

# Supplier Code of Conduct



**DIRECT**<sup>®</sup>  
TRAVEL



**Creative Group**<sup>®</sup>  
a Direct Travel company

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## About this Code

The Supplier Code of Conduct (“the Code”) sets out the minimum standards and expectations for all suppliers and partners that provide goods or services to Direct Travel, Inc. and Creative Group, a Direct Travel company (collectively referred to as “the Company”). It is intended to ensure that all suppliers operate in a manner consistent with the Company’s values and commitment to ethical business practices, respect for human rights, and environmental responsibility.

The Code applies to all suppliers, regardless of their size or location, and is grounded in internationally recognized standards, including the United Nations Global Compact, the UN Sustainable Development Goals, the International Labour Organization (ILO) Conventions, International Bill of Human Rights, and the OECD Guidelines for Multinational Enterprises.

Suppliers are expected to comply with this Code, all applicable laws and regulations, and the standards outlined in the following sections covering areas such as human rights, labor standards, environmental stewardship, data protection, and supplier inclusion. Suppliers are also encouraged to promote these principles within their own organizations and supply chains.

The Company may amend or update this Code from time to time. The most current version will be made available on the Company’s website or upon request.

## Introduction

Direct Travel, Inc. is one of the world’s largest travel management companies, providing services across Corporate Travel, Leisure Travel, and Meetings & Events. We combine advanced technology, experienced travel professionals, and strong industry partnerships to help clients manage travel programs efficiently, safely, and responsibly. Serving more than 7,500 clients in 100 countries, Direct Travel supports organizations and travelers through end-to-end travel coordination, cost management, and sustainability initiatives. Creative Group, a Direct Travel company, provides event and incentive design and management as part of Direct Travel’s

Meetings & Events offering, supporting clients in industries such as financial services, life sciences, manufacturing, and technology.

The nature of the Company's business requires multiple relationships — both direct and indirect — with suppliers. The Company expects our suppliers to engage with and uphold the principles outlined in this Supplier Code of Conduct.

## Ethical Conduct and Business Ethics

Suppliers are expected to conduct business responsibly and with integrity, in line with applicable laws and recognized standards of ethical conduct. Specifically:

- Suppliers shall uphold the highest standards of integrity in all interactions. Bribery, extortion, embezzlement, and facilitation payments are strictly prohibited.
- Suppliers shall comply with all applicable competition and anti-trust laws.
- Suppliers shall comply with all applicable trade sanctions and export control regulations.
- Suppliers shall not engage in any transaction that involves money laundering or terrorist financing.
- Suppliers shall avoid any situation that creates, or could be perceived to create, a conflict of interest with the Company's employees.
- Suppliers shall represent the Company and any of their subsidiary companies as an extension of their teams.

In cases where there is a conflict between applicable laws, contractual obligations, and this Code, suppliers are expected to apply the most stringent standard.

## Data Privacy and Protection

Suppliers are expected to comply with the Company's privacy and information security policies when handling data on behalf of the Company, and to protect personal and confidential information against unauthorized use or disclosure. Including, but not limited to, the following:

- Suppliers shall comply with all applicable privacy and data protection laws and regulations that govern the collection, use, disclosure, storage and destruction of personally identifiable information, including but not limited to, the California Consumer Privacy Act (CCPA), the Personal Information Protection and Electronic Documents Act (PIPEDA), the General Data Protection Regulation (GDPR) and other relevant privacy laws.
- Suppliers shall maintain an appropriately robust program designed to ensure compliance with regard to the product or service provided to or on behalf of the Company regardless of whether some or all of the provision is performed by the Supplier or a subcontractor (Company Fourth Party), such as process for, among other things, implementing industry best practice standards, implementing technical and organizational measures to ensure an appropriate level of security, identifying and communicating applicable legal and regulatory requirements, personnel training, ongoing monitoring for compliance, and promptly reporting and remediating any identified deficiencies.
- Supplier shall ensure appropriate and responsible development, design, implementation, and use of technologies, platforms, systems, and tools that support the relationship with the Company (including, but not limited to, new and emerging or emerged technologies, such as artificial intelligence, machine learning, agentic AI / intelligent automation) so as to align with and conform to ethical standards (including, but not limited to, fairness, transparency, collaboration, trust, accountability, and morality) as well as all legal, regulatory, and industry requirements and standards of good practice including consumer protection/privacy laws and regulations.
- Suppliers may be required to undergo a vendor security assessment in order to do business with the Company.

The Company's Data Privacy and Protection policies are available upon request.

