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# Modern Slavery and Human Trafficking Statement

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## OVERVIEW

Equifax Limited (Equifax) is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. Equifax will not tolerate any failures in its supply chain to meet these standards; they are a prerequisite of doing business with us.

### 1. Structure of the organisation

Equifax is a subsidiary of Equifax Inc., a leading global technology, data and analytics business, headquartered in Atlanta, Georgia. The group employs over 11,000 people worldwide and has business operations in over 24 territories. It has unique data, technology and analytics capabilities and is the market leader in almost every country in which it operates.

Equifax is the group's principal UK operating company, authorised and regulated by the Financial Conduct Authority. To find out more about the nature of our business, please visit [www.equifax.co.uk](http://www.equifax.co.uk) In order to support our operations and meet our customers' needs, we work with a range of suppliers, from office equipment through to technology providers.

### 2. Risk

Because of the nature of our business as a data, technology and analytics provider, and the extensive background screening checks undertaken on our workforce, we believe that the inherent risk level of modern slavery occurring in our organisation is low. However, we do recognise that risk levels are not homogenous across our supply chain, and there are certain facets of our supply chain that present a greater risk level than others.

The inherent likelihood of modern slavery and human trafficking occurring in our supply chain is considered remote, with a majority of expenditure within our supply chain falling on IT services and equipment, data acquisition, and professional services.

We recognise that suppliers that provide physical goods, or have parts of their supply chain outside of the UK present a greater risk, and therefore tailor our management of suppliers accordingly.

### **3. Policies**

All suppliers as part of our contractual terms and conditions, are obligated to maintain appropriate standards and controls for their employees.

As part of our commitment to combating modern slavery throughout our organisation and our supply chain, we have implemented a specific Modern Slavery and Human Trafficking Policy. We also consider several of our other policies to be relevant to this area:

Our Modern Slavery and Human Trafficking Policy applies to Equifax and our supply chain relationships. Fundamentally this policy compels Equifax to ensure modern slavery, human trafficking and child labour does not occur in our own operations; and to ensure our suppliers meet the minimum requirements Equifax believes should be demonstrated by them in accordance with the Act.

Our Code of Ethics & Business Conduct applies to Equifax's supply chain and requires that our suppliers adhere to our principles and that they encourage and work with their own suppliers to recognise these principles.

Our Pay Policy: We pay all employees at least the Real Living Wage rate. This applies equally in both the UK and Ireland.

Our UK Whistleblowing Policy under which employees and any person who undertakes to do or perform personally (or otherwise) any work or service for Equifax, regardless of the nature of the contractual relationship between them, can report any and all concerns in confidence and without prejudice.

### **4. Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the due diligence procedures in respect of our business-to-business suppliers and our HR and recruitment activities.

These include supplier questionnaires, risk assessments, contractual commitments and the right to conduct audits.

Our procedures are designed to;

- Establish and assess areas of potential risk in our business and supply chains
- Monitor potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Provide adequate protection for whistle-blowers.

In order to identify risk within our supply chain, we consider the following factors: industry type, nature of the workforce, supplier location, context within which the supplier operates, commodity type and supply chain model.

We are pleased to report that we have not identified any instances of modern slavery throughout our supply chain.

## **5. Recruitment**

Equifax are committed to only use reputable recruitment agencies. We conduct careful checks of recruitment agencies before adding them to its list of approved agencies. We require that the agency provides assurances that appropriate checks have been made on the person supplied. Recruitment agencies will be reviewed at least every three years.

Equifax ensures the staff it recruits or hires for temporary assignment have the appropriate paperwork (e.g. work visas). Staff will have a written contract of employment and staff will not have had to pay any direct or indirect fees to obtain work.

We will provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits to which they may be entitled.

## **6. Training**

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programme, employees are encouraged to identify and report any potential breaches of the organisational Modern Slavery and Human Trafficking Policy. Employees are taught the benefits of measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

## **7. KPIs**

We consider a number of data points in order to determine the effectiveness of managing Modern Slavery.

- Code of Conduct completion rate: 100%
- Number of instances of modern slavery reported within the company or our supply chain: 0
- Number of instances of debt bondage reported within the company or our supply chain: 0

## **8. Continuous Improvement**

We recognise that the fight against modern slavery is an area that continually changes and moves forward, therefore, it is important that we continually develop and improve our policy and practice.

Our focus continues to be working with our largest suppliers within the supply chain of TDX Group. TDX Group is a wholly-owned subsidiary of Equifax Ltd, and are the market-leaders in the provision of data, technology and advisory solutions within the debt industry. Because of the business model of TDX Group, they have a large supply chain, including a range of debt collection agencies (DCAs).

This puts TDX in a great position to be able to drive good practice throughout this industry, including to firms who are not covered by the Modern Slavery Act 2015. We will continue to utilise our unique position in the industry to share best practice and expertise regarding the tackling of Modern Slavery.

In addition, our future training focus will be on enhancing the specialist training for colleagues who are involved in the procurement of goods and services for Equifax, and colleagues responsible for managing our supplier base.

This statement covers the period ending 31 March 2024. This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015.

Nadia Strone

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April 2024