

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction**

At Titan, we are committed to carrying on our business operations responsibly and to acting ethically and with integrity in all business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking do not take place in our own business or in any of our supply chains.

### **About Titan**

Titan is a trading name of ST&H Limited. Established in 1978, Titan is the UK's number one provider of escorted holidays worldwide, providing a superb choice of more than 350 tours and cruises to almost 100 countries and every continent. With an unswerving commitment to quality and value for money, Titan continues to receive accolades from both consumers and the industry. Titan was the pioneer of home transfers, and the acclaimed VIP door-to-door travel service ensures our customers enjoy a stress-free journey to and from the airport or port.

Titan employs over 150 people who are largely based in the head office in Redhill, Surrey.

As a business we buy a wide range of things, from flight seats, hotel rooms, cruises (cabins and full charters), coach services, guide services and more. Some of these things we use in our own business and others we use as part of the services we provide to our customers.

As a member of the Saga Group, Titan complies with, and is subject to, all policies and processes that Saga plc has in place. Titan's employees have to complete the same mandatory training as Saga employees. In addition, Titan is included within Saga's wider audit and compliance activity to ensure we comply with both the law and Saga's internal governance.

### **Modern Slavery Act 2015**

As a result of the above, our statement includes the statement by Saga plc, which is set out in the appendix below. This describes the steps that Titan and Saga plc have taken to prevent acts of modern slavery and human trafficking occurring in our own businesses and in any of our supply chains.

Our statement covers 01 February 2016 to 31 January 2017.



Andy Squirrell  
**Managing Director**

July 2017



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Modern Slavery Act 2015**

This statement is made on behalf of Saga plc (a public limited company listed on the London Stock Exchange, registered in England and Wales, with registered number 8804263) and its subsidiaries (together, “we”, “us”, “our”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”). This statement sets out the steps we have taken to prevent acts of modern slavery and human trafficking occurring in our business and supply chains during the financial year ending 31 January 2017.

### **Introduction**

We are committed to carrying on our business operations responsibly with a zero-tolerance approach to any slavery and human trafficking incidents which are proven to have taken place. We are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking do not take place in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our business and in our approach to tackling slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we have developed and started to implement specific contractual clauses to prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards.

### **About the Saga Group**

We provide products and services predominately tailored to members and other customers over the age of 50 in the UK. Such products and services include insurance, cruises and package holidays, personal finance and the Saga Magazine. Central to the success of each of these operations are our 4,800 employees, all of whom strive to see the world through our customers’ eyes, so that we can exceed their expectations. Our ‘Saga’ brand has been developed over the past 67 years to become a recognised and trusted brand among UK consumers aged over 50.

The varied nature of our products and services means we purchase a wide variety of goods and services from suppliers within the UK and internationally. Therefore, our supply chain is large and complex, with each supplier often having its own supply chain.

## **Risk Assessment**

We have devised a risk assessment process that contains various human rights indices. This has been implemented for existing suppliers in order to analyse and evaluate their risk profiles and we shall do likewise for future suppliers. For example, suppliers may present a higher risk of slavery and human trafficking due to the location in which they provide goods or services or because of the type of goods or services they provide.

Conducting this risk assessment has helped us better understand the areas of our operations most at risk of abuses relating to modern slavery, and accordingly has enabled us to focus our efforts to ensure effective due diligence is conducted to mitigate such risks. We have found the highest potential risks are within our holidays and cruises operations, largely due to the vast number of locations in which we procure services.

## **Due Diligence**

We have developed a modern slavery due diligence questionnaire that is to be issued to higher risk existing suppliers as identified by the risk assessment. Once completed, the questionnaire will provide us with greater detail about our suppliers' workforce profiles, workplace management and supplier management, along with answers to probing questions concerning the potential risk of forced and child labour within the suppliers' operations.

We are committed to working with our suppliers to ensure business is conducted ethically and with integrity. This is an iterative process whereby any shortcomings are addressed by a corrective action plan and a timeline for completion.

The implementation process for this questionnaire is in its final stages. The questionnaire will be fully integrated within our procurement process by the next financial year end, 31 January 2018.

Our holiday companies are members of Travelife, an independent sustainability audit programme for tourism businesses. The human rights questions within our modern slavery due diligence questionnaire are based on those set by Travelife to prospective customers. We strongly encourage and support our hotels to achieve the Travelife Gold standard, which demonstrates compliance with leading international standards in areas including labour practices and human rights.

## **Our Policies**

We are committed to working responsibly and with integrity, as set out in our Personal Standards & Ethics Policy. We require the highest standards of personal and professional honesty and integrity from our employees in all business dealings and relationships, including with our members, customers, other employees and suppliers.

The prevention, detection and reporting of slavery and human trafficking in any part of our business or supply chains is the responsibility of all those working for us. We have, therefore, updated our Whistleblowing Policy to include reference to modern slavery and to ensure all employees can continue to confidentially and anonymously raise concerns and report suspected violations via our whistleblowing telephone facility.

The Whistleblowing Policy is communicated to employees twice annually and, in addition, they are regularly reminded of the whistleblowing telephone number via internal communications.

We have also formulated an Anti-Slavery & Anti-Human Trafficking Policy and this was approved by the Saga plc Board in May 2017.

This policy will be reviewed and communicated annually to ensure it remains current and reflects best practice.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, we will be providing training to our employees via our e-Learning centre. This will be completed by the end of the next financial year, 31 January 2018.

### **Auditing & Ongoing Compliance**

Following the introduction of the new anti-slavery and anti-human trafficking processes, our Internal Audit procedures have been amended to incorporate an assessment of these new processes within all relevant audits. Furthermore, our Group Compliance has also been engaged to assess our ongoing compliance with these processes.

We remain keen to develop key performance indicators in order to measure our effectiveness in seeking to ensure slavery and human trafficking do not take place anywhere in our own business or in any of our supply chains. As our new processes evolve, appropriate performance indicators will be identified and monitored.

### **Summary**

As a result of all the above, we now have systems in place to:

- Identify and assess potential risk areas within our businesses and supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle-blowers.

We will continually review and refine these processes to strive to operate to the highest standards at all times.

This statement covers 01 February 2016 to 31 January 2017 and has been approved by the Board of Saga plc.



**Lance Batchelor**  
Chief Executive Officer

July 2017