## Human Rights

Suppliers are expected to respect human rights and provide safe, fair, and dignified working conditions. The Company expects suppliers to respect internationally recognized human rights, including those set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. This includes:

- Suppliers shall comply with all applicable anti-slavery and human trafficking laws, statutes, and regulations and ensure that no forced, bonded, indentured, or prison labor is used in any part of their operations or supply chains.
- Suppliers shall provide a workplace free of harassment or inhumane treatment, including sexual harassment, abuse, corporal punishment, mental or physical coercion or verbal abuse.
- Suppliers should provide compensation paid to workers that comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits, and shall ensure wages meet or exceed the highest of applicable legal minimums, collective agreements, industry standards, or an amount sufficient to meet basic living requirements.
- Suppliers shall not engage in discrimination based on race, national origin, color, language, religion, political convictions, gender, gender identity, union membership, sexual orientation, marital status, age, disability, pregnancy status, or on any other basis prohibited by applicable law.
- Suppliers shall uphold a zero-tolerance position regarding slavery, human trafficking, and the sexual exploitation of children.

## Labor Standards

Suppliers are expected to uphold fair labor practices in line with global standards and local laws, including:

- Suppliers shall not employ children under the minimum age as determined in the Conventions of the ILO or by local law, whichever is higher.
- Suppliers shall not impose work weeks to exceed the maximum set by local law and are encouraged to align with internationally recognized labor standards, such as those established by the ILO and the Universal Declaration of Human Rights.
- Suppliers will respect the right of workers to associate freely, form and join works councils of their own choosing or collectively bargain within the framework established by local laws.
- Suppliers shall provide a safe, healthy, and sanitary workplace; comply with all relevant occupational health and safety laws; and ensure no worker under the age of 18 performs hazardous work.

## Supplier Inclusion

Suppliers are encouraged to support inclusion within their supply chains. This includes:

- Promoting opportunities for fair competition for underrepresented groups, including but not limited to women-owned, minority-owned, veteran-owned, Indigenous-owned, LGBTQ+-owned, and disability-owned enterprises.
- Supporting local sourcing where feasible to advance community development.
- Promoting fair treatment, equal opportunity, and inclusive growth across supplier relationships.

## Environmental Stewardship

Suppliers shall comply with applicable environmental laws. Additionally, where applicable, suppliers are encouraged to:

- Maintain an environmental management policy or system to identify and manage environmental risks, set improvement goals, and train employees on environmental responsibilities.
- Measure their environmental impact, including energy usage, water consumption, waste generated, and Scope 1, 2, and where relevant, Scope 3 greenhouse gas (GHG) emissions.
- Establish science-based targets to reduce GHG emissions in line with international best practice and the Paris Agreement.
- Use water responsibly, reducing consumption where possible, and preventing pollution of local water sources.
- Adopt responsible waste management practices, including reducing waste generation, increasing recycling and reuse, and exploring circular economy solutions to minimize lifecycle impacts.
- Source goods and services responsibly, avoiding practices that contribute to deforestation or ecosystem degradation.
- Promote environmental awareness among their employees and business partners.
- Track and, upon request, share information on environmental performance, including progress toward emissions reduction and resource efficiency goals.

## Training & Awareness

Suppliers are encouraged to promote awareness of this Code within their organizations and ensure that employees involved in work for the Company are familiar with its principles. Where appropriate, suppliers should provide training or guidance to help employees understand and apply these expectations in their daily activities.

## Reporting

Suppliers are expected to be transparent and work with the Company if issues arise. This includes:

- Promptly notifying the Company of any actual or suspected violations of this Code.
- Engaging constructively with the Company to address concerns, including providing additional information or participating in a review process.
- Working with the Company on improvement measures where needed, with the goal of continuous improvement.

The Company reserves the right to request information, documentation, or certifications, or to conduct audits to verify supplier compliance with this Code. Suppliers shall cooperate fully with such requests.

If a Supplier is found to be in breach of this Code, the Company may require a corrective action plan to achieve compliance within a reasonable timeframe. Failure to implement corrective actions may result in suspension or termination of the business relationship.

Upon request, suppliers shall provide a copy of their own Supplier Code of Conduct or equivalent policy outlining their approach to responsible sourcing. Suppliers are encouraged to communicate this Code and its principles to their own subcontractors, agents, and business partners. Any questions, concerns, or reports related to this Code – including potential or suspected violations – may be submitted confidentially to [DTsupplierrelations@dt.com](mailto:DTsupplierrelations@dt.com). The Company prohibits retaliation against any individual who raises a concern in good faith.



## Acknowledgement

We acknowledge and agree to uphold the principles outlined in the Company's Supplier Code of Conduct.

Company \_\_\_\_\_

Name \_\_\_\_\_

Title/Position \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

