of its supply chain.

 Launched Travel Manager Advocacy Boards and The Traveler Community to encourage two-way dialogue between us and our customers.

2019

- Raised additional awareness on anti-human trafficking through customer communications via our myCWT portal.
- Delivered bi-annual Business Impact Analysis refresh.

2020

- Launched Responsible Travel Consulting framework to help customers design more environmentally and socially responsible travel programs.
- Identifying ECO ambassadors across regions and business functions to support and endorse our responsible consulting practices.
- Conducted enterprise Risk Assessment.

CWT Annual Responsible Business Report September 2020

Community Involvement

Community Involvement



We think...

"Our people are creative, generous, concerned citizens of the world, and are driven to make their contribution to people who have little or who may be at risk.

With the help of our Responsible Business Network that spans all geographic regions and business functions, our colleagues are empowered to develop projects and partnerships that support communities close to their heart and their home.

In 2019, we continued to target initiatives with a focus on the 3Es of Education, Emergencies and Essential needs, as well as fighting the ever-present danger of human trafficking. When the passion and skills of our people are used to support community involvement programs like these, we help create powerful partnerships that benefit everyone involved."

Françoise Grumberg

Vice President, Global Responsible Business and Diversity & Inclusion



4 QUALITY EDUCATION

5 GENDER EQUALITY

8 DECENT WORK AND ECONOMIC GROWTH
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We act...

...to positively impact communities

Through our global reach, and the talent, expertise and insight of our people, we have a privileged opportunity to contribute to local communities worldwide. In 2019, we launched still more 3E community initiatives in dozens of countries around the world. With them, CWT colleagues demonstrated their dedication to make positive and lasting impacts. Help for communities can take many forms, including monetary donations, in-kind contributions, or the gifts of time and enthusiasm. Each has continued to fuel our 3E Community Involvement strategy and its impact continues to grow year-on-year. These initiatives around the globe are also helping to deliver our United Nations Sustainable Development Goals (SDGs) (see page 18 for more information).

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 that harm 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 are proud that our colleagues offer their talents so freely, and we actively encourage volunteering worldwide. Where there is no structured policy, local teams offer employees volunteering time so they can contribute to community projects in their location. In addition to the 3Es, we also support projects with a focus on human trafficking, military veterans and workforce development. In 2019, teams of employees from CWT and Carlson volunteered their time, organized fundraising events and created awareness for important causes. They channeled their energies into projects such as improving living conditions for families, donating food to people in need, providing education, financing health research and much more.

Promoting 3E activities

To increase awareness and engagement, our 3E Guidebook is available in seven languages and shows our aims and objectives, and provides guidance on how our colleagues can become 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 the impact we are having in local communities.

Working alongside the Carlson Family Foundation

We continue to work closely with the Carlson Family Foundation on our community involvement efforts. The Foundation provides employee-matched contributions, as well as significant grant support for many of our 3E global partners and those helping us to combat human trafficking around the world (see page 72 for more information).

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We live...

... to celebrate global giving

In 2019, the Carlson Family Foundation offered ten US\$5,000 grants to non-profits and charitable organizations, recommended by our people around the globe. To select the recipients of these grants, we asked colleagues to nominate organizations based on the difference they are making within their community and the alignment of their projects with RB priorities at Carlson and CWT.

