

Introduction

This Policy applies to all companies, Board members, officers and staff within the ATPI group of companies.

ATPI takes its responsibility as a corporate citizen very seriously and is very clear about what Corporate Social Responsibility (or CSR) means to its employees, clients, suppliers and all its other stakeholders. It also recognises that its business can have a detrimental impact on the wider world in a variety of different ways.

Therefore, in order to maintain a sustainable balance between economic growth, profitability, and care for the environment and community it affects, the Board of ATPI believes that ATPI's activities must be conducted responsibly, fairly, openly, and always with the aim of minimising its adverse impact on the environment and community in which it operates.

Accordingly, ATPI has developed this CSR policy to communicate how it will manage these responsibilities, and the Board expects all staff to be aware of the contribution that is required from each and every one of them in order to achieve this, and how they should actively participate in its implementation.

The Board therefore believes that it is the responsibility of everyone employed by ATPI, regardless of role or level of responsibility, to ensure compliance with this Policy, and to promote it.

A handwritten signature in black ink, appearing to read 'Ian Sinderson', written in a cursive style.

Ian Sinderson

Chief Executive Officer

December 2024

Duty of Care

Being part of a global industry that promotes the use of many forms of transport, ATPI recognises it has a role to play in assisting customers to be more aware of the effect of their travel on the environment. ATPI has already developed several reporting tools as part of its proprietary travel booking system to enable clients to assess the impact of their company's travel pattern on the environment by the mileage they have travelled, the method of their travel, and the CO2 this generates. ATPI also advises clients on solutions to their offset of CO2 emissions and other greenhouse gasses.

In order to ensure that ATPI is well informed about the business activities and practices of its suppliers, and to correctly align its suppliers with the requirements of its clients, ATPI will also regularly conduct a supplier risk review when considering purchasing solutions. Therefore, in addition to reviewing their products and services, this review will seek to take into account the track record of its existing and potential suppliers in reducing their impact on the environment and the communities that their commercial activities affect. For the same reason, it will also seek to prioritise the use of services from local suppliers wherever possible.

ATPI aims to make a positive impact in the communities that we operate in. The contributions that we make are both financial and non-financial contributions.

ATPI will also work closely with local colleges that provide travel industry training courses to seek to ensure that they are relevant to the travel industry's current and future requirements, so as to enable students to find long-term employment in the industry.

Further, when vacancies arise, ATPI will first seek to employ locally based employees to fill these positions, and only recruit from further afield in the absence of any suitable local candidates.

People and Equality

ATPI commits to always recruit and employ staff on the principles of equal opportunity, diversity and respect for human rights and in accordance with the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work Recruitment.

Employment will always be in strict accordance with the employment legislation of each jurisdiction in which ATPI operates, and as set out in its Group Equality, Diversity & Inclusivity Policy.

The Company will also put in place consistent employment procedures and policies across all locations to ensure that these principles are universally applied to all staff to the greatest extent permitted by their

local employment legislation. However, for the avoidance of doubt the provisions of this policy do not form part of any individual contract of employment.

ATPI strives to ensure that the principles of equality of opportunity are embedded in the culture and structure of the organisation. The policy of promoting equal opportunities in employment is therefore reflected in all the HR policies and procedures developed by ATPI. These span the following areas of the employee lifecycle:

- a) Recruitment
- b) Induction
- c) Training and Development
- d) Employment and wellbeing
- e) Employee movement and career breaks
- f) Performance review
- g) Reward and Recognition
- h) Disciplinary
- i) Grievance
- j) Termination of employment

ATPI therefore confirms that all employees will:

- Be recruited and employed according to written recruitment procedures that are regularly reviewed and audited, and which shall contain:
 - Recruitment validation procedures that;
 - ensure that sufficient evidence is obtained to ensure that no persons under the age of 18 or the local minimum age of employment are unknowingly employed;
 - ensure that evidence is obtained to ensure that all employees are eligible to work in the local jurisdiction in which they are applying for a position, and that their identity and background checks are suitably verified;
 - risk assessments and work procedures for students and other staff under the age of 18 or the local minimum age of employment who are temporarily with ATPI for work experience;
 - procedures that ensure that ATPI's Group Equality, Diversity & Inclusivity Policy is always complied with.

