

## Modern Slavery Statement 2018

Pursuant to section 54 (1) of the Modern Slavery Act 2015, this is our amended 2018 statement outlining the actions taken by Booking.com Transport Limited (the “Company”) for the financial year ending 31 December 2018. This amended statement was approved by the Board of Directors pursuant to section 54 (6) (a) on the 11<sup>th</sup> February 2020.

### Our business

Booking.com Transport Limited is the ground transport business unit of Booking.com and is a trading company for two business brands (**Booking.com** and **Rentalcars.com**), which provides a range of car rental and ground transportation services globally.

The Company (“we, us and our”) employ over 2,168 people at 6 offices across Manchester, London and Barcelona.

We recognise that Modern Slavery in all its forms (slavery, human trafficking, forced labour, debt bondage, descent-based slavery, servitude, child slavery and forced and early marriage) is a global issue. Modern Slavery is an increasing problem due to the rise in county lines related criminal exploitation and global migration. It exists in every region of the world.

Whilst our operations place us at a low risk of exposure to Slavery, including Human Trafficking issues, we have a zero-tolerance approach to Modern Slavery within our own organisation and supply chain, and with our affiliates. At all levels, there is an intrinsic expectation to report any and all concerns through appropriate reporting routes and our management body is required to act upon the same.

### Our supply chain

We do not act as a producer, manufacturer, or retailer of any physical goods – and as a provider of car rental and ground transportation services, we have a relatively straightforward supply chain.

We provide services to our customers and affiliate partners globally from our offices in the U.K and Spain. A small proportion (no more than 30%) of our customer support operations have been outsourced to partner companies based in Poland, Bulgaria, Egypt, Japan and The Philippines. Car rental and ground transportation services are provided by suppliers located in many of the countries in which these services are purchased by our customers.

### Our policies

Our policies include our Modern Slavery Policy, our Core Values and our Code of Conduct, within which we endorse our robust adherence to human rights and our zero-tolerance approach to Modern Slavery within any part of our business or our supply chains.

We operate a reporting Helpline and place a duty upon all employees to report either potential or actual violations either to their line manager, to the Compliance Team or to the Helpline. We have a zero-tolerance stance on retaliation against whistle-blowers who report in good faith and our non-retaliation stance is set out in our Code of Conduct.

We take all allegations seriously. All reports are thoroughly investigated and if appropriate, remedial action will be taken.

We recognise our role in seeking assurance from our suppliers of their compliance with the Modern Slavery Act 2015 where applicable, or with equivalent local laws and regulations; whilst acknowledging that this remains our suppliers’ responsibility.

Provisions on ethical business practice are included in new, renewed and existing agreements with suppliers and affiliate partners.

The requirement for new suppliers and partners to sign up to our ethical business provisions sets a clear example of our expectations and our commitment to ensuring that Modern Slavery does not form part of our supply chain.

We have been and remain committed to paying our employees not less than the current Living Wage, which exceeds the National Minimum Wage. Since 2017, we have also commissioned Mercer, one of the world's leading HR Consultants, to carry out an independent audit on gender pay within our organisation. They concluded that we have no systematic pay bias.

### **Actions completed so far**

After assessing and considering the impact of the Modern Slavery Act on the business, we completed the following actions: -

Company Modern Slavery Policy – First published in 2016, the CMSP is available to all staff via the intranet and can be accessed at any time.

Contractual Clauses – Notwithstanding that Modern Slavery, including Human Trafficking, is of a low risk to the Company, supplier contracts include provisions obligating suppliers to comply with the Modern Slavery Act where applicable, or with equivalent local laws and regulations; and we hold suppliers to the same standards that apply to our own business. We adhere to a policy that we would rather lose business than achieve it through unethical or illegal means. If, after enquiry, any organisation within our supply chain is unable to demonstrate their commitment to their obligations, either they will not be taken on as a supplier or existing services will be terminated.

We have also incorporated provisions obligating our suppliers and affiliates to adhere to our sanctions screening and verification process. Should any party fail to comply with this process, we have the ability to suspend and if necessary, terminate our relationship with them.

Helpline – We continue to promote the utilisation of the Helpline reporting facility to encourage all employees to report any perceived or actual ethics and compliance breaches. All reports are thoroughly investigated, and action is taken where appropriate.

Training – We developed an online mandatory training course dealing with Modern Slavery and Human Tracking topics. We require all employees, irrelevant of their position in the Company, to complete this training and continuously review completion rates. We have an escalation process in place should any employee fail to complete the same within the set timeframe.

The Modern Slavery Register – There is no central governmental register to host Modern Slavery Statements. There is, however, a Central Registry for Modern Slavery Statements ('the Registry') operated and controlled by the Business and Human Rights Resource Centre ('BHRRC'). The Registry is *'guided and supported by a governance committee which includes: Freedom Fund, Humanity United, Freedom United, Anti-Slavery International, the Ethical Trading Initiative, CORE Coalition, UNICEF UK, Focus on Labour Exploitation, Trades Union Congress and Oxfam GB'*<sup>1</sup>. We submitted our 2017 Modern Slavery Statement to the BHRRC for review and verification.

HM Government's Review of the Modern Slavery Act – In July 2018, the Home Secretary commissioned an Independent Review of the Modern Slavery Act 2015. The Review considered the effectiveness of provisions in the Act and recommended improvements to the same. The Government also published a response to the Review and accepted, in part, some of the recommendations made. We have considered both the Review and Response Documents to assess our compliance with the statutory requirements. It is noted that the Government is undertaking a further analysis of the recommendations and we will continue to monitor its response.

Engagement with the Home Office - Our former CEO received contact from the Home Office asking us to confirm whether we fell within the scope of Section 54 of the Modern Slavery Act 2015. We responded to confirm that we considered ourselves to be within scope and shared a copy of our Modern Slavery Statement to evidence our compliance with the same. Should any further contact be received we will continue to meaningfully engage with the Home Office.

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<sup>1</sup> [www.modernslaveryregistry.org](http://www.modernslaveryregistry.org)

Due Diligence – We have implemented a new and improved screening and verification process which supports our business in detecting parties and organisations that are subject to sanctions, including those associated with modern slavery and human trafficking offences. This screening process checks our customers, suppliers and affiliate partners.

**Future actions**

The Modern Slavery Register – We plan to submit our amended 2018 Modern Slavery Statement to BHRCC for review, verification and (subject to its acceptance) addition to the Registry.

Employee Training – We will continue to provide the Modern Slavery and Human Tracking course as a mandatory requirement for all new employees.

Due Diligence – We are reviewing our ability to partner with other Group companies as part of our sanctions screening and verification process, to create alignment and a consistent approach to detecting and preventing modern slavery within our respective supply chains.

Signed for and on behalf of the Board by

**Bryan Batista**

**Chief Executive Officer**

**Booking.com Transport Limited**