



CARLSON UNITED NATIONS GLOBAL COMPACT COMMUNICATION ON PROGRESS 2018

To Whom It May Concern,

Since first signing the United Nations Global Compact in 2010, Carlson has remained staunchly committed to the Ten Principles of the Global Compact and maintains strong policies on human rights, labor, environment and anti-corruption. The Global Compact aligns with our core values and our commitment to be a force for good. We incorporate its principles into our decision-making processes, day-to-day operations and training programs.

We affirm our dedication and commitment to the Global Compact. Across our businesses, we are inspired and guided by our core principles and those of the Global Compact. Contributing to our communities, serving our customers, constantly working to reduce our impact on the environment and empowering our employees to live and work responsibly is at the heart of our business actions today. We pledge to make continued progress in support of these principles as we look ahead to the future with a caring spirit, service heart and lasting legacy.

Diana Nelson,
Carlson Board Chair

HUMAN RIGHTS

ASSESSMENT, POLICY AND GOALS

Description of the relevance of human rights for the company (i.e., human rights risk-assessment).
Description of policies, public commitments and company goals on Human Rights.

Carlson believes in affording all employees basic human rights as defined in the United Nation Declaration of Human Rights, such as treating them with dignity and respect, providing a safe and healthy work environment for all employees, not using workers under the legal age for employment, and protecting children from any type of labor that may be hazardous to their health or interferes with their education.

We do not in any way participate in or condone practices that breach International Declarations covering key human rights issues, and we work to rid prevalence of such breaches and strengthen local communities by running a responsible operation. The Universal Declaration of Human Rights, and the UN Global Compact Human Rights and Labor Principles underlie our relationship with our employees. All business entities comply with local laws regarding work hours and payment. Our entities have routines in place to ensure alignment with our Equal Opportunity and Prevention of Discrimination and Harassment Policies, so that discrimination due to age, race, religion, gender or disability does not take place.

Our Guiding Principles and Policies

Carlson acknowledges and respects the principles contained in the United Nations Declaration of Human Rights, which are consistent with Carlson's core values and commitment to be a force for good. Carlson endeavors to conduct its business operations in a manner that seeks to promote and enhance human rights within its sphere of influence. This commitment is aligned with and supported by documents like our Code of Business Ethics and Conduct, and the principles of the United Nations Global Compact, to which Carlson is a participant.

Ethical Business Conduct

Carlson believes that it is defined both by the results it achieves, and the way it achieves them. Carlson is committed to maintaining a high standard of business ethics, integrity and honesty in full compliance with all applicable laws. The Company's Code of Business Ethics and Conduct contains rules and guidelines, and serves as a reminder of its commitment to do what is right and ethical for Carlson and all of its stakeholders. This Code applies to every individual or contractor that works for or represents Carlson. While these individuals shall comply with the laws and agreements applicable to operations and positions in the countries and jurisdictions where they operate, this Code helps all to adhere to the Core Values and good business practices that have built the excellent reputation of Carlson.

Protection of the Rights of Employees

Carlson seeks to maintain a culture that supports the well-being and inclusion of all employees and is committed to encouraging a positive working environment that meets and exceeds legal requirements. All Carlson employees shall comply with the company's policies of Equal Opportunity, Diversity and Inclusion, and Prevention of Discrimination and Harassment. Carlson will provide equal employment opportunity without discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, marital status, age, disability, veteran status or any other legally protected classification except where there is a bona fide business justification. Carlson supports the freedom of association, and the elimination of forced labor, prison labor, indentured labor and exploited bonded labor.

Protection of the Rights of Children

Carlson supports every child's right to a safe and secure childhood, and is committed to the principle that all people have the right to grow up and develop without fear of exploitation or harm. Carlson condemns all forms of exploitation of children. The Company does not recruit child labor, in accordance with the applicable International Labor Organization Conventions, and supports the elimination of exploitive child labor. Carlson and its employees shall comply with the company's Protection of Children from Sexual Exploitation Policy, as well as all applicable laws and regulations regarding the prevention of the commercial sexual exploitation of children, including the prevention of the use of its premises for such exploitation.

Combating Human Trafficking

Carlson is committed to combatting modern-day slavery through the adoption and promotion of business practices that seek to protect victims of human trafficking, and the development of proactive measures to educate employees and encourage its partners and the broader business community to take a stand against human trafficking.

