



# **Anti-slavery and Human Trafficking Statement**

**2021 – 2022**

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This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Collinson Group Limited (“Collinson”) during the year ending 30<sup>th</sup> April 2022 to combat modern slavery and human trafficking in our business and our supply chain.

This statement is produced in a period in which Russia commenced military action in Ukraine and the COVID-19 pandemic continued across the world, with both impacting Collinson and the wider travel industry. Our focus on travel recovery, and our continued low risk assessment for modern slavery has limited the focus provided in this space during the reported period.

This is our 5<sup>th</sup> statement made under the Act. Our previous statements can be found alongside this statement.

## 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 during its financial year to prevent slavery or human trafficking.

Collinson fully supports the UK Modern Slavery Act and will not tolerate any form of slavery. 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 in any form, particularly in relation to human trafficking and slavery, and we actively work to ensure suppliers and partners operate in accordance with the same belief and rigour.

This statement sets out our approach to managing modern slavery risks throughout our internal operations and our supply chains. It relates to the actions and activities undertaken across Collinson, irrespective of the turnover of each entity.

## OUR ORGANISATION

# Our structure

Collinson is a global, privately-owned company dedicated to connecting its clients and their customers to a world of travel possibility. Founded by our Chairman, Colin Evans, in 1991 and currently led by his sons, and joint CEOs, Christopher and David Evans.

Our employees work with the world's leading payment networks, over 1,400 banks, 90 airlines and 20 hotel groups worldwide to deliver market-leading airport experiences, loyalty and customer engagement and insurance solutions.

We operate through five primary business segments:

- 1. Airport Dimensions Holdings Ltd -**  
Our proprietary airport experiences, including traditional lounges, gaming lounges, and sleep pods
- 2. Collinson (Insurance) Holdings Ltd -**  
Our insurance and travel assistance programs
- 3. Collinson International Ltd -**  
Our travel related membership programs and loyalty consultancy
- 4. Collinson Investments Ltd -**  
Our minority investment portfolio in travel related service providers
- 5. Valuedynamx Holdings Ltd -**  
Our loyalty driven offers, content and rewards programmes

With a matrix structure, we deliver through our regional teams (EMEA, APAC and the Americas), and centralised enabling functions, operating in over 15 global locations.

More than just ourselves, we rely on a network of over 2500 suppliers and partners, and our Priority Pass network spans over 1,300 lounges and travel experiences in over 650 airports in 148 countries.

## OUR ORGANISATION

# Our People and Values

Our mission is to help the world travel with ease and confidence, elevating every journey into something special – and creating good beyond profit wherever we can. Our value centric approach sees us drive our mission with a focus on Doing the Right Thing, Acting Smarter, Being Insight Led and acting as One Team.

As we truly believe that the most meaningful change will occur when a colleague comes to work every day with the sole focus of driving progress in these areas, in FY22, we invested in four key new, dedicated roles:

- 1. VP Procurement & ESG**  
(Environmental, Sustainability, Governance)
- 2. Head of Diversity, Inclusion and Wellbeing**
- 3. Sustainability Manager**
- 4. Social Impact Manager**

We also believe we need to harness the passion of our people to drive change, and we are proud to have a range of internal networks including Women in Collinson, Collinson Under 30s, Link (Global LGBT+ Community), Embracing Neurodiversity and Kaleidoscope (Racial & Cultural Diversity). Our networks play an integral and active part in ensuring we stay educated on modern slavery challenges within different communities.

Ensuring we drive impact throughout our wider communities, we support our staff in undertaking a range of external committee and board roles. Of most relevance, our VP of Procurement and ESG is a Co-Chair for the Travel and Hospitality Chapter of the Sustainable Procurement Pledge, which is a non-profit and pro-bono community of those committed to embedding sustainability, including anti-slavery, into their procurement practices - and sharing knowledge and tools of how to do so.



## OUR ORGANISATION

# Our Charitable Partnerships

We believe inequality and a lack of education are key factors that can drive modern slavery and human trafficking, and so at Collinson we are passionate about empowering young people from disadvantaged communities, and we seek to equip them and their families with the education and skill-set to find sustainable employment and thrive.



### *Adolescent Skills for Successful Transition (ASST)*

The ASST programme is designed to support young people into decent employment in the Guangdong Province of China. Many of China's young migrants move from rural communities to urban areas, they often face financial and qualification barriers to access skills training and employment services, suffer from weak support networks and are unaware of their rights.

