



We live. We connect. We care.

Annual Responsible Business Report
September 2021

Welcome to our Annual Responsible Business Report – September 2021.

This is our ninth annual report detailing our Responsible Business (RB) policies, performance and progress against our seven RB domains. Due to the pandemic, we have chosen to not only cover our RB activities for 2020 and the beginning of 2021, but also to keep our most significant activities from 2019.

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

The report has been written in accordance with the Global Reporting Initiative Standards (core option) and its scope covers all RB activities across wholly-owned CWT businesses and joint ventures.



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Michelle McKinney Frymire
Chief Executive Officer, CWT

What does Responsible Business mean in a post-COVID world?

"The impact of the COVID-19 pandemic and the social events that occurred during it have highlighted more than ever the fact that a company's approach to responsible business needs to be forward-looking.

Being able to adapt to change and inform business decisions have emerged as key differentiators for the business.

Past accomplishments are important in so much as they serve as a foundation upon which to build a sustainable future."

More than ever, our clients see us as partners helping them prioritize the sustainability and social impact in their operations.

Whether it is through our ECO approach (Employee, Climate, Organization) to enhancing travel ROI by helping customers meet employee wellbeing standards while considering organizational goals and minimizing environmental impact, or through our anti-human trafficking initiatives, CWT has a holistic approach to responsible business that provides continuity while demonstrating the ability to continually adapt and improve. Despite the daunting challenges of the past 18 months, CWT's efforts to do business more responsibly have never wavered as witnessed by our recent Platinum EcoVadis rating.



Business resiliency is rooted in the resiliency of our company culture.

CWT have emerged from what is undoubtedly the most challenging moment in the company's history thanks to the power of our people. We would not be here without their dedication and sacrifice. We knew that the challenges of managing the business through turbulent times would put immense pressure on our people whether in the form of reduced staffing levels, greater workloads or the mental health challenges of working from home and trying to juggle personal and professional commitments.

That is why we dialed up our support for culture with initiatives such as a Work from Home charter; a Wellness Wednesday blog series; an employee-managed wellness and disability online forum; and a "here with an ear" employee support network on the occasion of World Mental Health Day. We built online social networks for staff on extended leave so they could keep in touch with their colleagues and held online challenges to bring people together around topics and causes that matter the most to them. We also increased the frequency and transparency of communication to all employees, to build trust and understanding about the challenges we faced.

One area where the care for our people is on display is in our SMART Restart program. Rooted in our values and culture, it was initiated in early 2020 with the goal of sustaining safe working arrangements for our employees, minimizing business disruption and controlling costs as we battled the pandemic. It allowed us to safely maintain operations in 26 sites in 13 countries during the worst of the pandemic. Now SMART Restart is entering a new phase focused on safely reopening over 50 currently closed locations as our business activity recovers.

Responsible business has emerged as a bright north star when navigating through uncertain times.

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. But these commitments and the overarching seven pillars of our responsible business strategy are more than an academic exercise of reporting and compliance.

Responsible business permeates the decision making of all our functions. We have an intrinsic responsibility to mitigate climate risks, which is why we signed the Science Based Targets mentioned in this report. You can see it in the way sustainability is front and center in our discussions with customers about their travel programs, meetings, events and overall value chain.

You can see how increased attention for employee wellbeing is informing the development of our products and services for travelers, and how Diversity, Equity and Inclusion (DE&I) are shaping our recruitment and retention of talent. On this last point, it has been extensively reported in the press how the pandemic has hit women and underrepresented groups disproportionately hard. Throughout this time CWT has been ramping up its DE&I efforts, and we will be re-launching new Employee Resource Groups in 2021.

In conclusion, it is clear there is no rolling back the clocks to a time when responsible business was a stand-alone center of excellence. It is now more deeply integrated than ever in what matters the most to CWT's customer, employees, investors and communities. Every aspect of our strategy and approach has made us stronger during these difficult times—and is preparing us to be more successful in the future.

Michelle McKinney Frymire
Chief Executive Officer, CWT



About CWT

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

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

About CWT



4 years

top rating for Responsible Business practices

57%

net promoter score (industry average is 18%)

149

years of history

69%

of workforce are women

140

Presence in over 140 countries

47%

representation of women at director level and above

43%

Women direct reports within the Executive Leadership Team

96%

client retention

15,000

employees at end of 2020

Who we are

74,000

people connected through virtual, hybrid and live events

343,000

monthly views of our original social content, blogs and podcast

32

traveler calls and emails answered every minute

24/7

business traveler services help save the day

220,000

people assisted with essential pandemic-related information

What we do



Responsible Business Strategy and Governance



We care...

"Our Responsible Business (RB) strategy is designed to create long-term value for all our stakeholders.

Having a clear strategy, supported by dedicated commitments across our seven RB domains, has helped guide our approach, focus our efforts and deliver consistently in what we set out to achieve. This has been more important than ever during the COVID-19 pandemic.

Ensuring that we align to key global standards such as the United Nations Global Compact and the Sustainable Development Goals 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





We live...

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

Responsible Business (RB) is our approach to living sustainably and acting with integrity. Throughout the pandemic in 2020, we adapted our activities to the exceptional circumstances we faced while remaining focused on our vision and our seven RB domains.

RB is central to how we think and act, and the meaningful actions we have taken have positioned us as a global leader in corporate social responsibility.

In both 2020 and 2021, we were rated Platinum by EcoVadis, an independent and internationally-recognized rating agency. This placed CWT among the top 1% of all companies evaluated worldwide, both within our industry and across all industries evaluated, for the fifth 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 ensure human rights are upheld across all our operations.
- **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 address the issues most relevant to our business and stakeholders and take action on the areas that will leave the most positive long-term impact, it is vital to have a robust materiality process based on stakeholder feedback and communication.

Our materiality assessment process comprises three key stages:

- 1. Identifying relevant Responsible Business issues:** we analyze a range of perspectives from sustainability experts, regulatory guidelines and legislation. These include global initiatives such as the United Nations Sustainable Development Goals, the United Nations Global Compact's Ten Principles, as well as 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. We gather the perspectives of our employees, clients, external assessors, regulators and global sustainability partners. 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 Responsible Business domains.



We care...






...by setting long-term commitments

Since 2015, our dedicated Responsible Business commitments have guided our approach to taking sustainable action. As we reach the end of our 2020 plan, we have created a new set of objectives for 2021.

RB domain	Priority	Long-term commitment	2021 objectives
 Responsible Business Governance	Global Responsible Business Governance Page 12	<ul style="list-style-type: none"> ● Ensure progress transparency ● Integrate Responsible Business into our activities 	<ul style="list-style-type: none"> ● Remain EcoVadis Platinum and UN Global Compact Advanced ● Keep momentum with our global Responsible Business taskforces
 Ethics and Business Behavior	Business Ethics and Compliance Page 23	<ul style="list-style-type: none"> ● Strategically address compliance and ethics worldwide: conduct our business in line with our values, our Code of Business Ethics and Conduct, and the UN Global Compact principles 	<ul style="list-style-type: none"> ● Further engage all employees and CWT partners
	Privacy and Data Protection Page 28	<ul style="list-style-type: none"> ● Maintain a secure business environment for a Global Data and Privacy Protection program 	<ul style="list-style-type: none"> ● Continue protecting employee and client data through cutting-edge data privacy and information security policies and practices, while continually developing expertise throughout the organization



Responsible Business Strategy and Governance

RB domain	Priority	Long-term commitment	2021 objectives
 Human Resources and Human Rights 	Diversity, Equity and Inclusion Page 33	<ul style="list-style-type: none"> ● Leverage diversity as one of CWT's major assets 	<ul style="list-style-type: none"> ● Further deployment of our Global Diversity, Equity and Inclusion strategy through Employee Resources Groups ● Continue our fight to combat human trafficking and hold our Global Anti-Human Trafficking taskforce ● Further advance LGBTQ+, women's rights, gender equality and non-discrimination
	Employee Engagement Page 43	<ul style="list-style-type: none"> ● Cultivate a highly-engaged workforce 	<ul style="list-style-type: none"> ● Further develop our Global Wellbeing and Disability forum for all employees
 Environment	Fight Against Climate Change Page 59	<ul style="list-style-type: none"> ● Develop an environmentally-responsible culture ● Measure our global carbon footprint ● Implement a global environmental strategy 	<ul style="list-style-type: none"> ● Continue to promote an environmentally-conscious culture through awareness and targeted initiatives ● Sign the Science Based Targets Commitment Letter ● Define CWT's climate roadmap to further reduce our environmental footprint and help our customers meet their sustainability ambition
 Responsible Products and Services	Responsible Portfolio Page 70	<ul style="list-style-type: none"> ● Contribute to our clients' Corporate Social Responsibility/Responsible Business ambitions and promote sustainability 	<ul style="list-style-type: none"> ● Further reinforce our Responsible Business products and services offering to our clients
	Business Continuity Page 73	<ul style="list-style-type: none"> ● Ensure a robust Global Business Continuity Management system 	<ul style="list-style-type: none"> ● Expand the scope of an ISO 22301-aligned Business Continuity Management system to include Crisis Management, Business Continuity Planning and Disaster Recovery
 Community Involvement	Corporate Community Involvement Page 76	<ul style="list-style-type: none"> ● Care for the communities where we live and work, and contribute to their development through our skills and expertise 	<ul style="list-style-type: none"> ● Continue to build on a strong community involvement culture



We connect...

...through strong governance and policy

Responsible Business (RB) is a business imperative and we adopt a comprehensive governance framework to ensure it is integrated into everything we do.

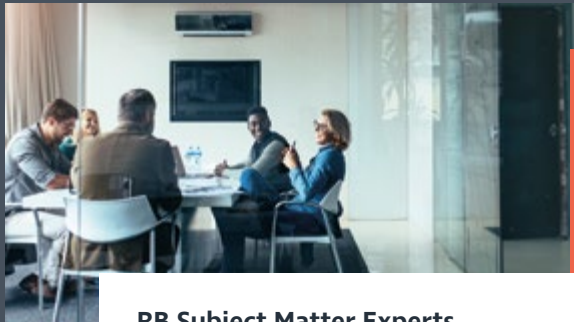


Global Responsible Business is overseen by the Executive Leadership Team. The Executive Leadership Team receives regular updates on RB performance and strategy from the Vice President of Global Responsible Business and Diversity & Inclusion, who annually updates the Board on RB plans and activities.

Our RB network is company-wide, encompassing all geographic regions and including members from most business functions 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.



Responsible Business Strategy and Governance



RB Subject Matter Experts

Our experts own particular areas of RB domains and provide specialist advice and recommendations. They develop action plans to ensure we achieve our objectives in each domain.

Executive Leadership Team

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

Global RB Team

Sitting at the heart of our RB framework, the Global RB team develops the strategy and coordinates programs 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 at CWT

RB Ambassadors

Ambassadors help to deploy the 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 balances CWT's needs with those of local cultures. Their role lies mainly in implementing local RB action plans, sharing best practices relevant to their country and facilitating and communicating RB initiatives.





We live...

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



Global Diversity, Equity & Inclusion Taskforce

We want a workforce that reflects and contributes to the diverse global community in which we do business.

To deliver this consistently, our Global Diversity, Equity & 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 and led by the Vice President of Global Responsible Business and Diversity & 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 our Global Diversity, Equity and Inclusion Charter, which can be downloaded [here](#).

Key objectives

- Supporting the UN 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 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 our 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.



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 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 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 UN 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 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.

Responsible Business Strategy and Governance



Global Climate Taskforce

Our colleagues and customers have been voicing increasing expectations for us 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 our long-term environmental strategy.

Key objectives

- Help with implementing our long-term environmental objectives.
- Proposing and leading initiatives to reduce our environmental impact at global and local level – in line with the 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 Responsible Business 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 and 2020, 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 team.

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 live...

...to align to global principles and standards

Our Responsible Business strategy is guided by a wealth of respected evidence and thinking relating to sustainable behavior in all its forms and aligned to globally-recognized principles and standards.

United Nations Global Compact (UNGC)

The UNGC is central to Responsible Business; 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 2020, our annual Communication on Progress reached the UNGC Advanced Level for a third consecutive year for demonstrating the integration of UNGC Principles in our core business and strategy.

We support the UNGC's Ten Principles covering human rights, labor, environment and anti-corruption; elements that make up the world's largest CSR initiative. We are also taking action to advance broader social goals such as the United Nations Sustainable Development Goals (SDGs – see [page 18](#)). Our UNGC correspondence table can be found on [page 90](#).

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 85](#).

CDP

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.