Businesses Ending Slavery and Trafficking (BEST) Employers Alliance:

Carlson continues to be a Partner for this first public-private partnership in the nation to work across industries to prevent sex trafficking and sex buying. [BEST](#) aligns and equips leaders to use the power of business to prevent human trafficking. Through training, consultation and

collaboration, BEST works with businesses to drive behavioral change and improve the lives of the victims involved. Carlson uses its tools, trainings, and networks to evaluate the current status of anti-trafficking efforts and help identify areas of opportunity within the company and externally.

End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes (ECPAT) Code of Conduct:

Carlson has long supported the End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes ([ECPAT](#)) Code of Conduct to protect children against sexual exploitation in travel and tourism. Carlson condemns all forms of commercial sexual exploitation of children. We support every child's right to a safe and secure childhood, and is committed to the principle that everyone has the right to grow up and develop without fear of exploitation or harm. The protection of children from sexual exploitation is a moral imperative, and socially responsible business policies and practices must reflect this principle. Recently, Carlson collaborated with ECPAT to develop employee training modules specific to travel management and meetings and events companies worldwide. Carlson and its employees shall strictly comply with all applicable laws and regulations regarding the prevention of the commercial sexual exploitation of children, including the prevention of the use of its premises for such exploitation.

No employee may:

- use or allow the use of any of the Company's facilities, resources or equipment (including the Company's computers and networks) for the viewing, storage, distribution, promotion or other use of materials which sexually exploit children;
- enter into, on behalf of the Company, or otherwise, any business relationships or any other arrangement with any organization which the employee has reason to believe participates in any way in the sexual exploitation of children;
- or use or allow the use of images or concepts that sexually exploit children.

All employees must be vigilant and immediately report to managers, supervisors, the Legal department, as appropriate, all situations that come to their attention in the Company's premises or businesses where sexual exploitation of children is suspected or appears to be intended.

Under no circumstances may the Company's funds, property (including electronic devices and the Company's supported technology) or personnel be used to further or support activities prohibited by the Compact, ECPAT Code or this Code.

Additional Information

Carlson is a privately held, global leader in the travel industry, headquartered in Minneapolis, Minnesota, and is the parent company of Carlson Wagonlit Travel (CWT).

Learn more about CWT human rights policies and initiatives in its Annual Responsible Business Report [June 2018](#). This report includes further details on CWT [Responsible Business Strategies](#), [Diversity and Inclusion](#) initiatives, and efforts to combat [Human Trafficking](#). Additionally, the CWT Responsible Supplier Code can be found [here](#).

IMPLEMENTATION

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

Signatory of The Code

Carlson has been recognized by the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (known as [The Code](#)) as a top member for 2017.

The Code is an industry-driven, multi-stakeholder initiative with the mission to provide awareness, tools and support to the tourism industry in order to combat the sexual exploitation of children in contexts related to travel and tourism.

In 2004 Carlson became the first North American travel and hospitality company to sign the Code of Conduct, which is aimed at protecting children against sexual exploitation in the travel and tourism industry. The Code was signed on behalf of Carlson during a United Nations ceremony at UNICEF headquarters in New York City by then Chairman and CEO Marilyn Carlson Nelson, an ardent supporter and pioneer of this effort.

The Code employs the following six criteria which Carlson committed to adhere to as a signatory:

1. To establish a policy and procedures against sexual exploitation of children.
2. To train employees in children's rights, the prevention of sexual exploitation and how to report suspected cases.
3. To include a clause in contracts throughout the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children.
4. To provide information to travelers on children's rights, the prevention of sexual exploitation of children and how to report suspected cases.
5. To support, collaborate and engage stakeholders in the prevention of sexual exploitation of children.
6. To report annually on their implementation of Code related activities.

Supplier Contracts

Carlson supports a child's right to a safe and secure childhood and condemns all forms of commercial sexual exploitation of children. Supplier will use its best efforts to assist in that support by: (1) not knowingly using any form of child or forced labor, including without limitation using subcontractors or suppliers who use child or forced labor; (2) not knowingly engaging in or supporting the business of, or doing business with companies who engage in or support, the commercial exploitation of children; (3) prohibiting the use of all company equipment for the viewing, storage, distribution, promotion or other use of materials, which sexually exploit children and establishing procedures to enforce such policies; and (4) prohibiting the use of images or concepts in its marketing or on its premises which sexually exploit children.

