

# Modern slavery statement

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## Modern Slavery Statement 2022/23

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms including slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The most recent Global Slavery Index<sup>1</sup> (2023) estimates that 50 million people were living in modern slavery on any given day in 2021.

Reed & Mackay is committed to ensuring that it conducts its business in accordance with its obligations under the Modern Slavery legislation in the territories in which it operates<sup>2</sup>. We recognise that in addition to a legal obligation (that we have by virtue of our operations in territories where Modern Slavery legislation applies), we also have an ethical responsibility to support the aims of the legislation and endeavour to ensure we minimise Modern Slavery risks throughout our global business and supply chains, irrespective of local legislation.

In that spirit, we publish this annual Modern Slavery Statement, made in compliance with legislation, in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it.

## Our Company Structure & Vision

Reed & Mackay was established in 1962 expanding into strategic travel management in 1988, with a view to specialising in travel management services for the professional services sector. Since May 2021 Reed & Mackay has operated as a stand-alone business within the Navan Group<sup>3</sup>. The trading entities listed below form the operational Reed & Mackay Group of companies –

- UK – Reed & Mackay Travel Limited
- USA – Reed & Mackay Travel Inc
- UAE – Reed & Mackay Travel Management Services FZE
- Australia – Reed & Mackay Travel Australia Pty Limited
- Singapore – Reed & Mackay Travel Singapore Pte Limited
- France – Frequent Flyer Travel Paris SAS (trading as Reed & Mackay France)
- Germany – Reed & Mackay Deutschland GmbH
- Canada – Reed & Mackay Canada Inc
- India – Reed & Mackay Travel India Private Limited
- New Zealand – Reed & Mackay Travel New Zealand Limited
- Spain - Atlanta Agendia De Viajes S.A (trading as Reed & Mackay Spain)
- Sweden – Resia AB

At Reed & Mackay, and as part of the Navan Group, we power the in-person connections that move people, ideas and businesses forward.

Our vision is to be the most valued, recommended and entrepreneurial travel and events business in the world. We recognise the role of travel in our clients' success and its critical place in their supply chain from a reputational standpoint.

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<sup>1</sup> <https://www.walkfree.org/global-slavery-index/>

<sup>2</sup> UK - Modern Slavery Act 2015 (MSA 2015); Australia - Modern Slavery Act 2018 (Cth) (Act)

<sup>3</sup> Reed & Mackay was acquired by TripActions Inc. in May 2021. TripActions Inc. rebranded as Navan Inc. in Feb 2023.

As a signatory to the UN Global Compact (UNGC)<sup>4</sup> we have pledged to incorporate the ten principles of the UNGC into our strategy, operations and decision making. Adopting a strong stance with regards to Human Rights and Modern Slavery reinforces our commitments to the following six principles in particular –

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights.

**Principle 2:** Make sure they are not complicit in human rights abuses.

**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 labour.

**Principle 5:** The effective abolition of child labour.

**Principle 6:** The elimination of discrimination in respect of employment and occupation.

By participating in the UNGC, we are committing to creating a culture of integrity across our business from strategy to operations, specifically:

- Operating responsibly, in alignment with universal sustainability principles
- Taking actions that support the society around us
- Committing to the effort from our organisation's highest level, pushing sustainability deep into our DNA
- Reporting annually on our ongoing efforts
- Engaging locally where we have a presence.

With the above in mind, we work with likeminded partners and suppliers whose values and ethos align with our own.

## Governance

We continue to make sure that our employees are aware of Modern Slavery legislation, of the definitions of slavery and human trafficking and that they know what to do should they suspect a case of slavery or human trafficking. Modern Slavery awareness is included in our employee induction and our mandatory compliance training.