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

Location	Focus area	Description	
Singapore	Essential needs	This organization is committed to raising awareness about breast cancer and supports survivors and their families through counseling and training activities.	
Canada	Anti-human trafficking This is a national charity dedicated to ending all types of human trafficking in Canada, and p a 24/7 confidential, multilingual hotline to connect victims and survivors with the support t		
China	Essential needs	This Non-Governmental Organization addresses poverty by providing services of personal development, emergency relief, and training for those who need employment assistance.	
Philippines	Education	A service partner of Orphaned Starfish Foundation, the mission of this organization is to transform lives at the grass roots level, by engaging out of school children and young adults in education programs.	
Australia	Education The aim of the ILF is to reduce disadvantage experienced by children in remote indigenous communities by writing and publishing books in regional dialects, and developing reading skills in those regions.		
Mexico	Education KKIS envisions a future where every student graduates and every educational challenge is inspiri and fun, and works with schools, teachers, students, and parents to make it happen.		
Germany	Essential needs	The Bone Marrow Donor Center (KMSZ) at University Hospital Düsseldorf is one of the largest stem cell donor registries in the world, and is a crucial resource for individuals with blood cancer.	
Costa Rica	Essential needs	A service partner of Orphaned Starfish Foundation, this organization is dedicated to the comprehensive care of teenage mothers and their babies, including meeting their needs and providing the skills and education for a stronger future.	
Kenya	Education	This organization supports and educates orphans and children in need in areas where access to basic human services are limited.	
India	Anti-human trafficking	Odanadi addresses all forms of sexual violence against women and children by adopting a holistic approach through prevention, rescue, rehabilitation, awareness and training.	
	Singapore Canada China Philippines Australia Mexico Germany Costa Rica Kenya	SingaporeEssential needsCanadaAnti-human traffickingChinaEssential needsPhilippinesEducationAustraliaEducationMexicoEducationGermanyEssential needsCosta RicaEssential needsKenyaEducation	

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We act...

...on education

A high-quality education is a building block of life, and Goal 4 of the United Nations SDGs is centered on education as the foundation of improving lives and sustainable development. During 2019, we continued to champion education and employability for young people as part of our 3E strategy. Acting on educational needs involves supporting the transfer of knowledge and skills from one generation to the next through teaching, training and research provision. Below are just a few of the ways in which we improved educational and employability outcomes during the year:

- Training the next generation of science and technology innovators, United States: CWT chose Project SYNCERE as its philanthropic partner for the 2019 GBTA Convention. Project SYNCERE students created fun, interactive stations that reflected innovation in the travel industry, which convention attendees could experience first-hand.
- Helping students build work experience, United States: Genesys Works helps high school students from low-income families through skills development and work experience. The summer before their senior year at high school, they receive eight weeks' professional and technical training, as well as college and career coaching. Students later go on to work for a corporate partner, such as CWT, for a year-long paid internship experience. In 2019, we brought in five Genesys Works interns to assist with IT projects at our HQ.
- Creating agents of social change and happiness, India: CWT Mumbai hosted a presentation by schoolchildren to raise awareness on human trafficking, modern slavery and the protection of children and women. Kranti School currently works with around 25 girls, aged 13-24, who are survivors of trafficking or who are daughters of sex workers from Kamathipura, a major red-light area. Kranti School started several years ago and provides accommodation, education and development for all the students.
- Keeping Kids in School, Mexico: during our Noram client executive meeting in Playa del Carmen, Mexico, we partnered with a local organization, KKIS, which works with schools, teachers, students and parents to motivate and assist students toward graduation. Through donations and activities, we provided 100 students with backpacks and much needed supplies to start the school year.
- Promoting Arts, Music, and Dreams, Philippines: for the last four years, our employees have planned the 'Movie for a Cause' fundraiser, to benefit a local NGO partner. In 2019, the beneficiary was Orphaned Starfish Foundation service partner, Hiyas ng Maynila. Colleagues sponsored two or more movie tickets so that kids and their parents could attend and enjoy the movie, and nearly 80% of students attended. Proceeds went to buy musical instruments for the organization's 'D.R.E.A.M.S.' project (Developing the Right Education through Arts, Music and Sports).
- Supporting the future of all communities, Australia: CWT AU partnered with the Indigenous Literacy Foundation, an organization focused on improving literacy rates among indigenous children by working with elders of the community to publish books in regional dialects, and organize educational activities to build youth literacy. In 2019, we supported a variety of activities including volunteering, participating in an educational trip, and fundraising.

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We live...

...to promote new talent in the travel industry through the Global Travel and Tourism Partnership (GTTP)

We have supported GTTP for the last nine years and our VP of Global Responsible Business and Diversity & Inclusion sits on its advisory board.