Carlson supports the values of human rights, labor standards, the environment and anti-corruption. Supplier will use its best efforts to assist in that support by: (1) affording all employees basic human rights by treating them with dignity and respect, providing a safe and healthy work environment and (2) protecting the communities and environments in which they operate by having effective environmental policies and complying with existing legislation and regulations regarding the protection of the environment.

External Collaboration against Human Trafficking

Carlson continues to utilize its network and influence whenever possible to champion the promotion and protection of Human Rights.

Global Business Coalition Against Human Trafficking (gBCAT):

As a founding member of [gBCAT](#), Carlson fully supports its mission to mobilize the power, resources and thought leadership of the global business community to end human trafficking, including all forms of forced labor and sex trafficking. This coalition capitalizes on the major organizational strengths, resources, and reach of global businesses to accelerate progress on human trafficking. Through three workstreams, members share learnings through webinars and in-person meetings; develop a Research Lab to incubate ideas, publish reports, and identify areas for action; and publicize findings through an enhanced Public Platform.

Super Bowl Initiative:

Carlson served on the Super Bowl LII Anti-Trafficking Committee, with Marilyn Carlson Nelson co-chairing the Super Bowl Host Committee. Given its expertise on the issue, Carlson played an important role in the development of a replicable anti-sex trafficking plan for this event and other future large-scale events.

International Delegations:

Carlson supports the U.S. State Department's International Visitor Leadership Program (IVLP) which focuses on combating the trafficking of persons. Partnering with Global Minnesota, Carlson regularly hosts delegations of IVLP visitors from around the world for visits that:

- introduce participants to U.S. policy and strategy to prevent and actively combat trafficking of persons, including prosecution and enforcement against traffickers;
- provide a comprehensive overview of the trafficking issue domestically and abroad, and the power of local, national and international cooperation;
- share information about initiatives to protect, assist and provide social reintegration of trafficking victims;
- demonstrate how representatives from a variety of societal sectors can effectively work together to address this issue, and to encourage similar cooperation among program participants in their work abroad.

This unique opportunity to raise awareness and share ideas with potential, future world leaders is a priority for Carlson as it works to eradicate this global problem. Sharing practical examples of the work it has initiated within industry, Carlson works to build relationships with these international delegates, and provide a framework they can use to foster partnerships with business, government, and non-profit organizations within their own respective countries.

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MEASUREMENT OF OUTCOMES

Description of how the company monitors and evaluates performance.

Rule of Law

Carlson has been recognized by the UN Global Compact Businesses for Rule of Law as a leader in Rule of Law for Partnering with Public Sector and NGOs Worldwide to Fight Child Trafficking; also recognizing Carlson Wagonlit Travel for Displaying Sex-tourism Warnings on Travel Itineraries.

Carlson Named Top Member of The Code

Carlson was again recognized as a Top Member of The Code in 2017 for successfully completing all six criteria within business operations, reporting efforts, and choosing to make child protection work public on The Code's website.

Presidential Award for Extraordinary Efforts to Combat Trafficking in Persons

Carlson was the first company to receive the Presidential Award for Extraordinary Efforts to Combat Trafficking in Persons.

Carlson received the award for its demonstrated commitment and corporate leadership in combating modern slavery through the adoption and promotion of business practices that seek to protect victims of human trafficking, and the development of proactive measures to train employees and encourage its partners and the broader business community to take a stand against human trafficking.

The company has been a leader and early supporter of efforts to recognize and prevent human and sex trafficking around the globe, and proactively trains its employees to be aware of the risks of sex trafficking, particularly of children.

Oslo Business for Peace Award

Marilyn Carlson Nelson, former Carlson chief executive officer and chairman emeritus, was honored with a 2014 Oslo Business for Peace Award, the highest form of recognition given to individual business leaders for fostering peace and stability through creating shared value between business and society.

Mrs. Nelson was nominated by the United Nations Global Compact (UNGC) for her leadership promoting responsible business practices - ranging from advocacy for the abolition of sexual exploitation of children, to guidance of the UNGC as an active board member. Five honorees were selected by an independent committee consisting of Nobel Prize winners in peace and economics.

The Business for Peace Foundation was established in 2007 to encourage the willingness of business leaders to engage with society as partners in developing shared value and increasing trust between business and society. The foundation has promoted the concept of "business worthiness" as a way to understand how business leaders can develop trust with communities, contribute to well-being, and create conditions for sustainable development.

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LABOR

ASSESSMENT, POLICY AND GOALS

Description of the relevance of labor rights for the company (i.e. labor rights-related risks and opportunities). Description of written policies, public commitments and company goals on labor rights.

