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Supplier Code of Conduct

A guide to our standards for ethical behaviour in our supply chain

Table of contents

A message from B	rian Cassin and	Mark Langrish	3
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Committed to the Code	4
 Our purpose 	5
 The Experian Way 	t
 About this Code 	7
 Speaking Up 	
 Experian's commitment to suppliers 	

•	Maintaining a safe and healthy workplace	9
•	Respecting human rights1	0

•	Disclosing and resolving conflicts of interest12
•	Preventing bribery and corruption12
•	Collaborating across the supply chain13

Protecting Experian's information	14
 Protecting Experian's information 	15
Promoting corporate responsibility	17
Promoting corporate responsibilityProtecting the environment	

To our valued suppliers:

At Experian, we have earned the trust of our customers and business partners through maintaining high ethical and professional standards. As a supplier, you play a critical role in maintaining this trust.

Experian's Supplier Code of Conduct explains these standards and the expectations we have for you. It also outlines what we ask of you to live up to them. All of this aligns with what we call the Experian Way. The Experian Way encapsulates our values and is detailed in this Code.

Our Supplier Code has been approved by the Experian plc Board, and we're fully committed to implementing it across our supply chain. We all have an important role to play in creating a better tomorrow.

Best wishes,

Brian Cassin Chief Executive Officer

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Group Chief Procurement Officer



Experian's commitment to suppliers

Committed to the Code



Our purpose

Experian harnesses the power of data analytics and technology to improve access to credit and to empower consumers to understand their finances. Our suppliers play a pivotal role in our pursuit of this endeavour.

Together, we carry out our purpose: to create a better tomorrow by transforming financial lives.



The Experian Way represents our values and expectations. It involves these principles:



About this Code

The Experian Supplier Code of Conduct ("this Code" or "Supplier Code") is a guide to help our suppliers make the right decisions when working with us. It explains how we all must comply with laws and policies that apply to our business.

This Code applies to all our suppliers, and we expect every supplier to apply these principles to their respective supply chains. However, if any part of this Code conflicts with an applicable contractual agreement, the contract prevails.

Experian will take appropriate action for noncompliance that may include ending our business relationship. In some cases, noncompliance may lead to legal action or even criminal prosecution.

Speaking Up

As our supplier, we expect you suppliers to speak up if you think our Code, our policies or the law have been or are being violated. If you see questionable or unethical behaviour or are unsure of how to manage the situation, ask for help.

Reach out to your Experian point of contact or use our Confidential Helpline for questions or concerns.

Our <u>Confidential Helpline</u> is available 24 hours a day, 7 days a week. Users

can stay anonymous, and any information disclosed will be kept confidential and shared only with those who have a legitimate need to know.

Experian has a zero tolerance for retaliation for making good faith reports of misconduct. We believe in a positive and open work culture where everyone should feel comfortable reporting concerns.

Experian's commitment to suppliers

Just as we expect your commitment to our Code, we make these commitments to you. **We will:**

- Maintain a healthy and safe work environment on Experian premises for our suppliers' employees.
- Never ask our suppliers to do anything that is illegal or unethical.
- Be responsible custodians of our suppliers' data.
- Treat all suppliers fairly.
- Undertake due diligence to ensure all suppliers maintain consistently high standards.
- Work collaboratively with our suppliers to support improvement throughout the supply chain.
- Play our part in protecting the planet and supporting communities upon which we all depend.

Maintaining a safe and healthy workplace.....

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Respecting human rights.....

Respecting the workplace

Maintaining a safe and healthy workplace

We expect our suppliers to provide a healthy and safe working environment in which all workers are treated with dignity and respect.

Suppliers MUST:

- Comply with all applicable environmental, safety and health laws and regulations.
- Minimise hazard risks and maintain an effective health and safety management system.
- Never tolerate corporal punishment or any form of harassment or abuse, whether physical, sexual or mental.
- Never engage in workplace discrimination based on gender identity and/ or expression, sexual orientation, race, ethnicity, culture, religious beliefs, disability, veteran status, parental status, thought, or style or any other characteristic protected by law.

Suppliers SHOULD:

- Provide holistic care for your employees' physical, mental and emotional health.
- Train and prepare risk assessments and records necessary to reduce safety hazards.
- Record health and safety incidents and take corrective actions for each occurrence.



