



Anti-slavery & Human Trafficking Statement 2020 -2021

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 31 April 2020 to combat modern slavery and human trafficking in its business and its supply chain.

This statement is produced in a period in which the COVID-19 pandemic continues to affect Collinson and the wider travel industry. In addition to our normal, continued activity to prevent modern slavery and human trafficking, we have also responded to the additional effects of COVID-19 and, where relevant, have included these actions in this report.

This is our 4th 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.

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 Structure, Business and Supply Chains

Collinson is a global loyalty and benefits company. 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 directly operate in over 20 global locations, and we have clients, suppliers and partners across the entire planet. We operate under a matrix structure, with our core divisions being Airport Dimensions, Assistance, Insurance, Loyalty, Travel Experiences and Valuedynamx, all managed across our regional teams (EMEA, APAC & the Americas). We are the owners of well-known brands such as Priority Pass and Columbus Direct.

Collinson is a private, family-owned business. Our founder, Colin Evans remains our Chairman after 30 years and his sons' Christopher Evans and David Evans operate as the joint CEOs. Building on our family ethos, we aim to be a business that our clients want to work with, and our people are proud to work for. A place of innovation and creativity, driving job satisfaction and a sense of belonging. 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 environments in which we operate.

At Collinson 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 both an integral and active part in ensuring we focus on celebrating, educating and enhancing diversity and inclusion across the organisation.

In April 2021 Collinson was awarded The Elgantyne Jebb Award for Extraordinary Team Contribution at Save the Children's Partnership Awards. We not only raised £10,000 for Save's Emergency Fund but we also mentored 200 young migrants in China, supported local children's villages in Cape Town, raised funds and awareness for children's mental health in Hong Kong, helped to bridge the digital divide in London and supported the Disaster Emergency Committee's Coronavirus Appeal. We continue to work with our charity partners to not only make a change but also to influence others to.

Collinson is part of the Stonewall Diversity Champions Programme, which not only gives support to organisations on meeting their statutory requirements under the Equality Act 2010, but the tools and resources to improve our practices beyond the legal minimum, and to develop a culture where all our LGBTQ+ colleagues can thrive.

We also support our staff's endeavours beyond their roles at Collinson and our employees sit on a range of external committees and boards. Our Director of Employee Engagement and CSR has a non-executive role on the board for the Youth Group; this advisory role helps to guarantee the success and viability of their initiatives and programmes. Our Director of Procurement is an Ambassador for the Sustainable Procurement Pledge, which is a pro-bono community of those committed to embedding sustainability in their procurement practices - and sharing knowledge and tools of how to do so.

We know that Collinson is much more than ourselves - we rely on a global network of over 2000 suppliers and partners, and our Priority Pass network spans over 1,300 lounges and airport experiences. These extended networks help us deliver our innovative and customer focussed solutions.

And 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. As a minimum we expect them 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 a dedicated "Speak Up" line, or to Collinson's Head of Internal Audit or Chief People Officer. The Collinson Whistle Blowing Policy is in place to safeguard 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.

Leading through the Covid-19 pandemic

Operating largely in the travel and hospitality industry, Collinson has undoubtedly been heavily impacted by the Covid-19 pandemic. Whilst this has created unprecedented challenges for our business, we have continued to operate to the core of our values, and we have taken numerous steps to protect as many jobs as possible. We have accessed the various government support schemes available in our countries of operation, our senior leaders have taken a temporary voluntary pay reduction, and we have taken steps to reduce non-employee driven costs where possible.

To ensure the safety and wellbeing of our staff, we have implemented flexible policies and provided the infrastructure for all teams to work from home as required. We have also worked within legislative guidelines to keep our offices open for those employees for whom home working is not an effective option. We have run monthly wellbeing pulse surveys and used the feedback to implement initiatives that will support our employees' physical and mental wellbeing through these challenging times.

Conscious of the impact the pandemic has had on domestic violence, we have launched our own online "Safe Space", providing a portal of information and resources to support those in need, and we have formed a partnership with the Employers Initiative on Domestic Abuse.

Due Diligence Management and Risk exposure

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 a risk log 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.

Our policies clearly set out our company standards, with the Collinson Code, our company wide code of conduct, being 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.

We expect the same high standards of ethical conduct from third parties with whom we engage. We use our due diligence processes when onboarding new suppliers to explore areas of relevant risk and all new Suppliers are asked to sign up to and adhere to our “Expectations for Ethical Supply”.

Actions taken and Looking ahead

To summarise, during the last financial year, we have:

- Supported our employees through the Covid-19 pandemic with Pulse surveys and various initiatives to support physical and mental wellbeing.
- Rolled out the “Collinson Code”, our primary Code of Conduct, globally, which is applicable to all of our group companies.
- Applied a modern slavery lens to our policies and helped drive change through the Employer’s Initiative for Domestic Abuse (EIDA), Wellbeing programmes, Flexible Working and Diversity and Inclusion initiatives.
- Won awards for our work and partnership with several charities, including Save The Children.

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

- Recruiting two new dedicated roles: a Head of Diversity, Inclusion and Wellbeing and a Sustainability Manager. Whilst we are proud of the progress we have made to date 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.
- Supporting our Procurement Director in developing a new Chapter of the Sustainable Procurement Pledge, focusing on driving sustainable procurement practices in the Travel and Hospitality industry.
- Further developing our ‘SafeSpaces’ initiative, working with EIDA, and identifying further opportunities to help domestic abuse victims beyond our organisation.
- Developing more formalised training relating to modern slavery for all of our employees.
- Working to improve the lives of at-risk and disadvantaged young people around the world through a series of local and global partnerships.

Leading our Modern Slavery approach

Our core policies and processes are endorsed by our Board of Directors and have clear ownership shared by our Director of Governance, Risk and Compliance, our Director of Procurement and our Director of Corporate Responsibility.

Approval

This statement is made with respect to the financial year ended 31 April 2021 in accordance with s54(1) of the Modern Slavery Act 2015. This statement applies to The Collinson Group Limited, 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 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.

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Mark Hampton

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Mark Hampton
Collinson Group Limited
September 2021