Science Based Targets

As part of our commitment to support our clients and to taking bold actions to go further in our fight against climate change, we are building a robust program based on climate science, by setting Science Based Targets. **In June 2021, CWT announced its commitment to significantly reduce its environmental footprint by signing the Science Based Targets Call to Action Standard Commitment Letter.**

ISO standards

ISO 26000 is the international standard for assessing and addressing social responsibilities. We refer to this standard when developing and reviewing our Responsible Business 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).

CWT Meetings & Events Italy holds ISO 20121:2013 certification for 'Event sustainability management systems' (see [page 68](#) for more information), and 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. **In August 2021, we received the 'Platinum' EcoVadis medal for our Responsible Business performance, keeping our top position for the fifth consecutive year.**





Responsible Business Strategy and Governance

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 64](#) for more information).

United Nations Sustainable Development Goals (SDGs)



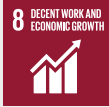
The 17 SDGs agreed by all 193 UN Member States in 2015 represent a global call to society (including governments, businesses and civil societies) to work together to end extreme poverty, fight inequality and injustice, and protect our planet. The aim is to meet these goals by 2030 and we are determined to play our part.

We have selected six SDGs and supporting targets that we believe we are 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.



Responsible Business Strategy and Governance



	 Quality Education	 Gender Equality	 Decent Work and Economic Growth
Sustainable Development Goals and Targets	<p>SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</p> <p>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.</p> <p>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.</p>	<p>SDG 5: Achieve gender equality and empower all women and girls</p> <p>Target 5.1: End all forms of discrimination against all women and girls everywhere.</p> <p>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.</p> <p>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.</p>	<p>SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p> <p>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.</p> <p>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.</p> <p>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.</p>
Our contribution in 2020	<p>During 2020, we continued to champion education and employability for young people as part of our 3E Community Involvement strategy.</p> <p>See page 79 to view all the educational initiatives we conducted.</p>	<p>By the end of 2020, 70% of our employees were women and they made up for 48% of all director-level roles and above.</p> <p>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.</p> <p>See page 33 for more on how we are promoting gender equality.</p>	<p>In 2020, more than 1,000 training sessions were made available. Topics spanned leadership and self development, job skills and CWT corporate training. In total, more than 50,000 training hours were logged globally.</p> <p>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 53 on how we are upholding Human Rights principles in all that we do.</p>

Responsible Business Strategy and Governance



	 Reduced Inequalities	 Climate Action	 Peace, Justice and Strong Institutions
Sustainable Development Goals and Targets	<p>SDG 10: Reduce inequality within and among countries</p> <p>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.</p> <p>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.</p>	<p>SDG 13: Take urgent action to combat climate change and its impacts</p> <p>Target 13.2: Integrate climate change measures into national policies, strategies and planning.</p> <p>Target 13.3: Improve education, awareness raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.</p>	<p>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</p> <p>Target 16.2: End abuse, exploitation, trafficking and all forms of violence against and torture of children.</p> <p>Target 16.5: Substantially reduce corruption and bribery in all their forms.</p>
Our contribution in 2020	<p>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.</p> <p>In 2020, we undertook actions to continue to fight all forms of discrimination. See page 36 for more information.</p>	<p>We are committed to identifying and mitigating climate-related risks for our customers, our employees, communities and the planet.</p> <p>As well as continuing to reduce our direct environmental impacts (see page 60 for more information) we also continued to work with our clients to help them manage their own environmental footprint (see page 68).</p>	<p>In partnership with Carlson, we actively raised awareness, engaged employees and worked with others to combat the issue of human trafficking and modern slavery in 2020 (see page 50 for more information).</p> <p>In addition, we continued to uphold strong standards of ethics and integrity within our business (see page 23), within our supply chain (see page 26), and to protect our customers and secure their information (see page 28).</p>



We live...

...and receive diverse recognition

Recognition from our peers and colleagues tells us 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 recent years.



- Newsweek rates CWT among America's best for customer service 2021 in the Travel Management category. The award is based on the results of an independent survey conducted by Statista, the market and consumer data specialists, which took the following parameters into consideration:
 - Willingness to recommend the brand to family and friends;
 - Quality of communications;
 - Professional competence;
 - Range of services;
 - Customer focus; and
 - Accessibility.
- The 2020 annual Responsible Business Report reached the UN Global Compact Advanced Level.
- CWT Singapore was recognized for the second year in a row for its Responsible Business program at the 45th Annual General Meeting of the American Chamber of Commerce (AmCham) in Singapore. The AmCham CARES program recognizes American companies in Singapore that demonstrate a strong understanding of the link between business operations and society.
- 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 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 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 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.



Our milestones at a glance

2015

- Launched Living Responsible Business program, aimed at all employees and further embedding Responsible Business 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.

2016

- Achieved an EcoVadis Silver rating for our Responsible Business performance in 2015.

2017

- Creation of two new global taskforces on Diversity, Equity & Inclusion and Anti-Human Trafficking, sponsored by members of the Executive Leadership Team.
- Achieved EcoVadis' Gold rating for our achievements in 2016, ranking in the top 1% of all companies worldwide for Responsible Business practices across all industries.



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 15](#) for more information).

2018

- Our annual Communication on Progress reached the UN Global Compact Advanced Level for demonstrating integration of UNGC Principles in our core business and strategy.
- CWT receives a second EcoVadis Gold rating for our Responsible Business performance in 2017.

2020

- CWT receives EcoVadis Platinum rating.
- Reached our 2015-2020 Responsible Business Ambition objectives.
- Continued leadership of the Anti-Human Trafficking and Diversity, Equity & Inclusion Taskforces.
- Published our eighth annual Responsible Business Report in September.
- Adapted our initiatives to the unprecedented global health crisis; some of them being suspended, delayed or revisited due to constraints related to the COVID-19 pandemic.
- Partnered with members of the Executive Leadership Team to continue sponsoring our different Responsible Business initiatives.





Ethics and Business Behavior



We live...

"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."

Lauren Aste
Chief Legal Officer





We live...

...to uphold strong standards of ethics and integrity

World-class businesses are 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.

Conducting business in the right way 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 include 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.

Communication is pivotal to the success of the program. We continue to raise awareness, remind and educate our employees and suppliers on the subjects of ethics and integrity, and encourage 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 Ethics and 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 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. This is reinforced through annual awareness training on topics such as anti-bribery, anti-corruption, non-retaliation, gifts and entertainment. As part of 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. 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, last 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 2020 (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 empowers our people to make smart, informed decisions and be accountable for their actions, while meeting our ethics and compliance commitments. The manual was launched in 2018 alongside the refreshed Code of Business Ethics and Conduct and contains the following policies:

1. **Protection of personal data:** we gather and hold personal data 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.



Ethics and Business Behavior

- 2. International Trade Compliance policy:** 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 Conflicts of Interest policy describes how to handle situations that could create a potential, real or perceived conflict between CWT's interest and our employees. Anyone acting on our 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 ('the Code')

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.

Employees can access the training as part of our online learning management system. In 2020, the training's format evolved in order to be completed all at once or in different chapters.

Our Global Compliance team has access to metrics on how employees 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.

Following the introduction of a new online Gifts & Entertainment reporting tool in 2018, which is 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.

Fighting bribery and corruption

As stated in our Code of Business Ethics and Conduct, we abide by all applicable laws, treaties and regulations that forbid bribery and corruption. In line with our commitment to conducting 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.

We actively monitor 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.



Ethics and Business Behavior

We connect...

...to raise concerns through the Ethics Helpline

Enabling stakeholders to raise concerns or questions is vital in making sure we behave ethically and can deal with issues 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. 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 cases are resolved. This information is 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 to all employees, clients, travelers, third-party vendors and partners.

In 2020, the Global Compliance team shared real-life examples of how the CWT Ethics Helpline had been used during the year on our social intranet to raise awareness about how important it is to report any concerns or violations.





We connect...

...to create a sustainable supply chain

We believe in working with suppliers who 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, builds trust and reduces the risk of unethical behavior in the supply chain.

Our Responsible Purchasing program was launched in 2014 with an initial focus on non-trade suppliers*. In 2019, we expanded the scope of the program to trade suppliers and will be adapting it to them further over the coming years. The program demonstrates our commitment to the UN Global Compact and to the International Labour Organization 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 Executive Vice Principal General Counsel, who is part of the Executive Leadership Team.

See [page 15](#) to read more about the Taskforce and its key activities in 2020.



Ethics and Business Behavior

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 our Responsible Business criteria throughout our purchasing processes.

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

- **Responsible Business questions in requests for proposals (RFPs):** Responsible Business criteria are integrated in official RFPs sent to non-trade suppliers. We ask suppliers how they address various Corporate Social Responsibility-related topics including compliance and ethics, human rights and labor conditions, environment and sustainable procurement. This is important for embedding responsible purchasing principles at the outset of a relationship with our suppliers.
- **Our Responsible Supplier Code:** to ensure that our non-trade suppliers match our 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 applicable laws and regulations, but the Responsible Supplier Code goes further requiring them to attain internationally-recognized standards to advance social and environmental responsibility.

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.
- **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).

* 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.





We care...

...about securing our customers' data

We are required to hold sensitive information about our travelers, including passport, payment, 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 focus on data privacy and being transparent about how and where we are using customer data, implementing effective policies and technical controls to safeguard our customers' information, whoever and wherever they are.

Information security and data privacy governance

Our Chief Information Security Officer is responsible for our Information Security program, supported by a Global Information Security team which reports directly to our Chief Technology Officer. Beyond this, a Global Risk and Security Steering Committee, comprised of members from the Executive Leadership Team, provides governance and oversight to facilitate the highest level of alignment, support and cooperation with global 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 (iRespond, see [page 30](#)), 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.



Ethics and Business Behavior

Our Risk and Security policies and standards

At the heart of our data security is 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.

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 and the Payment Card Industry Data Security Standard (PCI DSS) requirements.

Highlights

In 2019, we 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.

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 allows for improved speed and agility to bring products to the market. This Security as a Code (SaaS) solution is a collaborative effort supported by all the Product & Technology leaders and their teams, which will continue to contribute greatly to our 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 our security program. We require all employees to be familiar with them, as such, they are available in eight languages and can be accessed 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 administrative, technical and physical safeguards for securing users' 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 they 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 employees and contractors/contingent workers are informed and secure, both at work and at home. The week-long campaign covered a broad range of security themes, including 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.



Ethics and Business Behavior

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.





Our milestones at a glance

2015

- 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.

2016

- Video training module on the CWT Responsible Supplier Code rolled out to all CWT senior management.
- Updated Data Privacy policy was launched.

2017

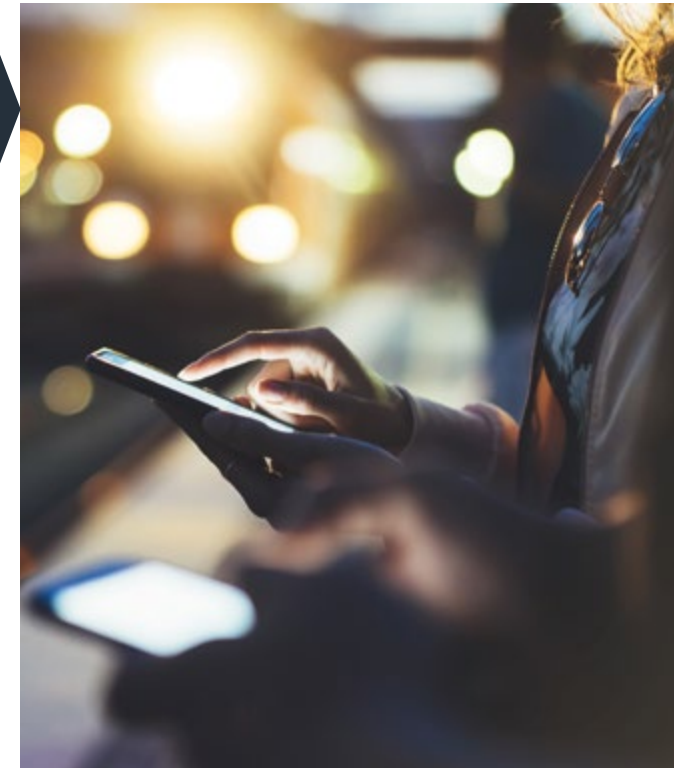
- Our Code of Business Ethics and Conduct was reviewed in detail to reflect the latest industry best practices and legislative trends. Our fully revised Code of Business Ethics and Conduct was launched on January 1, 2018.
- Numerous compliance policies consolidated into a single, easy-to-use Compliance Policy Manual.

2019

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

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.



2020

- Further engaged employees and CWT partners.
- Continued protecting employee and client data through leading-edge data privacy and information security policies and practices, while continually developing expertise throughout the organization.



Human Resources and Human Rights

We live...