Modern Slavery is incorporated in our Labour & Human Rights Policy which requires all staff to promptly report any concerns or suspicions of labour or human rights malpractice, and to avoid any activity that might lead to, or suggest, a breach of the policy. The policy is made available to all staff via the company intranet and to third parties on request. Failure to comply with the policy is investigated and may be treated as a disciplinary offence. We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

We have in place policies covering Anti-Money Laundering, Prevention of Tax Evasion and Anti-Bribery & Anti-Corruption; and, on an annual basis, conduct an Anti-Bribery and Anti-Corruption risk across six risk categories: Internal; Territory; Sector; Transaction; Business Opportunity; and Business Partnership.

Risk-based thinking and awareness is incorporated into Reed & Mackay's management system and the processes that underpin it. A Risk Management Framework is in place for addressing risks across the business and a Corporate Risk Register documents risks with different characteristics / from different perspectives using a "context based" approach. This allows for risks associated with Modern Slavery, Labour & Human Rights

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<sup>4</sup> <https://www.unglobalcompact.org/what-is-gc>

to be identified, assessed/evaluated, treated and reviewed/reported, as appropriate, alongside risks of other contexts.

In line with our ISO certifications, we have a programme of regular internal and external audits to check compliance with all our policies and procedures.

## Our Employees

There are many aspects of Reed & Mackay's culture which go to make up our unique environment. Maintaining and strengthening the culture is part of our everyday working life and underpins much of our corporate ethos. We strive to create an enjoyable and safe working environment where staff can excel. We recognise our staff as our most important asset and employee welfare is a key objective that is linked to the company's unique culture and values.

Our values underpin the behaviours that make us who we are; a business with integrity and a business that cares.



**Entrepreneurial Spirit** - At Reed & Mackay we're not afraid to be different. We don't follow. We are dynamic, creative and we stand out from the crowd. We communicate without criticism, learn from past experiences and aim to change people's lives for the better.

**Care** - We treat others as we would want to be treated ourselves, demonstrating compassion and empathy, going out of our way to promote equal opportunity and protect the well-being of colleagues.

**Passion** - We love what we do. We are energetic, take responsibility and achieve extraordinary results. We inspire customers with our entrepreneurial spirit and are passionate about our exceptional levels of service.

**Fun** - We enjoy what we do. We share stories and successes, engage with each other with banter and laughter and avoid taking ourselves too seriously. We keep smiling even when facing adversity.

We welcome, grow and celebrate the extraordinary; it is our mission to emanate our values across the globe encompassing a variety of perspectives and a commitment to our people that everyone matters. We seek to be inclusive and diverse, creating a working environment where everyone is appreciated and encouraged to thrive. We have developed objectives against four main pillars that act as the foundation of our approach in this area; **Human Rights; Talent Development; Wellbeing; and Employee Engagement**. More information on these can be found in our Sustainability & Responsible Business Report<sup>5</sup>.

Our Recruitment Policy ensures a transparent and fair process for all internal and external candidates, and our Homeworking and Agile Working Policies recognise that such working practices benefit the company and employees alike.

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<sup>5</sup> <https://www.reedmackay.com/sustainability/>



As a responsible employer Reed & Mackay offers competitive pay and benefits in all our markets, always paying at least the minimum wage rate applicable under local laws. We promote employee wellbeing through a range of benefits<sup>6</sup> including, an Employee Assistance Programme; Private Health Insurance; Group Income Protection; Short & Long-Term Disability Insurance; Pension; flexible Annual Leave allowance exceeding statutory entitlement; accommodation of flexible working requests.

Reed & Mackay is fully committed to the development of a diverse workforce which reflects the communities we work in. We provide equal opportunities for all employees and prospective employees through recruitment, training and promotions. Our Employee Handbook identifies codes of conduct related to Health & Safety, Equity, Dignity at Work and Ethical Conduct, and there are management approved policies for Health & Safety; Corporate Social Responsibility; and Equity, Diversity & Inclusion, which sets out our zero tolerance to discrimination and harassment. We will not discriminate because of age, disability, race, religion or belief, sex, sexual orientation, marriage or civil partnership status, gender reassignment, pregnancy, or maternity, ethnic or national origin, educational background, or socio-economic status. All staff must adhere to our codes of conduct and company policies.