Respecting human rights

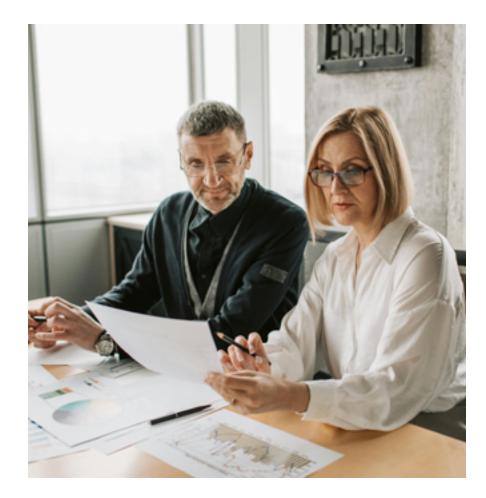
We are committed to respecting human rights by upholding the United Nations Universal Declaration of Human Rights (UDHR), the <u>United Nations Guiding</u> <u>Principles</u> on Business and Human Rights (UNGP), and the International Labour Organization (ILO).

Suppliers MUST:

- Not tolerate human trafficking, slavery, child labour or other exploitative work practices.
- Respect the freedom of association and the right of workers to form and join trade unions and bargain collectively.
- Comply with all applicable wage laws, including minimum wages, working hours and mandatory benefits.
- Identify, report and respond to potential human rights violations.

Suppliers SHOULD:

- Train your employees on human rights.
- Raise human rights awareness among your own suppliers and local communities.
- Perform due diligence to ensure that your own suppliers and subcontractors follow human rights standards.
- Comply with applicable guidance on living wages and hours.





Learn More:

- Salient Human Rights Statement
- Modern Slavery Statement

- Disclosing and resolving conflicts of interest.....12
- Preventing bribery and corruption.....12
- Collaborating across the supply chain.....13

Working with integrity

Disclosing and resolving conflicts of interest

We expect suppliers to act in Experian's best interests and to disclose and resolve any conflicts of interest. A conflict of interest can occur when a supplier has a personal or financial interest that could influence their professional decision-making or their responsibility to Experian.

Suppliers MUST:

• Disclose to procurement or your sponsor any relationship, investment, job and anything else that might pose a conflict of interest, so that it can be managed or resolved.

Preventing bribery and corruption

We do not bribe or work with people who do.

Suppliers MUST:

- Refuse any business engagement that would violate applicable laws, including tax evasion, or that would be unethical.
- Not make or accept any offer that could be a bribe, kickback or facilitation payment.

Suppliers SHOULD:

• Have anti-corruption policies in place with programmes to verify compliance.

For example, a conflict of interest could arise when a Director of a supplier organisation is also a family member of an Experian employee. Such situations can give rise to biased decision-making.

Be careful when gift-giving, and be on the alert for situations that may indicate a potential risk of bribery or corruption, such as unusual compensation, accounting or invoicing. Report any concerns to your sponsor, procurement or Experian's <u>Confidential</u> <u>Helpline</u>.

Bribe - Anything of value given, promised, accepted or solicited to influence someone's business decision-making to obtain an advantage.

Kickback - Providing anything of value to someone who corruptly enabled or facilitated a benefit or advantage. A bribe after the fact.

Facilitation payment - An unofficial payment made to secure, expedite, delay or refrain from performing a routine action, typically within an administrative process.

Collaborating across the supply chain

We work with third parties and suppliers who share our commitment to the highest ethical standards, and we expect our suppliers to do the same with their third parties. Suppliers should protect Experian's reputation and secure our data and systems by regularly monitoring third-party performance.

Suppliers MUST:

- Participate in Experian's due diligence processes when invited.
- Pay your respective suppliers promptly.

For suppliers serving our United Kingdom and Ireland, North America and Brazil regions, we provide a discounting programme for early payment of invoices. Refer to <u>our website</u> for more details.



Learn More:

Procurement Policy



Protecting Experian's Information15

Protecting Experian's information

Protecting Experian's information

Our Global Data Principles guide how we manage and use data, build products and conduct our business. We all have a role in protecting all Experian information, including personal data.

