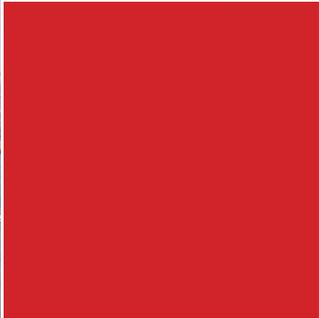
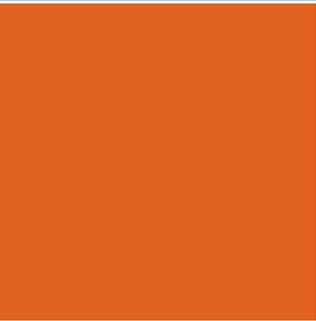
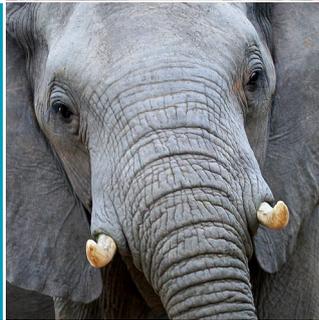




Albatros

Communication on Progress

March 2015



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Statement of continued support

I am pleased to confirm that Albatros Travel continues to support and implement the ten principles of the UN Global Compact with respect to all areas of concern. With this COP we show how we integrate the ten principles in our strategies, policies and daily practices. Albatros Travel will make a clear statement of this commitment to our stakeholders and the general public.

I am the new Chief Executive Officer CEO of Albatros Travel, but I am not new in the organisation. My husband started Albatros Travel 29 years ago, as a small tent safari company and I have worked beside him for many years. Despite not having a formalised corporate social responsibility framework in the past, social responsibility has always been a big priority for us. Our company slogan, translated from the Danish, 'Travel with heart, head and mind', reminds us of that on a daily basis. The first few years as a UN Global Compact signatory has been educational and we learned that training on all levels is essential to progress. Working in a structured manner and strategically with CSR by applying international principles for sustainable development to all three bottom lines is now a long-term commitment.

We take our responsibility very seriously and we have delegated the responsibility of our CSR development and strategy to a new employee. This new CSR manager is in charge of our projects, but our CSR goal is to get the whole organisation involved. As stated in this COP, the overall 2014 strategy has been on communication, including initiation of public communication and demonstration of concrete actions. At the compliance level we have established due diligence processes which enable us to identify, prevent and mitigate any adverse impacts on the core principles for human rights, the environment and anti-corruption.

Another Albatros Travel strategy is to buy locally where possible, to support local economy, and to educate and share knowledge. Albatros Travel arranges package tours with tour leaders, so we have an opportunity to disseminate knowledge and awareness about cultural differences and the environment to our guests. We already have knowledgeable and experienced tour leaders, but we will strengthen our sustainability performance further by providing training in human rights and other sustainability-related topics specific to the destination. The focus on education reaches beyond our own organisation and also directs any philanthropic projects, such as the establishment of sustainable guest donation projects.

We have identified our greatest environmental adverse impact to be the carbon footprint of our products. We cannot produce travel products without a significant carbon footprint with the technology available, but we strive to reduce our carbon footprint wherever possible and we have included demands for this in our new Code of Conduct, which will be included in all contracts from 2015. With this Code of Conduct we will integrate CSR in our whole organisation and to our substantial supply chains. But, even though eco-tourism has been known and practised for many years, working strategically and holistically with sustainability on all three

bottom lines is new to the travel industry and we will be faced with a challenge in encouraging suppliers to work with sustainability.

This year's COP mainly covers our Copenhagen headquarters. We are in the initial phase of formalising our work with sustainability and still need to integrate our country offices in the process. The Copenhagen headquarters produce almost all of our products and thus the greater part of our organisation is covered in this report.