#### **FY22 outcomes:**

- 231 young people gained the skills and knowledge they need to gain decent employment
- 30 young people received additional career counselling
- 71% of these young people showed improvement in employability skills, and 78% found the programme useful to clarify and achieve their career plans
- It's estimated 50-60% of the youth who participated in the ASST Programme are expected to be employed and 40% are expected to pursue further education

### *Responding in times of emergency*

Save the Children's Emergency Fund ensures children can be safe, healthy and continue learning in times of crisis. Aside from an annual company contribution to this flexible fund, our people fundraised throughout the year, raising vital funds for Ukraine, India COVID-19 crisis, Global Hunger Crisis, Haiti, Afghanistan and other emergencies caused by climate change and conflict.

#### **FY22 outcomes:**

- Collinson was proud to contribute over £43,400
- 68 countries benefited, with 113 allocations from the fund
- Collinson's people raised £19,200 globally
- 2,500 COVID-19 rapid antigen test kits were also donated to support low-income families in Hong Kong



### *Social mobility through sports apprenticeships*

Collinson is proud to be a founding partner of UK-based employment and education charity, Coach Core. Coach Core targets young adults not in employment, education or training (NEET) and empowers them to not only change their own future pathways, but to become a positive influence in their communities. 87% of apprentices move on to full-time education or employment.

#### **FY22 outcomes:**

- 14 apprentices completed their sports coaching qualifications
- These coaches went on to deliver 1560 coaching sessions which engaged 175,000 people in their local communities
- 32 apprentices took part in additional Collinson-sponsored volunteering programmes



UNIVERSITY OF  
BIRMINGHAM

Collinson are supporting one student to access University and support their studies through the A2B programme over the next three years. Through the programme, we also supported an entrepreneurial skills boot camp with Accenture in March 2021.

As we move into FY23 we have committed to increase funding to support an additional two students through the programme.

## OUR SUPPLY CHAIN

We don't just work with anyone. We expect that our partners and suppliers work with integrity and maintain robust standards of governance, seeking to avoid any decisions that may have a negative societal impact. All new suppliers and partners are required to sign and adhere to our Expectations for Ethical Supply.

### As key extracts from our Expectations relevant to modern slavery, we require all suppliers and partners to:

1. 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;
2. Ensure that all workers undertake work voluntarily with no incidences of forced, compulsory, or bonded labour and no human trafficking;
3. 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;
4. Comply with applicable laws in respect of child employment and legal working age;
5. 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;
6. 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;
7. 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);
8. 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;
9. 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;
10. 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;
11. Maintain and communicate formal and documented disciplinary processes; and
12. Not force employees to undergo any medical testing of any kind unless except where required or allowed for under applicable laws.

## OUR POLICIES

Our policies clearly set out our company standards. Alongside our Expectations for Ethical Supply, the Collinson Code, our company wide internal code of conduct, forms the overarching reference point for our behavioural expectations. We operate a confidential Whistleblowing Policy and system to allow anyone to call out behaviour that does not align with the Collinson Code, and our shared values.

## DUE DILIGENCE

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 centralised risk team oversees an enterprise risk management framework and reports directly to the Risk Committee.

Through our recruitment, training and appraisal processes we aim to employ staff with high ethical and professional standards. All new employees undergo a vigorous verification process. We ensure that they have the right to work through document checks, proof of ID and investigation into duplicate bank accounts.

We also employ structured due diligence processes when onboarding new suppliers to explore areas of relevant risk.

## KEY PERFORMANCE INDICATORS

To date, Collinson have had 0 reported incidences of Modern Slavery or Human Trafficking.

In our next financial year, we will be looking to build on our progress by:

- Re-conducting an internal risk assessment of our supply chain against threats of Modern Slavery and Human Trafficking.
- Updating and refreshing our Expectations for Ethical Supply and asking all suppliers to agree and adhere to the revised terms.

This statement is made with respect to the financial year ended 30<sup>th</sup> April 2022 in accordance with s54(1) of the Modern Slavery Act 2015. This statement applies to The Collinson Group Limited, Collinson International Limited, Lounge Key Ltd, Priority Pass Inc, Priority Pass Ltd, Astrenska Insurance Ltd, Collinson Insurance Solutions Europe Ltd and Collinson Assistance Services Ltd (each a “Collinson Company”) and has been approved by the Board of Directors of The Collinson Group Limited on behalf of 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 The Collinson Group Limited, the holding company of the group.



*Christopher Evans*

**Christopher Evans**

Collinson Group Limited

October 2022