UK Modern Slavery Act 2015

Board Update December 2022

Background

The UK Modern Slavery Act 2015 (the "Act") was enacted into law in March 2015 and is designed to tackle slavery both in the UK and internationally. Commercial organisations subject to the Act must report annually to the steps that they have taken during the financial year to ensure that modern slavery is not taking place in their own business or in their supply chains.

Experian Technology Limited is required to publish an annual Modern Slavery Statement as part of the annual reporting process.

Board Action

The attached draft statement, which has been updated from last year's statement, has been produced for the Board's review and approval. This is Experian's sixth Modern Slavery Statement reflecting the activity in the last financial year and the plans for the financial year ending 31 March 2023.

Which organisations are required to publish a statement?

By way of reminder, UK government guidance clarifies that if an organisation in any part of a group structure, wherever incorporated or established, meets the turnover threshold of £36 million pa, is carrying on a business or part of a business in the UK and supplies goods or services, it must make a statement.

Content of the Statement

The guidance expands upon the suggested content of the statement as set out in Section 54 of the Act. It highlights that organisations are expected to tailor their activities in preventing modern slavery to their specific sector and business.

The guidance states that the statement should be concise and written in English, although it may also be provided in other languages if this is appropriate. It must relate to steps which the organisation has undertaken or begun to undertake. The statement does not require any specific layout, content or level of detail, but must include all steps that have been taken by the organisation to prevent modern slavery in the organisation's supply chains and own business in that financial year.

The draft statement attached as Appendix A builds upon our statement for the current financial year, includes an update on the actions taken, and outlines our plans for the next financial year.

This statement reflects the content of the Experian plc modern slavery statement which was approved in the March OPCO.

Approval and Publication of the Statement

The statement should be approved by the Board and signed by a director.

Experian Technology Limited does not have a website, so cannot publish the full statement on its website. It is required to provide a copy of the statement in writing to anyone who requests one within 30 days. The email address of the Deputy Company Secretary is provided on the Modern slavery statement registry to facilitate this.

Experian Technology Limited

Modern Slavery Statement

Financial year ending 31 March 2023

This statement is made pursuant to section 54 (1) of the UK Modern Slavery Act 2015 (the "Act") and sets out the steps the Company has taken to ensure that slavery, human trafficking and child labour is not taking place in our supply chains or in any part of our business.

As part of the Experian Group, Experian Technology Limited takes the same approach, operates to the same modern slavery standards and with the same controls as the other operating subsidiaries within the Group.

Our Definition and Approach to Modern Slavery

Experian is dedicated to creating a better tomorrow. A key element of this mission is to ensure that we do all we can to eliminate the blight of modern slavery.

Experian defines modern slavery as the severe exploitation of individuals for personal or commercial gain. It can take many forms and is often very difficult to detect. Common forms of modern slavery are human trafficking, forced labour, bonded labour, sexual exploitation and the slavery of children. Experian seeks to do all it can through the efforts outlined in this statement to prevent, detect and eliminate these practices in our organisation and supply chain.

We have established a modern slavery steering committee which meets each quarter and is chaired by our Group Chief Procurement Officer. This committee oversees our modern slavery programme globally. Our Head of UK & Ireland Procurement is accountable for our approach to modern slavery within Experian Technology Limited.

Our Business

We give our customers the power to assess, predict and to plan so they may achieve their goals and navigate the world with confidence. Our expertise in data, analytics and technologies means we give answers; we create coherence and clarity from complexity.

Every day, our data and analytics are helping people and businesses to achieve more; individuals to access the financial services they need; people to protect their identities and lives; and economies and societies to flourish.



We aim to have a positive effect on the communities in which we live and work. From teaching unemployed young people the interview skills they need to get a job, to helping charities expand so they can feed and shelter even more people, we're using our expertise to make a difference.

How we work

How we work is as important as what we do. We recognise that our work carries with it an enormous responsibility, and our guiding principle is to treat everyone fairly and their data with respect.

Our Structure and Supply Chain

Experian is the world's leading global information services company. During life's big moments - from buying a home or a car, to sending a child to college, to growing a business by connecting with new customers - we empower consumers and our clients to manage their data with confidence. We help individuals to take financial control and access financial services, businesses to make smarter decisions and thrive, lenders to lend more responsibly, and organisations to prevent identity fraud and crime.

We have 20,000 people operating across 44 countries and every day we're investing in new technologies, talented people, and innovation to help all our clients maximise every opportunity. We are listed on the London Stock Exchange (EXPN) and are a constituent of the FTSE 100 Index.

Learn more at www.experianplc.com or visit our global content hub at our global news blog for the latest news and insights from the Group.

Each year Experian Group companies spend cUS$1.6bn with external vendors on goods and services. The majority of this spend is on IT, professional services, data and marketing. Our suppliers employ over 6,000 contractors who work on Experian projects, many of these are based in India and are specialists in software development.

Given the nature of Experian's business we believe the risk of modern slavery in our organisation and supply chain is low compared with businesses operating in other sectors. Nonetheless, we are not complacent and continue to focus on improving our procedures and policies to ensure that there is no modern slavery in our organisation or supply chain.

Our Standards and Policies

We have standards and policies in place which combat the risk of modern slavery.

