

EXPERIAN TECHNOLOGY LIMITED - MODERN SLAVERY STATEMENT

Financial year ended 31 March 2024

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. It covers our activities for the financial year for the 12 months to 31 March 2024, hereafter referred to as ‘FY24’.

As part of the Experian Group, Experian Technology Limited takes the same approach, operates to the same modern slavery prevention 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 in line with Article 12 of the Act, which encompasses slavery, servitude and forced or compulsory labour, human trafficking, sexual exploitation, and child labour; all conducts that constitute offence under section 1, 2 or 4 of the Act, and under other relevant criminal justice acts for Scotland and Northern Ireland. It can take many forms and is often very difficult to detect. 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 quarterly and is chaired by our Group Chief Procurement Officer. This committee oversees our modern slavery programme.

Our Business

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.

Every day we're investing in new technologies, talented people, and innovation to help all our clients maximise every opportunity. 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.

At the heart of the business is data, with extensive data sets of credit history and repayment data on 1.1 billion people and 150 million businesses across the world. Experian is an expert at developing analytics and decisioning tools that can help businesses and consumers make better use of their data and empower them to seize opportunities.

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.

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.

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.

Our Structure

Experian plc is the ultimate parent company of the Group, it operates its business through its subsidiaries globally, the majority of which are wholly owned (see p251-254 of the [FY24 Annual Report](#)). Experian plc and its subsidiaries employ approximately 22,500 people in 32 countries. Experian provides services across four geographic operating segments: North America (66% of revenue); Latin America (16%); UK and Ireland (12%); and EMEA and Asia Pacific (6%), with the leaders of each region reporting to the Chief Operating Officer of the Group.

The three largest markets are the USA, Brazil, and the UK. A full list of the countries in which we operate can be found on our [website](#). This regional structure enables Experian to better understand the different needs and constraints of each local market and to service both domestic and international clients effectively within each region. Its global reach enables Experian to offer its clients the benefit of shared product development and market knowledge, supporting existing clients (frequently large multinational organisations) as they expand into new countries. Experian's activities are grouped into two business segments: Business-to-Business (73% of revenue) and Consumer Services (27% of revenue).

The Group corporate headquarters are in Dublin, Ireland with operational headquarters in Nottingham, UK; Costa Mesa, USA; and São Carlos, Brazil. The Experian plc Board has oversight over the Group globally, and we have a well-developed system of internal authorities, controls, and policies within the Group. We also have a number of corporate functions (e.g. Procurement, Risk, Finance, HR, Sustainability etc) that support the regions.

We are listed on the London Stock Exchange (EXPN) and are a constituent of the FTSE 100 Index.

Our Supply Chain

Each year Experian Group companies spend c.US\$2.9bn 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.



Our supply base is heavily weighted towards service-based providers rather than the purchase of manufactured goods. Most of the manufactured goods that we do purchase are purchased from large multinational corporations who have their own supply chain principles and ethical standards in addition to agreeing to ours where appropriate.

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 complies with local laws;
- certify compliance with our Global Code of Conduct which is published on our [website](#) 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 whistle-blower. Where a supplier is involved, the Experian business owning the relationship has responsibility for ensuring the supplier responds to any violations and undertakes any recommended actions;
- are provided with an all-employee communication highlighting 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;
- must comply with our supplier code of conduct. In FY24 we published our new supplier code of conduct which sets out our expectations of suppliers. It separates these expectations into obligations our suppliers must fulfil and best practices that they should seek to comply with. The new supplier code of conduct can be found on our [website](#) and specifically covers human trafficking, modern slavery, and forced/child labour.

Risk Assessment

In FY23, we invited our partners at the Slave Free Alliance to undertake a risk assessment of our business. They concluded that the internal risk in our business is relatively low due to the pre-employment checks that we undertake.



The categories of modern slavery that Experian is most at risk of (operating in a service-based environment), 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.

Supplier Due Diligence – Ongoing

When starting a new relationship with a supplier, we:

- ask questions at the outset of any competitive process regarding 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 agree to our supplier code of conduct or their equivalent standards.

Supplier Due Diligence – FY23

We also undertake annual assessments of our existing supply chain. In FY23, we carried out desktop assessments in the UK and Ireland, North America, Latin America and EMEA and Asia Pacific. The assessment began with a segmentation of all our suppliers by spend, region and category. We focused on higher risk categories including facilities management, labour agencies and software development suppliers. We combined this with data from the Corporate Human Rights benchmark and Glassdoor.com to identify 98 of our highest risk suppliers. These suppliers received an assessment questionnaire.

The assessment questionnaire included a series of questions to ascertain the suppliers' knowledge, approach and policies relating to modern slavery risks in their business. The process included a review of their modern slavery statements and supporting policies where available. We received a 100% response-rate to our FY23 assessment questionnaire.

The responses to the assessment questionnaire highlighted a number of measurable key performance indicators ("KPIs"):

- 51 of the 98 suppliers stated that they have a modern slavery policy;
- 65 suppliers audit their own new suppliers (with modern slavery and human rights in scope);
- 48 suppliers include clauses in their supplier contracts aimed at preventing modern slavery in their respective supply chains.

