



# Our Integrity Guide:

Experian's Global Code of Conduct



## A message from Brian Cassin

At Experian, we operate with honesty, integrity and high ethical standards. People and organisations trust us because of our high level of professionalism, and we have earned this trust over a long period of time. Each of us has a responsibility to maintain that trust for years to come.

Our Global Code of Conduct has been designed to give everyone a clear understanding of our approach to professional and ethical standards and to make sure that we know exactly what is expected of us individually and the role we play in helping Experian live up to those standards. Our Code has been approved by the Experian plc Board; it applies to everyone at Experian, and we are fully committed to implementing it across our business.

Please read this Code carefully to make sure that you fully understand your responsibilities as well as the implications of not fulfilling them.

If you have any questions about this Code, please contact your manager or your Compliance department. At Experian, we have zero tolerance for retaliation against those who speak up and report their concerns. Each of us has an important role to play in maintaining the trust and confidence of our consumers, clients, shareholders, third parties and colleagues. So please embrace and follow our Global Code of Conduct and remember that how we achieve our results is as important as the results themselves.

Best wishes,



**Brian Cassin**  
Chief Executive Officer

“ Our Global Code of Conduct has been designed to give everyone a clear understanding of our approach to professional and ethical standards ”

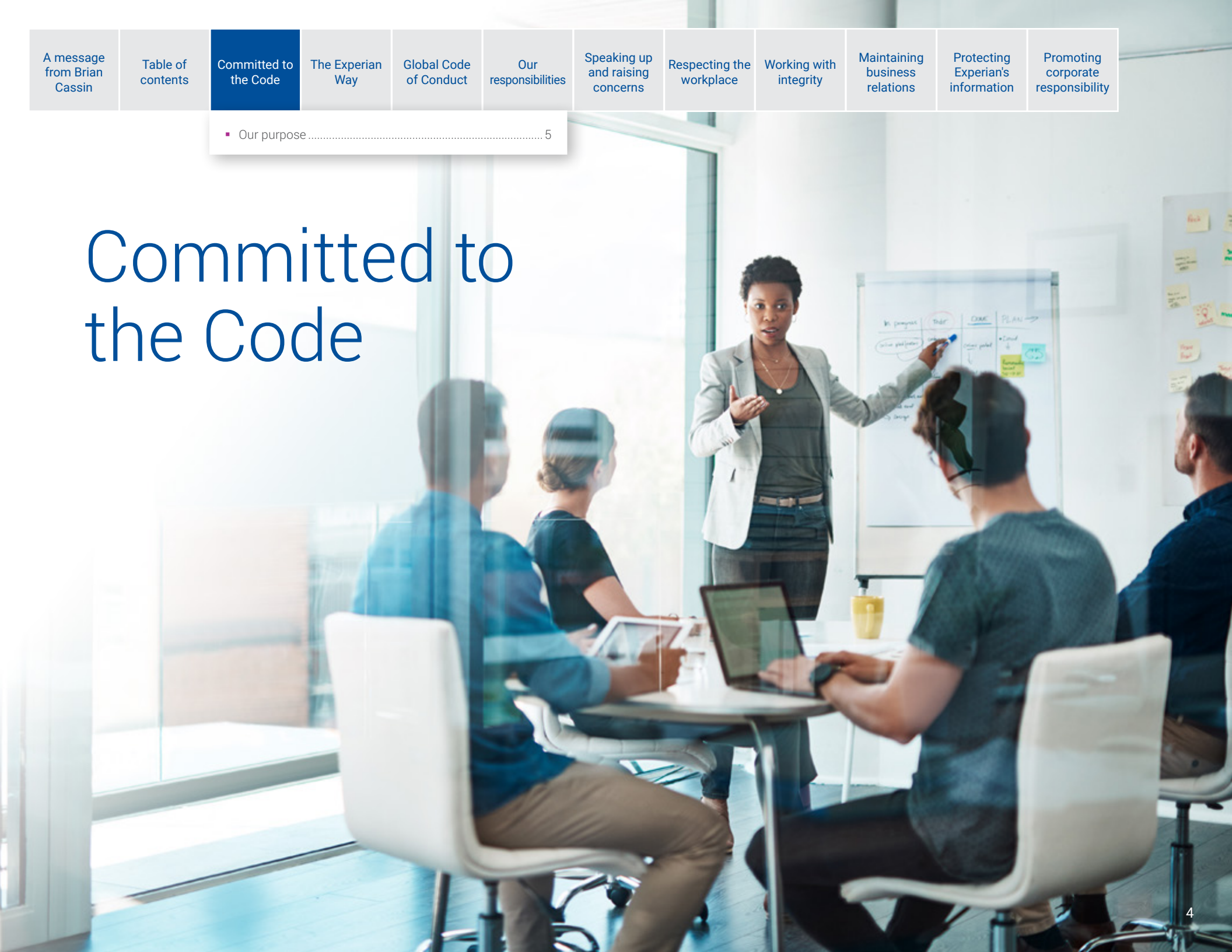
# Table of contents

<b>A message from Brian Cassin</b> .....	2	<b>Working with integrity</b> .....	22
<b>Committed to the Code</b> .....	4	▪ Managing risk.....	23
▪ Our purpose.....	5	▪ Disclosing and resolving conflicts of interest.....	24
<b>The Experian Way</b> .....	6	▪ Preventing bribery and corruption.....	26
<b>Global Code of Conduct</b> .....	8	▪ Interacting with government and public officials.....	28
▪ Why do we have a Code of Conduct? .....	9	▪ Giving and receiving gifts and hospitality.....	29
▪ Who must follow our Code?.....	9	▪ Complying with anti-money laundering and sanctions laws.....	31
▪ Waivers and exceptions.....	9	▪ Preventing and detecting fraud .....	32
▪ Consequences of not following the Code.....	9	<b>Maintaining business relations</b> .....	34
<b>Our responsibilities</b> .....	10	▪ Promoting fair competition.....	35
▪ Everyone's responsibilities.....	11	▪ Third party and supplier relations.....	37
▪ Expectations of leaders .....	11	<b>Protecting Experian's information</b> .....	38
▪ Making ethical decisions.....	12	▪ Data privacy and protection.....	39
<b>Speaking up and raising concerns</b> .....	13	▪ Protecting and securing our assets.....	41
▪ Non-retaliation .....	15	▪ Confidential and proprietary information .....	42
▪ Investigations.....	15	▪ Record management.....	44
<b>Respecting the workplace</b> .....	16	▪ Communicating with the public.....	45
▪ Maintaining a safe and healthy workplace.....	17	<b>Promoting corporate responsibility</b> .....	46