Berit Willumsgaard

CEO and owner, Albatros Travel

Organisational Profile

Albatros Travel A/S was established in 1986 by Søren Rasmussen, now chairman of the board. We provide travel packages for private guests primarily travelling out of the Danish, Swedish, Norwegian and Finish markets. The guests travel mainly in groups of 20-50 persons and are accompanied by a tour leader.

All Scandinavian operations are conducted from the company's headquarters in Copenhagen. In addition, small subsidiaries have been established in India, China, Greenland, Kenya, Tanzania and South Africa to handle local operations and destination management services, and we own several safari camps and small cruise ships.

The company is headed by the Board of Directors, including the main shareholder of the company. The management team reports to the Board of Directors.

Our head office is divided into departments, each of which with specialisEd work functions in relation to the types of tours. Within the different work areas there is a person with in-depth knowledge on the specific area. This ensures that our guests are being served with the best expertise available in the field.

We currently employ 145 persons in our office in Copenhagen. In addition, we employ approximately 800 freelance tour leaders with Danish, Swedish, Norwegian and Finnish backgrounds, who work with the local tour operators at the travel destinations.

On an annual basis we handle approximately 1,000 tours serving more than 40,000 travellers, with net sales of approximately 680 million Danish Kroner (DKK).

Contact information

Questions regarding the content of this COP report should be addressed to:

Cæcilie H. Willumsgaard, CSR Manager Albatros Travel, cw@albatros-travel.dk

Policy commitment

Albatros Travel is still in the phase of the implementation of the UNGC principles in all aspects of our organisation. Our CSR policy is now publically available on our websites. The policy commitment stipulates our human rights expectations of our personnel and business relations. The policy is formulated as a general CSR policy and includes environmental and anti-corruption commitments. We have also finalised our Ethical Requirements (Code of Conduct), which includes human rights, environmental and anti-corruption requirements and will be referenced in most of our business contracts from 2015 onwards.

Focus on communication

In 2014 our CSR strategy was increased focus on communication. We focussed on familiarising all employees with our CSR policy and projects. CSR is now a fixed point in our monthly morning meetings for all staff at our head office. To further involve and educate all employees in our CSR activities, our CSR manager, frequently provides training sessions in smaller team meetings. In the fall of 2014 we had a workplace assessment where 116 employees answered a question about their level of knowledge of Albatros' CSR policy. 63% answered that they had a high level of knowledge of our CSR policy. After the assessment review all employees were invited to participate in a CSR presentation and discussion.