We undertook 13 video calls with suppliers that, based on the questionnaire responses, were of highest risk. The calls were led by a modern slavery expert from the Slave Free Alliance. The subject matter expert produced a report for each supplier with a series of recommendations which were shared with the suppliers to action.

Supplier Due Diligence – FY24

In FY24, we wanted to build on the due diligence from the previous year and not just repeat it. We decided to focus on facilities management vendors at our main sites as this was identified as one of our higher-risk areas. We embarked on a series of on-site visits to each of our main offices around the globe including in the UK, USA, Brazil, Germany, Bulgaria, and Malaysia. At



each of these offices, in person meetings were held with staff such as cleaners, caterers, maintenance and reception staff.

The agenda and questions for the meetings were prepared with assistance from our partners at the Slave Free Alliance. The meetings assessed the interviewees' level of knowledge regarding the subject, whether they would recognise the signs of modern slavery and their level of confidence in Experian and their employer to deal with the situation. The meetings were organised as general welfare discussions so that interviewees did not prepare and to ensure that we obtained a true picture of their knowledge of modern slavery.

80 facilities management colleagues and contractors were interviewed across 12 offices. The main themes that emerged were;

- facilities management employees' current understanding of the issue in some regions was primarily obtained through local media which varies from region to region;
- all interviewees appeared to have a good understanding of their rights and what to expect of their employers;
- there were no instances of modern slavery or human rights being infringed within our organisation or supply chain.

As a founder member of the [Slave Free Alliance](#) we seek their input each year when developing and undertaking internal or external assessments. In FY2 the Slave Free Alliance assisted with the visits in the UK. Visits undertaken outside of the UK were undertaken by Experian colleagues (not the facilities teams) with support from the Slave Free Alliance. We have a panel of external auditors who would have been deployed had a more in-depth supplier assessment been required. Each external auditor is selected based on location, capacity and whether there is any potential conflict of interest.

Training

A global briefing note about modern slavery was issued to all staff via our internal intranet. This highlighted what modern slavery is, and how employees should report any suspicions and findings.

In FY24, our global procurement team received supplementary modern slavery training through our on-line learning and development tool. These assignments were tracked to ensure that all procurement colleagues completed the training.

We also extended training to 120 Human Resources Business Partners with two webinars held to increase understanding and awareness.

Following our FY23 due diligence, in April 2023, we undertook a webinar that was open to the 98 suppliers that were identified to be of higher risk. The supplier training webinar was hosted in partnership with the subject matter experts at the Slave Free Alliance. We advised our suppliers what they should do to achieve best practice and recommended that they seek the support of organisations like the Slave Free Alliance to obtain expert advice.

Support for Anti-Slavery Organisations

Between 2020 and 2023, Experian's partnership with the charity Hope for Justice supported 544 survivors of modern slavery through advocacy and advice services in the UK. This helped those survivors prove their identity, access credit reports, and resolve fraudulent debts registered in their name. An additional 13,465 people at risk of exploitation were also engaged through



community outreach and training to equip them with the tools and skills to identify and report modern slavery. Hope for Justice also used Experian's funding to implement a Case Management System ("CMS") called 'Caseworker Connect'. This CMS went live in 2022 for all Hope for Justice's UK advocacy work, enabling their teams to log and measure complex individual outcomes for survivors. This has allowed 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. Since 2023, Experian has developed a new mapping tool for use by Hope for Justice and the Slave Free Alliance in the UK, which models vulnerability propensity of heightened modern slavery instances by geographic area.

The North America region has partnered with Hope for Justice to support the RISE Programme (Restore, Inspire, Strengthen and Empower) in North Carolina (ranked 9th in the US for highest number of human trafficking cases) to generate enhanced, long-term services for human trafficking survivors. So far, 14 survivors are being helped across 14 domains such as housing, education, employment, financial literacy, physical and mental health.

Summary of Activities for the financial year ended 31 March 2024

We completed more thorough, on-site due diligence at a range of Experian offices across the globe, speaking in person to a range of suppliers' facilities management employees. We assessed their knowledge and understanding of the subject to identify strengths and areas that could be improved. Actions and follow-ups to the assessments will be closed out in FY25.

We published a new supplier code of conduct. It covers modern slavery and human rights in greater depth than the previous version.

We worked with our sustainability, compliance, and people engagement teams to review our Human Rights Statement and requirement for a Human Rights policy. It was agreed that, given our strengthened Supplier Code of Conduct, the existing policies are adequate to cover our areas of risk.

We assessed the areas of our business where employee training was most required. Refresher training was rolled out to the procurement team through our online learning platform. Two webinars were also held with Experian's HR Business Partners. Training webinars were held for highest-risk suppliers identified through the FY23 due diligence.

We established a clear chain of reporting for emergency situations reported to our whistleblowing helpline. 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.

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Following the modern slavery assessment mentioned above, we continue to work with Slave Free Alliance to track progress against our three-year plan. This is reviewed at our quarterly modern slavery steering committee meetings.

Proposed Actions for the next financial year ending 31 March 2025

1. Implement the learnings from FY24 on-site due diligence;
2. Undertake a deep dive into the IT hardware supply chain to identify and mitigate risks beyond our first-tier suppliers; and
3. Continue to use our data and analytics tools to help Hope for Justice bring an end to modern slavery.

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



Mark Pepper, Director, Experian Technology Limited

Date: 19 December 2024