

# Ethical Marketing Policy

## 1.0 Overview

As a business focused on enriching the lives of young people, we're passionate about being a force for good in all areas of our operation – including our marketing. PGL Beyond is committed to the highest standards of honest and ethical marketing.

We want to make a positive difference in the education sector; nurturing long-standing relationships with our customers through mutual trust, loyalty and a commitment to marketing our products and services with integrity.

Our group-wide values of quality, respect, safety, inclusivity, teamwork and fun, help us develop the ethical framework within which we operate. These values guide our decisions, define our beliefs and underpin everything we do as an organisation.

Our Ethical Marketing Policy helps us focus on staying true to these values, so we can connect our customers and prospects with our products and services in a way that makes us proud, whilst also supporting our long-term growth.

## 2.0 Purpose

This Ethical Marketing Policy sets out the position of PGL Beyond and its family of brands, to go beyond legal compliance to ensure fair, safe, honest, ethical and inclusive marketing practices and activity across all customer touchpoints.

## 3.0 Scope

This policy applies to all employees of PGL Beyond and its family of brands – PGL Travel Ltd., NST, European Study Tours and StudyLink, and any associated companies trading worldwide (primarily in the UK, Ireland, France and Australia). The policy applies to Board members at any level.

This policy also applies to third parties that we work with; which may include (but not limited to) suppliers, marketing agencies, contractors or customers – wherever they are located.

## 4.0 Guiding Principles

As an organisation that is committed to ethical marketing practices, our six guiding principles have been developed in alignment with our corporate values. We pledge to:

1. Provide **quality** communications – that are honest, relevant, accurate, lawful and free of any misleading content. We never overpromise or oversell.
2. Protect the **safety** of our customer data – to go beyond legal compliance to ensure our customer information is used in the right way.

3. **Respect** our customers, communities and planet – maintain trust, ensure relevance and consider the environment within our marketing activity.
4. Be **inclusive** in the way we run campaigns – be culturally sensitive in the creative, and use photography that reflects our diverse range of guests.
5. Practice good **teamwork** in strategy and tactics – challenge each other to reflect & adapt during campaign planning and execution.
6. Keep the **fun** nature of what we do in mind – ensure the messaging is positive, avoid talking negatively about the competition when making comparisons and use language that is confident and expressive without exaggerating the benefits of our products or services.

## 4.1 Provide quality communications

Our aim is to build long-term trust with our customers by providing communications that are honest, relevant, accurate and lawful:

- We take all reasonable steps to avoid using false or misleading statements.
- We avoid exaggerating, inflating numbers, cherry-picking data or focusing on narratives that aren't representative of the overall outcomes.
- We actively reject 'impact washing' – exaggerating the positive impact of our products or services to gain marketing advantage or distract from negative outcomes.
- We only use authentic testimonials or reviews which can be verified through TrustPilot (UK only), Google Reviews or our Guest Experience Survey data.
- We are open and transparent about the way we operate.
- We only use ethical SEO and digital content marketing\* practices:
  - We facilitate organic link building through content that provides value for users and via appropriate collaborations based on shared values
  - We use redirects appropriately to help users find the right content
  - We ensure our 404 pages offer useful navigation
- We commit to ethical digital advertising – considering the accuracy, honesty and targeting approach within the content and placement of ads

\*Please see our Digital Content & SEO Policy for further information.

## 4.2 Protect the safety of our customer data

As an organisation that puts safety at the heart of everything we do, protecting our customer's data is of the upmost importance in ensuring we protect the trust of our customers and meet our legal obligations:

- We commit to being GDPR compliant for our marketing operations in the EU and APP compliant for our operations in Australia.
- We will never misuse or sell our customer data to third parties.
- For PGL consumer marketing campaigns (aimed at contacts with personal email addresses), we practice permission-based email marketing - recipients opt-in to receive marketing emails.

- For schools, colleges, universities, youth groups and other establishments that publish their email addresses or are considered ‘corporate subscribers’, we will target the content appropriately, to ensure relevance to the recipient’s establishment type; always providing the option to opt-out via our preference centre, which covers all brands within PGL Beyond.
- We use OneTrust cookie compliance software across the group’s UK websites, ensuring that customers have control over what information can be used about their online behaviour. OneTrust is one of the most trusted providers for privacy compliance worldwide.

### 4.3 Respect our customers, communities and planet

As a group of educational travel brands, we recognise that the very nature of what we do has a significant social and environmental impact, and we take our responsibilities seriously. Our group-wide ESG strategy ‘Better Beyond Adventure’ sets out our bold commitments and key workstreams to help us achieve our goals in caring for our places and planet, championing wellbeing and playing our part in society.

Within our marketing activity, it’s important that we treat our customers and communities with respect at every touchpoint and ensure we consider the environment with every marketing decision we make.

#### For our customers:

- Any content we provide must be relevant to the audience.
- We will hold annual review sessions to monitor the number of marketing emails being sent each month.

#### For our communities:

- We moderate our online and social channels with integrity and respect to ensure they are safe spaces for experience, perspective and opinion.
- We consider all 3<sup>rd</sup> party media placements carefully to check alignment with our ethos and values.
- Any user-generated content is moderated to ensure the content is appropriate and respectful.

