



COP REPORT

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Klee Data System SAS au capital de 3 550 699.04 € - RCS Nanterre - TVA intracommunautaire FR 07 394 915 581 - Code APE 5829C

SUMMARY

- Statement from Roxana BRESSY, CEO
- Introducing KDS, pioneer in online booking and expense management
- United Nations Global Compact : the 10 principles
- KDS engagement in the main 4 issue areas :
 - ⇒ Human rights
 - ⇒ Labour policies and rules
 - ⇒ Environment policies
 - ⇒ Fight against corruption

STATEMENT FROM ROXANA BRESSY - CEO

Issy les Moulineaux, September 5th 2017,

Engagement letter

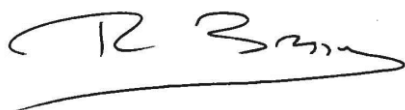
This United Nations Global Compact report is part of the values and commitments of KDS and the basic principles of its policy on sustainable development.

Beyond this report, KDS has always been deeply engaged and completely aware of its role in the respect of humans and employee's rights and in the environment protection. The company has joined the United Nations Global Compact and is thus deeply committed to respect the principles as well as get all its partners involved in the issue areas.

We are therefore pleased to reaffirm our support to the ten principles of the United Nations Global Compact and will describe in this first report our initiatives and actions in the four main areas : Human rights, Labour, Environment and Anti-corruption.

Sincerely yours,

Roxana BRESSY
CEO



INTRODUCING KDS

Klee Data System (KDS) is a global provider of integrated travel technology and an industry leader in complete door-to-door trip booking and expense management.

Founded in 1994 as the first online booking tool in Europe, KDS established itself over 20 years as a global leader in innovative online travel and expense management, helping over 4 000 customers and 2 million users in more than 60 countries, to complete 7 million Travel & Expense transactions annually on its award-winning Neo platform.

KDS is based in Issy-les-Moulineaux - France, with offices in Germany, United Kingdom and United States of America employing 200 people.



Due to our position in the market, and as an independent supplier of on and off-line travel reservation solutions as well as management of expense reports, KDS focuses on axes of development around the customer satisfaction, available contents, performance and technological innovation. This "convergence" allows us to propose the most efficient solution with regard to customers' constraints.

Travel & Expense can represent over 10% of a company's turnover and is often one of the largest area of controllable spend. KDS enables companies to save up to 25% on their T&E spend and improve productivity by 40%, empowering them to stay ahead in a competitive environment.



KDS offers a consumer-grade, intuitive way of booking business travel 'door-to-door' and managing expenses in context, by building every segment of a trip into a single, compliant, bookable and approvable itinerary and weaving in expenses. A unified SaaS T&E platform delivers better visibility on total cost of trip, more accurate forecasting, therefore driving better decision-making. It streamlines the finance process, reduces time to submit and process claims and eliminates costly errors.

OUR VALUES :



Respect

We earn the respect, loyalty and confidence of our customers and each other. We collaborate in a fair, open and honest way.



Courage

We have the courage to innovate and challenge the way things are done. We show the way forward and we drive to improve.



Empowerment

We are empowered to innovate and make a positive difference for our customers and KDS. We grasp responsibility and are accountable for what we deliver.



Passion

We are passionate about delivering innovative and reliable quality software. We measure our performance by the success of our customers.

UNITED NATIONS GLOBAL COMPACT : THE 10 PRINCIPLES



Created in 2000 by the United Nations, the UN Global Compact is the world's largest initiative with participants over 170 countries, encouraging businesses to adopt sustainable and socially responsible policies, stating ten principles in the following 4 areas :

Human Rights

- Principle 1 : Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2 : Make sure that they are not complicit in human rights abuses.

Labour

- 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 labour;
- Principle 5 : The effective abolition of child labour; and
- Principle 6 : The elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7 : Businesses should support a precautionary approach to environmental challenges;
- Principle 8 : Undertake initiatives to promote greater environmental responsibility; and
- Principle 9 : Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10 : Businesses should work against corruption in all its forms, including extortion and bribery.

