



# TRAVEL PLACES

(Travel Places, in association with American Express Global Business Travel)

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## TRAVEL PLACES SUPPLIER CODE OF CONDUCT

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The Supplier Code of Conduct sets out our expectations of suppliers, generally in terms of business practices, and specifically with regard to:

- ethical supply and people practices including diversity and inclusion,
- prevention of financial crime,
- environmental responsibility and sustainability,
- data protection and information security,
- health and safety.

Travel Places recognises that each supplier may have their own standards and ambitions in relation to the above criteria. We expect all our suppliers to meet the requirements set out in legislation, regulation, and good industry practice and to ensure that their suppliers do the same.

Travel Places Supplier Code of Conduct set out the commitments from us and the expectations of our suppliers. Working together across our supply chains, we will encourage and enable sustainability and long-term positive impacts on the global community.

### GENERAL REQUIREMENTS

- Travel Places expects its suppliers to behave ethically, apply high standards of corporate conduct and to fully comply with all relevant law
- Prior to entering into any contract, Travel Places carries out due diligence on each supplier in order to comply with relevant law and to assess suitability of the supplier to meet our business needs.
- Where Travel Places agrees and enters into a contract with a supplier, the relationship will be governed by agreed terms and conditions.
- Suppliers shall respect the human rights of their employees, supply chain and local communities and shall comply with all relevant law relating to human rights.
- Suppliers shall also take appropriate steps to identify and eradicate modern slavery, in all its forms, including slavery, servitude, forced and compulsory labour and human trafficking, whether of adults or children, this includes within your supply chain.
- Travel Places explicitly forbids the use of child labour or the onwards sourcing of materials from suppliers who have not verified that there is an absence of child labour in their supply chain.
- Travel Places is committed to a policy of equality, diversity, and inclusion in our employment practices in order to ensure that no one associated with us is discriminated against and treated less fairly because of a protected characteristic. As such we expect our suppliers to be committed to the same principles and have written board or ownership approved policies in place to ensure this.
- Suppliers should promote the training of workers on their labour and employment rights.
- Suppliers should ensure freedom of association and the right to collective bargaining.
- Suppliers should have clear and effective policies that prevent and eliminate harsh treatment and harassment.
- Suppliers shall comply with all relevant law pertaining to Financial Crime and shall not do or omit to do anything which would cause Travel Places to be in breach of such relevant law.
- Suppliers must have appropriate policies and procedures in place with regard to anti-bribery and anti-corruption measures and whistleblowing.



- Suppliers shall comply with all relevant law relating to the environment and shall operate their business in an environmentally responsible way.
- Suppliers shall take a proactive approach to working with Travel Places towards reducing our environmental impact.
- Supplier shall:
  - adopt such practices and utilise such systems that minimise the use of resources e.g. water efficiency, energy efficiency;
  - ensure that it and its suppliers use environmentally friendly working practices, tools and equipment, consumable and replacement parts, where possible;
  - ensure where practicable that all consumables originate from a sustainable or recycled source;
  - ensure there are facilities or arrangements in place, either directly or through its suppliers to ensure we can return used packaging for recycling, reuse or environmentally friendly disposal; and
  - ensure that any hazardous or toxic waste that is produced must be properly identified and disposed of by licensed and competent bodies via authorised and/or licensed means.
- Travel Places encourages third party certifications related to positive social and/or environmental performances.
- Suppliers shall have a written environmental / sustainability policy appropriate to the size and nature of their operation which addresses preventing, mitigating and controlling serious environmental and health impacts from their operations.
- Each supplier shall carry out annual reviews and audits of its environmental performance and the environmental performance of its suppliers and shall keep a record of all findings and any remedial action or improvements in processes or procedures that can be made to reduce any negative environmental impact.
- Suppliers must have an effective internal environmental management program, with adequately trained staff, responsible for environmental impact control and collating and communicating data
- Suppliers shall comply with all relevant law pertaining to data protection and shall not do or omit to do anything which would cause Travel Places to be in breach of such relevant law.
- Travel Places requires that a safe and healthy workplace is provided for all supplier personnel and that of the Health and Safety at Work Act 1974 and all other relevant law pertaining to health and safety is complied with at all times.

### **CONTINUAL EVALUATION**

Suppliers will be assessed on a job per job basis after Supplier Approval has been granted. Records of these assessments are not maintained unless an issue has occurred. In this case, communication with the supplier will be kept for future performance evaluation.

If a suppliers' performance is very low, or there are concerns over non-compliance a performance review will be carried out, which can lead to the supplier being removed from the Suppliers List. Alternatively, Travel Places will agree on improvements that the supplier needs to put in place and will re-assess the supplier performance after an agreed time has lapsed. Should a supplier be unwilling to work with us to make improvements, they will be removed from our approved supplier list.