Our employees:

- are provided with a written contract of employment which sets out their rights as employees clearly and which comply with local laws;
- comply with our Global Code of Conduct which is published at https://www.experianplc.com/responsibility/our-policies/ and communicated to employees via a mandatory online annual training module;
- are provided with a global confidential helpline where any concerns can be reported anonymously 24 hours per day. Any instances of whistleblowing are received by our Head of Global Internal Audit. If serious, a triage committee assesses the report, agrees on next steps and decides on reporting lines. The committee is also responsible for ensuring that all whistleblowing policies are adhered to in relation to the whistleblower. Where a supplier is involved, the owning business have responsibility for ensuring the supplier responds to any violations and undertakes any recommended actions;
- are provided with an all-employee communication highlighting the risks of modern slavery and how they can report any suspected instances.

Our suppliers:

- are obligated under our contractual terms and conditions to maintain acceptable controls and standards in respect of their employees and their rights and freedoms, and replicate these in any contract with subcontractors that they may use to deliver services to us;
- are assessed as part of our Procurement process - we undertake appropriate due diligence checks as part of this process and include a section on modern slavery at the beginning of any new transaction;
- must comply with our Supply Chain Principles as a minimum, which can be found at https://www.experianplc.com/responsibility/our-policies/ and specifically covers human trafficking, modern slavery and forced/child labour; and

Due Diligence

When starting a new relationship with a supplier, we:

- ask questions at the outset of any competitive process around a supplier's modern slavery compliance;
- may conduct onsite assessments of supplier premises where services are to be delivered and request to see policies and statements around modern slavery; and
- obligate suppliers to comply with our supply chain principles.

Risk Assessment

We continue to assess our existing supply chain by carrying out desktop assessments annually and select those we believe are more exposed to potential modern slavery risks.

Our internal and external operational activities are primarily service based. As a consequence, our risk assessment is that the primary risks of modern slavery, whilst remaining low, relate to excessive working hours (where victims are forced to work more than the maximum hours allowed by the law of the country of operation) and bonded labour. Our assessment activities are therefore focused on these areas.

The assessment questionnaire includes a series of questions to ascertain the supplier's knowledge, approach and policies relating to modern slavery risks in their business. This includes reviewing their modern slavery statements and supporting policies where available.

We received 55 responses to our 2021 desktop assessment. The majority of our suppliers conducted due diligence and had processes in place for employees to raise modern slavery concerns. Our regional buyers undertook follow-up work with suppliers of particular concern following guidance from the Slave Free Alliance and our legal team.

As a founder member of the Slave Free Alliance https://www.slavefreealliance.org/, we seek their input each year when developing and undertaking internal or external assessments. We also have a panel of external auditors available to undertake in depth supplier assessments where required. The auditor is selected based on location, capacity and whether there is any potential conflict of interest.

Training

A global briefing note on modern slavery has been issued to all staff via our internal intranet. This highlights what modern slavery is, and how employees should report any suspicions and findings. This briefing note is updated annually.

All members of the global procurement team have attended more detailed training on modern slavery. This explains the purpose of the Act, Experian's approach and what members of the procurement team should do if they suspect any form of modern slavery in our supply chain.

Summary of Activities for the financial year ended 31 March 2022

We completed our first annual desktop assessments, managing this centrally through our Procurement Hub. Actions and follow-ups to the assessments have been closed out.

During the year, no calls were received concerning modern slavery to our global confidential helpline.

There have been no instances of modern slavery found in our business or supply chain against the 11 International Labour Organisation indicators in this financial year. We commenced the process for annual desktop assessments for the financial year ending March 2023.

We have renewed our membership with the Slave-Free Alliance for another three years. We work with them to track progress for the against our three-year plan. This is reviewed at our quarterly modern slavery steering committee meetings.

We delivered a supplier focused modern slavery awareness event in October 2021. This was conducted in partnership with the Slave Free Alliance. Our key suppliers attended to learn more about modern slavery and Experian's work in this area.

With funding entirely provided by Experian, Hope for Justice (the charitable arm of the Slave Free Alliance) is implementing a Case Management System ("CMS") called 'Caseworker Connect', developed by Blue Door. This CMS went live in early 2022 for all Hope For Justice's advocacy work. This will enable them to measure complex individual outcomes for survivors, allowing them to store and track live and closed cases in a single, secure database, ensuring more resources can be used for victim recovery and support.

We have established a process, in partnership with Hope for Justice, working with our Fraud & Authentication and Compliance teams to streamline three key processes:

- adapting the identity verification process which, in most circumstances, would be unsuitable for victims of slavery (little or no identification documents).
- with the consent of victims, sending encrypted statutory credit reports directly to Hope for Justice, reducing costs and lead times.
- supporting victims of financial abuse through our dispute process (where financial accounts have been fraudulently opened by impersonation or coercion).

Proposed actions for the next financial year ending 31 March 2023

1. Continue our partnership with the Slave Free Alliance to drive awareness and support them financially to provide advocacy support for modern slavery victims;

2. Undertake refresher training on modern slavery via a face-to-face session with the procurement teams, and delivering appropriate targeted training to internal staff in high risk areas (outside of the procurement team);

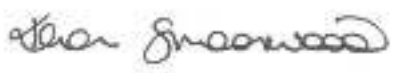
3. Maintain an on-going programme of supplier reviews which include a deeper focus on modern slavery risks, including onsite assessments;

4. Extend our whistleblowing process via the global confidential helpline to be available to employees of our suppliers;

5. Continue to use the quarterly modern slavery steering committee to drive our agenda; and

6. Working with our internal compliance colleagues, review processes and policies on Modern Slavery for Merger and Acquisition targets as part of our overall due diligence.

This statement is approved by the Experian Technology Limited Board and signed on its behalf by:



K J Greenwood
Director
Experian Technology Limited
Date: 21 December 2022