KDS ENGAGEMENT IN THE MAIN 4 ISSUE AREAS

1. Human Rights

KDS seeks excellence in its business and commits to continuously improve its performance by communicating and working with its Employees and Suppliers/Partners on business conduct and ethics issues.

Human rights respect is a fundamental principle within KDS as part of the company's Code of Business Conduct and Ethics. Subject to the French labour law, KDS has always respected with a level of engagement, a policy of non-discrimination in its activities and particularly internally in its employee's management, as well as with its partners and suppliers.



Working conditions :

Our new office in Issy-les-Moulineaux has a high level of comfort in a recent building respecting the latest environmental norms ensuring a high quality of working conditions (Health, safety and hygiene).



Internal code of conduct :

All employees and other persons acting on behalf of KDS are expected to treat compliance with our Code of Conduct as an important element of their relationship with the company. In France, it comes in addition to the Labor Code, the Collective Agreement and the Internal Regulations. Like the latter, the Code is hand-delivered to each employee of the company.

KDS operates with policies and procedures which are consistent with the values and the standards set out in our Code. The following standards of conduct apply to all employees and other persons acting on behalf of the company. In particular, the group's senior management has a special responsibility to lead according to these standards.

In terms of Health, safety and hygiene, KDS does its utmost to provide each employee with a clean, healthy and safe working environment. Adequate steps are taken to prevent accidents; some employees receive First Aid training (a First Aid box is at everybody's disposal).

In terms of discrimination and harassment : Abuse or threat of physical abuse, sexual or other harassment and verbal abuse or any other form of intimidation is prohibited by law and disciplinary measures of a serious nature shall be reported to the management.

The company seeks to eliminate discrimination in all aspects of employment and recruitment included but not limited to: diversity in recruitment, remuneration, training, personal development and working conditions, based on race, colour, sex, religion, political opinions, nationality (Multicultural diversity is maintained through 15 different

nationalities represented within KDS), sexual orientation, disability, social origin or age and promotes parity of opportunities and treatment.

KDS is intolerant of discrimination, harassment or victimization and seeks to maintain a favorable employee's environment in which the involvement of each is encouraged. A chart to guarantee professional equality between women and men (in terms of : recruitment, salary, career management and trainings, balance between private and professional life) is being provided and signed by our employees.

Our HR team continuously work on improving our best practices and insure that non-discrimination and human rights are deeply respected in our processes and every day behavior.



Commitments to customers and suppliers :

All KDS employees must treat customers fairly, open and honestly and provide high levels of service. The company aims to provide and promote its range of products and services that must meet customer needs.

All employees must also maintain the highest possible standards of integrity in business relationships with their suppliers, develop their relationships with those suppliers who operate with values and standards equivalent to KDS's and work together with said suppliers to improve all aspects of performance.

Similarly, all employees must contribute to the social and economic well-being of communities where the company is an employer and ensure that they conduct their activities, so far as possible, in a manner sensitive to the cultural and social traditions of communities with which the company comes into contact.

2. Labour

KDS is strongly involved in constantly improving its actions to reduce labour risks, avoid labour violations, improve labour conditions and ensure employees' rights are respected.



The Company **prohibits the use of forced or child labour** and has no forced or involuntary labor (all employees are able to leave the company after giving the appropriate contractual statutory notice as per the conditions of their contract of employment). The company expects all its suppliers and contractors to comply with these standards.



Employee representatives (CHCST & DP) work closely with the top management to prevent any labour risks and improve balance between private and professional life. A "Charter for the right to disconnect" and a "Home office charter" were issued in consultation with our employee representatives.



Employees are strongly encouraged to **seek advice about the company policy** and

everything concerning ethics. Employees and managers may seek advice and must promptly report any suspected breach of the company policy or applicable legal requirements using one of the following ways : Consult their supervisor or, for purposes related to employment or workplace, consult the Human Resources or the management. All reports will be treated as confidentially as possible, during a full and fair investigation.

