

## Opening Statement

At TravelPerk one of our core values is '[Being an owner](#)'. That means owning up to our responsibilities and actions.

That core value is true and present in our commitment and responsibility to how we play our part in the elimination of modern slavery.

This statement sets out the efforts we have undertaken to understand the specific risks to TravelPerk and the steps towards addressing modern slavery (including forced labour and human trafficking) in our operations and supply chains on a global level.

The following statement is made by TravelPerk Inc. and its subsidiaries (including, without limitation, the UK-domiciled companies TravelPerk Ltd, TK Operations Ltd, Click Holdings Ltd, and TravelPerk UK IRL Ltd), referred to collectively here as **TravelPerk**.

This statement is made in compliance with section 54(1) of the UK Modern Slavery Act 2015.

## Our business

TravelPerk is a hyper-growth SaaS business travel platform and a pioneer in the future of business travel. Our all-in-one platform gives travellers the freedom they want - whilst providing companies with the control they need.

At TravelPerk, we believe in the power of real-life connections for personal and business growth.



This value of human interaction and connection is at the heart of TravelPerk's mission, and informs our approach to modern slavery.

In 2023 TravelPerk extended its Executive Leadership Team to include a Vice President of Customer Care, who holds a pivotal role in combating modern slavery. This includes; continually improving the company's operations to reduce the risk of modern slavery, fostering a culture of awareness and

accountability, and collaborating with stakeholders to drive an even higher level of positive change throughout the supply chain.

*"As the VP of Customer Service, I am committed to upholding the highest ethical standards in our operations. Our dedication to human rights extends beyond our products and services to the very core of our supply chain. This statement reflects our unwavering commitment to eradicate modern slavery, ensuring that every individual involved in our business is treated with dignity and respect."* **Kamil Jagodzinski, Vice President of Customer Care**

### **Our structure**

The majority of our staff are based in Barcelona, Spain, and we have offices located across Europe, the UK and the US. The overwhelming majority of our customers and suppliers are also located in these territories.

All entities in our group are wholly owned, directly or indirectly, by TravelPerk Inc. No changes to the corporate structure of TravelPerk group have been made since 22 August 2022.

### **Governance and Policies**

TravelPerk has implemented measures to minimise risks relating to modern slavery and human rights, including verifying and recording employee compliance with its Code of Business Conduct and Ethics (the **Conduct Code**), promoting channels for stakeholders to report unethical or illegal issues, and promoting a positive working culture among its suppliers through its [Supplier Code of Conduct](#) (the **Supplier Code**).

TravelPerk reviews its policies and processes regularly, and deploys considerable resources to ensuring that its policy suite accords with best practice.

### **Employee Conduct Code**

The Conduct Code applies to all contractors, consultants, employees, executives and directors of all TravelPerk's companies and offices. In summary, the Conduct Code:

- emphasises ethical and legal principles to be followed by our personnel, and the importance of making good, ethical decisions at all times. The Conduct Code expressly recognises the importance of ethical decision-making, and perceptions of ethical conduct.
- highlights the importance of creating a respectful workplace, inclusive culture, and equal opportunity regardless of race, gender, sexual orientation, or any other matters.
- prohibits any acts of violence, harassment, or bullying in the workplace, including gender-based behaviour discrimination, unwelcome flirtation or sexual advances, sending porn or sexual pictures, and name-calling that is insulting or humiliating.
- emphasises respecting privacy, intimacy, labour rights, and security at work.

Employees are required to read and confirm their acceptance of the Conduct Code, and TravelPerk's Anti-Corruption and Anti-Bribery Policy, during onboarding and annually thereafter. We track completion of this exercise (and the completion of other important internal policies) using the online

platform KnowBe4. TravelPerk expects personnel to immediately report any behaviour or activity that jeopardises the safety or well-being of the company and its employees.

TravelPerk's employment and personnel policies comply with relevant labour laws, and promote the company's culture of respect as an equal opportunities employer.

### **Supplier Code**

You can find the Supplier Code [here](#). In summary, the Supplier Code:

- incorporates specific provisions for suppliers regarding human rights and labour rights. Suppliers are required to respect diversity and ensure that everyone is treated with dignity and respect regardless of their personal characteristics.
- incorporates minimum standards for working conditions and pay including, specifically, the payment of living wages and the provision of humane conditions for workers. Workers must not work more than the maximum daily working hours set by local laws, and must receive legally mandated benefits and leave.
- prohibits all forms of offensive behaviour and harassment towards workers.
- prohibits use of forced, bonded, involuntary or child labour. Suppliers are obligated to report any risks of human trafficking or exploitation, or incidents or suspicions of sexual or other exploitation of children, to local authorities.

