



TransUnion UK - Modern Slavery & Human Trafficking Statement

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 ("the Act") and sets out the steps TransUnion's UK entities ("TransUnion UK") 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. This statement is made on behalf of the following group companies:

- TransUnion International UK Limited;
- TransUnion Information Group Limited;
- Iovation Limited;
- Neustar Technologies Limited;
- Callcredit Marketing Limited;
- Crown Acquisition Bidco Limited;
- Vail Holdings UK Ltd;
- TransUnion UK Holdings Ltd;
- TransUnion Global Funding Limited;
- Marketshare Partners EMEA, Ltd; and
- Argus Information and Advisory Services UK Limited.

Our Business

At TransUnion UK, our business is to help our customers make smart and responsible decisions by providing innovative software, data and information to clients and consumers. We assist people to understand their credit status and to protect themselves against fraudulent activity.

TransUnion UK operates out of its Head Office in Leeds, and offices in London and Europe and is supported by TransUnion's global capability centres based in South Africa and India. TransUnion UK directly employs around 1100 people across these locations, the vast majority of which are in the UK. TransUnion UK is owned by TransUnion, a US listed company.

Our Policies

Throughout our organisation, and in our supply chain, TransUnion UK will not tolerate any form of slavery or people trafficking. TransUnion UK therefore operates policies which reflect its commitment to acting ethically and with integrity, implementing procedures to ensure slavery, human trafficking and child labour is not taking place anywhere within our own operations or supply chain.

The following policies reinforce our commitment.

- Our *Anti-Trafficking and Slavery Policy* applies to TransUnion UK and our supply chain relationships. Fundamentally this policy compels TransUnion UK 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 TransUnion UK believes should be demonstrated by them in accordance with the Act.
- Our *Supplier Code of Conduct* applies to TransUnion UK'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.
- Our *Equal Opportunities and Dignity at Work Policy* commits TransUnion UK to creating a work environment where everyone is treated with dignity and respect. We adopt a zero-tolerance approach to any acts of discrimination, harassment, bullying or victimisation. Any conduct of this type is likely to be considered gross misconduct leading to dismissal.



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

Our Supply Chain Standards

TransUnion UK operates a continuous improvement approach to our policies, procedures and vigilance to ensure that there is no modern slavery or human trafficking exposure in our supply chain, and it is important that our suppliers represent TransUnion UK with equal integrity towards their own customers, employees and stakeholders.

Our actions to safeguard against human rights abuses in our supply chain include:

- ***Contractual Terms and Conditions:*** Under our Procurement and Supplier Management Policy we undertake appropriate due diligence checks, and through applicable terms and conditions in written contracts we obligate our suppliers to maintain the same standards of business conduct as ourselves.
- ***Assessment of risk within our supply base:*** The inherent likelihood of modern slavery and human trafficking occurring in our supply chain is considered remote, with a majority of third party expenditure falling on IT services and equipment, data acquisition, professional services and facilities management. TransUnion UK therefore takes a risk-based approach to reviewing its supply chain arrangements in accordance with the Act. Risk in relation to the Act is considered in terms of the procured products or services, whether the industry or sector has a high prevalence of modern slavery or other labour rights violations and the visibility and accessibility of the supplier's workforce.
- ***Reviews of contracted suppliers:*** We take a risk-based approach to the assessment of our suppliers and engage with them to communicate our expectations and carry out due diligence. For example, a supplier may be expected to:
 - *Agree to comply with TransUnion UK's Supplier Code of Conduct*
 - *Have a policy on modern slavery that covers the supplier's operations and also any applicable subcontractors*
 - *Sign a declaration or contract committing to enforce a policy on modern slavery*
 - *Have governance procedures to ensure compliance*
 - *Complete a due diligence questionnaire and provide evidence of supporting documentation and processes*

Where any supplier falls short of our expectations remedial actions will be taken. In high risk cases, this could result in the termination of the relationship.

Internal Training and Capability

We expect all employees to be treated fairly, with respect and dignity. All employees are recruited legally and must meet the minimum legal requirements for working in the UK, as well as relevant background checks. Our code of conduct, which applies to all workers (which includes employees, contractors and agency workers) makes clear the actions and behaviour expected when representing the organisation. TransUnion UK strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. Inappropriate conduct may be considered gross misconduct and could lead to dismissal.

Employees within TransUnion UK's Procurement team are trained annually in ethical procurement and supply to ensure they possess the skills and knowledge necessary to understand the risks of corruption, fraud, bribery and human rights issues when selecting and managing suppliers, and how to spot the signs and eradicate concerns from the supply chain.



We also run mandatory annual refresh training on the theme of risk and compliance, which includes specific reference to the obligations of each employee under the Act.

In addition, we host all our policies on our intranet for broad availability and accessibility across the entire TransUnion UK business, both inside and outside the UK. All employees are expected to be familiar with these policies so that they understand their obligations.

From time to time, we may also distribute relevant messages to our employees to reinforce our approach.

The Year in Summary

TransUnion UK's Operations:

We have continued to apply all relevant background checks and fulfil our legal obligations when recruiting new employees and are comfortable that there have been no discrepancies that would indicate consequence in terms of the Act.

TransUnion UK's Supply Chain:

Through our risk-based approach of assessing new and incumbent suppliers, TransUnion UK continues to experience a remote likelihood of exploitation in our supply chain. TransUnion UK is therefore able to state that within our last financial year there were no requirements to terminate business with any suppliers on the grounds of contravention of the Act.

TransUnion UK has an established Supplier Code of Conduct in place which is published on the TransUnion UK website and is publicly accessible.

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This statement constitutes the TransUnion UK modern slavery and human trafficking statement for the latest financial year ending 31 December annually.

*This policy was approved by the board of TransUnion International UK Limited on 15 August 2024, by the boards of TransUnion Information Group Limited, iovation Limited, Neustar Technologies Limited, Callcredit Marketing Limited, Crown Acquisition Bidco Limited, Vail Holdings UK Ltd, TransUnion UK Holdings Ltd and TransUnion Global Funding Limited on 23 September 2024 and by the boards of Argus Information and Advisory Services UK Limited and MarketShare Partners EMEA, Ltd on 27 September 2024. Signature of this policy was designated by the respective boards to the Chief Executive Officer who is, at the date of signing, a board member for each of these companies.*

Signed by:  
  
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Mark Horsey