Carlson believes in affording all employees basic human rights as defined in the United Nation Declaration of Human Rights, such as treating them with dignity and respect, providing a safe and healthy work environment for all employees, not using workers under the legal age for employment, and protecting children from any type of labor that may be hazardous to their health or interferes with their education.

We do not in any way participate in or condone practices that breach International Declarations covering key labor issues and work to rid prevalence of such breaches and strengthen local communities by running a responsible operation. The Universal Declaration of Human Rights underlies our relationship with our employees. All business entities comply with local laws regarding work hours and payment. Our entities have routines in place to ensure alignment with our policies on Equal Opportunity and Prevention of Discrimination and Harassment, so that discrimination due to age, race, religion, gender or disability does not take place.

Protection of the Rights of Employees

Carlson seeks to maintain a culture that supports the well-being and inclusion of all employees and is committed to encouraging a positive working environment which meets and exceeds legal requirements. All Carlson employees shall comply with the company's policies of Equal Opportunity, Diversity and Inclusion, and Prevention of Discrimination and Harassment. Carlson will provide equal employment opportunity without discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, marital status, age, disability, veteran status or any other legally protected classification except where there is a bona fide business justification. The Company has zero tolerance for discriminatory treatment including harassment of employment candidates, employees, customers, vendors, contractors and subcontractors by any person in the course of their work for Carlson. Carlson supports the freedom of association, and the elimination of forced labor, prison labor, indentured labor and exploited bonded labor.

Protection of the Rights of Children

Carlson supports every child's right to a safe and secure childhood, and is committed to the principle that all people have the right to grow up and develop without fear of exploitation or harm. Carlson condemns all forms of exploitation of children. The Company does not recruit child labor, in accordance with the applicable International Labor Organization Conventions, and supports the elimination of exploitive child labor. Carlson and its employees shall comply with the company's Protection of Children from Sexual Exploitation Policy, as well as all applicable laws and regulations regarding the prevention of the commercial sexual exploitation of children, including the prevention of the use of its premises for such exploitation.

Safe Environment

All employees and contractors must strive to provide a safe and secure work environment for employees, clients and guests, and to protect the Company's physical and intangible assets.

Employees must comply with established Company and facility security guidelines and report all incidents involving a potential or actual breach of the security guidelines to their immediate supervisor, human resources department, or security department.

Non-Discrimination

Carlson will provide equal employment opportunity without discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, marital status, age, disability, veteran status or any other legally protected classification except where there is a bona fide business justification. The Company has zero tolerance for discriminatory treatment including harassment of employment candidates, employees, customers, vendors, contractors and subcontractors by any person in the course of their work for Carlson. Every employee shall ensure that all of our Values are practiced and will uphold the principles set forth in the Code of Business Ethics and Conduct Policy and comply with all employment policies that apply to their business and local laws.

Respect

The Company is dedicated to maintaining a work environment where employees are treated with courtesy, dignity and respect. The Company expects employees to behave politely and respectfully in all interactions. This includes face-to-face interactions as well as communications by phone, email, social media or Internet. All employees should act with integrity and professionalism and demonstrate respect for those with whom they work. The Company does not tolerate behavior that threatens the well-being of any colleague, customer or other person. Employees must never verbally or physically mistreat others or engage in offensive behavior. This encompasses sexual and other forms of harassment, abusive treatment or intimidating behavior, inappropriate language or gestures, discrimination and any other conduct that materially distracts from an employee's ability to competently perform the work or meet his or her responsibilities and duties, regardless of whether or not the behavior is illegal.

Workforce Development and Job Creation

Carlson has a strategic focus around workforce development and job creation. These initiatives are supported through corporate grantmaking, participation in community partnerships and collaborations, and the support of employee professional development and training.

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IMPLEMENTATION

Description of concrete actions taken by the company to implement labor policies, address labor risks and respond to labor violations.

Reporting of Possible Violations

Employees should immediately report which is or may be contrary to any of the above policies or guidelines laid out in the Code of Business Ethics and Conduct Policy. Employees are instructed to

go to any of the following entities: a manager with whom they feel comfortable, Human Resources, Legal department, the Ethics Helpline or website. Retaliation is never condoned at Carlson, so employees can rest assured that they will never be punished for coming forward with a good-faith reporting of wrongdoing.