Suppliers must not share confidential information without an executed nondisclosure agreement in place. Be aware that disclosing our confidential information can violate insider trading laws, which may lead to severe criminal penalties.

Suppliers MUST:

- Adhere to our <u>security principles</u> and policies.
- Safeguard our data use secure methods and controls to protect all data and ensure these are continually reviewed and updated.
- Follow classification standards to identify the level of sensitivity for different data sets.
- Protect Experian information ensure access is on a need-to-know basis and that data is not shared on shared workspaces or social media.
- Continually develop your cyber maturity to respond quickly and effectively to evolving threats impacting you and your supply chain.

- Ensure that your environment is resilient to cyberattack and other resilience threats, regularly testing the preparedness of your defenses and response procedures.
- Ensure that your workforce stays alert and demonstrates sound cyber judgement conduct regular security awareness training for all employees.

Personal Data

"Personal data" can be information about:

- Employees
 Contractors
- Consumers Clients/Customers
- SuppliersShareholders

Personal data can include names, identification numbers, addresses, email, phone numbers, IP addresses, photos or location data.

Experian's Global Data Principles

We are committed to:

- **Data Security:** We protect data against loss and unauthorised access, use and disclosure.
- **Accuracy:** We maintain accurate, complete, relevant and legally compliant data.
- **Fairness:** We collect and use data fairly and for legitimate purposes, balancing privacy expectations with the social and economic benefits.
- **Transparency:** We disclose the types of data we collect, where we get it, how it is used and where it is shared. We provide individuals with appropriate opportunities to access the data we collect about them and the ability to correct, restrict or delete data.
- **Inclusion:** We improve financial health for everyone through the innovative use of data to improve financial lives.



•	Protecting the environment1	8
•	Community involvement1	9

Promoting corporate responsibility

Protecting the environment

We are committed to reducing our environmental impact, and we expect our suppliers to do their part. As an information services business, our main environmental impact is the carbon footprint generated from our operations and value chain. We recognise the importance of climate change and are committed to becoming carbon neutral in our operations.

Suppliers MUST:

- Protect the environment by complying with all applicable laws and regulations.
- Maintain an effective environmental policy, statement or programme.
- Minimise the use of energy, water and raw materials, sourcing sustainability with renewable resources where possible.
- Eliminate or reduce waste by reusing and recycling where possible.

Suppliers SHOULD:

- Publicly report carbon emissions through CDP (formerly the Carbon Disclosure Project) or equivalent.
- Have validated, science-based targets and a plan in place that is aligned to reduction pathways to limit global warming to 1.5°C or less.



- Undertake corporate due diligence within your respective supply chain.
- Actively support Experian in the removal of single-use plastic from our facilities and supply chains.
- As part of the products and services provided to Experian, include options that offer reduced environmental impact, such as via efficient processes, sustainable materials and the like.
- Consider selecting businesses within the supply chain based on your environmental credentials and operation within a minimum set of standards.

Experian's carbon reduction commitments

Experian is committed to reducing carbon emissions in line with our science-based target initiative (SBTi).

With over 80% of our total global emissions coming from our vendors, we recognise the biggest positive impact we can have is to work together to tackle these emissions.

Our science based targets are:

- Scope 1 and 2 (1.5°C scenario): Reduce absolute Scope 1 and 2 emissions by 50% by 2030 (from 2019)
- 78% of our vendors by spend will have their own science-based targets by 2029

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Learn More:

- Environmental Policy
- Annual Report
- Sustainability Reporting Hub

Experian's other corporate responsibility commitments

- We include corporate responsibility considerations in our requests for proposal when tendering for new work.
- We conduct yearly supplier training and due diligence on modern slavery and human trafficking risk in the supply chain.
- We engage with our suppliers on an annual basis through CDP.
- We improve financial health for everyone through the innovative use of data to improve financial lives.

Community involvement

We are committed to supporting the communities where we live and work, and we work with suppliers who share the same engagement.

Suppliers SHOULD:

• Support and create products and services while considering your effects on consumers, employees, suppliers, third parties, investors and local communities.



