

APPENDIX C – MODERN SLAVERY & ANTI-TRAFFICKING STATEMENT *FOR EXTERNAL USE*

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 Information Group Limited (“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:

- Crown Acquisition Topco Limited*;
- Crown Acquisition Midco Limited*;
- Crown Acquisition Midco 2 Limited*;
- Crown Acquisition Bidco Limited;
- Crown Acquisition Consumer Limited*;
- TransUnion Information Group Limited;
- Callcredit Lead Generation Limited*;
- DecisionMetrics Limited*;
- TransUnion International UK Limited;
- Callcredit Marketing Limited;
- Callcredit Data Solutions Limited*;
- Callcredit Public Sector Limited*;
- Coactiva Limited*

*company now dormant and will be struck off in 2021.

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. The Group directly employs around 950 people across these locations, the vast majority of which are in the UK. The Group 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. This policy is supported by an *Anti-Trafficking and Slavery Procedure* document that directs our people in how to enact and support a number of key principles which underpin TransUnion UK’s compliance 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 Living Wage Foundation 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 the Group 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.

In 2018, we completed a programme of work to enhance our Ethical Code for suppliers and have implemented a new Supplier Code of Conduct 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.

The Board of Directors of TransUnion International UK Limited, on behalf of all the companies in the TransUnion UK group, approved this policy on 16 August 2021 and delegated signature of this policy to the Chief Risk Officer & General Counsel (Board member).

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William Flynn  
Chief Risk Officer & General Counsel  
TransUnion International UK Limited