"Our community of employees makes CWT what it is. It is the responsibility of all of us to ensure we create and nurture a culture that promotes respect, safety, health and wellbeing for all regardless of their background, origins, gender, color, age or sexual orientation.

We strengthen our community and culture by strongly supporting human rights, diversity, equity, inclusion and ethical behavior, which is upheld by our Global Diversity, Equity and Inclusion Charter. At CWT, we come together to stand up for what's right every day of

the year because it's the right thing to do. Equally, we feel the same about contributing to protecting the world. This year, we were tested. Not only to protect the health and wellbeing of our employees, but also our clients and their traveling employees. We overcame many challenges during the COVID-19 pandemic and I am so proud of how we have all pulled together to support each other."

Catherine Maguire-Vielle
Chief Human Resources Officer





We live...

...to promote diversity, equity and inclusion

We believe that an all-inclusive workforce, which celebrates diversity, equity and inclusion, contributes to our shared success and creates a workplace that thrives.

Diversity, equity and inclusion (DE&I) is core to how we conduct business. Our approach looks to foster respect and create a team spirit 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 UN Global Compact and the Universal Declaration of Human Rights (see [page 53](#) for more information).

Diversity and inclusion governance

In 2020, we reinforced our commitment to through our Global Diversity, Equity and Inclusion Taskforce. Sponsored by the Chief Human Resources 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 DE&I.

Our local DE&I committees also continued their work at a regional/country level, including hosting a variety of activities and events throughout the year – such as promoting celebrations around International Women's Day.

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 24](#) for more information). The Code outlines our zero-tolerance 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, Equity and Inclusion (DE&I) Charter, which was published in December 2018, outlines what DE&I means to us and details our key objectives. Our Charter is informed by the UN Global Compact and the United Nations Women's Empowerment Principles (see [page 34](#) 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 25](#) for more information).

Promoting gender equality

At the end of 2020, 69% of our 15,000 employees were women, as well as 47% of all director-level roles and above and 43% of direct reports of our Executive Leadership Team.

In line with our commitment to gender equality, we fully endorse 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 Statement of Support from our CEO, the entire Executive Leadership Team has signed these principles including our Chairman of the Board, Rick Gage, thereby putting our values into action and demonstrating strong leadership support for advancing gender equality.





We connect...

...to celebrate International Women's Day

We continued to celebrate women in the workplace globally on International Women's Day (IWD) in March 2020.

International Women's Day 2020's theme was 'Each for Equal' a call for individual contributions to gender equality. This has been a great opportunity to take our commitment to the United Nations' Women's Empowerment Principles (WEPs) a step further.

We invited our employees to sign the WEPs and take part in a contest:

- Tell us how you will further contribute to women empowerment/gender equality in your day-to-day activities.
- Participate in the contest for the function and country with the most signatories for the WEPs.

- Find innovative, inspiring pledges that could be selected by the Global Diversity, Equity and Inclusion (DE&I) Taskforce to become part of the DE&I program.
- Join the global celebrations by featuring your 'Each for Equal' selfie on the Global Diversity, Equity and Inclusion page.

On March 5, the Executive Leadership Team and our Board members joined the Minneapolis-based CWT and Carlson employees to celebrate IWD and to pledge for gender equality.





Human Resources and Human Rights

We connect...

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

As a prominent business within our industry, it's vital we show leadership by using our platform to promote Diversity, Equity and Inclusion (DE&I). In 2019 and 2020, we held several events to encourage dialogue on DE&I around the world.

In Asia, our Asia Pacific (APAC) manager spoke on a panel to discuss DE&I 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.

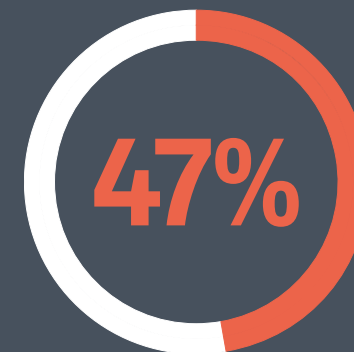
In the Netherlands, our Chief Legal Officer and General Counsel participated in the General Counsel Diversity & Inclusion Group comprised of heads of legal from several large multinational companies.

Gender representation (as of Q4 2020)

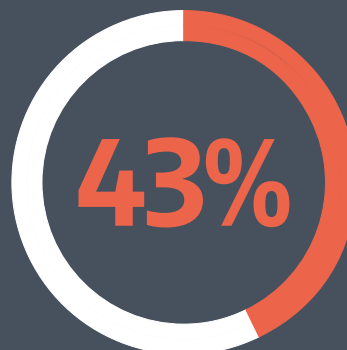
Total employee population (%)



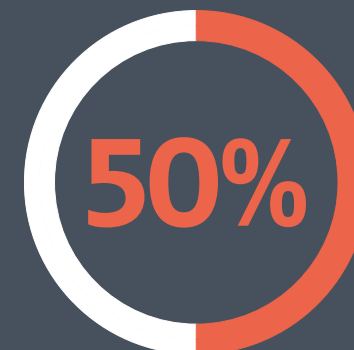
Women at director level and above



Women direct reports of the Executive Leadership Team



Women on the Executive Leadership Team





We live...

...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 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. Each year we run a communications campaign to further promote our Code of Business Ethics and Conduct, which addresses anti-harassment and other key topics (see [page 33](#) for more information). Examples of several local activities to promote our Code of Business Ethics and Conduct across our business:

- **CWT Italy:** signed a local collective agreement, recommitting 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 – that company policies regarding non-discrimination, equal opportunity and recruitment by competency are to be respected – is embedded throughout the recruitment process. A diverse workforce is better able to innovate, connect with our customer base and ensure we continue to attract the best talent. 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.

Let's celebrate Black History Month, January 31, 2020

One of the goals of the US Diversity, Equity & Inclusion (DE&I) team is to raise awareness of the rich cultural diversity we have in the United States and at CWT. We also want to celebrate, recognize and honor diversity throughout the year by sharing articles and links to diversity sites, and by creating more formal DE&I campaigns.

Black History Month is an annual celebration of African-American men and women who have made significant contributions throughout history. The Black History Month 2020 theme, 'African Americans and the Vote' is in honor of the centennial anniversary of the Nineteenth Amendment (1920) granting women's suffrage and the 150th anniversary of the Fifteenth Amendment (1870) giving black men the right to vote.

As part of that celebration, we wanted to recognize outstanding black men and women, from history and present day, who have achieved so much despite the challenges they faced and made a difference to our lives today.



Human Resources and Human Rights

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 2020, for example, a certified workshop for 'Women's Self-Defense' and wellness program for Female Health Awareness were conducted.
- **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 festivals of various races and religions to promote cultural diversity and bring harmony to the workplace.

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 festivals of the various races and religions 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 took place in 2019 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. In 2020, this separate Gender Pay Equity course was embedded into our annual Affirmative Action course. In addition, we abide by all requirements as a Federal contractor and submit an EEO (Equal Employment Opportunity) report every year to the EEO Commission including detailed information on pay equity based on gender and minority.
- **Discrimination and harassment training:** a mandatory training course aimed at preventing discrimination and harassment was rolled out to over 3,800 colleagues in 2019 and should be offered globally to all managers and employees in 2021. 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.
- **Supporting military personnel:** in 2020, the San Antonio and Arlington offices collected special items for deployed women service members in honor of International Women's Day. The teams also supported virtual volunteer efforts year-round amidst the COVID-19 health crisis by donating masks, sending cards of support and creating paracord bracelets.



Take 15 minutes to understand unconscious bias

Fighting the bias

The first step to fighting unconscious bias – and therefore contributing to a more inclusive and collaborative workplace – is understanding it.

That's why we encourage all employees to take the 15-minute 'Understanding Unconscious Bias' training, now available in English, Spanish, French, German, Portuguese and Chinese.

In these challenging times, it's more important than ever for our teams to collaborate effectively. Tackling unconscious bias plays an important role in this goal, helping us to work together more closely so we can emerge from this global crisis in the strongest position possible.

Carlson Family Foundation statement about the death of George Floyd and the Change We Need, Minneapolis – June 3, 2020

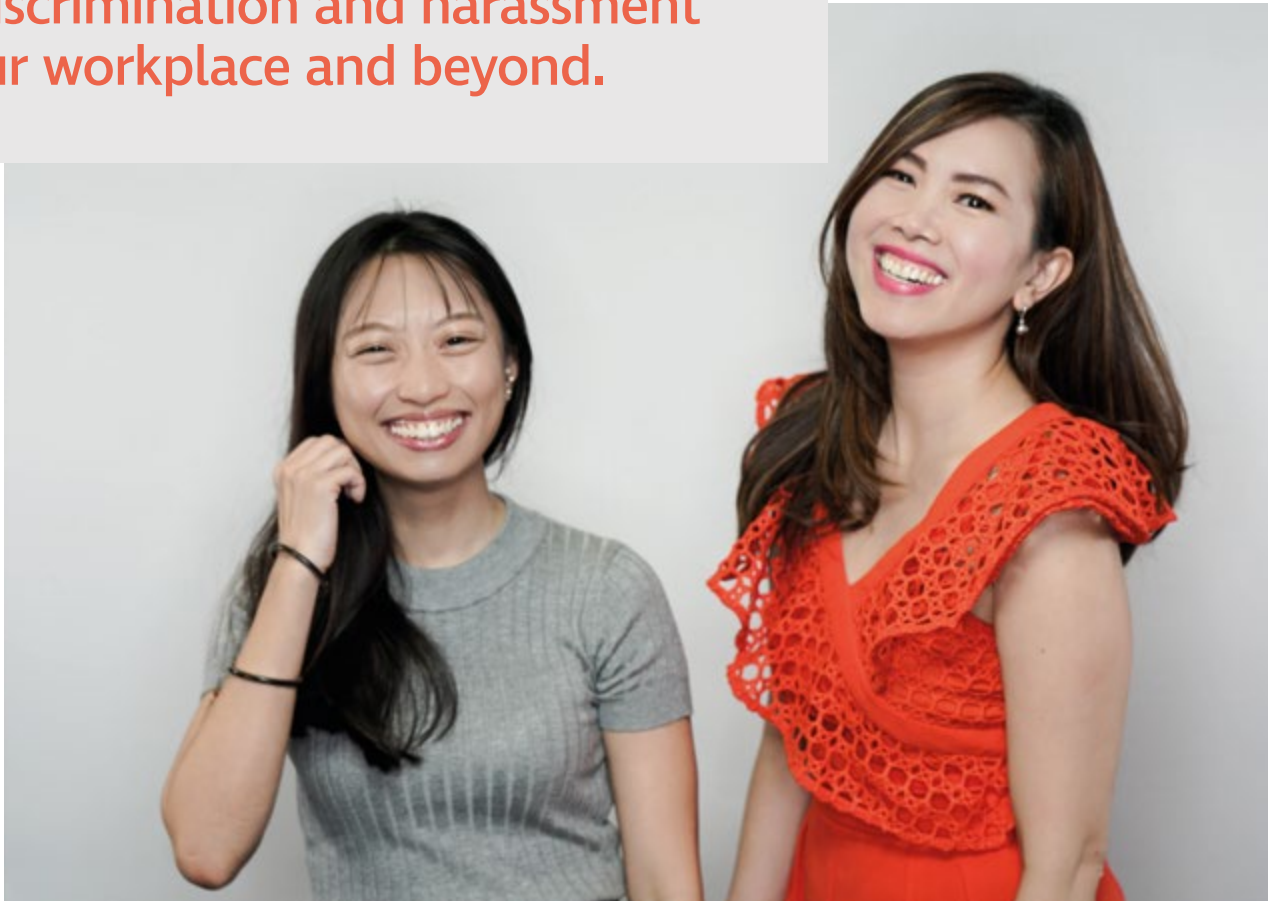
Carlson, Inc. stands with its colleagues and community in Minneapolis in the call for justice and swift, meaningful change. We are heartbroken over the killing of George Floyd and deeply troubled by the pervasive injustice facing people of color every day. Carlson and its businesses are committed to listening to the voices of people of color, amplifying the call for systemic change and aggressively continuing our 80-plus-year global fight for social justice, human rights, and diversity and inclusion. We thank our customers, clients, colleagues and communities around the globe for joining us in taking meaningful steps today toward a more just and peaceful future.



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 APAC.



We connect...

...to attract, recognize and reward

The talent of our employees is key to our success. Accordingly, we offer 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 36](#) for more information).

Our Global Talent Acquisition strategy seeks to select the best candidates to match the needs of our business, by finding top performing and diverse talent that aligns with our 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.

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. Every year, outstanding colleagues are selected by Carlson and CWT leadership 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.