In case of any uncertainty or immediately on becoming aware of any matter that may contravene the Supplier Code of Conduct, Suppliers are obligated to contact [legal@travelperk.com](mailto:legal@travelperk.com).

### **Supply Chain**

TravelPerk boasts a high-quality supply chain that supports key operational areas like customer care, and supplier relations. Several of our key suppliers - like [Marriott Group](#) and [Deutsche Bahn](#) - have made their own public commitment to combating modern slavery.

These partnerships are not just transactions; they represent collaborative ventures where suppliers are integral partners to TravelPerk, working in tandem to achieve mutual success, sharing knowledge and learnings to develop compliance in anti modern slavery efforts. Through these alliances, we deliver outstanding experiences for our customers and operational efficiency, and we uplift our standards by proxy.

#### *Business Process Outsourcing (BPO) Partners*

Customer care is critical to every one of our Values. It follows that TravelPerk cares deeply about our partnerships in customer care, and this is reflected in how we select, contract, and verify our suppliers in this vertical.

We select customer care providers according to country, cultural, and business ethics, including compliance with standards expressed in the [Ethical Trading Initiative](#) base code. In addition, our contracts with outsourcing companies contain provisions we consider appropriate to support our compliance with the Modern Slavery Act.

*“Enshored [a key BPO to TravelPerk] is an employer of choice in the markets we operate (primarily the Philippines and Portugal). We aspire to continue to lift the living standards and life trajectories of all of our employees in these markets. We directly employ all of our teams. We offer competitive salaries and top-quartile benefits packages for our teams.” **Ana Timóteo, Country Manager, Enshored, Portugal***

In 2023 TravelPerk improved its processes to evaluate our BPO partners, and particularly to ensure that all of our partners reflect and deliver on our commitment to ethical working practices. We deepened our scrutiny of partners' policies, practices, and compliance track record, and TravelPerk's representatives paid personal visits to BPO facilities. During these meetings, we interviewed and confirmed with relevant persons the continued commitment to fair treatment of workers (including catering and cleaning services used in our offices):

- Every hire is subject to the presentation of a birth certificate or other equivalent documentation, in order to verify age and ensure no one under the legal age is hired.
- All employees have the skills required for their jobs' description, receive training, and can leave their jobs on 30 days' notice.
- All employees are free to associate and be part of collective deals.
- The facilities are safe and hygienic as attested by the providers, checked personally by TravelPerk's staff against a quality control checklist.
- Working hours are compliant with local laws and regulations.
- Living wages are pre-agreed and over the national legal standard and reviewed regularly.
- The providers have put in place anti-discrimination measures and policies.
- There are internal rules, policies and procedures against inhumane treatment and abuse in the working environment.
- TravelPerk has directly engaged with 3rd parties to oversee the management of the providers.

### **Progress and looking forward**

To repeat, TravelPerk is committed to play its part in the elimination of modern slavery. TravelPerk will continue to review its anti-slavery policies, obligations and processes to ensure they are fit for purpose and continue to follow the strict vetting processes as standard TravelPerk practice.

### **Applicability**

Each member of the TravelPerk group of companies jointly makes this statement in compliance with section 54 (1) of the UK Modern Slavery Act 2015 and in response to their requirements and efforts in combating Modern Slavery during the fiscal year ending 31 December 2023.

Backed by world-class investors like SoftBank Investment Advisers, General Catalyst, Kinnevik, Greyhound Capital, Felix Capital, Target Global, LocalGlobe, Spark Capital, and Heartcore — investors

in some of the most disruptive companies in tech - TravelPerk is reinventing business travel. These investors share our commitment to enjoyable and sustainable business travel, and to working in a way which is determined by values.

TravelPerk strives for continual improvement in all of its business areas and welcomes open and honest dialogue on its modern slavery stance. Please feel free to contact us at [legal@travelperk.com](mailto:legal@travelperk.com) with any comments, queries or suggestions regarding this statement.

Abraham Meir

Co-Founder and CEO

Approved by TravelPerk, Inc's Board of Directors on 16<sup>th</sup> April 2024 in relation to the financial year ending 31 December 2023

*TravelPerk S.L.U., TravelPerk GmbH, TravelPerk America, Inc., TravelPerk US Inc., TK Operations Ltd, Click Holdings Ltd, TravelPerk Ltd and TravelPerk UK IRL Ltd are all wholly owned subsidiaries of TravelPerk, Inc., directly or indirectly.*