

# Slavery and Human Trafficking Statement

## Introduction

This statement sets out the actions Affinion International Limited (“Affinion”) has taken to mitigate potential modern slavery and human trafficking risks taking place in the business and its supply chains. This statement relates to actions and activities during the financial year ending 31<sup>st</sup> December 2018.

## Structure of the organisation

Affinion is a global firm in the customer engagement and loyalty solutions sector. It is a member of the Affinion Group and has business operations across Europe. To find out more about the nature of our business, please [click here](#). Affinion’s supply chain in relation to its services predominantly consists of IT development and software providers. Given the nature of Affinion’s business, the Board and Management consider the risk of modern slavery in the business or within its chain to be low.

## Our Policy on Slavery and Human Trafficking

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in our business dealings and relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place in any part of our business.

## Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- we thoroughly check and regularly review recruitment agencies by conducting background and visa checks;
- we ensure all staff have a formally written and signed contract of employment, are legally able to work in the UK, and names and addresses are checked;
- we make sure our third party suppliers read and have understood this statement and are taking steps to ensure human trafficking and slavery is not taking place in any of their supply chains or their business;
- we ensure all staff are made aware of slavery and human trafficking through our on-boarding documentation and key UK policies;
- we include anti-slavery and human trafficking obligations in our contracts with suppliers;
- all new suppliers will need to address their modern slavery obligation either via the contract approval process or during procurement and on-boarding;
- we have updated our Contract Approval Form to include due diligence checks in relation to the modern slavery statements and policies of our clients and suppliers;
- we have updated our Anti-Slavery and Human Trafficking Policy to reflect our continued actions to monitor the risk of modern slavery and human trafficking;
- we continue to monitor any supply chains deriving down from Affinion Group which could be subject to Affinion’s anti-slavery and human trafficking policy.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains

**Further actions**

Following our review of our actions this financial year to ensure slavery and human trafficking is not taking place in our business or supply chains; we intend to take the following further steps to tackle modern slavery:

- make available the updated version of the Anti-Slavery and Human Trafficking Policy to all UK employees via the Affinion intranet and within on-boarding documentation;
- all contract renewals for clients and suppliers will address modern slavery and human trafficking obligations;
- continue to monitor and improve upon our due diligence processes.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Affinion's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2018.



Michele Conforti  
Affinion International Ltd.

Date: 26 June 2019