We also use peer-to-peer Buzz Bravo Badges, a simple and visible way for anyone to give a 'shout out' to a colleague. Dozens of badges are awarded daily across the organization for employees who have gone the extra mile.



We care...

...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 continuously invest in learning and development.



Learning and development

Our overarching aim is to provide learning opportunities that support individual and organizational growth, and achieving this comes from connecting what we do with our corporate values. We apply the 70/20/10 learning model principles to our learning programs, in which 70% of learning is achieved by on-the-job exposure, 20% is derived from mentoring or coaching, and 10% is from attending our face-to-face or virtual learning opportunities. We believe this approach enables our people to gain greater insight into the skills needed to carry out their work and refine them.

Each employee has access to My Learning, our global learning management system. From here, they can gain access to online training courses, topic-specific videos, and toolkits that provide support to those in leadership roles. Additionally, it is via this portal that employees register to attend webinars and classroom courses. We believe self-driven learning is key to empowering our employees and making learning engaging.

Although 2020 presented challenges due to the pandemic, we made 1,319 training sessions available, comprising 910 virtual sessions and 409 instructor-led sessions. These accounted for just over 52,000 learning hours.

The following gives a summary of the main training sessions that were provided in 2020.



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High Impact Teams

This program provides senior team leaders with insights into their own Myers Briggs Type Indicator, followed by leadership principles that strengthen the cohesiveness of a team and make it more impactful. It also encourages the giving and receiving of candid feedback.

The learning roadmap for 2020 focused on developing the skills gained from the workshops by providing the leaders with specific activities to carry out with their teams.

Code of Business Ethics and Conduct

Each year, our employees are required to undertake learning modules that support the company's Code of Conduct. In 2020, we launched this course as four separate modules, each one focusing on a specific topic that falls under the Business Ethics and Conduct category. It was offered in 15 different languages to embrace the global reach of our workforce.

Annual Security Awareness

Data protection and security are of paramount importance. To ensure our employees are up-to-date with the latest policies and practices, they are required to complete this mandatory learning module. It is offered in eight languages and provides instruction on our risk and security policies, data privacy and best practices, which are in place to protect data belonging to CWT, our customers and travelers.

Leading Customers with Confidence

We continuously train our travel counselors to ensure they are leading our customers with confidence. A new counselor platform and modular training sessions are delivered regularly to ensure best practices are refreshed to give our customers an unforgettable service experience. Most courses are available in English, French, Italian, German and Spanish.

Performance development

Ongoing performance development matters for all our people and 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 are a natural framing to those ongoing conversations. We call this approach Everyday Performance Development.

All of our functions consistently follow and use the same performance review process and platform, and we have worked to keep the process simple and effective. Guides, toolkits and e-learning training modules support managers, and their teams have clarity on the expectations of 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 provide safe travel for our employees

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





We connect...

...to encourage two-way dialogue

We actively listen to our people and act on their feedback.



Buzz: Our online employee community

Our award-winning social intranet site, Buzz, was widely used by our colleagues in 2020. Analytics show that more than a third of employees are 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.

Members of the community can choose to share or collaborate through a number of different channels, including blogs, discussion threads, videos and groups. This year also saw the launch of a specific group for our ever-growing homeworker community to collaborate and share best practice. The most popular feature is the discussion threads, which are used by teams across the business to gather feedback and engage in dialogue covering a wide range of business topics.

Continuous dialogue

Before the pandemic, senior leaders used 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. During the pandemic we held regular Webex meetings, often cross-functional, to keep teams updated and motivated.

'Talk About Anything'

To ensure senior leaders keep in touch with the pulse of employees during the pandemic, we introduced 'Talk About Anything' sessions. Executive Leadership Team members would invite randomly selected colleagues to an informal video chat. There was no pre-work nor set agenda. Participants were asked to simply come with a question or topic to talk about, and executives were there to listen and answer questions. In addition, during the pandemic, leaders have increased the frequency of impromptu 'check-ins' with employees and team virtual social activities to strengthen personal ties during these challenging times.

Pulse Surveys

To check the heartbeat of employee opinion throughout the year, we have historically run Pulse Surveys. Employees, spanning a broad range of grades, levels, countries and functions, answer 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 use 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.



We care...

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

We are committed to maintaining the highest standards of safety and employee protection. As a signatory of the UN Global Compact, we endeavor to adhere to its Ten Principles, including supporting and respecting the protection of internationally proclaimed Human Rights, and 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 regional Environmental, Health and Safety Managers 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 the European Society of Medicine 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 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, as a move towards a harmonized EMEA-wide 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 has developed Workplace 3.0, 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:

- Work from home rules to improve work-life balance while reducing the environmental impact of traveling into the office.



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- 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, 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. 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 64](#) for more information).

Global commitment, local implementation: A Culture that cares

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:

- **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.
- **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.

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 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.
- **United States:** provides free, confidential support for employees and their families whenever they need it, 24/7. It is not only for counseling, but also for work-related issues, finding child/elder care, budgeting money, career development, legal information services and much more.



We care...

...through committing to workplace wellbeing



We foster a culture that cares, putting in place measures to promote work-life balance and employee wellbeing for all employees.

In 2020, we created a global 'Welcome to Wellbeing & Disability' space on our online internal Buzz communication platform. This space promotes awareness of physical and mental wellbeing for all employees, including what it means to work with a disability at CWT, and the many support mechanisms available to our people. The focus is on grassroots stories and information to ensure people with or without disabilities are well informed about this important aspect of diversity, equity and inclusion and equipped to work.

Content on our Wellbeing & Disability (Official) page:

- Living with stories – including personal stories our colleagues have bravely shared with us.
- Wellbeing and Disability blogs and 'Wellness Wednesday' posts.
- Thought leadership articles.
- A People Manager resource page.

'Wellness Wednesday' blogs:
Keeping our employees healthy and safe
Throughout 2020 and 2021, every other Wednesday, our Executive Leadership Team and others share blogs to help employees stay well both individually and collectively.

While we are familiar with viruses like the common cold and the flu, COVID-19 was new and presented a situation that none of us could have imagined a year ago. With our lives disrupted from quarantine measures and new routines shaping our day-to-day activities, it is important that we pay extra attention to our overall wellness and that of others.

We kicked off our first Wellness Wednesday blog by focusing on mental health.

Looking after our mental health
Paying close attention to our mental health is just one aspect of overall wellness. It affects how we think, feel, and act and determines how we handle stress, relate to others, and make choices.

Similar to taking active steps to impact our physical health, there are also many practical tools to improve our mental health and increase resiliency. There are also ways everyone can support the mental health of friends, family,

work colleagues and our customers. Here are a few tips recommended by the World Health Organization (WHO) and the efforts we're taking at CWT during these uncertain times:

- **Stay informed.** Follow trusted news channels and keep up-to-date with the latest news from WHO on social media. In 2020 we created the Stay Connected Buzz site, and our President & CEO has hosted regular all-employee town halls as a way for employees to stay informed about our company.
- **Social contact is important.** If your movements are restricted, keep in regular contact with people close to you by phone and online channels. For example, some employees have used team meetings to talk about what's been positive about quarantining or shared selfies to stay in touch.
- **Help others.** If you are able to, offer support to people in your community who may need it. Acts of giving and kindness can help improve your mental wellbeing by creating positive feelings and a sense of reward.
- **Visit the WHO website for many more helpful tips about mental health.** Also, feel free to share your mental health tips so we can all help each other.

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Celebrating World Mental Health Day

October 10, 2020 was World Mental Health Day – an important opportunity to raise awareness around mental health, as well as a reminder to connect with our colleagues and check in on each other's wellbeing more regularly.

We took advantage of World Mental Health Day to launch our 'Here with an ear' initiative. The act of listening is one of the simplest and most effective ways to help colleagues who are having difficulties. Sometimes we just need to have a friendly chat or let off a bit of steam. The initiative allowed employees to add a special 'Here with an ear' photo frame to their Buzz profile picture to let colleagues know that they're there if they want to talk.

We have also supported the mental wellbeing of our employees in a number of other ways. For example, in France in 2019, our 'Quality of life at work action plan' offered a variety of measures to improve work-life balance. This included implementing a 'listening cell' where employees could seek professional support and a contact address for collaborators to ask questions or make any sensitive situations known in confidence. Also during 2019, in Shanghai and India, we held Workplace Yoga to bring increased productivity, reduced stress, and overall wellness to local employees, and in Germany, we organized a health day in our Eschborn offices. In Belgium and Luxembourg we provided fresh fruit and bike facilities, and in the Netherlands we offered a shuttle bus in winter to local train stations to keep employees safe.

- **Healthy living:** we expanded our compensation offer related to health at our Estonia offices, with sports clubs and swimming pool membership tickets 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:

- **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' welcome presentation was reviewed and expanded 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 health and safety management system.

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. We do not tolerate the use of child or forced labor, human trafficking, or any action that lacks integrity, meaning 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 UN 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. We uphold 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.



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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. 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 25](#) for more information). We strictly prohibit 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 (UNGC) and International Labour Organization (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.



Working from home

'Wellness Wednesday' dedicated to Working from home

For many of us, our work-life turned upside down in March 2020, very abruptly. From spending the majority of days working from a CWT office, to working from home every single day has been a big change to adapt to.

We recognize that this has been a huge shift, and while many enjoy our new ways of working, it definitely takes some time getting used to. This is why we focused on wellness while working from home.

CWT Charter for Working from Home

This Charter, published in 2020, has a very clear and simple goal: to make life a little bit easier and more comfortable for everyone while we work from home.

It has been created in collaboration with employees and covers three main themes: wellbeing, self-care and work-life balance.

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 International Labour Organization, and as a signatory to the UN Global Compact.

The CWT European Works Council (EWC), the official body for information and consultation, represents all CWT 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. Although the United Kingdom has left the EU under the 'Brexit' negotiations, and consequently should have left our EWC as well, we have reached an agreement with the EWC to retain the country in scope at least until the end of the current mandate which will expire in Q4 2022.

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.

EWC 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 live...

...to reward healthy living and reduce workplace stress

Our 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.

Our teams around the world are working on ways to prevent stress and to promote ways to manage it. For example, United Kingdom and Ireland offices organized an event around 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.





We connect...

...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 focus.

Our policies and procedures

In response to the United Kingdom Modern Slavery Act (2015), we published a global statement on anti-slavery and human trafficking that was updated in 2020. 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 UN Global Compact focusing on the core areas of human rights, labor, the environment and anti-corruption as well as the International Labour Organization's Fundamental Principles and Rights at Work. We 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 27](#) for more information).

Global Anti-Human Trafficking Taskforce

In 2020, we reinforced our commitment to this fight through policies, increased awareness and education, and closer collaboration with stakeholders and public leadership.

Carlson's Head of Government and Community Affairs currently co-leads the Global Anti-Human Trafficking Taskforce with our Vice President 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 14](#) for more information).

Partnering to combat human trafficking

The work against human trafficking will not be won by fighting alone. As with much of our Responsible Business work (and our commitment to the UN Sustainable Development Goal 16 – see [page 19](#) for more information), we count on partnerships to make a targeted, scalable impact. Working alongside Carlson and the Carlson Family Foundation (see [page 82](#) for more information), some of the most prominent partnerships in this area include:

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 Carlson Family Foundation representatives provide leadership on various World Childhood Foundation boards, including those in Sweden, Brazil and the United States. Our Chief Legal Officer is on the Board of World Childhood USA.

Human Resources and Human Rights



To commemorate the 20th Anniversary of Childhood in 2019, we 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 650 participating clients and the campaign included 2.7 million messages to CWT travelers about the work of Childhood.

In 2021, CWT participated in the Go Blue for Childhood USA campaign. Our employees published photos of themselves wearing something blue to recognize the National Child Abuse Prevention month of April and the efforts of Childhood USA in ending child sexual abuse. Thanks to 180 participants this campaign resulted in nearly US\$13,000 in combined employee donations and matched grants from the Carlson Family Foundation.

