

UK Modern Slavery Act 2015

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 on the steps that they have taken during the financial year to ensure that slavery and human trafficking are not taking place in their own business or in their supply chains.

Experian is required to publish an annual Slavery and Human Trafficking 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, prior to formal consideration for approval at the time of the approval of the results for the year ended 31 March 2019.

This is Experian's fourth Slavery and Human Trafficking Statement reflecting the activity in the last financial year and the plans for the financial year ending 31 March 2020.

Which organisations are required to publish a statement?

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. Experian plc is a holding company which does not itself carry on business in the UK, however, in line with best practice, the Company is intending to continue to publish an annual 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. 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 last year's statement, includes an update on the actions taken and outlines our plans for the next financial year. The structure has been updated to match the headings suggested in Section 54 of the Act in order to make our statement easier to reference when being reviewed externally.

Approval and Publication of the Statement

The statement should be approved by the Board and it is intended that such approval will be delegated to the Board Committee which has responsibility each year for approving the results of the Group, the Annual Report and Accounts, etc.

The statement then needs to be signed by a Director and a link to the statement should be published prominently on the Experian plc website. This link is currently in place, but will require updating with the new statement once it has been signed. It is intended that the Chairman or Deputy Chairman will again sign the statement on behalf of the Board following the approval of the annual results in May 2019.

Actions undertaken during the current financial year

All our standard procurement contract templates contain consistent ethical contractual obligations globally and we continue to require such clauses in both our procurement contracts and in supplier agreements.

We have completed desktop assessments of our current suppliers in the UK and Ireland, North America and Brazil, selecting those we believe are more exposed to potential Modern Slavery risks. We will complete our reviews of EMEA and Asia Pacific by June 2019.

We have continued to enforce our supply chain principles on our suppliers during the course of the year, and have joined the Slave-Free Alliance an organisation working towards a slave-free supply chain globally.

During the year ended 31 March 2019, the Global Head of Internal Audit has confirmed that no calls were received concerning modern slavery in our supply chain to our global confidential helpline.

Members of the global procurement team have attended a face to face training session on modern slavery. This explains the purpose of the act, Experian's approach and what they should do if they suspect or uncover any form of modern slavery in our supply chain.

A briefing note on modern slavery is available to our employees via our internal intranet and the Experian internal confidential helpline information was refreshed with a section dedicated to modern slavery along with a set of "Frequently Asked Questions".

Proposed actions for the next financial year

1. Complete desktop review of our supply chain in EMEA / Asia Pacific and conclude any required follow up meetings.
2. Undertake an on-going programme of supplier reviews focused on modern slavery risks.
3. Using our membership of the Slave-Free Alliance to undertake refresher training on modern slavery via a face to face session with the procurement teams globally and develop an interactive session that tests the knowledge of the team on modern slavery
4. Repeat the all – employee electronic communication which highlights what modern slavery is, how employees can report any concerns or suspicions and where they can find more information.

Appendix A

Experian plc

Slavery and Human Trafficking Statement 2019-2020 – DRAFT

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.

Our Business

We help to 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

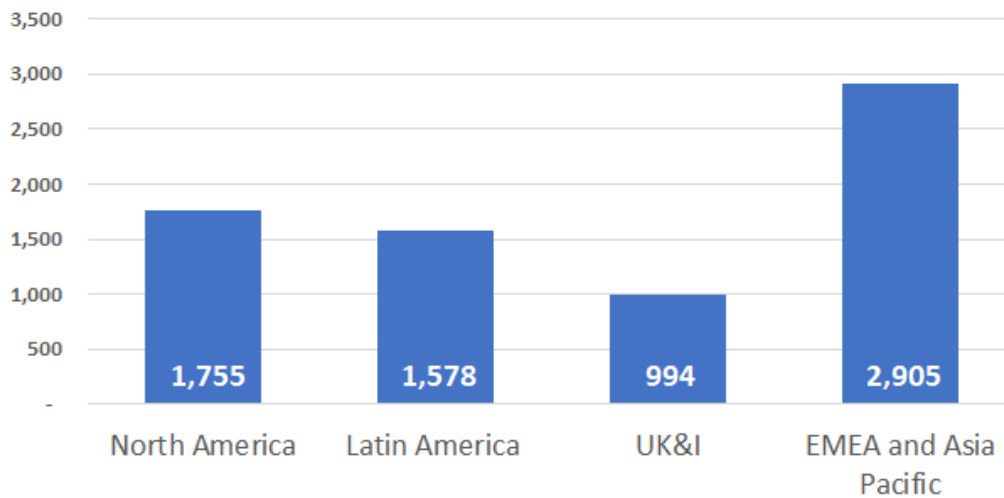
At the same time, how we work is as important as what we do. We recognise that our work carries with it an enormous responsibility, and our guiding principle is to treat everyone fairly and their data with respect.

