

[Consumer \(/\)](#) [Small Business \(/business-express/home.html\)](/business-express/home.html) [Business \(/business/\)](/business/)

[Data Privacy \(/privacy-and-your-data.html\)](/privacy-and-your-data.html)

[About Experian \(/about-us/\)](/about-us/) [Careers \(/careers/\)](/careers/)

[Global Sites](#)

Slavery and Human Trafficking Statement 2019-2020

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.

slavery and human rights

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.

We’re investing for the future



We've been around for more than 125 years, and we're growing. We're investing in the future, through new technologies, talented people and new innovative products – all to help create a better tomorrow.

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 operate can be found at

<https://www.experianplc.com/contact-us/region> (<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.

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.

The use of service provider contractors in our organisation is largely within our facilities support area, comprising: security guards, caterers and cleaners. In addition, Experian 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 we minimise the risk of modern slavery in the Experian supply chain. This year we have joined the Slave Free Alliance <https://www.slavefreealliance.org> (<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/> (<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/> (<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, 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 were held with suppliers to ensure that they had delivered on their plans to address our concerns.

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.

An updated briefing note will be distributed to all staff 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.


This training will be provided to our global procurement team again in 2019.

Summary of activities for the financial year ended 31 March 2019

All our UK standard procurement contract templates now contain consistent ethical obligations and we continue to require such clauses in both our procurement contracts. These include reference to modern slavery.

We completed a desktop assessment of our current supply base in the UK and Ireland.

Members of the UK procurement team attended a face to face training session on modern slavery. This covered 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 was issued to all staff via desk drop and 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". 

Experian joined the Slave-Free Alliance, an organisation working towards a slave-free supply chain globally, and have further raised the profile with employees by building of a “Freedom Wall” in one of the Nottingham offices.

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 financial year ending 31 March 2020

1. Undertake an on-going programme of supplier reviews focused on modern slavery risks.
2. Use our membership of the Slave-Free alliance to undertake a detailed gap analysis to enable us to develop our strategic plan relating to modern slavery.
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 Limited Board and signed on its behalf by:

Charles Butterworth

Director

Experian Limited

Date: 4 July 2019

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