

Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions Affinion International (“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 31st December 2016.

Structure of the organisation

Affinion International 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 adopted the following due diligence procedures:

- thoroughly checking and regularly reviewing recruitment agencies by conducting background and visa checks
- ensuring all staff have a written contract of employment, are legally able to work in the UK and their names and addresses are checked.

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:

- include our anti-slavery and human trafficking policy within our on-boarding documentation for all new starters
- make available a copy of the full anti-slavery and human trafficking policy on the company intranet
- update our termsheet and procurement processes to include questions on modern slavery

- incorporate reference to slavery and human trafficking in our key UK policy introduction to new starters and Contractors Health, Safety and Environmental Questionnaire
- where relevant, include anti-slavery and human trafficking obligations in contracts with suppliers
- investigate whether any supply chains derive down from Affinion Group which could be subject to Affinion's anti-slavery and human trafficking policy.

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 31st December 2016.



Michele Conforti
Affinion International Ltd.

Date: 30 September 2017