- Be provided with:
 - a clear written role description;
 - a contract of employment (which shall contain the legal terms of their employment and their full remuneration details);
 - access to Group employment policies, including:
 - Group Equality, Diversity & Inclusivity Policy
 - Local Recruitment Policies
 - Group Anti-Harassment & Anti Bullying Policy
 - Group Grievance Policy
 - an employee handbook containing additional local employment policies, investigation procedures and any variations of Group employment policies required in order to comply with local legislation.
 - the local Health and Safety procedures, which shall always comply with local legislation, but which shall also meet Group requirements.
- Be paid at least the local minimum wage.
- Not be required to work at night, work excessive hours, or perform duties of a hazardous nature if they are under the age of 18.
- Be free to leave their employment with ATPI at any time, and without financial penalty or deduction if such deductions have not been communicated and agreed with the employee in advance of their departure.
- Be free to take with them any original personal identity, training, medical or other documents held by ATPI during their employment when they leave.
- Not be recruited through recruitment or other agencies that demand a fee from the employee, such that the only fee receivable by such agencies shall be that which is paid by ATPI.
- Only perform night-time duties in accordance with the relevant local legislation and their contracts.
- Be employed under terms and conditions that include a limit on the number of hours they can work, unless they agree otherwise, and provide them with their statutory rest breaks.

- When ATPI requires it, be offered overtime without being compelled to perform it.
- Be free to join or create a trade union or equivalent body.
- Be employed in offices that are safe to work in and which comply with:
 - Local Health and Safety legislation and Fire regulations, such that they shall contain:
 - Protective equipment that is provided free of charge.
 - Firefighting aids and prevention equipment that is regularly checked;
 - Emergency medical supplies provisions to the local statutory standard;
 - Clear and visible fire / emergency instructions;
 - Health and Safety Risk identification and management systems and procedures.

Discrimination

Discrimination can take many forms and ATPI has a zero-tolerance approach to discriminatory behaviour. All employees should be familiar with the behaviours that are considered as discrimination.

Protected characteristics detailed below are defined by the UK Equality Act 2010 and outline the attributes of a person that must not be discriminated against in business.

ATPI will at all times observe and respect its legal obligations that govern the employment of all personnel in all countries in which it operates.

ATPI recognises that certain groups and individuals in society are disadvantaged because of discrimination they have experienced. ATPI requires that no customer or prospective customer, supplier or prospective supplier, employee, temporary worker or job applicant receives less favourable treatment on the basis of:

- a) Age
- b) Disability
- c) Gender (including gender reassignment)
- d) Marriage and civil partnership
- e) Race (including colour or nationality)
- f) Religion or belief
- g) Sexual orientation.
- h) Full or part time or temporary working
- i) Pregnancy and maternity

ATPI recognises that there may be other areas where people experience discrimination and will work

towards an anti-discriminatory environment, based on open discussions with employees, customers, suppliers and others on perceptions of discrimination.

Responsibility

ATPI expects that you will apply the principles of non-discrimination and equality of opportunity whenever and wherever you interact with other employees or officers of ATPI, clients, suppliers, and business partners of ATPI, and ATPI will apply the relevant disciplinary procedures to any staff that fail to do this.

The Environment

ATPI believes that good corporate management should consider all environmental impact matters and is committed to upholding this principle. ATPI publishes environmental performance metrics annually within the Sustainability Report inclusive of GHG emissions reporting. A key focus is on measuring, reducing and compensating our CO2 Footprint and reducing the waste ATPI produces.

This principle is therefore a consideration in all our decisions and policies, and reflected in the activities, products and services we offer. ATPI encourages these and other forms of environmental responsibility at all levels of our organisation, which we aim to achieve through a programme of employee awareness and environmental training courses.

The Boards' approach to its environmental responsibilities is set out in its Energy & Environmental Policy.

Ethics

ATPI believes that sustainable growth should be based on, and driven by, two fundamental principles; those of expertise and integrity.

ATPI has therefore published an, which is designed to communicate the importance that it attaches to ensuring that the highest standards of integrity are consistently applied to all aspects of its activities.

The policy also supports ATPI's Vision, Mission and Value statements, and means that in order for ATPI to be successful, all staff must understand and accept that it is everyone's responsibility to act at all times with honesty, fairness, and in full compliance with the law.

The confirms ATPI's commitment to a zero-tolerance on slavery and human trafficking, either within ATPI, or its network partners and suppliers.

Management Review

As part of ATPI's Corporate Governance framework, the results of the internal audits are regularly reported to management for review and action.

An annual Management Review is also conducted to assess both compliance with, and performance against, this Policy and the targets that have been set around it.

The Management Review Team will then determine and arrange for the implementation of any action plans that are required, and also set the new targets for the forthcoming year.

Communication

As is the case with all of ATPI's policies, this CSR Policy will be available to all staff through ATPI's Share Point site.

All other relevant compliance training material will also be accessible by staff via the ATPI Academy training platform. All staff will be able to confirm that they have read and understood this material within their respective HR Systems in order for their personal development and compliance training records to be kept up to date.

ATPI will also arrange regular on-site and virtual training sessions to encourage discussion of the training subject matter. External stakeholders, customers, suppliers and third parties will have access to ATPI's policies via the ATPI website.