An employee or a manager who raises an issue involving a possible violation of the law or the KDS code of conduct or any other Company policy will be protected against any form of reprisals. Any action taken against an employee or a manager, officially or not, simply because he or she reported a possible infringement or other legal or ethical concern to a supervisor is a violation of this code. If an employee or a manager deems that he or she has suffered from retaliation contrary to this code, he or she should report such concerns to a manager, the Human Resources or the Staff Representatives.



All employees have to take **annual code of conduct and ethics on-line trainings** and have access to the **ethics helpline** to report any incidents.



Managers carry out **2 yearly interviews** as well as **mid-year meetings** incorporating learning and development opportunities to enhance skills and encourage communication between employees and managers. Our HR department ensures a daily and regular link with our employees and help them treat any potential issues.



Induction programs dedicated to new employees, bespoke **on-boarding programs** tailored to specific employee role within our organization, **awards** and **recognition programs** empower employees to enhance their skills.



As a recognition for our labour practice and processes, KDS has been awarded the **Investors in People** Standard, demonstrating our commitment to realizing the potential of our people.



**INVESTORS
IN PEOPLE**

3. Environment

To ensure a sustainable development respecting the balance between environmental protection and competitiveness, KDS issued a **Corporate environmental policy**.

The process of sustainable development has been part of the company's values and commitments for many years and is reflected in its following commitments :

- Develop an eco-efficiency policy by implementing value added environmental solutions.
- Achieve the best environmental standards for the preservation of natural resources, energy consumption, waste management and the protection of biodiversity.
- Contribute and be in compliance with the NF HQE certification.

All KDS employees work for an entity where the environmental performance is monitored by regular audits according to the ISO 14001 requirements. The company is committed to managing its environmental impacts in a responsible way and to encouraging and activating an environmentally responsible behavior on the employees, customers and business associates throughout the world.

Thanks to its CSR policy, KDS has received from EcoVadis* a Silver level recognition (* First collaborative platform enabling companies to assess their worldwide suppliers' environmental and social performances).



Waste management

KDS aims to minimize conscientiously and creatively waste in its operations and business activities.

In addition to current provisions facilitating sorting in offices, KDS waste collection is provided by connection to the pneumatic system of transport of waste operated by the municipality of Issy-Les-Moulineaux, within the context of its ISSEO environmental charter.

Reducing paper consumption is a priority that KDS has acted on by setting practical guidelines : the company induces its employees and business associates to make positive efforts to consume less but better and recycle more (e.g. a certificate of destruction is delivered monthly indicating the number of saved trees thanks to shredded and recycled paper). Selective sorting is set up in each office of the company.

Rainwater treatment is optimized in the building occupied by other tenants and KDS: retention ponds, storing and draining areas allow to reuse the resource for the needs of the building and to reduce discharges to sewer. Reducing the consumption of drinking water (58% approx. compared to the reference) is provided by a low flow distribution and performant taps with occupancy sensors.



Greenhouse Gas Emissions Reduction

KDS Corporate Travel Expenses Policy advises to avoid travelling and to organize meetings via conference calls as often as possible. It also reminds "to think green whenever organizing office activities". Employees are encouraged to reduce gas emissions on an individual basis, to take the train rather than the plane and to maximize the use of public transportation and carpooling. The selection of company cars is based on low CO² emission. A statement on the average CO² emission is included in the KDS travel booking tool.



Green IT

KDS focuses on optimizing the performance, energy consumption and recycling of IT equipment (computers and data centers). IT equipment is handled by specialist service providers.

All confidential data and computer systems owned by KDS are hosted in highly secure "data centers", which have the ISO 9001-2008, OHSAS 18001-2007, ISO 14001-2004. ISO / IEC 27001: 2005 and ISO 50001-2011 certifications.



Energy consumption

KDS meets the requirements of the ISO 50001 standard and its organizational drivers to facilitate transparency/communication on management of energy resources and assist facilities in evaluating and prioritizing the implementation of new energy-efficient technologies.