▪ Promoting Inclusion and belonging .....	19	▪ Community involvement.....	47
▪ Respecting human rights .....	21	▪ Protecting the environment.....	48
		▪ Political activities.....	49

A message from Brian Cassin	Table of contents	Committed to the Code	The Experian Way	Global Code of Conduct	Our responsibilities	Speaking up and raising concerns	Respecting the workplace	Working with integrity	Maintaining business relations	Protecting Experian's information	Promoting corporate responsibility
-----------------------------	-------------------	-----------------------	------------------	------------------------	----------------------	----------------------------------	--------------------------	------------------------	--------------------------------	-----------------------------------	------------------------------------

Our purpose .....	5
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# Committed to the Code



## Our purpose

“Experian is a company proudly built on purpose. Our purpose is central to our brand, articulated by our people and mutually reinforced by our culture – it is explicitly bound to everything we do.” — **Brian Cassin**

We have a clear purpose: to create a better tomorrow. We accomplish this by bringing the power of data, analytics and technology to transform lives and deliver better outcomes for people, for businesses and for our communities. We transform financial lives by improving access to credit and empowering people to understand their finances.

# The Experian Way

We have a unique and consistent way of working globally that informs how our people act and behave, thus shaping our culture. We call it **The Experian Way**.



A message from Brian Cassin	Table of contents	Committed to the Code	<b>The Experian Way</b>	Global Code of Conduct	Our responsibilities	Speaking up and raising concerns	Respecting the workplace	Working with integrity	Maintaining business relations	Protecting Experian's information	Promoting corporate responsibility
-----------------------------	-------------------	-----------------------	-------------------------	------------------------	----------------------	----------------------------------	--------------------------	------------------------	--------------------------------	-----------------------------------	------------------------------------

The Experian Way provides a globally consistent set of expectations across five areas of strategic importance:



The Experian Way culture is embedded throughout our organisation. We understand the responsibility that goes with what we do by acting with integrity in everything we do.

**The Experian Way** represents our values and the behaviours we expect from all our employees in their everyday activities. It helps us express the performance goals we have for our business, while also empowering our people and enabling them to drive innovative solutions for customers. They are fundamental in guiding our decisions that define our purpose for creating a better tomorrow.

Fostering a risk-aware culture is essential to living our values, protecting our assets and reputation and maintaining stakeholder trust. Our success relies on all employees embodying and acting on our values.