#### For our planet:

- In the UK we partner with Carbon Footprint, whose expertise helps us offset and reduce our environmental impact and that of our customers.
- For our tours brands, we can supply customers with a carbon footprint calculation as part of their quote. We also offer a carbon reporting service to support their own sustainability initiatives and we’ll plant one tree for every trip booked, to support reforestation projects worldwide.
- We acknowledge that our email marketing activity contributes to our carbon footprint.
- We only use FSC certified paper products in our printed marketing collateral.
- We try and source promotional items and packaging that is either recyclable or made from recycled/sustainable materials.

## 4.4 Be inclusive in the way we run campaigns

It's important that our marketing campaigns truly represent the diversity of our customers within the experiences we have to offer, whilst being culturally sensitive.

- We will keep our image library up-to-date with representative photography to cover a diverse range of ages, genders, ethnicities and abilities.
- We will avoid stereotyping, exploiting or appropriating any underrepresented or historically oppressed groups within our marketing content.
- We will promote a culture of self-awareness and ensure we assess the cultural sensitivity of each campaign before it's signed off.
- For new websites being developed across the group, we use Readabler to ensure our web content can be displayed to accommodate a range of accessibility requirements.
- We will ensure alt text is provided for images displayed across our digital platforms.

## 4.5 Practice good teamwork in strategy and tactics

As marketers, we choose how to represent the people, places and experiences that feature in our marketing collateral. As well as being self-aware, we also recognise that including others within the creative process will help us explore the various perspectives, opinions and options for how to build a successful campaign. One that's appropriate for the audience, an accurate reflection of our products and services and culturally sensitive in its messaging.

Taking a team approach within the planning and execution of each campaign is something we believe is crucial to its success:

- We will reflect on each campaign during the planning and content creation process and challenge ourselves in the following areas:
  - Are we clearly expressing the value of our product or service, without exaggerating or misleading?
  - Is our imagery appropriate and representative?
  - Can our claims be backed up?
  - Is the messaging appropriate, meaningful and culturally sensitive?
  - Have we considered the timings & any other marketing activity?
- We are comfortable with challenging each other and exploring different perspectives or opinions.
- We will involve more than one person in campaign planning and content creation.
- When we use new platforms or channels to reach and engage our audiences, we will evaluate any ethical considerations and share best practice.

## 4.6 Keep the fun nature of what we do in mind

As a group of brands dedicated to enriching the lives of young people with educational - but also fun - experiences, it's important that we reflect the positive impact of what we do in our messaging and content.

- We will avoid talking negatively about our competitors when making comparisons – the focus should be on differentiation only (i.e. product, price or value), with a positive tone.
- Any comparisons we make with industry standards or competitor offerings will avoid ‘puffery’ and will be grounded in evidence which substantiates them.
- We will use a tone of voice that is down-to-earth, focussed, assured and ambitious, without being misleading or exaggerating the benefits of our products or services.
- We will use humour sensitively and where appropriate.

## 5.0 Diversity

Within all our marketing activity, we will strive to understand the needs of our customers and will make all reasonable efforts to monitor and improve their satisfaction on an ongoing basis using our insight platform.

We acknowledge the basic human dignity of all stakeholders (colleagues, customers, suppliers, partners etc.). We will avoid stereotyping, or depicting demographic groups (e.g. gender, race or sexual orientation), in a negative or dehumanising way.

We value individual differences and will make every effort to treat all stakeholders in our community and the cultures they are from, with respect.

## 6.0 Legal Compliance

As with all business operations, we will ensure we are legally compliant in all areas of our marketing and advertising activity too:

- All marketing communications will be lawful, decent, honest and truthful.
- All advertising must be compliant with the advertising and marketing codes of practice.
- We will respect our customers’ privacy and confidentiality. Should we receive complaints or questions about our privacy policy, we will take them seriously and investigate them.
- We will not unfairly portray or refer to anyone in an adverse or offensive way

## 7.0 Our commitment to updating and evolving our practices

As new technology, online platform updates and ways of working change the marketing landscape and the way we communicate with our audiences, we recognise that the ethics involved in our marketing practices will also need to evolve.

We will continue to monitor the various platforms and customer touchpoints that we use and update our tactics and practices accordingly, via an annual review with marketing stakeholders.

## 8.0 Responsibilities

The senior marketing team, led by the Chief Customer Officer, have the ultimate responsibility and accountability for ensuring compliance with this policy. The wider team are responsible for the delivery of activities in line with this policy.

The Chief Customer Officer should be consulted where any key decision points arise or in case of any breach of our policy. Compliance extends to our marketing partners and suppliers, and PGL Beyond will not work with any partner unwilling to comply with this policy.

All colleagues and third parties who have responsibility for marketing activities will need to review and agree to this policy. For internal colleagues, this will be set as a mandatory annual training requirement; delivered via our learning and development portal, 'Strive'.

All marketing colleagues are encouraged to challenge and report any violations to this policy. Reports can be made anonymously and will be taken very seriously. Breaches of this policy may result in disciplinary action.

## 9.0 Review and revision

This policy will be reviewed annually and revised as necessary to reflect changes in laws, regulations, technology, marketing channels, customer profile or organisational values.

## 10.0 Questions and feedback

We will always strive to do the right thing by our customers, colleagues and communities and would welcome any feedback to help in this effort.

Please contact us on 0333 321 2100 (in the UK) or email [hello@pglbeyond.com](mailto:hello@pglbeyond.com) if you have any questions or feedback on any aspect of our marketing practices or the platforms that we use.