Purchase of products and services of economical energy is highly requested.

4. Anti-corruption

As part of the American Express GBT (GBT) group, KDS is strongly committed to acting professionally, fairly and with integrity in all its business and on all top concerns :



As part of its commitment to ethical business practices, KDS will not tolerate any form of bribery or corruption.



Sanctions

We enforce a strong global sanctions compliance program to help ensure :



NO prohibited transactions



NO prohibited persons



NO evading or circumventing sanctions programs



OFAC



UNITED NATIONS

We must always comply with all economic and trade sanctions laws and regulations applicable to GBT and KDS. This means that controls will be applied such that :

- Customers cannot book prohibited sanctioned destinations : Cuba & Crimea
- Customers cannot book through sanctioned entities (e.g. sanctioned airlines, sanctioned hotels etc.)



Anti-corruption : Safeguarding against corruption and bribery

The American Express Anti-Corruption & Bribery Policy is applicable to KDS



No Compromising

Adherence to this Policy is the responsibility of **ALL** GBT and KDS employees, third-parties, non-affiliated entities, government intermediaries, and controlled entities.



Our Reputation Matters

GBT Global Compliance and Risk maintains a robust global anti-corruption program, consisting of an anti-corruption policy, third-party anti-corruption due diligence, related guidelines, assessments, procedures and controls.



Robust Training & Testing

Online and in person training is provided for key employees and third party business partners. Payment monitoring, including use of cash, using a risk-based approach to detect instances of non-compliance or potential improper payments.



Third-party oversight :

The following GBT features have been implemented for KDS :



Risk Applicability

- › Risk surveys are used prior to engaging any third party as a way to identify inherent risk in the outsourcing engagement
- › Fourth Parties are also evaluated in instances where they will act as government intermediaries for GBT or KDS



Pre-Contract Due Diligence

- › Screening of all clients, beneficial owners, and directors for allegations of bribery and fraud or have government affiliations
- › Internal reviews, independent audit results and/or certifications are required for any third party that will access, store or process GBT/KDS or GBT/KDS client data



Post-Contract Oversight

- › A risk-based approach is taken to periodically assess third party controls related to:
 - Information Security and Privacy
 - Corruption and Bribery
 - Service Continuity and Financial Health



Compliance eLearning courses

KDS Employees are also required to complete eLearning courses and face-to-face Anti-corruption training.

Training Title

GBT InfoSec
 GBT Sanctions and AML
 GBT Anti-Corruption
 GBT Privacy
 AXP Bank Awareness
 GBT (Employee) Preventing Harassment
 GBT Antitrust
 GBT Code of Conduct




All KDS employees, officers and directors, and all those acting for or on KDS's behalf are strictly prohibited from offering, paying, soliciting or accepting bribes or kickbacks, including facilitation payments.

Agents, representatives and intermediaries who act on behalf of KDS, anywhere in the world, must comply with the KDS (or relevant operating company) Business Principles (which include relevant Anti-bribery provisions) or a comparable code of conduct. Third parties such as suppliers and other contractors are expected to comply with the KDS (or relevant operating company) Code of Conduct or a comparable code of conduct.

Given the serious nature of a breach, an employee's failure to comply with this policy, whether intentionally or by an act of negligence, may lead to disciplinary action being taken that could ultimately result in termination of contract.

In addition to regular audits to verify compliance with relevant anti-corruption laws and more broadly with this and other KDS policies, practices and procedures, there may be individual instances in which KDS wishes to investigate a specific issue or allegation. In these events, an audit or investigation of records, books and accounts may be performed to prevent and detect violations of anti-corruption laws and procedures and to ensure compliance with this policy and other KDS policies, practices, and procedures.

-  The GBT Ethics Helpline is available for all KDS employees with a way to report incidents regarding ethical or compliance matters in the following areas : Accounting, including misconduct or errors concerning financial accounting, internal accounting controls or auditing areas ; Finance, including financial fraud, banking or financial crimes ; Anti-bribery & Auditing matters.