ECPAT

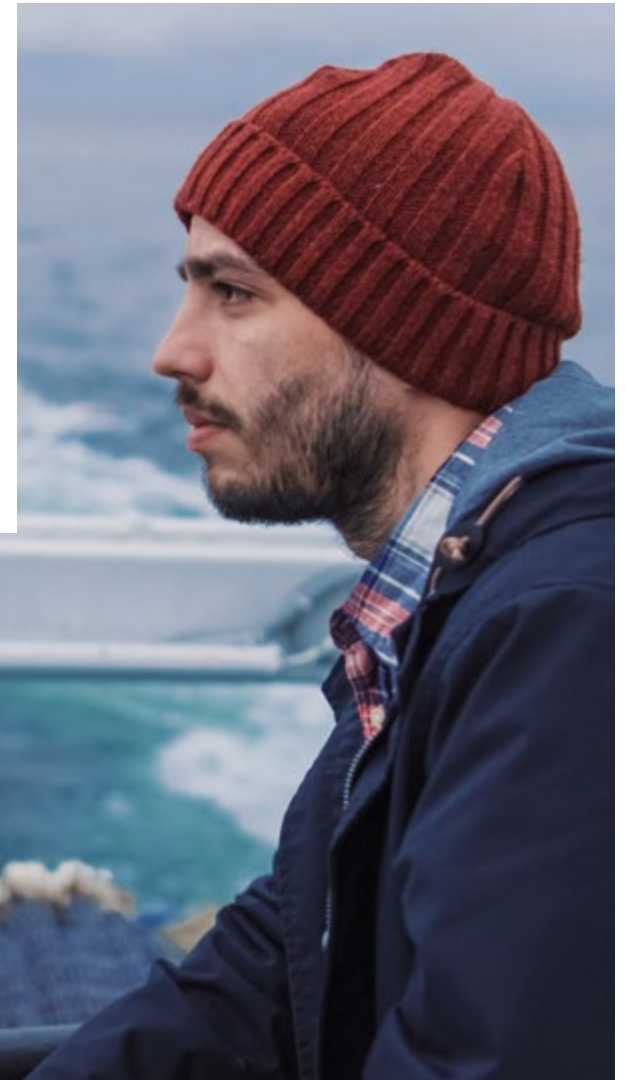
For more than 15 years, Carlson has supported ECPAT, a non-profit organization working to protect children from trafficking, sexual exploitation and online abuse. In 2004, Carlson was the first North American travel and hospitality company to sign ECPAT's Tourism Code of Conduct to Protect Children. 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 Head of Government and Community Affairs sits on the board of ECPAT-USA.

Of course, trafficking needs to be identified before it can be stopped. To this end, in 2019 we 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.

In 2020, we hosted ECPAT Philippines in the Manila office so employees could learn about programs in the region and funding support was presented by the Carlson Family Foundation.

- In February, we made a donation on behalf of all attendees of CWT's Customer Leadership Summit 2020. Former Carlson Chair and CEO, Marilyn Carlson Nelson, presented the gift through a moving video message.
- Carlson Family Foundation grants funded ECPAT International and ECPAT-USA to support private sector engagement, policy advocacy, operations, and regional projects and programs.

We also offer the ECPAT Anti-Human Trafficking Training in four languages on the My Learning platform.





We connect...

...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 spoke at multiple events in 2019 and 2020. Highlights included a human trafficking workshop led by our Chief Legal Officer during a first-of-its-kind 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 President and Chief Operating Officer 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. In 2020, the Carlson Family Foundation provided funding to support their work around three main priorities: country engagement, keeping children safe to learn, and protecting them from online risks.

Global Rights for Women (GRW) (globalrightsforwomen.org)

With a worldwide reach from its base in Minnesota, this organization has quickly become the leading voice in the global movement to end violence against women and girls. To commemorate this national month, in 2020, we hosted GRW Founder and CEO, Cheryl Thomas, to present at Carlson HQ about its programming and vision to realize a world in which women are guaranteed their human rights to equality and freedom from violence. Through funding from the Carlson Family Foundation, they are expanding their



resources in the United Kingdom, increasing services for victims in India, monitoring law enforcement in Colombia, and exploring partnership opportunities in Costa Rica.

Nomi Network (nominetwork.org)

Continuing our longstanding relationship, in 2020, CWT colleagues joined with Nomi leaders in India to learn first-hand about Nomi's work to provide economic and job skills training opportunities that empower and protect women from human trafficking in India and Cambodia. Additionally, the Carlson Family Foundation provided funding to expand their existing workforce development programs in three states in India, launch their United States domestic program, and expand the reach of their new digital training app.

Odanadi (odanadi.org)

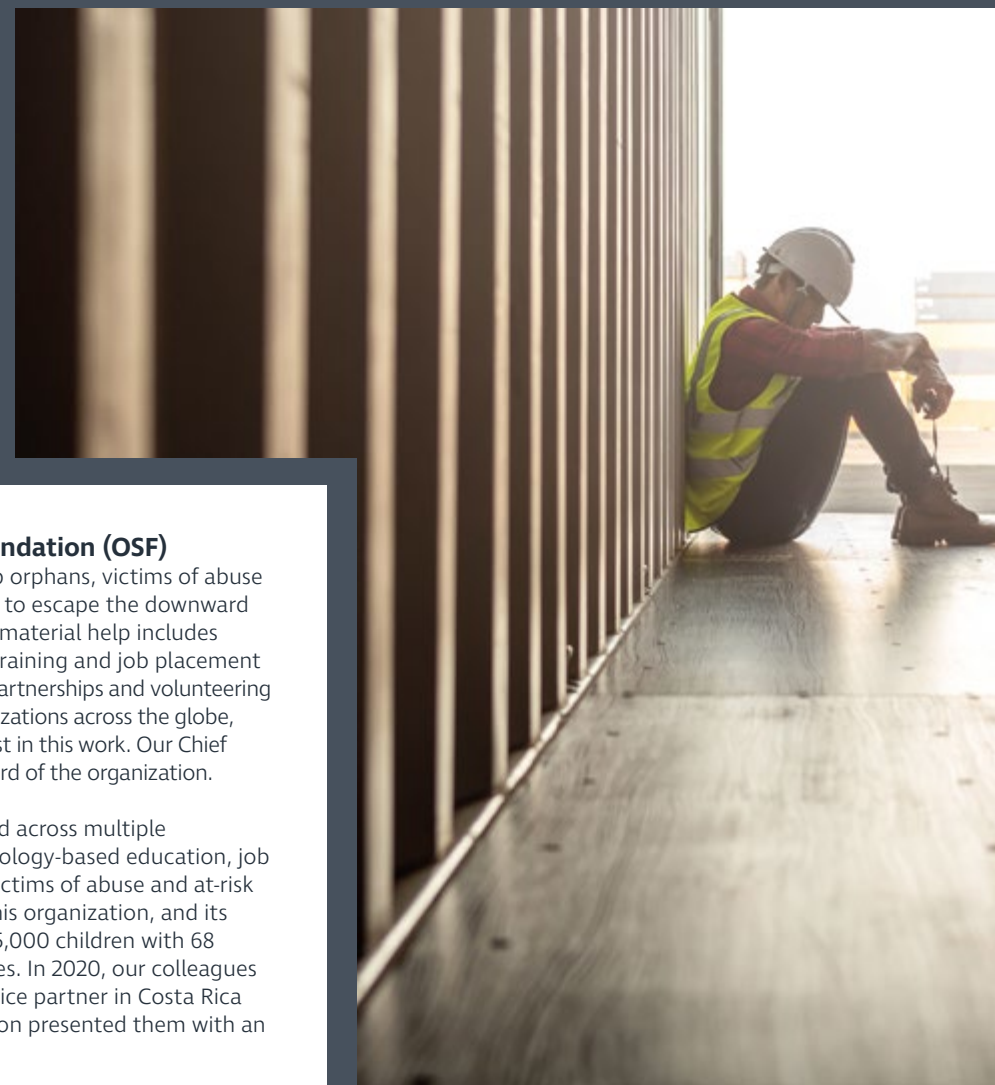
Founded in India in 1984 by recognized anti-trafficking experts, Odanadi is known internationally for its work on four key issue areas: rescue, rehabilitation, advocacy, and awareness. With a past guest visit and an Employee Choice Grant, we were proud to continue our partnership. The Carlson Family Foundation also continued its support in 2020. As COVID-19 increased economic devastation in villages, the need is now even greater for Odanadi, which has rescued more than 6,500 women and children from prostitution, child labor, modern day slavery, child marriage, and poverty.



We connect...

...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 UN Global Compact, the International Labour Organization and the Universal Declaration of Human Rights.



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 read more about the Hackathon please see the 'We live' box on [page 56](#).

Since 2012, Thorn has partnered with tech companies, law enforcement, and NGOs to identify more than 10,000 child victims. Our partnership with Thorn continued into 2020, and they also received funding from the Carlson Family Foundation to expand Spotlight, their sex trafficking investigation tool that is used by more than 77 agencies and 200 investigators in Minnesota alone.

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. We are growing local partnerships and volunteering with several OSF-supported organizations across the globe, and our employees donate to assist in this work. Our Chief Technology Officer sits on the board of the organization.

For several years, we've partnered across multiple continents to help provide technology-based education, job training and job placement for victims of abuse and at-risk youth. Our commitment helps this organization, and its local partners serve more than 15,000 children with 68 technology centers in 29 countries. In 2020, our colleagues donated personal items to a service partner in Costa Rica and the Carlson Family Foundation presented them with an



Human Resources and Human Rights

Employee Choice Grant. Our OSF Board member and CWT Chief Technology Officer announced a donation of more than 350 computers and devices to help close the digital divide and better connect students impacted by the COVID-19 pandemic, and CWT Brazil employees donated food and hygiene kits to help ensure basic needs are being met during these difficult times.

Awareness and education

Raising awareness and education about human trafficking and slavery is crucial. In 2019 and 2020, 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 56](#) for more information). Throughout the year, we displayed more than 580,000 of these impressions for travelers on myCWT.

We 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 keep the issue front of mind by periodically sharing additional information, stories, and tools from our NGO partners through our internal communications platforms.

Our 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 to promote our fight against sex exploitation of children and stakeholder dialogue.

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 partnered with Trust Law 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 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: www.outoftheshadows.eiu.com/.

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

World Childhood Foundation (USA and Brazil)

- In June 2020, CWT Chief Legal Officer and General Counsel, Lauren Aste, was appointed Board Chair of World Childhood Foundation USA.
- The Carlson Family Foundation also provided funding to support global and local initiatives in 2020, such as the Survivor Testimony Program and Brazil's Growing up Without Violence project, which aims to spread high-quality information and methods to combat sexual violence against children and adolescents.

Human Resources and Human Rights



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 and local corporations to develop a Thorn 'Hackathon' at the Carlson headquarters in Minnesota. With funding support from Carlson Family Foundation, this summit of many of the region's most skilled technologists and computer engineers was created to find effective solutions to keep children safe.



Raising awareness of child exploitation

For a considerable time now, CWT has taken a leadership position on eliminating human trafficking.

Carlson and CWT, in partnership with ECPAT International (a network of organizations working to end the sexual exploitation of children), launched digital anti-trafficking ads on myCWT in 2018. These raised awareness of sexual abuse and trafficking, with the campaign having a clear call to action: report it. Throughout April 2019 alone, the campaign was shown more than 250,000 times to our travelers and the campaign continued throughout 2020.

In 2019, RoomIt by CWT also launched its first global campaign in support of the World Childhood Foundation, an agency working to prevent and address sexual abuse, exploitation and violence against children. The campaign brought together 650 CWT clients, each donating US\$1 for every hotel booking made globally during the month of August, up to a limit of US\$100,000. Amazingly, we were able to nearly double that figure, resulting in the charity giving special thanks to RoomIt for its contribution during one of its galas.



Our milestones at a glance

2015

- 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.

2018

- Published our vision, objectives and principles in a Global Diversity and Inclusion Charter, and organized diversity and inclusion events including a diversity and inclusion week.
- All employees were granted access to unconscious bias training materials.
- The 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.
- Held quarterly Diversity, Equity & 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.

2016

- 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.

2017

- In Asia Pacific, creation of a group of Chief Millennial Officers.
- 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.
- 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.

2020

- Launched programs to take care of our employees health and wellness in the context of the COVID-19 pandemic outbreak.
- Published a Charter for Working from Home to make life a little bit easier and more comfortable for everyone while we work from home.
- Promoted celebrations around diversity and inclusion such as International Women's Day.
- Updated global statement on Anti-Slavery and Human Trafficking.
- Further reinforced our commitment to fight against human trafficking through closer collaboration with stakeholders.
- Promoted employee wellbeing and work-life balance through initiatives like 'Wellbeing and Disability' and 'Here with an ear'.



Environment



We care...

"We are committed to making bold actions to tackle climate change and our entire value chain is collaborating to support each other in reaching our climate targets.

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.

To define and implement a climate roadmap for both our business and our clients, we created a Global Climate Taskforce and signed the Science Based Targets commitment letter which will direct our actions.

The Taskforce 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





We care...

...about preserving our planet

In response to the climate crisis we are facing, 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. However, we acknowledge that the sector contributes to carbon emissions. Through collaboration and partnership, there is a concerted focus towards adopting more sustainable global practices – and recognition that the entire industry must work together to make a meaningful impact.

It's just the beginning but we continue to see 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.

