

Callcredit - 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 the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Our Business

At Callcredit Information Group (Callcredit) 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 protect themselves against fraudulent activity.

Callcredit operates out of its Head Office in Leeds, other UK based offices, and around the world with interests in the EU, Japan, China and Dubai. The Group directly employs around 1200 people across these locations, the vast majority of which are in the UK.

Our Policies

Throughout our organisation, and in our supply chain, Callcredit will not tolerate any form of slavery or people trafficking. Callcredit therefore operates policies which reflect its commitment to acting ethically and with integrity, implementing procedures to ensure slavery and human trafficking does not take place anywhere in its supply chain.

The following harmonious policies reinforce our commitment.

- Our *Anti-Trafficking and Slavery Policy* applies to the relationship between us and our supply chain as well as our relationship with clients. Fundamentally this policy compels Callcredit to only deal with suppliers who meet the minimum requirements Callcredit 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 Callcredits’ compliance with the Act. The policy is hosted on our intranet for broad availability across the entire Callcredit business, both inside and outside the UK, and all staff need to be able to demonstrate an understanding of their obligations under the policy.
- Our *Ethical Code for Suppliers* to adhere to and for them to encourage and work with their own suppliers to meet our principles. The Code requires compliance with the UN Global Compact that asks organisations to embrace, support and enact, within their sphere of influence, a set of universally accepted core values in the areas of human rights, labour standards, the environment and anti-corruption.
- Our *Equal Opportunities and Dignity at Work Policy* which commits Callcredit to creating a work environment where everyone is treated with dignity and respect. We adopt a zero-tolerance approach and 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 can report any and all concerns in confidence and without prejudice.

Our Supply Chain Standards

We strive to always improve 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 Callcredit 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 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. Callcredit 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 and the visibility and accessibility of staff to Callcredit when selecting and on-boarding a supplier.
- *Reviews of contracted suppliers*: We take a risk-based approach to the assessment of our suppliers and engage with them to communicate our expectations. For example:
 - 'Low-risk' suppliers are expected to have a public policy on modern slavery and must give a commitment to enforce it.
 - 'Medium-high risk' suppliers are subjected to a more rigorous due diligence investigation as part of the selection process, and may be expected to agree to more specific anti-slavery obligations.
 - 'High risk' suppliers may be considered for further review on an annual basis.

Where any supplier falls short of our expectations we ensure they resolve our concerns, otherwise we reserve the right to terminate our business with them.

Callcredit is 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.

Internal Training and Capability.

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.

An awareness raising programme has been carried out in order to inform all Callcredit employees of modern slavery issues. In addition, we maintain accessible information on our intranet and from time to time may circulate appropriate messages to employees to reinforce our approach.

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

The board of directors of the Company delegated approval of this statement on its behalf to the Chief Risk Officer & General Counsel, at its board meeting on 04 May 2017.

A handwritten signature in black ink, appearing to read 'CRutter', with a long horizontal flourish extending to the right.

Colin Rutter
Chief Risk Officer & General Counsel
Callcredit Information Group

30 / May / 2017