Ethical Behaviour Guide For Suppliers

	SUPPLIERS MUST	SUPPLIERS SHOULD
To maintain a safe and healthy workplace	 Comply with all applicable environmental, safety and health laws and regulations. 	 Provide holistic care for your employees' physical, mental and emotional health.
	 Minimise hazard risks and maintain an effective health and safety management system. 	 Train and prepare risk assessments and records necessary to reduce safety hazards.
	 Never tolerate corporal punishment or any form of harassment or abuse, whether physical, sexual or mental. 	• Record health and safety incidents and take corrective actions for each occurrence.
	 Never engage in workplace discrimination based on race, ethnicity, culture, religious beliefs, gender, sexual orientation, gender identity and/or expression, national origin, dis(ability), age, veteran status, parental status or leave, marital status, physical or mental health, political views or any other characteristic protected by law. 	• Take actions to address unacceptable workplace behaviours.
To respect human rights	 Not tolerate human trafficking, slavery, child labour or other exploitative work practices. 	Train your employees on human rights.
	 Respect the freedom of association and the right of 	 Raise human rights awareness among your own suppliers and local communities.
	workers to form and join trade unions and bargain collectively.	 Perform due diligence to ensure that your own suppliers and subcontractors follow human rights standards.
	• Comply with all applicable wage laws, including minimum wages and mandatory benefits.	Comply with applicable laws on living wages and hours.
	 Respect internationally recognised minimum standard working times. 	• Identify, report and respond to potential human rights violations.
To disclose and resolve conflicts of interest	• Disclose relationships, investments, jobs and anything else that might pose a conflict of interest to your sponsor or procurement, so that they can be managed or resolved.	
To prevent bribery and corruption	 Refuse any business engagement that would violate applicable laws, including tax evasion, or that would be unethical. 	• Have anti-corruption policies in place with programmes to verify compliance.
	 Not make or accept any offer that could be a bribe, kickback or facilitation payment. 	

	SUPPLIERS MUST	SUPPLIERS SHOULD
To collaborate across the supply chain	Participate in Experian's due diligence processes when invited.	
	• Pay your respective suppliers promptly.	
To protect Experian's information	• Adhere to our <u>security principles</u> and policies.	
	 Safeguard our data - use secure methods and controls to protect all data and ensure these are continually reviewed and updated. 	
	• Follow classification standards to identify the level of sensitivity for different data sets.	
	 Protect Experian information - ensure access is on a need-to-know basis and that data is not shared on shared workspaces or social media. 	
	• Continually develop your cyber maturity to respond quickly and effectively to evolving threats impacting you and your supply chain.	
	• Ensure that your environment is resilient to cyberattack and other resilience threats, regularly testing the preparedness of your defenses and response procedures.	
	 Ensure that your workforce stays alert and demonstrate sound cyber judgement - conduct regular security awareness training for all employees. 	
To protect the environment	• Protect the environment by complying with all applicable laws and regulations.	• Publicly report carbon emissions through CDP (formerly the Carbon Disclosure Project) or equivalent.
	• Maintain an effective environmental policy, statement or programme.	• Have validated, science-based targets and a plan in place that is aligned to reduction pathways to limit global warming to 1.5°C or less.
	• Minimise the use of energy, water and raw materials,	• Undertake corporate due diligence within your respective supply chain.
	sourcing sustainability with renewable resources where possible.	• Actively support Experian in the removal of single-use plastic from our facilities and supply chains.
	 Eliminate or reduce waste by reusing and recycling where possible. 	• As part of the products and services provided to Experian, include options that offer reduced environmental impact, such as via efficient processes, sustainable materials and the like.
		• Consider selecting businesses within the supply chain based on your environmental credentials and operation within a minimum set of standards.
To participate in community involvement		• Support and create products and services while considering your effects on consumers, employees, suppliers, third parties, investors and local communities.



Corporate headquarters

Experian plc 2 Cumberland Place Fenian Street Dublin 2 D02 HY05 Ireland

Operational headquarters

Experian The Sir John Peace Building Experian Way NG2 Business Park Nottingham NG80 1ZZ United Kingdom

Experian 475 Anton Boulevard Costa Mesa CA 92626 United States

Serasa Experian Av. Doutor Heitor José Reali 360 CEP 13571-385 São Carlos Brazil