We have a clear role to play, not only by collaborating with our colleagues in the sector but also by listening to our clients. They want more visibility around the impact of their travel and Meetings & Events programs, more granular detail of where those impacts arise, and, above all, to know how to reduce them.

This is reflected in the fact that 100% of global requests for proposals now include questions on sustainability.

Our global environmental strategy

As we state in our [Global Environmental Charter](#), we are committed to environmental stewardship. Our approach aligns with the commitments we make as a signatory to the UN 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;
 - by encouraging employee-led environmental actions and initiatives; and
- supporting our clients in implementing environmentally responsible solutions to tackle climate-related issues (see [page 68](#) for more information).

To ensure our strategy is consistently delivered, our global cross-functional Climate Taskforce, launched in January 2020, drives the strategy forward. The Taskforce has two areas of focus: help support our customers' environmental ambitions and further reinforce our own environmental performance.

As part of our commitment to support our clients and to taking bold action to go further in our fight against climate change, CWT is building a robust program based on climate science. In June 2021, we announced our commitment to significantly reduce our environmental footprint by signing the Science Based Targets Call to Action Standard Commitment Letter.

Science Based Targets are greenhouse gas emissions reduction targets that are consistent with the level of decarbonization that, according to climate science, is required to keep global temperature increase within 1.5°C to 2°C compared to pre-industrial temperature levels and therefore to meet the goals of the Paris Agreement.

Within two years, CWT will submit its targets for validation with the Science Based Targets initiative (SBTi).

The SBTi is a collaboration between the Carbon Disclosure Project, the UN Global Compact, the World Resources Institute and the World Wide Fund for Nature and is one of the We Mean Business Coalition commitments.



Environment

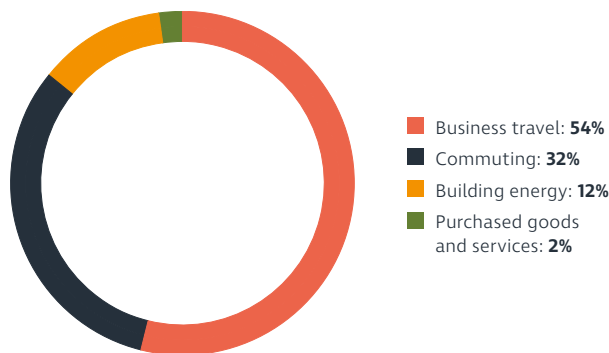


We live...

...to measure and reduce our carbon footprint

We seek to understand and reduce our impacts by measuring, comparing and analyzing them.

Our footprint by size



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. 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:

Scope 1: 1,879.69 tCO₂e
 Scope 2: 4,101.18 tCO₂e
 Scope 3*: 42,729.73 tCO₂e

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.

In 2021 we did an estimation of our 2020 emissions in tCO₂e. The very significant decrease of our emissions corresponds to the pandemic effect and the reduction of both commuting, employee business travel and the very significant increase of homeworking:

Scope 1: 375.9 tCO₂e
 Scope 2: 820.2 tCO₂e
 Scope 3*: 4,827 tCO₂e



* Excluding emissions from use of sold products and services, which represent more than 90% of our Scope 3 emissions.



We connect...

...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

Each year, 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-by-step 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.

In April 2020, we also celebrated the 50th anniversary of Earth Day. However, because of the COVID-19 pandemic it was very different from previous years. A list of climate documentaries was shared on our intranet and employees were invited to widen their overall knowledge about climate change and the ways to tackle it.



Environment

Carbon offsetting

Planning our internal meetings and events responsibly is a clear way for us to improve our environmental footprint. The Global Responsible Business team collaborates with organizers of key internal meetings and events to ensure that they are planned in the most environmentally and socially conscious way possible.

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.

In 2019, the Responsible Business team shared resources to ensure that our Culture Week celebrations would maximize its social and environmental impact. Through offsetting our meetings and events, we had a carbon neutral Culture Week, combining support of local communities and fighting against climate change.

In 2019 alone, we offset more than 1,400 tCO₂e¹ 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 neutral, 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.

Our 2020 Global Leadership Conference was planned taking into account the different facets of Responsible Business. The organizing team was purposeful and thoughtful in its actions to reduce our carbon emissions and to give back to local communities.

This was achieved by choosing a centrally-located hotel, shared transport organized from the airport to the hotel and to evening events, a dedicated app centralizing all the information to avoid unnecessary printing, and water dispensers and reusable sustainable goodies.

Attendees were also invited to participate in a community giving activity, helping to build bikes which were donated to those with transportation needs.

For the fifth year in a row, the emissions produced by the Global Leadership Conference were offset. We chose a local carbon offsetting project in China: the 'Sichuan Biogas Program', which supports the installation of advanced biogas digesters and smoke-free biogas cook stoves to help reduce CO₂ emissions and improve indoor air quality for underserved, low-income rural households.





Environment

We act...

...to reduce the impact of our offices

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



Promoting responsible offices

Through optimizing their use, space and energy consumption, offices can become better places to be and work. Our Real Estate team has a multi-year Workplace 3.0 strategy, focused on reducing office space, merging underutilized offices and upgrading offices 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 in order to lower our carbon footprint. It is more efficient to have employees commuting to one central hub rather than running multiple mid-sized offices.
- A policy of leasing more modern, energy-efficient buildings, 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.



Environment

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 can make a big difference.
- **United Kingdom** (2019): following staff feedback during a senior management town hall, enhancements were made to recycling facilities at one of our offices in London.
- **United States:** our Minneapolis HQ joined the Medonta Heights office in its recycling efforts, including strategically placing recycling bins around the office and using reusable cups and water bottles.

Due to the COVID-19 pandemic, a vast majority of our employees worked from home during 2020 and a majority of our offices have been closed for sanitary reasons, meaning that some of these eco-friendly initiatives were put on hold.



Environment

We live... ...to dispose of disposables

The world throws away 500 billion plastic cups every year. Research by RoomIt (CWT's hotel distribution division) in 2018 found that its employees collectively used over 300,000 single-use disposable items.

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. In June, the RoomIt Responsible Business team launched another survey to identify the barriers to eliminating disposables and stepped up efforts 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 our 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 #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 and encourage 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.

Environment



Our milestones at a glance



2015

- 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 information on environmental trends and how CWT is responding.
- Launched our inaugural worldwide environmental campaign on World Earth Day to raise awareness of eco attitudes for employees.

2016

- 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.

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.

2017

- Global Commuting Survey was launched to all employees for the first time to learn more about our commuting habits.
- 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'.



2019

- We 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.

2020

- Continued to promote an environmentally-conscious culture through awareness and targeted initiatives.
- Further reduced our own environmental footprint, while helping our customers lower theirs through an enhanced environmentally-friendly product and service offering.



Responsible Products and Services



We care...

"Business travel is an ever-changing blend of many different components, each of which adds to the greater good of a trip, or travel program. Our Business to Business for Employees (B2B4E) approach is not only designed to ensure that our customers' travelers get an employee-grade experience when they are on the move, but that they also feel safe and secure while they do so, or attending corporate events – and this has been front-of-mind as we adapted to the new normal, providing new products and services during the pandemic. It has helped us continue to receive excellent satisfaction scores and allows us to continue to serve our clients' changing needs during this period of uncertainty for the sector, and beyond.

We are noticing a significant increase in desire for solutions to help our customers better manage their own CSR performance, with requests ranging from topics such as the environmental impact of business travel, traveler wellbeing, and diversity & inclusion. We remain committed to further embedding environmental and social considerations into our product offering, whether it be equipping travel managers with CWT AnalytIQs (to help track the CO₂ emissions of every planned trip), providing consulting to help clients design employee-focused and reduced-emission travel programs, offering responsible events, and informing our customers of travel updates, safety and security alerts.

For us responsible business is not an initiative – it is our way of life."

Patrick Andersen
Chief Commercial Officer





We care...

...to help our customers meet their environmental objectives

One of our key roles is to provide our clients with the right tools and services to help them measure, manage and report their emissions. Our analytical results help them build a more responsible travel program.

CWT remains committed to helping our clients reduce the environmental impact of their travel programs. Our efforts include:

Responsible travel consulting

In 2020, CWT Solutions Group developed a responsible travel consulting program to help companies look beyond compliance and cost management. This new ECO framework, which covers Employee Wellbeing, Climate Impact and Organizational Performance, lets clients design travel programs that enhance bottom line figures in social, environmental and financial fields.

By using the ECO framework, companies can use business travel to simultaneously engage and motivate their workforce, while reducing their environmental impact and managing costs more effectively.

Our consulting services have traditionally focused on ensuring compliance while lowering costs for our clients. However, this new ECO framework also ensures employee wellbeing and environmental considerations are key parts of our client's business travel decision-making process. Our aim is to help these companies find the sweet spot between these different and sometimes conflicting priorities within their travel programs, while providing them with a roadmap to achieve their travel ambitions.

In addition to developing proprietary tools for our clients to assess and improve the performance of their travel programs, while considering employee wellbeing and the environmental impact, CWT Solutions Group also partners with Atmosfair, an independent non-profit organization. They specialize in making business travel greener, with a highly accurate and granular methodology to calculate CO₂ emissions.

Emissions reporting

We know that reporting is crucial in order to measure and manage emissions and set meaningful targets. AnalytIQs, our business intelligence platform and reporting tool, analyzes CO₂ emissions and provides our clients with environmental data after their trips. This data can then be shared with our clients' travelers to help raise awareness and drive their future behaviors.

This post-trip reporting service enables clients to calculate carbon emissions for both air and rail travel, based on the individual traveler, their business unit (hierarchy) or country. The report metrics are based on methodology from the United Kingdom's Department for Environment Food & Rural Affairs. CWT can also offer annual emissions reporting through the CDP Supply Chain Program.

Messaging for travelers

Our Program Messenger tool can send customized messages to our client's travelers. These messages raise awareness about various environmental impact aspects of their travel purchasing decisions.

Responsible Meetings & Events

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

In 2020 CWT Meetings & Events was officially certified ISO 20121 Sustainable Event and Epidemic/Pandemic Risk Management, with two separate events in Italy gaining the official accreditation.



We care...

...to help our clients design more sustainable travel programs through our ECO framework

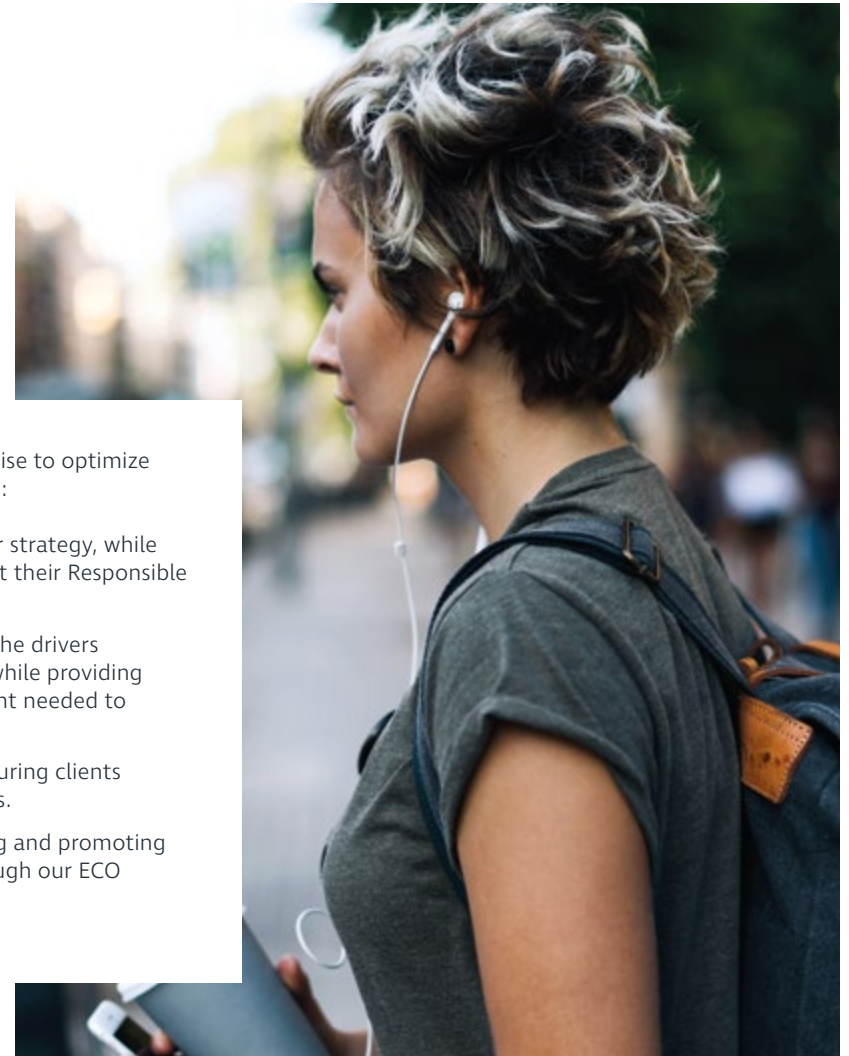
We seek to create an environmentally conscious culture through awareness raising activities and encouraging direct change through employee-led actions and initiatives.