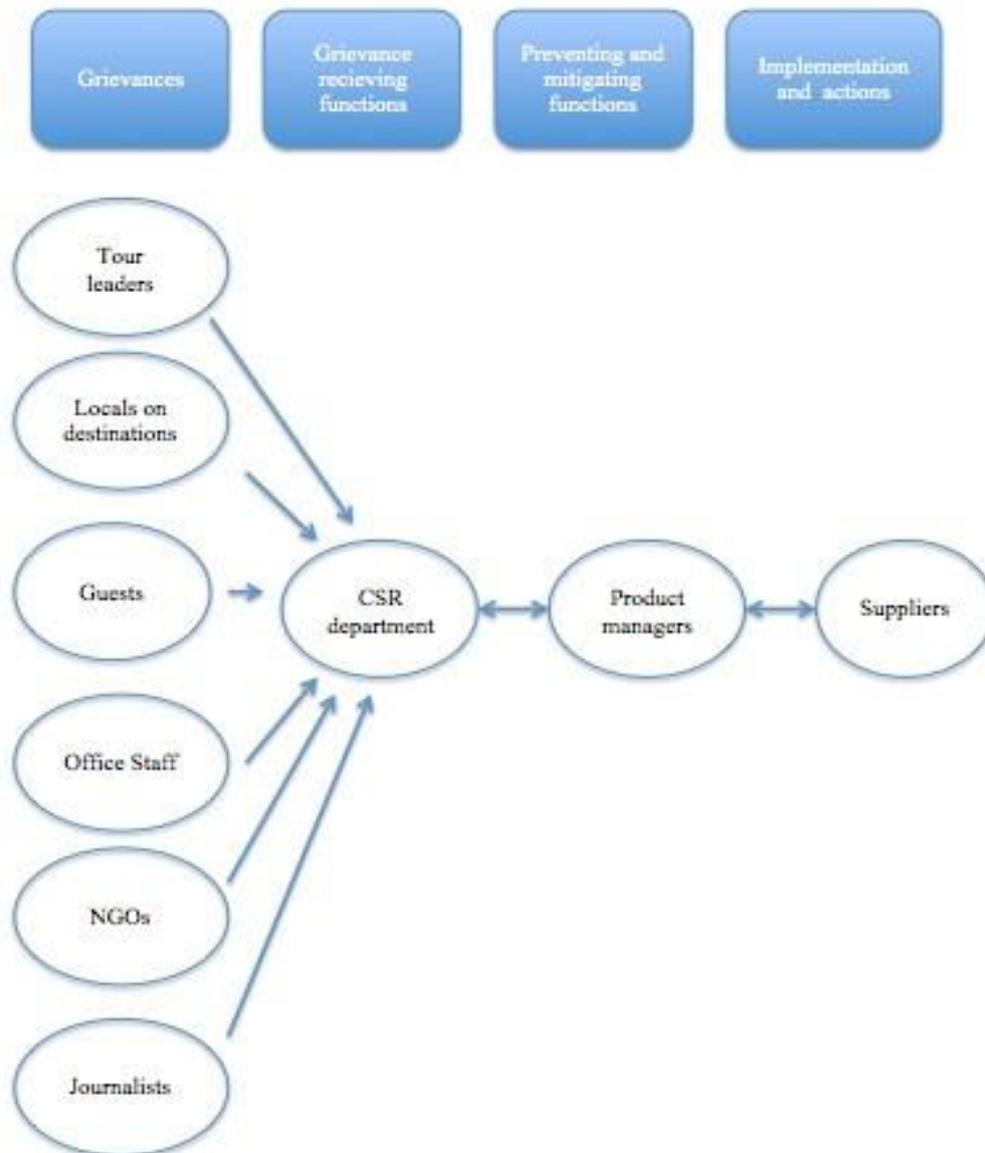
We have knowledgeable and experienced tour leaders, but we will further strengthen our performance by continue to educate them in our CSR policy. Our tour leaders are updated with our CSR initiatives through newsletters and seminars. It is our perception that CSR has to be rooted in all levels of the operation. Therefore the CSR manger has been invited to participate in weekly management meetings.

The communication focus also includes external communication with our suppliers and our guests. As mentioned above, we have finalised our CSR policy and our Ethical Requirements for our partners. Our CSR policy is available on our website, together with our CSR manifest and descriptions of some of the projects we support. In 2014 we initiated external CSR communication through Facebook, travel fairs and distributed small pamphlets to inform of our projects.

Due diligence process

We have established a due diligence process on all aspects of our sustainability platform, enabling us to identify, prevent and mitigate any adverse impacts on the principles for human rights, the environment and anti-corruption. In the basic setup all employees contact the CSR manager in case of any possible negative impact (see the figure on next page). The information flow of adverse impacts identified by guests or tour leaders currently flows through both the quality department and tour leader coordination, who because of their basic due diligence training now redirect it to the CSR manager. We are in the process of implementing the direct flow from the tour leaders to the CSR manager, who then contacts the product manager to take action through the supply chain. We believe we will get the best results from

letting the product managers who have the daily contact with the suppliers be the key implementing agents of mitigation throughout the supply chain. Internally, the human resources department takes care of the function of collecting and reporting all accidents and staff grievances, identifying trends and initiating mitigating actions.



