

Anti-slavery and human trafficking statement 2017 - 2018

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Collinson Group ("Collinson") during the year ending 31 April 2018 to combat modern slavery and human trafficking in its business and supply chains.

Introduction

The Modern Slavery Act 2015 requires commercial organisations supplying goods or services with a turnover above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

Collinson fully supports the objectives of the UK Modern Slavery Act and will not tolerate any form of slavery. This statement sets out our approach to managing modern slavery risks in our operations and supply chains. It relates to the actions and activities undertaken across our organisation irrespective of turnover, to ensure slavery and human trafficking does not take place internally or anywhere within its supply chain.

As an ethically driven company, Collinson respects the human rights of all those who work for us directly and on our behalf. We will not accept any violation of these rights particularly in relation to human trafficking and slavery in any form and actively work to ensure suppliers and partners work in accordance to the same belief.

Our business

Collinson is a global loyalty and benefits company operating in over 20 countries throughout the Americas, Asia Pacific, Europe, the Middle East, India and Africa. We use our expertise and products to craft customer experiences which enable some of the world's best known brands to acquire, engage and retain customers. We aim to be a business that our clients want to work with and our people are proud to work for and be a place of innovation and creativity, driving job satisfaction and a sense of belonging for our people. We also aim to be a commercially successful and trusted organisation with a social conscience, providing a share of our profits, assets and people to enhance the communities and environment in which we operate.

But we don't work alone - we rely on a global network of suppliers and partners to help us deliver our innovative and customer focussed solutions; and we don't just work with anyone - we are a value driven organisation and our values drive our decision making and reflect the way we work, challenging us to push boundaries and make a positive impact globally.

Collinson expects that its employees, partners and suppliers work with integrity and maintain robust standards of governance, seeking to avoid any decisions that may have a negative societal impact. As a minimum we expect our partners and suppliers to:

- comply with all applicable laws and regulations;
- provide recurrent anti-bribery training to employees and ensure that no employee intimates, offers, provides or accepts any form of bribe (or any other inappropriate type of inducement) to or from any other individual, business or foreign public official;
- not associate with any group that supports acts of violence or terrorism;
- develop corporate initiatives that seek to improve the communities in which they operate; and
- raise any concerns about inappropriate conduct by Collinson, its employees, suppliers or partners in confidence to Collinson's Head of Internal Audit or the Global People & Culture Director. The Collinson Whistle Blowing Policy is in place to safeguard here and offer an alternative route to raising concerns.

We are guided by established standards such as the International Labour Organisation Core Conventions, the United Nations Convention on Human Rights and the UK Modern Slavery Act 2015. We treat our employees with respect and dignity and expect the same of our partners and suppliers. As a minimum we expect our partners and suppliers to:

- provide a safe and hygienic working environment (and, where relevant, living quarters) for all workers and proactively work to minimise health and safety risks through process controls and training and ensure any incidents are logged and learnt from in a cycle of continuous improvement;
- ensure that all workers undertake work voluntarily with no incidences of forced, compulsory, or bonded labour and no human trafficking;
- provide all employees with a written employment contract that clearly explains their role, delivery expectations, remuneration and rights and ensure that all reasonable steps are taken to confirm that each employee has understood the contract prior to signature;
- comply with applicable laws in respect of child employment and legal working age;
- ensure workers are appropriately trained to carry out their roles and are fairly remunerated in money and not in kind in accordance with any minimum wage requirements at the very least;
- not force workers to work excessive hours, ensure allowances are made for appropriate breaks and any overtime is in accordance with applicable laws;
- not restrict the right for employees to exercise freedom of association and collective bargaining if such is in accordance with applicable laws or prevent the development of alternative means of employee representation;
- not require workers to lodge monies or identity papers in order to work and be free to leave employment (after reasonable notice is given if required);
- promote a diverse workplace, free from any form of discrimination or victimisation grounded in (but not limited to) age, disability, ethnicity, gender, gender identity, nationality, marital status, parental status, political orientation, race, religion, sexual orientation, social origin, or union affiliation;
- maintain and promote formal and documented processes for employee grievances, allowing grievances to be raised, heard, assessed and resolved fairly and with no fear of personal repercussions;
- maintain and promote formal and documented whistleblowing policies that encourage employees to raise any concerns of unlawful or inappropriate business practices with no fear of personal repercussions;
- maintain and communicate formal and documented disciplinary processes; and
- not force employees to undergo any medical testing of any kind unless except where required or allowed for under applicable laws.

Risk exposure and management

Our risk management framework enables us to identify, assess, manage and control key risks to the business including those related to slavery and human trafficking across the organisation.

Our commitment to preventing the crystallisation of these risks can be evidenced in our recruitment and appraisal processes as well as our company policies which are reviewed on an ongoing basis. We aim to employ staff with high ethical and professional standards and expect the same high standards of ethical conduct from those parties with whom we engage with.

Actions taken and looking ahead

We have hired a new Procurement Director and a new head of Corporate Social Responsibility (“CSR”). Our Procurement Director has conducted a review of our third party sourcing processes and worked with our new head of CSR to introduce our “Expectations for Ethical Supply” (“Expectations”) which detail the standards we set for both ourselves and for all of our partners and suppliers across a broad range of criteria.

In the next financial year, we will be requesting our existing suppliers to sign up to this policy through a phased roll out. When considering the award of future contracts (with both new and existing suppliers), we will be building our Expectations into our sourcing processes and meeting our Expectations will become one of the key elements of our decision making criteria.

We expect full transparency from our partners and a commitment to gaining full compliance with our Expectations (or as close to them as legally possible) if any areas of noncompliance are identified.

Our Expectations are owned by our Procurement Director, with support from Collinson’s Board of Directors. The Expectations shall be updated from time to time to reflect changes in legislation, regulations, and good practice.

In the next financial year we will also be reviewing our management approaches to monitoring compliance with our Expectations and continuing to enhance our procedures to help us ensure that, so far as possible, our own operations are free from Modern Slavery.

Approval

This statement is made with respect to the financial year ended 31 April 2018 in accordance with s54(1) of the Modern Slavery Act 2015. This statement applies to Collinson International Limited, Priority Pass Limited, Lounge Key Limited and Astrenska Insurance Limited (each a “Collinson Company”) and has been approved by the Board of Directors of Collinson Group Limited and each other Collinson Company. The statement will be reviewed and updated (if necessary) annually to reflect Collinson’s ongoing commitment to ensure its business and supply chain are free from slavery and human trafficking. This statement is signed by a director of Collinson Group Limited, the holding company of the group.

Mark Hampton
Collinson Group Limited
December 2018