We are committed to ensuring inclusion and accessibility for employees and job applicants with disabilities, ensuring they are able to participate equitably in comparison to employees who do not have a disability. This includes, but is not limited to, providing reasonable adjustments.

We take the wellbeing of employees seriously. In addition to our Health & Safety Policy we have launched a Menopause Policy; trained Mental Health First Aiders across the business; provided support pathways for staff and training to line Managers on how best to support their teams; and supported staff with wellbeing initiatives including “walk and talk” sessions, articles and training resources.

Reed & Mackay nominates official charities that the company supports through various fundraising activities and community volunteering events to help engage our employees. Our ‘Day for a Day’ policy allows employees to take a day of paid leave each year to volunteer with a charity or organisation which promotes positive social or environmental benefits.

## Our Supply Chain

We only work with reputable suppliers and endeavour to ensure our supply chain is free from slave labour. We will not work with a supplier before researching their business and we ensure they are appropriately licensed to carry out the service they are providing. Spend commitments are subject to internal Purchase Order approval and agreed legal contracts, and we do not pay cash for services. Our Anti-Bribery & Anti-Corruption Policy prohibits making, offering or accepting bribes, facilitation payments or kickbacks; and also prohibits making payments or giving anything of value in order to obtain or retain contracts or business, or to secure any other improper business advantage, with any entity or individual.

Prior to approval, suppliers undergo a due diligence process across a range of topics, including Modern Slavery/Child Labour, Ethical Business Practices, Equal Opportunities and Diversity, and in order to do business with Reed & Mackay all suppliers are required to comply with our Supplier Operating Principles on an on-going basis. These principles include adherence to all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions and set expectations around the adoption of standards, including those regarding: forced and compulsory labour; child labour; freedom of association & employee representation; non-discrimination & harassment; working hours, wages & leave; employment terms; health, safety & hygiene; resources, skills & competence; and community impact. Suppliers are monitored on an appropriate periodic basis through our supplier review process.

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<sup>6</sup> Precise benefits are dependent on the location of employees

Our Partner Operating Principles set the same expectations on our global partner network. In addition to this, our contractual agreements with partners require their compliance with Modern Slavery legislation, and that they take reasonable steps to ensure that their business and supply chain remains free of slavery, servitude, human trafficking, forced or compulsory labour, and/or child labour.

We visit all our partner offices, and where appropriate and practical, we visit our suppliers. This helps us become familiar with how they operate and the safeguards they have in place to reduce, remove and prevent the use of slave or forced labour in their organisations and in their supply chains.

Our Commercial and Partner Solutions department maintain close relationships with the travel industry service providers who supply air travel, ground travel, hotels and ancillary services to our clients. Understanding the business practices of these service providers helps ensure that our clients make appropriate choices about their travel.

Our standard client contract includes a mutual clause on compliance with Modern Slavery legislation and prevention of Modern Slavery in the business and supply chain.

Our Corporate Risk Management Framework specifically identifies “Supply Chain” as a category of risk and, as such, risks within this category, including any related to Modern Slavery, are regularly reviewed and mitigated. Risks previously identified in this area have resulted in the development of our Supplier and Partner Operating Principles, and enhancements to both our supplier due diligence and our supplier review process.

### Our Recent Activities & Future Plans

Since February 2022 we have published an annual Sustainability & Responsible Business Report on our website<sup>7</sup> and will continue to use this to highlight our commitment to working both sustainably and responsibly.

In 2022, we made our second annual submission to the Ecovadis sustainability rating platform, improving our rating from “Bronze” in 2021, to “Gold”. In 2023 we made our third submission and retained the Gold rating with a score that puts us in the 96<sup>th</sup> percentile of companies rated by Ecovadis.