Accidents occurring while travelling are a possible adverse impact on the health of our guests. Travelling always involves the risk of accidents, especially in less developed countries with poor infrastructure and lack of traffic regulations. Albatros Travel demands high safety standards from suppliers, which is also included in our Ethical Requirements document. In case of an accident involving clients of Albatros Travel, the company has an emergency contingency plan in place. The contingency plan delegates responsibilities between staff for dealing with the emergency situation in the best way. Tour leaders can always contact the Copenhagen office through a 24-hour emergency phone service, where our experienced staff provides support.

People in the centre

At Albatros Travel, we are aware that our operations have an impact on many people's lives and therefore our impact on people is at the heart of our concern. We recognise the right of everyone to work in an environment where individual dignity is respected, and will not condone any form of discrimination or harassment. We had a workplace assessment of our head office in Copenhagen in 2014, where 93% of the participating employees answered that they were satisfied or very satisfied with their jobs as a whole. Even though that result was fine, other results showed that adjustments were needed, as the organisation had some communication problems. The assessment was carried out just before our CEO chose to leave the company, due to a difficult economic period. This was followed by extensive organisation adjustments, with redundancies and several changes in the executive management team. We now look forward to an improvement in communications and expect an increase in employee satisfaction.

Demography and work/life balance

Albatros Travel seeks a diversity of people and equal rights for men and women. A head count on the 1 January 2014 showed that we had 162 employees at our head office in Copenhagen, with an average age of 39 years and a gender distribution of 102 women and 60 men. But in the management team the gender distribution was 40% women and the CEO was a man. In 2015 the picture has changed a little (as of 1 January 2015) – the Copenhagen office now employs 145 people, the average age is 40 and the gender distribution is 52 men and 93 women. In the management team the gender distribution is now 54% women and our CEO is a woman.

Demographic	Employees	Average age	Gender distribution all employees	Gender distribution in the management
2014	162	39	63% women	40% women
2015	145	40	64% women	54% women

Not all employees are employed on a full-time basis, as we do offer part-time jobs for those who need less working hours to juggle family life and work life. We also have some colleagues who have flexible job arrangements due to illnesses. We try to help the struggling job market by taking in students from business programmes wherever suitable, for instance when we need new sales employees. We have just employed a university student in a trainee programme and a student in our finance department. Our salaries are in line with the industry average and all employees have the right to negotiate their salaries once a year.

Employee wellbeing

Albatros Travel strives to be an attractive workplace, where we focus on employee health and overall wellbeing. We have an intranet forum where all employees have a profile and access to an employees' handbook. In this handbook all our employee policies are available including a noise policy and a stress policy. In the stress policy, employees can find a number for a twenty-four hour stress coach in case of an

emergency. We also have our own doctor at our head office twice a week, where our employees are welcome to seek counselling and get a general health check. All our employees have a health insurance, which gives them the opportunity to get treatment at a private hospital and bypassing the public waiting list. We offer our employees a warm lunch at the in-house canteen where the company pays half the price. We get fresh organic fruit every day and all of our coffee is organic.

We have several extra staff offers at the head office, including a certified masseuse twice a week, yoga classes, a choir with a professional singer and table tennis. We believe that a good social environment is very important to employee wellbeing, so we encourage all employees to get together at social events. In 2014, these included a big summer party, a Christmas party, several Friday bar events and a staff trip where all employees at our head office were invited to the island of Jersey, for a 4-day learning and social trip.



Tour lecture and teambuilding at Jersey.

Our tour leaders have their own summer party and Christmas gathering. As we are a travel agency, we live for travelling and where it is relevant we send employees on study trips to expand their knowledge. All employees have the opportunity to buy trips at net prices for themselves and their families.

Locals at our destinations

When we talk about the ethical dimensions of travel, a priority is treating people with equality and respect. This applies to both the people we work with in other parts of the world (as well as in Denmark) and the people whose country, neighbourhood and homes we are visiting.