Supplier Conduct

Carlson is committed to ensuring the highest ethical standards in conducting business, and the same is expected of suppliers. As a supporting member of the UN Global Compact, Carlson believes in and is committed to advancing the Global Compact's core values in the areas of human rights, labor, environment and anti-corruption. Suppliers are expected to abide by all applicable laws, codes and regulations in the countries in which they operate.

Workforce Development

Carlson and the Carlson Family Foundation support a wide variety of workforce development initiatives, including organizations such as [Orphaned Starfish](#), which provides vocational and technological skills to children who are survivors of or at risk of abuse. Carlson leaders also serve on the boards of organizations which provide workforce development skills for at-risk youth, and Carlson employees engage in volunteer activities to help provide vocational skills in their communities.

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MEASUREMENT OF OUTCOMES

Description of how the company monitors and evaluates performance.

Human Rights Campaign Corporate Equality Index

Carlson has been recognized as one of the "Best Places to Work for LGBTQ Equality" by The Human Rights Campaign (HRC) Corporate Equality Index each year from 2006-2018. The index is the only nationally recognized measure of lesbian, gay, bisexual, transgender and queer (LGBTQ) workplace equality.

The Corporate Equality Index measures the extent to which employers protect their LGBTQ employees from employment discrimination. Ratings are based on factors like non-discrimination policies, diversity training, and benefits for domestic partners and transgender employees.

Carlson has implemented comprehensive workplace policies and benefits, including medical benefits and adoption assistance, to include LGBTQ employees. Our goal is to accommodate the wide-ranging needs of our employees and their families with programs and policies that are inclusive and fair to all employees and that demonstrate our commitment to diversity. Carlson maintained a 95% rating over the past two years.

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ENVIRONMENT

ASSESSMENT, POLICY AND GOALS

Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.

Carlson believes in protecting the communities and environments in which we work and live. The Company promotes the protection of the environment through effective conduct and compliance with existing legislation and regulations. Carlson strives to pursue environmentally sound business practices in its day-to-day activities. Our encouragement of global and local initiatives helps Carlson to improve its environmental footprint and consciousness. We make a point to follow and exceed the laws and regulations that apply to our work, no matter where we conduct our business.

Carlson is also committed to assisting clients to address their environmental issues and to provide information that can enable them to reduce their environmental impact.

Additional Information

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IMPLEMENTATION

Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.

Supplier Conduct

Carlson is committed to ensuring the highest ethical standards in conducting business, and the same is expected of suppliers. As a supporting member of the UN Global Compact, Carlson believes in and is committed to advancing this Global Compact's core value of environmental protection.

These principles and expectations are not only evident in the conduct of Carlson, but also within its business entities.

CWT Carbon Management

Since 2012, Carlson Wagonlit Travel (CWT) has been measuring and reporting its carbon emissions across 22 countries. This is part of a systematic approach to better understand and target efforts to reduce emissions across CWT operations. Based upon this data, CWT put various initiatives in place in 2016, including an environmental awareness campaign, the implementation of best practices across operations, and four offsetting activities. After the success of the 2016 pilot, which helped reduce 1,205 tons of CO₂ equivalents and distributed 2,700 water filters to 25,680 beneficiaries in 2016, CWT continued to offset the carbon impact of some events in 2017. Last year, CWT offset 515 tons of CO₂ equivalents to make the Global Leadership Conference and the “global Exchange in Singapore” carbon neutral.

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MEASUREMENT OF OUTCOMES

Description of how the company monitors and evaluates environmental performance.

LEED Certified

Carlson’s Minneapolis world headquarters earned the U.S. Green Building Council’s (USGBC) LEED Silver level certification for Existing Buildings: Operations & Maintenance (LEED EB O&M®) certification with a perfect score of 48 LEED credit points. It’s ENERGY STAR score of 87 placed it in the top 15 percent of all comparable buildings nationwide. Among the environmental efforts are:

- An interior pest management program to reduce toxicity of pesticides
- Replacement of high-flow restroom fixtures with water-saving models
- Implementation of ENERGY STAR-rated IT equipment
- Sustainable food purchases through the Farm-to-Fork program in the building’s café.

CWT EcoVadis Gold Rating

In April 2018, CWT was rated Gold for Corporate Social Responsibility (CSR) for a second successive year, placing it in the top 1% of all companies evaluated worldwide both within the industry and across all industries. CWT was also rated in the top 1% for Fair Business Practices and Ethics & Compliance. [EcoVadis](#), who evaluates over 25,000 suppliers every year, uses a methodology that rates companies according to 21 CSR criteria, grouped under four themes: Environment, Labor, Fair Business Practices and Sustainable Procurement. CWT’s performance in each of these four themes was evaluated looking at policies, actions and results.