We sponsor a program that trains secondary and tertiary students in 15 countries on how to pursue a career in the travel and tourism industry. GTTP has produced over two million graduates since 1996, and in 2019 reached over 710,000 students. GTTP's curriculum introduces our industry's basic structure, and in 2019 GTTP launched a highly successful online version of the introductory course, 'Passport to the World'. Learners from 110 countries were introduced to our industry and its many career options. A feature of the program is the Sustainability Competition, an online competition for individual students to find sustainable travel ideas, which started in 2017 with a grant from the Carlson Family Foundation. Another popular competition for student teams is the Research Competition where students address a challenge faced by our industry. The 2019 challenge was to study the impact of 'events tourism' in their respective countries.



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We act...

...to provide essentials and bring relief in emergencies

A core part of our 3E Community Involvement is to help with the very basics of life – clothing, food, water, shelter and medical care. This includes acting in times of crisis, such as when natural disasters strike or outbreaks of disease occur.

Providing support when disaster strikes

In the US, the Carlson Cares Employee Assistance Fund is available for people in hardship due to unforeseen circumstances beyond their control. Started with seed funding from the Carlson Family Foundation, the fund is supported through employee contributions and regular donations from the Carlson Family Foundation (see page 72 to read more about Carlson and the Foundation's activities in 2019).

Helping to meet essential needs

We ran numerous initiatives around the world in 2019, focused on providing essential needs. Some of these included:

- Australia: employees in our Melbourne office donated clothes and necessities during the month of October to support Yalata, a remote indigenous community in South Australia.
- China: CWT China again supported the annual 'Great Walker' fundraising trekking event organized by the China Foundation for Poverty Alleviation. Two teams of eight walkers with four support staff completed a one-day 50km hiking challenge from Ju Yong Guan Great Wall to Hui Jia School in Beijing, raising money to support children from low-income families.
- **Colombia:** our Global Program Solutions Leadership Team invited a local foundation, Hands for Reconciliation, to its quarterly team meeting. Four children from the foundation, which focuses on the welfare of children of former Colombian militants, were invited to join in the activities.

This included building bikes that the children could then keep. During this responsible business event, the CWT team talked with the Colombian children and found out they had a love for soccer. After this meeting ended, the CWT team collected soccer shirts/shorts/socks/shoes from people/teams/organizations all over the US and then donated thousands of dollars of soccer gear to the children of the foundation.

- Egypt: CWT participated in the annual food campaign 'during the holy month of Ramadan' led by the Misr El Kheir (MEK) Foundation, a local non-profit organization focused on comprehensive human development. CWT funded 30 packages each containing 29kg of dry food to be distributed to limited income families across Egypt. In addition, 30 meals were distributed daily at Iftar tents. CWT staff also volunteered for half a day to pack 300 dry food meals, as part of the MIK campaign during the holy month of Ramadan. These were distributed to travelers on the road during Iftar, the break of the fast.
- Greece: our CWT Greece team took part in the 'Race for Cure' charity run, raising awareness and funds for breast cancer research.
- The Netherlands: once again, our Dutch employees participated in 'NLdoet' – the biggest annual national volunteering event in the Netherlands. As part of the day, our people volunteered for projects of their choice, from making lunch for the elderly in a nursing home to supporting community gardening projects.

- United States: the global leadership team of CWT Energy, Resources & Marine volunteered to provide much-needed food assistance at Three Square, a charity organization in Southern Nevada that gives food to people in need. The team gave their time and muscle to participate in packing over 11,340 pounds of food that went to 2,268 vulnerable families.
- Poland: our CWT colleagues in Poland again participated in the annual 'Poland Business Run', one of the largest charity business relays of the region. Each year, the organization uses this event, held in cities across the country, to raise awareness and funds to support individuals impacted by physical disabilities.

We act...

...in partnership with Carlson

Matched-giving contributions, anti-trafficking partnerships and our global Employee Choice Grants are just a few of our community involvement areas supported by Carlson and the Carlson Family Foundation.

Anti-trafficking initiatives and support

For many years Carlson has been a leader in the fight to stop and prevent human trafficking and sexual exploitation. For example, it was the first major North American company to sign ECPAT's Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism; was a founding member of the Global Coalition Against Human Trafficking (gBCAT); and was a signatory to the United Nations Global Compact.