Our Modern Slavery & Human Trafficking Policy has been renamed and updated as a Labour & Human Rights Policy to recognise breadth of our responsibilities in this area that go beyond the definition of Modern Slavery, and our Equality & Diversity Policy has been renamed as an Equity, Diversity & Inclusion Policy and updated to formally recognise that the needs of individuals may differ and to include the following specific objectives –

- Improve awareness and promote diversity across the business through a range of initiatives and training.
- Ensure at least 95% of employees across the globe complete Reed & Mackay’s mandatory Equity, Diversity & Inclusion training.
- All managers or those involved in the hiring process will complete the Interview Skills training.
- Aim for 85% of UK employees to submit diversity monitoring data for benchmarking purposes, other countries will also be encouraged to submit data in line with local legislation.
- Establish an Equity, Diversity and Inclusion Advocacy Network and Steering Group with the aim to ensure that the fair treatment and social inclusion of employees is at the heart of what Reed & Mackay does.
- Increase the balance of age distribution, particularly focussing on developing our employees aged 18-25 to ensure we have a pipeline of talent within the business.
- Ensuring all internal mobility and promotions are inclusive and free from discrimination.
- Increasing opportunities for flexible working, including encouraging managers to consider options for flexible working for the diverse range of roles we have across the company.

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<sup>7</sup> <https://www.reedmackay.com/sustainability/>

We have launched a Prevention of Sexual Harassment policy (“POSH Policy”) in India in order to meet local legal requirements<sup>8</sup>. In due course we will review the policy with a view to incorporation within our global policies as appropriate.

With the aim of improving consistency across our global business we have updated our Recruitment Policy and we are rolling out a new employee background check process.

Reed & Mackay has always maintained a robust whistleblowing procedure. To further demonstrate our commitment to creating a culture of transparency, accountability and ethical behaviour, we introduced a formal Whistleblowing Policy in 2022, providing guidance on the confidential process for reporting concerns without retaliation, retribution, or criticism, and including details of a new anonymous whistleblowing hotline service.

Our employee inductions and mandatory compliance training continue to undergo review and update and we have recently launched mandatory training in Equity, Diversity & Inclusion and Health & Safety in the Workplace for all employees, and Interview training for all hiring managers.

Reed & Mackay has created an annual "Global Diversity, Equity & Inclusion Calendar" to champion different elements of diversity, equity, and inclusivity in the workplace in four “seasons” - “Wellness”, “Celebrating You”, “Heritage” and “All Abilities”.

We have enhanced our collection, tracking and reporting of statistics and KPIs across labour, human rights, ethics, diversity, equity and inclusion and will continue to ensure that reporting meets legal obligations and that the KPIs are used to make improvements across the business.

As a result of targeted leadership development training, we saw the percentage of women in top executive positions increase by 7% from 2020 to 2021; they remained at this level in 2022. Our latest UK Gender Pay Gap 2021-22 Report shows women earn 82p for every £1 men earn, comparing median hourly pay in the UK business. We're dedicated to equal opportunities and aim to minimise this gap over time. Our current gender pay gap can be attributed, in part, to a higher proportion of males in Head of Department and Executive Team positions.

We continue to review of our Partner due diligence develop training material, including Modern Slavery training, for our partner network.

Our Modern Slavery risk assessment process will be developed in due course to reflect recent changes in the business, the travel industry and global Modern Slavery risk profile.

More details on these and any other relevant activities will be shared in future Modern Slavery statements as appropriate.

Reed & Mackay maintain a commitment to conducting its business in an ethical way and preventing Modern Slavery and will continue to operate a zero-tolerance policy in this regard.

This statement is reviewed and updated annually. Reed & Mackay’s financial year runs from 1st February – 31st January and, as required, the organisation publishes its Modern Slavery statement within 6 months of the financial year end.

In accordance with Modern Slavery legislation this statement has detailed the actions taken during the financial year ending 2023.

Approved by Fred Stratford, Group CEO, Reed & Mackay, 21<sup>st</sup> July 2023.

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<sup>8</sup> Sexual harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act-2013 (POSH Act-2013).