▪ Why do we have a Code of Conduct? .....	9
▪ Who must follow our Code? .....	9
▪ Waivers and exceptions.....	9
▪ Consequences of not following the Code.....	9

# Global Code of Conduct



## Why do we have a Code of Conduct?

Our Global Code of Conduct is a guide to help us make the right decisions. It explains the standards of behaviour we should follow and helps us comply with applicable laws and policies. It isn't a list of rules, but rather a set of principles to help us make ethical choices.

## Who must follow our Code?

The Code applies to everyone at Experian, including:

- All employees, whether permanent or temporary
- Contingent workers/contractors
- Consultants
- Suppliers
- The Board of Directors
- Those who act on our behalf and all of Experian's businesses and subsidiaries in all the countries that we operate

Contingent workers/contractors and third parties performing work on behalf of Experian must comply with the law and the portions of the Code that apply to them. Experian will take appropriate action for non-compliance.



## Waivers and exceptions

Waivers or exceptions to the Code are extremely rare and require the approval of the Executive Risk Management Committee, as applicable.

## Consequences of not following the Code

Employees must follow the Code, Experian's policies and relevant laws. Violations could result in corrective action, such as an unpaid suspension or termination of employment. Certain violations may result in civil or criminal liability. Failure to report a violation can also result in disciplinary action.

▪ Everyone's responsibilities.....	11
▪ Expectations of leaders.....	11
▪ Making ethical decisions.....	12

# Our responsibilities



## Everyone's responsibilities

At Experian, we are all accountable for managing risk across our business to effectively safeguard our future. We must understand the risks associated with our actions and decisions and manage them in line with Experian's risk management standards.

**We all follow our Code, work ethically and help manage risk across our business. To do so:**

- Understand the behaviors expected of us and comply with our Code, policies and procedures and applicable laws
- Apply good judgement and avoid even the appearance of improper conduct
- Raise any questions and concerns
- Act professionally, truthfully and ethically when working on behalf of the company
- Cooperate fully when responding to an investigation or audit

## Expectations of leaders

Leaders are models of ethical conduct and behaviour. Managers must show a commitment to the highest standards of business conduct and follow our Code.



**If you are a manager, you are expected to:**

- Lead by example
- Encourage employees to ask questions and raise concerns
- Respond appropriately to questions and concerns
- Monitor conduct and support employees who seek guidance or report misconduct or concerns
- Never retaliate and take immediate action to protect employees from retaliation by others
- Ensure your team understands their responsibilities under our Code
- Manage situations involving a conflict of interest or other Code violation in a reasonable and appropriate manner



**Learn More:**

- Experian Policy Library

A message from Brian Cassin	Table of contents	Committed to the Code	The Experian Way	Global Code of Conduct	Our responsibilities	Speaking up and raising concerns	Respecting the workplace	Working with integrity	Maintaining business relations	Protecting Experian's information	Promoting corporate responsibility
-----------------------------	-------------------	-----------------------	------------------	------------------------	----------------------	----------------------------------	--------------------------	------------------------	--------------------------------	-----------------------------------	------------------------------------

## Making ethical decisions

When making decisions, we should always keep our values and our Code in mind, even when it is difficult to decide on the best course of action. When you consider making a decision, ask yourself the following:



You should be able to answer **“yes”** to all these questions. If the answer is **“no,”** do not proceed. If you are unsure, ask for guidance from your line manager, or Compliance

▪ Non-retaliation.....	15
▪ Investigations.....	15

# Speaking up and raising concerns



A message from Brian Cassin	Table of contents	Committed to the Code	The Experian Way	Global Code of Conduct	Our responsibilities	Speaking up and raising concerns	Respecting the workplace	Working with integrity	Maintaining business relations	Protecting Experian's information	Promoting corporate responsibility
-----------------------------	-------------------	-----------------------	------------------	------------------------	----------------------	----------------------------------	--------------------------	------------------------	--------------------------------	-----------------------------------	------------------------------------

We speak up when we have questions or concerns.

We speak up if we think our Code, our policies or the law have been violated. Speaking up helps us act quickly to solve problems. Managers are encouraged to create an environment where people feel comfortable speaking up. Together, we protect Experian's integrity and credibility.

If you see questionable or unethical behaviour or are unsure of how to manage the situation, ask for help.

Questions or concerns? Reach out to these resources:

- Experian's Confidential Helpline
- Any Experian manager
- Risk or Compliance department
- Human Resources

**The Confidential Helpline** is available 24 hours a day, 7 days a week. Employees can stay anonymous, and any information disclosed will be kept confidential and shared only with those who have a legitimate need to know. The Helpline is operated by an independent third party and supports all languages spoken by our employees.