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Anti-Corruption

ASSESSMENT, POLICY AND GOALS

Description of the relevance of anti-corruption for the company (i.e., anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

Carlson Code of Business Ethics and Conduct

Carlson is committed to maintaining a high standard of business ethics, honesty and integrity, and requires all employees to comply with its Code of Business Ethics and Conduct. These rules and guidelines serve as a reminder of its commitment to do what is right and ethical for Carlson and all of its stakeholders.

Within this policy, the Company commits to comply with the laws of all countries and jurisdictions in which it operates. Additionally, the Company will not cause or permit any director, officer or employee to take any action which would result in violation of applicable laws or regulations. The Company will forego any business opportunity that requires a violation of the law or this policy.

All Carlson employees, and contracted parties shall comply with the laws, treaties, regulations and agreements applicable to operations and positions in the countries and jurisdictions where they operate.

Additional Information

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IMPLEMENTATION

Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.

Reporting Ethical Problems

Carlson is committed to providing an environment that helps employees resolve any ethical business dilemmas they may face. Any employee who encounters an ethical problem or has information about a questionable practice that does not comply with the Code of Business Ethics and Conduct, the Company policies or applicable law, must contact management or the Carlson Human Resources department.

If the persons to whom an employee reports an ethical problem or questionable practice is not responsive or if there is reason to believe that reporting to the persons indicated above is inappropriate in a particular case, then an employee should contact the Company's Legal department, or the Ethics Helpline or website.

In no event will any action be taken against the employee for reporting, in good faith, ethical problems or information on questionable practices.

Prohibition of Bribery

Employees must never attempt to bribe or otherwise improperly influence the employees, agents or others who may be acting for any third party, including, but not limited to, potential and current customers, clients, franchisees, or other enterprises with whom the Company wants to do or retain business in an attempt to obtain or retain business or to gain any other benefit for the Company.

Conflicts of Interest

Employees are to avoid situations where their own personal interests, or that of persons or companies in which they have ties or links (financial or otherwise), could conflict with the Company's interests. Employees are required to promptly disclose any and every conflict of interest between themselves and the interests of the Company to their supervisors, the Human Resources Department, or the Legal Department. Where necessary or appropriate, the conflict must be removed.

Gifts

In alignment with the Code of Business Ethics and Conduct, Carlson employees are to avoid giving or receiving gifts, merchandise, services, travel, donations or business courtesies in connection with Company business relationships, except as legally permissible and recognized as courtesies of the trade such as meals and entertainment reasonably related to a legitimate Company business purpose. Appropriately acceptable gifts must meet all of the following criteria:

- Modest or otherwise reasonable in value and not lavish (not in excess of \$100 USD or local equivalent). Gifts in excess of \$100 USD (example: sporting event tickets) or gifts that would be considered excessive in the local market should be approved by management
- Infrequent
- Transparent, in good taste, and in an appropriate environment
- Unsolicited
- Not cash or cash equivalent such as a gift card
- Not in contrast to the third parties' policy
- Not restricted or prohibited by the law

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MEASUREMENT OF OUTCOMES

Description of how the company monitors and evaluates anti-corruption performance.

Integrity is the foundation for how our decisions and actions help Carlson attain its highest aspirations – in service to each other, our customers, our guests and the communities in which we

operate. At Carlson, we believe that we are defined both by the results we achieve, and the way we achieve them, and this belief is consistent throughout all business entities.

CWT Review of the Code of Business Ethics and Conduct

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

Each year, CWT runs mandatory training on the Code and its policies, both for new recruits and current staff – CWT achieved a 99% completion rate in 2017. CWT also runs Responsible Purchasing training for those working with our suppliers. The CWT Compliance team has access to metrics on how employees are performing on each compliance topic, and benchmarking data that shows how we are performing as a business against our peers. CWT uses this insight to determine if additional training is required.

Additional Information

Carlson is a privately held, global leader in the travel industry, headquartered in Minneapolis, Minnesota, and is the parent company of Carlson Wagonlit Travel (CWT).

Learn more about CWT anti-corruption policies and initiatives in its Annual Responsible Business Report [June 2018](#). This report includes further details on CWT [Responsible Business Strategies](#) and [Ethics and Business Behavior](#) initiatives. Additionally, the CWT Responsible Supplier Code can be found [here](#).