Our Structure and Supply Chain

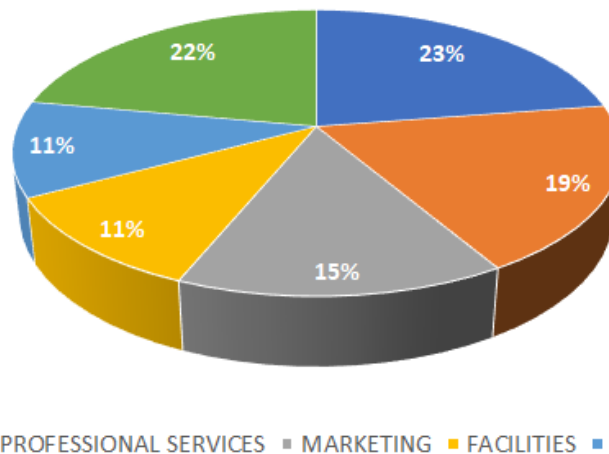
Experian plc operates its business through its subsidiaries globally, the majority of which are wholly owned. A list of the regions in which we are operate can be found at <https://www.experianplc.com/contact-us/region>. We have a well-developed system of internal authorities, controls and policies within the Group. Experian plc and its subsidiaries employ approximately 16,500 people in 39 countries. The Group corporate headquarters are in Dublin, Ireland with operational headquarters in Nottingham, UK; California, US; and São Carlos, Brazil.

Each year Experian Group companies spend c\$1.5bn with external vendors on goods and services. The majority of this spend is on IT, professional services, data and marketing. Given the nature of Experian’s business we believe the risk of modern slavery in Experian’s supply chain is low compared with businesses operating in other sectors.

NUMBER OF VENDORS BY REGION



FY19 GLOBAL TOP 5 SUPPLIER CATEGORIES



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.

The use of service provider contractors in our organisation is largely within our facilities support area, comprising: security guards, caterers and cleaners. In addition, the Group also uses IT contractors. We do not generally enter into individual arrangements for any of these roles and contract via reputable large facilities management and specialist IT resourcing companies respectively. We consider these areas to be a higher risk in our business and as such ensure deeper due diligence is undertaken during the procurement process (which may include desktop or onsite visits and observations of the workforce providing such services).

On the basis set out above, we believe the risk of modern slavery in our supply chain is low, however, we are not complacent and will continue to focus on improving our procedures and policies to ensure that there is no modern slavery in the Experian supply chain. This year we

have joined the Slave Free Alliance <https://www.slavefreealliance.org> a global movement working towards a slave-free supply chain.

Our Standards and Policies

Experian does not tolerate any form of modern slavery or human trafficking whether internally or within our supply chain and the leadership team are aware of the risks 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;
- undertake training in relation to our ethical standards;
- comply with our Global Code of Conduct which is published at <https://www.experianplc.com/responsibility/our-policies/>;
- are provided with a global confidential helpline where any concerns can be reported anonymously 24 hours per day;
- are provided with an all employee communication highlighting the risks of modern slavery and how they can report any suspected instances; and
- in the Procurement team are provided training on modern slavery on an annual basis.

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 this 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 of 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
- may be randomly selected and reviewed to assess their compliance with our requirements on modern slavery, and their adherence to the Act as part of our risk based assessment of our existing supply chain. This may be in the form of a questionnaire, telephone interview or face to face meeting and an onsite review of the premises from which they provide services to us.

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.

With our existing suppliers, we randomly select a sample and assess their processes and procedures in place around several areas, including compliance with ethical standards (which includes modern slavery).

Risk Assessment

We have carried out a desktop assessment of our current suppliers in the UK and Ireland, North America and Brazil and selected those we believe are more exposed to potential modern slavery risks.

A questionnaire was sent that included a series of questions to ascertain the supplier's knowledge, approach and policies relating to modern slavery risks in their business. This included reviewing their modern slavery statements and supporting policies where available. We then scored these responses. Where we had concerns with their responses and a low score was achieved, we followed up with either a face to face interview or telephone conference to discuss these further, and for a plan to alleviate and address our concerns.

Follow up calls or meetings are held with suppliers to ensure that they had delivered on their plans to address our concerns.

Training

A briefing note on modern slavery is available to our employees via our internal intranet and the Experian internal confidential helpline information was refreshed with a section dedicated to modern slavery along with a set of "Frequently Asked Questions".

An updated briefing note will be distributed to all employees at least once annually.

All members of the global procurement team have attended face to face 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 or uncover any form of modern slavery in our supply chain.

Summary of Activities for the Year

All our standard procurement contract templates contain consistent ethical contractual obligations globally and we continue to require such clauses in both our procurement contracts and in supplier agreements.

We have completed desktop assessments of our current suppliers in the UK and Ireland, North America and Brazil, selecting those we believe are more exposed to potential Modern Slavery risks. We will complete our reviews of EMEA and Asia Pacific by June 2019.

We have continued to enforce our supply chain principles on our suppliers during the course of the year, and have joined the Slave-Free Alliance an organisation working towards a slave-free supply chain globally.

During the year ended 31 March 2019, the Global Head of Internal Audit has confirmed that no calls were received concerning modern slavery in our supply chain to our global confidential helpline.

Proposed actions for the next financial year

1. Complete desktop review of our supply chain in EMEA / Asia Pacific and conclude any required follow up meetings.
2. Undertake an on-going programme of supplier reviews focused on modern slavery risks.
3. Using our membership of the Slave-Free Alliance undertake refresher training on modern slavery via a face to face session with the procurement teams globally and develop an interactive session that tests the knowledge of the team on modern slavery
4. Repeat the all – employee electronic communication which highlights what modern slavery is, how employees can report any concerns or suspicions and where they can find more information.

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

George Rose
Deputy Chairman and Senior Independent Director
Experian plc

Date: 14 May 2019