Albatros Travel wishes to be precautionary and we have included our standpoint on child labour in our Ethical Requirements. We demand that suppliers not only assure us that they respect our views against child labour but also the respective country's

labour laws with special emphasis on minimum wages, working hours and union participation.

One of our important CSR strategies is to generate local cash flow. We want to contribute to the local economy, make sure that the right people benefit from our presence and create job opportunities for locals. To achieve this we collaborate with small local businesses wherever it is possible. We work with local agents, small hotel, local restaurants and use local guides. At our own safari camps we employ local staff.

Facilitation of our guests' access to knowledge about other people's cultural life is an important part of our business. All our tours are conducted with experienced tour leaders who generally speak the local languages and have a special insight into local conditions. In this way we can ensure good working conditions locally and we are able to make sure that all cultural encounters are done in the right spirit so that there is no negative impact on local societies. Furthermore we always seek counselling and consent from locals before visiting their communities and we continue to have a dialogue on the form and frequency of visits. In this way responsible tourism creates the opportunity for indigenous people to continue their traditional lifestyles in relatively remote areas with only little adaptation to modern economy and culture.

Guests in the centre

No company can exist without satisfied customers and we are no exception. We have always tried to listen to our guests and we have a quality assurance department that handles complaints or negative feedback. But since 2014 we initiated a strategy of extra guest satisfaction focus. This includes new loyalty programmes, VIP events for our most important guests and new offers for guests who do not reside in Copenhagen. We also have an evaluation form, which is sent to all customers after any tour with us and where all comments are taken seriously by our quality assurance department. Furthermore we recently began measuring customer satisfaction with more statistical tools. We don't have any significant results on this yet, as it is still in the initial phase.

Environment and climate

As a service provider, Albatros Travel only has a small direct environmental impact, but a more significant indirect footprint from our supply chains. Our most significant environmental impacts are those from the use of flights and cruise ships. These are impacts we cause through our suppliers mainly. We have little opportunity to affect the environmental performance of these suppliers, but we have included several environmental demands in our Ethical Requirements that will be included in all our supplier contracts when implemented by the end of 2015.

What is easier to affect is the environmental performance of our offices and how our clients act while travelling with us. In this way, our initial environmental efforts have been on improving environmental performance in offices and raising awareness with our customers to follow the towel saving guidance in hotels, using less plastic while travelling and to leave nothing but footprints in fragile environments.

Office environmental awareness

In our Copenhagen office we strive to lower our energy consumption. Albatros Travel is a Climate Partner with DONG Energy, a Danish energy company. This partnership means that we buy all our electricity with RECS (Renewable Energy Certificate System) certification from Dong Energy's wind turbines. Furthermore DONG Energy has helped us with mapping our potential for saving energy in our Copenhagen office. We have replaced conventional light bulbs with energy saving and LED ones and put a timer on our ventilation system to ensure that it only runs during office hours. We have two company cars that are electric cars. Our CEO drives one electric car and the other is used for daily trips to embassies to collect visas for our guests and similar short errands in the city area. In this way we eliminate particle pollution in the city from these daily errands.

In our Copenhagen office we have reduced our paper use significantly by printing on both sides. This is now done automatically by all computers in the office. We have also reduced paper usage by upgrading our IT system so that we now send a lot of our letters by email. We only use recycled paper for all purposes. Our brochures are printed on recycled paper and we sort paper, cardboard, glass and aluminium from the conventional waste. This level of sorting is what the Copenhagen municipality waste infrastructure allows for at present. We bought a pallet of organic fair-trade coffee for office consumption from a supplier in Germany and we get organic fruit every day.

Nature conservation

Nature conservation is of big importance to us, as the company was built on the foundation of nature experiences on tented safari trips in Kenya. Over the years we have been involved in several nature conservation projects, especially in Africa. One of these was a big elephant research project in Kenya, conducted in collaboration with a renowned scientist and Copenhagen University. The research was performed from our previously owned Karen Blixen Camp in the Masai Mara. The camp itself continuously into a comprehensive sustainability project with focus on

environmental improvements, nature conservation and protection of wild animals, education and improvement of work conditions for local employees.