At CWT we are proud to continue this leadership, maintaining and increasing the momentum of awareness-raising and positive action among our colleagues and stakeholders across the globe. Projects and impacts in 2019 included:

• ECPAT children's rights organization:

the Carlson Family Foundation funded the development of dedicated employee training modules for travel management, and meetings and events companies worldwide. CWT's experts provided input into this first-of-its-kind training to help better identify and stop human trafficking. This training is now available for companies to utilize in multiple languages, and has been imported into our internal Learning Management System for all CWT employees to access.

 World Childhood Foundation: in 2019, the Carlson Family Foundation marked a 20-year partnership with the World Childhood Foundation, supporting local agencies working to prevent and address sexual abuse, exploitation and violence against children, including trafficking. Most recently, the Foundation supported the development and launch of the 'Out of the Shadows Index', a ground-breaking research and benchmarking tool to measure countries' response to child sexual exploitation (see page 49 for more information).

- Thorn: plays a critical role in rescuing sex trafficking victims and arresting perpetrators by developing and providing specialist digital tools to law enforcement agencies. In 2019, this was again supported by continued grant funding from the Carlson Family Foundation, and by CWT partnership in the Thorn 'Hackathon' held at Carlson headquarters (see page 51 for more information).
- Orphaned Starfish Foundation (OSF): one of many grantees that is supported by the commitment of our colleagues. OSF does remarkable work in 29 countries to help orphans, victims of trafficking and at-risk young people to break the cycle of abuse and poverty, with the assistance of computer-based education, job training and job placement assistance. CWT continues to grow local partnerships and volunteering with several OSF-supported organizations worldwide. CWT employees also made significant financial contributions through our 2019 Community Giving Campaign, and chose two partner organizations to be recommended for Employee Choice Grants.
- Nomi Network: creates economic opportunities for survivors and women

at risk of trafficking in India and Cambodia by equipping them with leadership, entrepreneurship and production skills. Nomi has been a grantee of the Carlson Family Foundation for a number of years, and CWT employees continued to support it through contributions in the Community Giving Campaign, and with an informational session at the Carlson headquarters in September 2019.

Community Giving Campaign

Breaking records for good causes is always a powerful motivator, and our 2019 Community Giving Campaign again set new records in CWT participation and funds contributed. In its third year as a US-wide initiative, this annual employee giving campaign also features on- and off-site volunteer activities for employees across the country and is supported by matching grants from the Carlson Family Foundation.

With over 2,100 employees logging donations and volunteer hours, the 2019 campaign saw a 23% increase in CWT US employee participation over last year. This included a 25% increase in financial contributions and a 23% increase in individual donors contributing US\$1,000 or more. This combination of generous employees and the support of the Carlson Family Foundation resulted in our communities receiving more than US\$615,000 in contributions.

Volunteering was once again a mainstay of the Community Giving Campaign, as more than 625 employees recorded an extraordinary 32,000 hours to hundreds of non-profits.

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Additionally, the final two weeks of the campaign featured our annual Habitat for Humanity build, in which nearly 150 employees assisted in constructing a home for a regional family in need.

Lastly, with support from the Carlson Family Foundation, this year's campaign again featured a global component to engage CWT employees around the world. It comprised the US\$50,000 in Employee Choice Grants mentioned on page 76, to support ten local charities in our worldwide regions with US\$5,000 grants. Nominations for local NGOs came from dozens of countries, and participation in this program doubled from the previous year.

Focus Area Grants

In addition to anti-sex trafficking, the Carlson Family Foundation also worked closely with CWT to support grantees for the benefit of military and veterans, and, separately, workforce development. Here are three examples of organizations that received Focus Area Grants and significant support from CWT volunteers:

• Soldiers' Angels: provides aid and comfort to the men and women in the US military and their families. Our colleagues have been involved with this organization for many years, including organizing, contributing, and sending care packages for troops overseas and veterans in hospitals. In 2019, the Carlson Family Foundation once again bolstered this support with a significant grant.

