

# Governance, Risk and Compliance

### Doing the right thing is essential to our brand promise.

- Our strong governance framework protects our reputation, employees, and clients.
- Compliance truly is our competitive advantage as we are the most highly regulated travel company in the world.
- Our risk mitigation strategies address privacy, cyber-security, business continuity, crisis management – and combat fraud, terrorist financing, money laundering, bribery and corruption.





#### OUR CODE OF CONDUCT

It provides guiding principles to show our colleagues how to conduct business, examples to assist them in resolving potentially troublesome issues and contact information for seeking advice.

# RESPONSIBLE PROCUREMENT

Our Supplier Responsible Business Shared Values provide an overview of the ethical standards that are important to GBT. All our suppliers and their employees must abide by these Shared Values in all business dealings for and on behalf of our Company.



## OUR RISK AND COMPLIANCE PROGRAM

#### A true 360° program

How compliance and risk management is built into the DNA of GBT

#### PREVENT

- Policies
- Procedures
- CommunicationTraining



#### RESPOND

- Investigations
- Disciplinary Actions
- Remediation
- Issue Management

### Risk Assessment

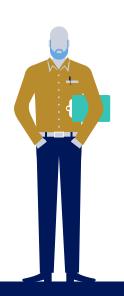
- Testing
- Monitoring
- Reporting/ Whistleblower

#### **Risk and Compliance Policies**

- Sanctions and Anti-Money Laundering
- Anti-Bribery and Anti-Corruption
- Fraud Prevention
- Antitrust
- Incident Management and Business Continuity
- Third-Party Oversight
- Responsible Marketing
- Product Development
- Data Privacy and Information Security

#### Risk & Compliance Training

- Code of Conduct
- Sanctions and Anti-Money Laundering
- Anti-Bribery and Anti-Corruption
- Privacy Awareness
- Information Security
- Antitrust
- Unfair, Deceptive or Abusive Acts or Practices (UDAAP)
- Telephone Consumer Protection Act (TCPA)



Click here to view the complete Environmental, Social, and Governance 2019 Report.



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