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 their travel, which is one of the top drivers of carbon emissions in our industry. Responsible Travel Practice by CWT Solutions Group enables our customers to maximize their employee satisfaction, minimize their impact on the climate and drive their organizational goals.

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

- **Strategy:** helping clients set their strategy, while 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 through our ECO framework.





We live...

...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 2020, 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:

- **Safety and security 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. Safety and security 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 2020, 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 AnalytIQs 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 destination-relevant communications to clients as well as support or health event planning and medical advice.

Responsible Products and Services



To address this, CWT has 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.

Improving through listening

We are committed to delivering exceptional experiences for all our customers. This is guided and informed by programs and initiatives that gather feedback, from which we can address any issues with our creativity and know-how.

When the COVID-19 pandemic hit in early 2020, it forced organizations to re-think the way they manage the health and safety of their employees and their travel program.

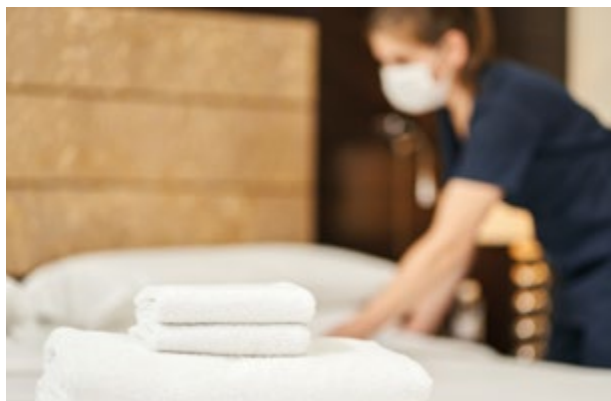
In 2020, we intensified our client engagement initiatives and these helped us understand the impact of the pandemic on our customer's priorities and what new expectations had emerged in this changed business climate. We conducted traveler and travel arranger surveys, reaching out to more than 10,000 participants. These were supported with additional one-on-one interviews and travel manager peer-to-peer group discussions. Many of our customers participated in these roundtable discussions about topics impacting their travel programs and their travelers, such as new Distribution Channels, or those specific to the pandemic, such as the digital health passport.

Throughout 2020, we launched new products and services into our portfolio. Many of these include effective reporting tools so travel managers can make informed decisions about safety, security, employee wellbeing, carbon impact and travel program enhancements. Examples of these innovative solutions include:

Return to travel dashboards

Launched a series of dashboards designed to make the job of monitoring and assessing the risk to travelers in a travel program during the COVID-19 pandemic easier. The easy to use dashboards provide up-to-date COVID-19 risk and travel restrictions information from multiple sources in one convenient location.

In addition to globally consolidated CWT booked travel data (updated near real-time), the dashboards incorporate data from external sources.



Hotel implementation of COVID-19 guidelines

Launched a new 'Enhanced Health Measures' label in our myCWT booking tools and several online booking tools. This data provides traveling employees with quick and easy access to specific hotel health and hygiene measures in place related to the prevention of COVID-19.

CWT Travel Essentials

Launched the CWT Travel Essentials site to help employees plan their trip effectively by providing preliminary information about restrictions and procedures of a country or certain states/provinces in one convenient location, according to their origin, destination, passport and travel dates. It is available via [myCWT web](#) and app and the [myCWT website](#).

Standard Trip Approval

Introduced a new trip approval service which is quick-to-deploy and easy-to-use, available consistently to employees across email, phone and messaging channels.

Messaging expansion

Continued to expand CWT's newest booking channel into new countries and onto new platforms. Employees can instantly chat with a CWT counselor through Microsoft Teams, Facebook Workplace, Facebook Messenger and myCWT web and mobile.

In 2021, we launched a new version of our CWT Listens survey to capture important feedback from travelers about their booking experience with CWT and introducing the Net Promoter Score.



We live...

...to organize sustainable events

Our clients' increasing awareness of, and demand for, sustainability is also reflected in the requests received by 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 certified hotel brands that apply sustainable actions within their properties. As well as ensuring responsible catering, we even ensured the stage matched sustainable goals by carefully selecting a supplier that allowed us to rent metal structures used for previous events. This meant only needing to create customized fabrics for this one event.

Additional solutions and actions 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 direct the future planning and delivery of more sustainable solutions for our clients.

During the COVID-19 pandemic, the CWT Meetings & Events (M&E) team quickly focused on enhancing their delivery of virtual events. The virtual events that were delivered in 2020 allowed participants to be fully immersed in the event, giving them the best experience possible. These solutions combined cost savings and the ability to communicate strategic information in an engaging and exciting format.

Our M&E team is also reframing their processes and policies, establishing on-site health and safety

protocols and pre-approved contingencies in case of new outbreaks of COVID-19. This has been achieved through leveraging our ISO 20121 Sustainable Event and Epidemic/Pandemic Risk Management certification.

As travel restrictions ease around the globe, many of our clients are keen to return to face-to-face meetings. To support that ambition, we have simplified the booking experience through our CWT easy meetings solution – a direct-booking platform for meeting rooms. It is a consistent, secure, and customizable solution to help organizations find and book their next meeting room within just a few minutes.





We live...

...to manage risk

Risk affects any industry and our sector is not immune to factors such as staff shortages, technical disruptions, terrorism, pandemics and natural disasters. However, we proactively manage travel risks to minimize their impact.

At CWT, we take a proactive and systematic approach to risk management. Initially, we look to identify, assess and prioritize potential areas of risk. Following that, we develop risk mitigation plans to both reduce the probability of that risk occurring and limit its impact should it develop. These plans are then formally integrated into a Business Continuity Plan which embeds risk management into CWT's daily organizational practices.

When the unexpected occurs, our 24/7/365 crisis management process helps us to respond and recover more quickly, helping minimize the impact of any crisis event.

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 Chief Executive Officer 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 a 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, the everyday management of risk is the responsibility of each and every employee of 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. This identified and prioritized risks such as natural disaster exposure and business continuity impact, as well as health and safety at work. In 2021, we are restructuring our continuity plans to align with the organization's strategy to service travelers from language clusters.

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 an effective and efficient response to any unplanned disruptions, whenever and wherever they occur. Any global BCP activations are logged and monitored and a detailed review is documented in our proprietary online business continuity database. We then publish metrics analyzing BCP activations annually to identify vulnerability trends, responding to these by implementing corrective actions. In 2020, we delayed publishing due to pandemic response with most staff working remotely and fewer activations.

CWT offices are required to update their location's BCP documentation twice per year, while performing two annual drills to test the effectiveness of their BCP. Carried out by regional owners, the drills cover fire-based scenarios and an additional drill chosen by the BCP Steering Committee. Due to the pandemic response, which saw most employees working from home, we reduced this to one BCP update and canceled the fire-based scenario drills.

Client-dedicated service coverage drills are also performed and these are supplemented with BCP owners, new hires, operations managers and backup owners being required to complete internally-developed training annually.

CWT's Disaster Recovery program ensures that our core systems and IT capabilities are highly available, and CWT tests its enterprise disaster recovery plans annually. Our 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.



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, and even the best laid plans can require immediate change based on reliable, up-to-the-minute information.

In collaboration with our long-term partner, International SOS, we hosted two joint webinars in 2020. The first one focused on 'How will the 'new world' of travel impact the employee experience?' with the second covering 'How to revise your travel risk policy during unprecedented times'.



Our milestones at a glance



2015

- Completed an ISO 22301 gap analysis and action plan.
- Refreshed our Business Continuity Plan (BCP) Awareness Training module which was rolled out to all our 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.

2016

- 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.

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 the reporting of suspected sexual abuse and trafficking.
- Launched safety and security alerts 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 the social, economic and environmental impact of any event during all stages of the supply chain.

2017

- 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 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.

2019

- Launched Travel Manager Advocacy Boards and The Traveler Community to encourage two-way dialogue between CWT and our customers.
- Raised additional awareness on anti-human trafficking through customer communications via our myCWT portal.
- Delivered a bi-annual Business Impact Analysis refresh.

2020

- Launched a Responsible Travel Consulting framework to help customers design more environmentally and socially responsible travel programs.
- Identified ECO ambassadors across regions and business functions to support and endorse our responsible consulting practices.
- Conducted enterprise Risk Assessment.
- CWT Meetings & Events was officially certified ISO 20121 Sustainable Event and Epidemic/Pandemic Risk Management in Italy.



Community Involvement

We live...



"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 2020, we continued to target initiatives with a focus on the 3Es of Education, Emergencies and Essential needs, as well as human rights and fighting the ever-present dangers of discrimination and human trafficking. When the passion and skills of our people are used to support great causes and community involvement programs like these, we further reinforce our positive impact and help create powerful partnerships that benefit everyone involved."

Françoise Grumberg

Vice President, Global Responsible Business and Diversity & Inclusion



Community Involvement

We live...

...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 2020, amidst the COVID-19 pandemic, CWT employees, with Carlson's support, demonstrated unwavering commitment to support those most in need.



Help for communities can take many forms, including monetary donations, in-kind contributions, or the gift of time and enthusiasm. Our 3E Community Involvement strategy is fueled by all three and its impact continues to grow year-on-year. These initiatives around the globe are also helping to deliver against our chosen UN Sustainable Development Goals (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, and access to clothing, healthcare, food, water, shelter and a safe environment.

We actively encourage volunteering worldwide and are proud that our colleagues offer their talents so freely. Where there is no structured policy, local teams offer employees volunteering time so they can contribute to community projects such as improving living conditions for families, donating food to people in need, providing education, financing health research and much more. In addition to the 3Es, we also support projects with a focus on human trafficking, military veterans and workforce development.

In 2020, employees from CWT and Carlson volunteered their time, organized fundraising events and created awareness for important causes during the COVID-19 pandemic. Initiatives included virtual volunteering and donations of essential items for communities that were most impacted.

Working alongside the Carlson Family Foundation

We have worked closely with the Carlson Family Foundation on our community involvement efforts. The Foundation provided employee-matched contributions, as well as significant grant support for many 3E (Education, Emergencies and Essential needs) global partners and those helping us to combat human trafficking around the world (see [page 50](#) for more information).





We care...

...about high quality education

Goal 4 of the United Nations Sustainable Development Goals is centered on education as the foundation of improving lives and sustainable development. During 2019 and 2020, we continued to champion education and employability for young people as part of our 3E (Education, Emergencies and Essential needs) strategy.



On the first anniversary of George Floyd's death, the Carlson Family Foundation honored his legacy with a \$75,000 grant to fund the George Floyd Human Rights Scholarship at the Humphrey School of Public Affairs at the University of Minnesota.

This scholarship fund will provide financial assistance to five students each year for the next three years – allowing them to make a direct impact in their local community by working with organizations that help promote equity but may not have the ability to provide a paid internship.

This grant followed a US\$25k George Floyd memorial grant provided in 2020 by the Carlson Family Foundation to Twin Cities Rise, which provides career skills training to under and unemployed individuals, primarily men of color, to create a community of empowered people who achieve long-term job success.

In 2020:

- The Carlson Family Foundation continued to fund the Orphaned Starfish Foundation (OSF) in their extensive work with victims of abuse, survivors of trafficking, orphans and other at-risk youths. The Foundation is proud to support OSF programs in the United States (Minnesota), Brazil, Costa Rica, the Philippines and Colombia, helping to fund teacher salaries, computer purchasing and maintenance, and other projects and necessities. Meanwhile, CWT and Carlson colleagues around the world have contributed on a local level, assisting with grant-making opportunities, providing organizational assistance, and mentoring children participating in the programs.



Community Involvement

- With COVID-19 health measures requiring millions of children around the world to switch to remote schooling for significant parts of the last year, the digital divide has been highlighted like never before. We worked with Minnesota Computers for Schools to donate computer equipment to children in underserved communities. These devices are crucial in enabling children from lower-income backgrounds to continue their education with as little disruption as possible, and ultimately, to realize their full potential.

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 in 2019:

- **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 (KKIS), 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 Australia 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.



Community Involvement

We connect...

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



There is no doubt that 2020 has been a year of great challenge for the industry but, despite the pandemic, GTPP continued to thrive and grow, delivering the Password to the World® program to 628,000 students during that year. One of the key 2020 initiatives was the extension of Password to the World® curriculum to an online audience for the first time in January 2020. Over 4,000 students from more than 100 countries registered to take the course.