- The Mission Continues: a nationwide organization that empowers veterans to apply their unique insight and abilities to community challenges. In addition to being a partner organization in the Community Giving Campaign, the Carlson Family Foundation awarded The Mission Continues a grant, and was named a lead sponsor for service platoons in St. Paul and Washington DC. Multiple large-scale volunteer projects with CWT and CWT Sato employees took place in both cities, to the benefit of schools and non-profits throughout the regions.
- Student mentorship: continued in 2019, with dozens of employees contributing hundreds of hours to support at-risk youth by providing mentoring, guidance and friendship through the programs. Our CWT colleagues volunteered for both the Big Brothers Big Sisters 'Beyond School Walls' and Best Prep's eMentoring programs. Both organizations are supported by the Carlson Family Foundation and are longstanding partners of CWT.



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2015-2020 Objectives

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

* Education, Emergencies, and Essential needs.

2019 Performance

• More than 100 3E initiatives organized by employees worldwide.

• Community Giving Campaign reached record participation.



2020 Goals

• Continue to build on a strong community involvement culture both at corporate and country levels.



Our milestones at a glance

2015

2016

• Focused on turning CWT's 3E Community Involvement strategy into an operational program and maximized its impact.

- 220 examples of community projects led by our teams worldwide.
- Collaborated with 63 organizations Community Giving Campaign on 75 initiatives worldwide in 20 countries in one year.
- Reinforced our 3E Community Involvement strategy by improving how our people can implement initiatives and have a greater impact at a local level.
- was expanded to include all employees in the United States and attracted 1,400 participants who delivered record results.
- More than 100 3E initiatives organized by employees worldwide.

2017

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

2018

• Community Giving Campaign went global for the first time.

2019

- More than 100 3E initiatives organized by employees worldwide.
- Community Giving Campaign reached record participation.



Global Reporting Initiative (GRI) Table

GRI Standard	Disclosure	Location
Organizational pro	file	
GRI 102-1	Name of the organization	Front cover
GRI 102-2	Activities, brands, products, and services	About CWT – page 9
GRI 102-3	Location of headquarters	Online – mycwt.com – Paris, Minneapolis, Singapore
GRI 102-4	Location of operations	Online – Office locations
GRI 102-5	Ownership and legal form	Online – Company ownership
GRI 102-6	Markets served	About CWT – page 9
GRI 102-7	Scale of the organization	About CWT – page 9
GRI 102-8	Information on employees and other workers	About CWT – page 9 Human Resources and Human Rights – page 34-53
GRI 102-9	Supply chain	Ethics and Business Behavior – page 28-29
GRI 102-10	Significant changes to the organization and its supply chain	About CWT – page 9 Ethics and Business Behavior – page 28-29
GRI 102-11	Precautionary Principle or approach	Responsible Products and Services – page 66
GRI 102-12	External initiatives	Responsible Business Strategy and Governance – page 17-20
GRI 102-13	Membership of associations	Responsible Business Strategy and Governance – page 17-20 Community Involvement – page 76-77

GRI Standard	Disclosure	Location	
Strategy			
GRI 102-14	Statement from senior decision-maker	Chair's and President & CEO's statement of RB within the travel industry – page 5-6	
GRI 102-15	Key impacts, risks, and opportunities	Responsible Business Strategy and Governance – page 10-11 We said/We did/We will – page 22, 32, 52, 60, 68, 78	
Ethics and integrity	,		
GRI 102-16	Values, principles, standards, and norms of behavior	Ethics and Business Behavior – page 25-26	
GRI 102-17	Mechanisms for advice and concerns about ethics	Ethics and Business Behavior – page 25-27	
Governance			
GRI 102-18	Governance structure	Page 14, 25, 35	
GRI 102-19	Delegating authority	Page 14, 25, 35	
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	Responsible Business Strategy and Governance – page 14	
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics	Responsible Business Strategy and Governance – page 11	
GRI 102-22	Composition of the highest governance body and its committees	Online – our people	
GRI 102-25	Conflicts of interest	Ethics and Business Behavior – page 26	
GRI 102-26	Role of highest governance body in setting purpose, values, and strategy	Responsible Business Strategy and Governance – page 14	
GRI 102-32	Highest governance body's role in sustainability reporting	Responsible Business Strategy and Governance – page 14	