To focus on new projects, the Karen Blixen Camp was sold in 2012 and new camps were bought in South Africa. The Entabeni game reserve, where one new camp is situated, lies in an area of high density of cattle and crop farms, where most wild animals aren't welcome. For instance the leopards, that have been shot by farmers for many years, because they hunt the cattle. Entabeni game reserve - and its tourists - give the animals a safe place and is important for wild animal conservation. The goal of the reserve is to become a nature park, with the capacity to house a self-sustainable animal population. This is done by expanding the park area and regulating the animals until the balance is restored. The reserve mainly focuses on endangered animals species. They have a successful breeding programme of tuberculosis-free buffalos and a special rhino protection programme. Rhinos have a fragile status due to poachers, but the Entabeni game reserve has now reached a healthy population of white rhinos.

Another new Albatros camp is Khoka Moya on the edge of Kruger National Park. We want this to be a new sustainability project as Karen Blixen Camp was and we have initiated several environmental actions, including cost/benefit analysis on solar panels. The camp also has a community project with a small village called Welverdiend (see more under Albatros Travel's projects).

Albatros Travel's cruise ships

As mentioned above, most of our flights and cruises are provided by suppliers, but we also charter and own a few ships ourselves. On these ships we plan the sailing routes and we do that with a big focus on fuel consumption. Fuel is a growing financial burden, meaning that any reduction in its consumption leads to an improvement in both the environmental and financial bottom lines.

Albatros Travel is a full paying member of the Association of Arctic Expedition Cruise Operators (AECO). The association was founded in 2003 and has since become an important organisation representing the concerns and views of arctic expedition cruise operators. AECO is dedicated to managing responsible, environmentally friendly and safe tourism. Apart from the membership fee, Albatros pays AECO a certain amount for every guest we send to the Arctic. All funds from membership fees and from fundraising, are used by AECO to achieve our mutual goal of setting the highest possible operating standards in the Arctic.

Animal welfare

We have partnered with the organisation World Animal Protection, to get help with evaluating the living conditions of animals in places where our guests are in close contact with them. This resulted in some changes in our trips, especially in Thailand where we visited some elephant camps that didn't live up to the standards that these big and highly social animals require.

Albatros Travel does not offer trips where wild animals are used for commercial entertainment, including elephant rides. We believe that all wild animals should be viewed in nature, unfortunately that is not always possible, but we don't want to contribute to an industry that captures wild animals for commercial use and we don't want the animals that are in captivity to do unnecessary performances bordering on animal cruelty.

Business ethics and anti-corruption

Albatros Travel has identified no major adverse impacts on anti-corruption. However as a travel agent that provides services all over the world, we operate in countries where there are significant risks of unregistered workers, kickbacks, local ticket sharks and corrupt border police. Much of these relate to informal practices that are hard to change and require a long-term industry initiative to do so.

We are able to show data on income and expenditure for the last six years on request and maintain accurate books and records, available for inspection. These properly and fairly document all financial transactions. We do not maintain off-the-books accounts, and any contribution to bribery and corruption is unacceptable. Internal controls are in place in order to prevent this. Furthermore we do not offer or accept gifts, apart from gifts related to anniversaries, birthdays etc.

Albatros Travel has chosen to register their main organisation in Denmark, where most of the operations work is done from the head office. This means that we pay most of our taxes in Denmark, in line with Danish law. We collaborate with Danish tax authorities when we hire new suppliers for our head office, to ensure that we don't support any illegal work or moonlighting.

Anti-corruption training

The implementation of our Ethical Requirements (Code of Conduct) will be followed up by training of relevant employees. The primary target groups for this training are the product managers who handle the supply chains and our tour leaders, who may come up against corrupt institutions in the countries in which they operate.

