

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 2017.

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
- ensuring our third party suppliers understand and have read our statement and are taking steps to ensure human trafficking and slavery is not taking place in any of their supply chains or their business
- ensuring all staff are made aware of slavery and human trafficking through our on boarding documentation and our key UK Policies
- including anti-slavery and human trafficking obligations in contracts with suppliers
- updated our supplier on-boarding form to consider anti-slavery and human trafficking as part of our procurement process
- investigating whether any supply chains derive 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:

- investigate our pre contractual approval process to see how we could include due diligence checks in relation to modern slavery early on in our negotiations with clients and suppliers
- continued monitoring of our due diligence procedures

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 2017.



Michèle Conforti
Affinion International Ltd.

Date: 21 June 2018