Carlson Family Foundation and CWT have supported GTPP for the last ten years and our Vice President of Global Responsible Business and Diversity & Inclusion sits on its advisory Board.



Community Involvement

We live...

...to provide essentials and bring relief in emergencies

A core part of our 3E (Education, Emergencies and Essential needs) Community Involvement strategy 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 during the COVID-19 pandemic.

Providing support when disaster strikes

In the United States, the Carlson Cares Employee Assistance Fund has been available to employees in hardship due to unforeseen circumstances beyond their control. Started with seed funding from the Carlson Family Foundation, which also makes regular donations, the fund is supported through employee contributions. In 2020, the fund was used for colleagues impacted by COVID-19 (see [page 82](#) to read more about Carlson and the Foundation's activities in 2019 and 2020).

Helping to meet essential needs

Numerous employee initiatives and Carlson Family Foundation Grants around the world in 2020 focused on meeting essential needs, in particular the needs of those most affected by the global pandemic. These initiatives included:

- **Australia:** funding from the Carlson Family Foundation supported the Australian Red Cross and the Australian Wildlife Rescue Organization to address the wildfires at the beginning of 2020.
- **Brazil:** in response to the pandemic, the Orphaned Starfish Foundation developed a campaign to donate basic food and hygiene baskets to families supported by their various existing programs. Combined with a donation from the Carlson Family Foundation, this campaign was bolstered by direct contributions from CWT Brazil employees. It enabled the purchase and delivery of over 100 food and hygiene kits, reaching 250+ families by November 2020.

- **India:** following a grant in 2020 to UNICEF's global COVID-19 relief program, additional funding from the Carlson Family Foundation supported UNICEF India in 2021. This grant was given while the country faced a dramatic increase in COVID-19 cases and was used for a supply of lifesaving oxygen generator plants and PCR testing machines.
- **Singapore:** employees from the CWT Singapore office volunteered with Willing Hearts Soup Kitchen, which was struggling with volunteer numbers due to the COVID-19 outbreak. This charity kitchen provides 6,500 cooked meals a day to the elderly and disabled across the island.
- **United States:** the Meetings & Events Global Operations leadership team, together with local teams, packed a total of 8,791 pounds of food for Feeding Tampa Bay – one of the top hunger-relief organizations in the United States. The food was distributed to 700,000 food-insecure people in the Tampa Bay area, where the Customer Leadership Summit had been hosted. The Environmental Resources and Marine leadership team participated in volunteer work at the Houston Food Bank, preparing more than 5,000 meals and packaging over 1,000 fresh milk bottles to be served in over 150 schools across Texas.



We connect...

...in partnership with Carlson

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



Anti-trafficking initiatives and support

Carlson is a leader in the fight to stop and prevent human trafficking and sexual exploitation. 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 is a signatory to the UN Global Compact.

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. Our experts provided input into this first-of-its-kind training to help better identify and stop human trafficking. This training is available for companies to utilize in multiple languages and has been imported into our internal Learning Management System for all 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 51](#) for more information).

Community Involvement



- **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 56](#) for more information).
- **Orphaned Starfish Foundation (OSF):** one of many Carlson Family Foundation 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. We continue to grow local partnerships and volunteering with several OSF-supported organizations worldwide. A partner to the OSF in Costa Rica, La Posada de Belen – which shelters girls between the ages of nine and 18, who have children of their own – was selected to receive an Employee Choice Grant. In 2020, the HR Leadership Team joined local employees in presenting the US\$5,000 grant from the Carlson Family Foundation.
- **Nomi Network:** The Carlson Family Foundation has been a supporter of Nomi for many years. Nomi 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 our employees continued to support it through contributions in the Community Giving Campaign and with an informational session at the Carlson headquarters in September 2019.

In 2020, some of our senior leaders made a trip to India and presented the activities of Nomi Network to the local staff. They also visited the Nomi Network training sites in West Bengal, where young girls and women can learn technical and life skills and graduate with a nationally recognized certificate in their specialist area.

Community Giving Campaign

We are at our best in times of great need. As Rick Gage, Chairman of Carlson's Board, stated "The world has changed, but our values have not. In fact, we've relied on them all the more."

This year, the Carlson Community Giving Campaign has called on CWT and Carlson employees to lend a hand in the recovery for their communities and colleagues.

In its fourth year as a United States-wide initiative, our annual employee giving campaign featured volunteer activities for employees across the country and was supported by matching grants from the Carlson Family Foundation.

In 2020, our Community Giving campaign focused on volunteerism and featured a new community engagement portal with thousands of virtual and in-person opportunities available, making it easier for employees to search and register for volunteer opportunities that fit their passions and location.

Focus Area Grants

In addition to anti-sex trafficking, we have also worked closely with the Carlson Family Foundation 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 our volunteers:

- **Soldiers' Angels:** provides aid and comfort to men and women in the United States military and their families. Our colleagues have been involved with this organization for many years, including arranging, contributing, and sending care packages for troops overseas and veterans in hospitals. In 2020, 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 a service platoon in St. Paul and Minneapolis.
- **Student mentorship:** our employees have historically contributed hundreds of hours to support at-risk youth by providing mentoring, guidance and friendship. CWT colleagues have previously volunteered for both the Big Brothers Big Sisters 'Beyond School Walls' and Best Prep's eMentoring programs. In 2020, both organizations were supported by grants from the Carlson Family Foundation to support the basic needs of students.



Community Involvement



Our milestones at a glance

2015

- 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.

2019

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

2016

- Collaborated with 63 organizations 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.

2017

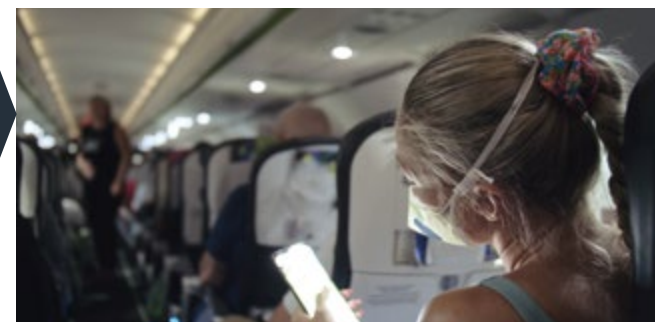
- Community Giving Campaign was expanded to include all employees in the United States and attracted 1,400 participants who delivered record results.
- More than 100 3E initiatives organized by employees worldwide.

2018

- In honor of Carlson's 80th anniversary, the Carlson Family Foundation offered US\$10,000 grants to organizations recommended by CWT employees.
- Community Giving Campaign went global for the first time.

2020

- A US\$25k grant from the Carlson Family Foundation provided in 2020 to Twin Cities Rise and a US\$75k grant from the Foundation to fund the George Floyd Human Rights Scholarship at the Humphrey School of Public Affairs at the University of Minnesota in 2021.
- Employee volunteering as well as donated items in several countries around the globe to address essential needs of those most stricken by the COVID-19 pandemic.
- Grants from the Carlson Family Foundation supported global and partner organizations to address the most pressing needs created by the COVID-19 pandemic. This included support for projects in Brazil and India, while a specific grant was given to the University of Minnesota's Center for Infectious Disease Research and Policy's (CIDRAP) COVID-19 Resource Center, to support COVID-19 research.



Appendix**Global Reporting Initiative (GRI) Table**

GRI Standard	Disclosure	Location
Organizational profile		
GRI 102-1	Name of the organization	Front cover
GRI 102-2	Activities, brands, products, and services	About CWT – page 6
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 7
GRI 102-7	Scale of the organization	About CWT – page 7
GRI 102-8	Information on employees and other workers	About CWT – page 7 Human Resources and Human Rights – pages 32-57
GRI 102-9	Supply chain	Ethics and Business Behavior – pages 26-27
GRI 102-10	Significant changes to the organization and its supply chain	About CWT – page 7 Ethics and Business Behavior – pages 26-27
GRI 102-11	Precautionary Principle or approach	Responsible Products and Services – page 70
GRI 102-12	External initiatives	Responsible Business Strategy and Governance – pages 14-15
GRI 102-13	Membership of associations	Responsible Business Strategy and Governance – pages 14-15 Community Involvement – pages 77-79

Appendix**Global Reporting Initiative (GRI) Table** continued

GRI Standard	Disclosure	Location
Strategy		
GRI 102-14	Statement from senior decision-maker	CEO's statement of Responsible Business within the travel industry – pages 4-5
GRI 102-15	Key impacts, risks, and opportunities	Responsible Business Strategy and Governance – pages 9-11
Ethics and integrity		
GRI 102-16	Values, principles, standards, and norms of behavior	Ethics and Business Behavior – pages 23-24
GRI 102-17	Mechanisms for advice and concerns about ethics	Ethics and Business Behavior – page 25
Governance		
GRI 102-18	Governance structure	Pages 13, 23, 33
GRI 102-19	Delegating authority	Pages 13, 23, 33
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	Responsible Business Strategy and Governance – page 13
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics	Responsible Business Strategy and Governance – page 9
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 23
GRI 102-26	Role of highest governance body in setting purpose, values, and strategy	Responsible Business Strategy and Governance – page 13
GRI 102-32	Highest governance body's role in sustainability reporting	Responsible Business Strategy and Governance – page 13

Appendix

GRI Standard	Disclosure	Location
Stakeholder engagement		
GRI 102-40	List of stakeholder groups	Responsible Business Strategy and Governance – page 9
GRI 102-41	Collective bargaining agreements	Human Resources and Human Rights – page 48
GRI 102-42	Identifying and selecting stakeholders	Responsible Business Strategy and Governance – page 9 Human Resources and Human Rights – page 43
GRI 102-43	Approach to stakeholder engagement	Responsible Business Strategy and Governance – page 9
GRI 102-44	Key topics and concerns raised	Responsible Business Strategy and Governance – pages 9, 10, 11
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 9
GRI 102-47	List of material topics	Responsible Business Strategy and Governance – pages 10, 11
GRI 102-48	Restatements of information	About CWT – pages 6, 7
GRI 102-49	Changes in the reporting period	No significant changes from previous reporting periods
GRI 102-50	Reporting period	About CWT – page 7
GRI 102-51	Date of most recent report	About CWT – page 7
GRI 102-52	Reporting cycle	About CWT – page 7
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 16
GRI 102-55	GRI content index	Pages 85-89
GRI 102-56	External assurance	None

Appendix**Global Reporting Initiative (GRI) Table** continued

GRI Standard	Disclosure	Location
Economic		
GRI 205-1	Operations assessed for risks related to corruption	Ethics and Business Behavior – page 25
GRI 205-2	Communication and training about anti-corruption policies and procedures	Ethics and Business Behavior – pages 23, 24, 25 Human Resources and Human Rights – page 25
Environmental		
GRI 302-1	Energy consumption within the organization	Environment – pages 59, 60, 61, 62, 63, 64, 65
GRI 302-2	Energy consumption outside the organization	Environment – pages 59, 60
GRI 305-1	Direct (Scope 1) GHG emissions	Environment – page 60
GRI 305-2	Energy indirect (Scope 2) GHG emissions	Environment – page 60
GRI 305-3	Other indirect (Scope 3) GHG emissions	Environment – page 60
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	Ethics and Business Behavior – pages 26, 27

Appendix

GRI Standard	Disclosure	Location
Social		
GRI 403-1	Workers representation in management – worker health and safety committees	Human Resources and Human Rights – pages 43, 44, 45
GRI 404-1	Average hours of training per year per employee	Human Resources and Human Rights – pages 40, 41, 42
GRI 404-2	Programs for upgrading employee skills and transition assistance programs	Human Resources and Human Rights – pages 40, 41, 42
GRI 405-1	Diversity of governance bodies and employees	Human Resources and Human Rights – page 35
GRI 408-1	Operations and suppliers at significant risk for incidents of child labor	Ethics and Business Behavior – page 27 Human Resources and Human Rights – pages 50-56
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Ethics and Business Behavior – page 27 Human Resources and Human Rights – pages 50-56
GRI 412-2	Employee training on human rights policies or procedures	Human Resources and Human Rights – page 50 Ethics and Business Behavior – pages 23, 24
GRI 413-1	Operations with local community engagement, impact assessments, and development programs	Community Involvement – pages 77-83
GRI 414-1	New suppliers that were screened using social criteria	Ethics and Business Behavior – pages 26, 27 Human Resources and Human Rights – pages 52-56

Appendix

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 Areas	Principles	CWT Responsible Business 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	Pages 32-57
Labor	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	Pages 32-57 Pages 22-31
Environment	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	Pages 60-66 Pages 67-75
Anti-Corruption	Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery	Ethics and Business Behavior	Pages 22-31