We don't include tips in our prices, because we want the guest to have influence on the tip amount. In the written itinerary we provide recommended amounts and on most of our tours the tour leaders are expected to handle gratuities. To minimise the risk of the tour leader ending in an uncomfortable situation where some guests might assume that he/she didn't pass on the money to the rightful receiver, we have made a tip history sheet. On the sheet, the tour leader writes the collected amounts from all guests and then writes all receivers and amounts. The tip sheet is then sent to our tour leader coordination team in the Copenhagen head office where it is checked and saved.

Albatros Travel projects

We have been aware of our responsibility since day one, and we will continue in this way. We focus on the areas where we can make the biggest difference, and we have chosen some projects that make sense for us to support.

Supporting orphaned children in Delhi

Albatros Travel supports the organisation Karm Marg, which operates an orphanage in Faridabad outside Delhi. We purchase a variety of their self-made Jugaad products, including fabric bags as a gift for all our guests in India. Our guests do not visit the orphanage, but they are informed about the organisation and have the opportunity to support it by donating their remaining rupees after the tour.

Karm Marg was established in 1997 and started by teaching children at the local train station on how to sell bags they made from used newspapers that they found in the trains. Today Karm Marg's orphanage shelters 60 children from the age of 4 to 18. The orphanage provides food, medical care, education, recreation and counselling.

Karm Marg means the way of action, and in line with this name, the organisation places great emphasis on the children becoming self-reliant. The organisation finances about half of its expenses by producing and selling environmentally friendly Jugaad products mainly made from recycled materials like newspapers.



Albatros Travel sent all the children from Karm Marg on a day excursion to Taj Mahal in the fall and at Christmas, Albatros Travel employees had the opportunity to buy small red hearts for our Christmas tree - each symbolising a gift for a child at the orphanage. By the end of December the tree was filled with hearts and Albatros Travel decided to double the collected money so all the children and staff received presents and were given a Christmas party.

Supporting a local community in South Africa

Wolverdiend is a small village in the Kruger area of South Africa with about 12,000 inhabitants. It is located close to Albatros Travel's two safari camps, Khoka Moya and Mantobeni. Albatros Travel has frequently donated money to the village and continues to support them by paying for guest visits every week. 90 per cent of Albatros Travel staff at our safari camps comes from Wolverdiend.

The village has a kindergarten and five schools, three from 1st to 7th grade, a high school from 8th to 12th grade, and a school for the mentally disabled. Albatros Travel has primarily supported the schools. Since there are many students in the 7th grade this year, the village has chosen to use some of the donated money to build new classrooms. In addition, new books were purchased for the library. The school also bought a new television and a DVD machine for teaching.

Wolverdiend has its own football team "Wolverdiend Masters", which Albatros Travel has sponsored with uniforms.

After several Albatros Travel guests expressed their wish to donate money to the village, we made a collection system, where each guest's donation goes directly to a specific project. On the guests' behalf we have donated money for a football tournament for local pupils.



The Wolverdiend School library with new books and our sponsored football team in their new uniforms.

Conservation of heritage in Borneo

Albatros Travel has supported the hunter-gatherer people Penan in Sarawak, in the Malaysian part of Borneo, for more than twenty years. It started as support in documentation of their battle against the destruction of their last remaining forests, and their way of life. Later we initiated support within medical care and food supply. It all culminated with a village project where two large houses were built for one of the last nomadic groups of the Penans who had to abandon their traditional nomadic lifestyle, due to the logging of the rainforest.

Contributions and clothes collections

We offer our guests the chance to make financial contributions to some of our local projects, which we have assessed to make sure that any donated money has the intended effect. All work Albatros Travel does in this area will always be funded by the company and never by external sources. We are in the progress of structuring the work with donations to provide 100% transparency.



Employees at our Copenhagen office have collected clothes and toys for locals at our destinations and people in conflict areas on several occasions. In 2014 we sent toys and clothes to children in Greenland and warm clothes to refugees in Syria.