

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, human trafficking and child labour 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, USA 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, human trafficking and child labour does not take place anywhere in its supply chain.

The following harmonious policies reinforce our commitment.

- *Our Anti-Trafficking and Slavery Policy* applies to Callcredit and our supply chain relationships. Fundamentally this policy compels Callcredit 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 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.
- *Our Ethical Code for Suppliers* which applies to Callcredit’s supply chain, requires that our suppliers adhere to our principles and that they encourage and work with their own suppliers to recognise these principles. The Code requires compliance with the UN Global Compact which 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. This also applies to recruitment agencies.
- *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

Callcredit 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 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 and carry out due diligence. For example a supplier may be expected to:
 - Sign a declaration or contract committing them 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 in accordance with relevant legislation, including the 1998 Immigration Act, and undergo relevant background checks. Our code of conduct, which applies to all workers (employees, contractors and agency workers) makes clear the actions and behaviour expected when representing the organisation. Callcredit strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. Any inappropriate conduct is likely to be considered gross misconduct and may 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 colleague under the Act.

In addition, we host all our policies on our intranet for broad availability and accessibility across the entire Callcredit business, both inside and outside the UK. All staff 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

Callcredit'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 Modern Slavery Act.

Callcredit's Supply Chain:

Through our risk based approach of new suppliers Callcredit continues to self-assess a remote likelihood of exploitation in our supply chain. Callcredit 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 are undertaking a programme of work to enhance our Ethical Code that will compel each of our suppliers to formally agree to uphold and comply with that Code.

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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 approved this statement at its meeting on 1st May 2018.

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Colin Rutter  
Chief Risk Officer & General Counsel (Board Member)  
Callcredit Information Group

04 / June / 2018