Global Reporting Initiative (GRI) Table continued

GRI Standard	Disclosure	Location
Stakeholder engage	ement	
GRI 102-40	List of stakeholder groups	Responsible Business Strategy and Governance – page 11
GRI 102-41	Collective bargaining agreements	Human Resources and Human Rights – page 47
GRI 102-42	Identifying and selecting stakeholders	Responsible Business Strategy and Governance – page 11 Human Resources and Human Rights – page 43
GRI 102-43	Approach to stakeholder engagement	Responsible Business Strategy and Governance – page 11
GRI 102-44	Key topics and concerns raised	Responsible Business Strategy and Governance – page 11, 12, 13
Reporting practice		
GRI 102-45	Entities included in the consolidated financial statements	Online – Financial statements
GRI 102-46	Defining report content and topic boundaries	Responsible Business Strategy and Governance – page 11
GRI 102-47	List of material topics	Responsible Business Strategy and Governance – page 12, 13
GRI 102-48	Restatements of information	About CWT – page 8, 9
GRI 102-49	Changes in the reporting period	No significant changes from previous reporting periods
GRI 102-50	Reporting period	About CWT – page 9
GRI 102-51	Date of most recent report	About CWT – page 9
GRI 102-52	Reporting cycle	About CWT – page 9
GRI 102-53	Contact point for questions regarding the report	responsiblebusiness@mycwt.com
GRI 102-54	Claims of reporting in accordance with the GRI Standards	Responsible Business Strategy and Governance – page 17
GRI 102-55	GRI content index	Page 80-84
GRI 102-56	External assurance	None

GRI Standard	Disclosure	Location
Economic		
GRI 205-1	Operations assessed for risks related to corruption	Ethics and Business Behavior – page 27
GRI 205-2	Communication and training about anti-corruption policies and procedures	Ethics and Business Behavior – page 25, 26, 27 Human Resources and Human Rights – page 27
Environmental		
GRI 302-1	Energy consumption within the organization	Environment – page 56, 57, 58, 59
GRI 302-2	Energy consumption outside the organization	Environment – page 55, 56, 63
GRI 305-1	Direct (Scope 1) GHG emissions	Environment – page 56
GRI 305-2	Energy indirect (Scope 2) GHG emissions	Environment – page 56
GRI 305-3	Other indirect (Scope 3) GHG emissions	Environment – page 56
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	Ethics and Business Behavior – page 28, 29

Global Reporting Initiative (GRI) Table continued

GRI Standard	Disclosure	Location
Social		
GRI 403-1	Workers representation in management – worker health and safety committees	Human Resources and Human Rights – page 43, 44, 45
GRI 404-1	Average hours of training per year per employee	Human Resources and Human Rights – page 40, 41, 42
GRI 404-2	Programs for upgrading employee skills and transition assistance programs	Human Resources and Human Rights – page 40, 41, 42
GRI 405-1	Diversity of governance bodies and employees	Human Resources and Human Rights – page 37
GRI 408-1	Operations and suppliers at significant risk for incidents of child labor	Ethics and Business Behavior – page 29 Human Resources and Human Rights – page 48-51
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Ethics and Business Behavior – page 29 Human Resources and Human Rights – page 48-51
GRI 412-2	Employee training on human rights policies or procedures	Human Resources and Human Rights – page 48 Ethics and Business Behavior – page 25, 26
GRI 413-1	Operations with local community engagement, impact assessments, and development programs	Community Involvement – page 71-78
GRI 414-1	New suppliers that were screened using social criteria	Ethics and Business Behavior – page 28-29 Human Resources and Human Rights – page 50-51

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	Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights Principle 2: Make sure that they are not complicit in human rights abuses	Human Resources and Human Rights	Page 34-53
Labor Principles	 Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining Principle 4: The elimination of all forms of forced and compulsory labor Principle 5: The effective abolition of child labor Principle 6: The elimination of discrimination in respect of employment and occupation 	Human Resources and Human Rights Ethics and Business Behavior	Page 34-53 Page 24-33
Environment Principles	 Principle 7: Businesses should support a precautionary approach to environmental challenges Principle 8: Undertake initiatives to promote greater environmental responsibility Principle 9: Encourage the development and diffusion of environmentally friendly technologies 	Environment Responsible Products and Services	Page 54-61 Page 62-69
Anti-Corruption Principle	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery	Ethics and Business Behavior	Page 24-33