## Q&A

**Q:** I am asked to do something that may violate our Code; what should I do?

**A:** You have a responsibility to comply with our Code. If you are asked to do something that could violate our Code - even if it is by your manager who asks - you should speak up by contacting our Helpline or reaching out to any of the resources outlined in the Code. Experian doesn't tolerate any retaliation against those who make good faith reports, so you should feel comfortable speaking up when you suspect a violation.

## Non-Retaliation

Experian has a zero tolerance for retaliation. We believe in a positive and open work culture where everyone should feel comfortable reporting concerns. Retaliation can result in disciplinary action, including termination of employment or legal action. Anyone who knows about a potential violation and doesn't report it could be subject to disciplinary action. Experian will not tolerate retaliation against anyone for making a good faith report of actual or suspected violations of our Code, applicable laws or regulations.

## Investigations

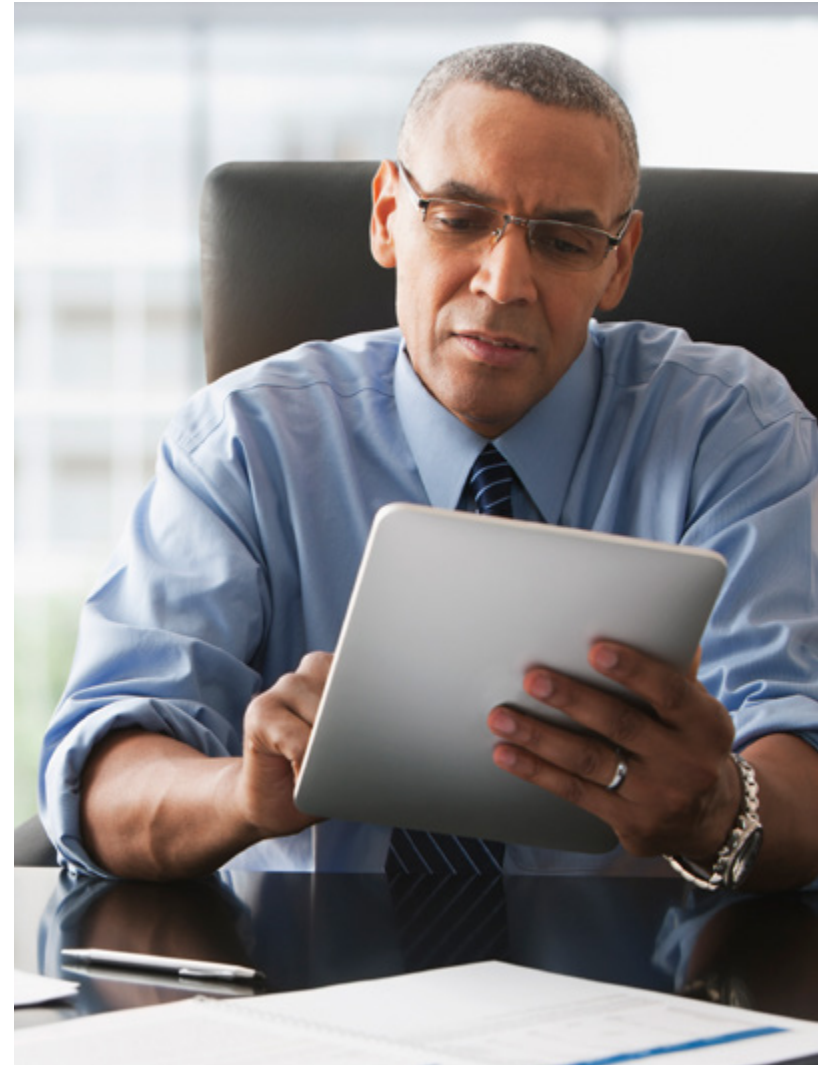
We take any violations of our Code very seriously and investigate quickly, fairly and confidentially. Appropriate personnel will investigate the reported concerns to gather facts and take corrective action. We follow local laws in all cases. If necessary, we will inform the relevant authorities of any illegal activity. If possible, we will provide feedback to the person who reported the issue.

Concerned about something you see at work?  
Speak up by contacting Experian's Confidential Helpline.



### Learn More:

- Confidential Helpline
- Whistleblower Policy
- Contact your regional Compliance department for regional-specific requirements



▪ Maintaining a safe and healthy workplace.....	17
▪ Promoting inclusion and belonging.....	19
▪ Respecting human rights.....	21

# Respecting the workplace



# Maintaining a safe and healthy workplace

We are committed to providing a safe, healthy and secure workplace.

## Why it matters

At Experian, we care about our people and their wellbeing. We strive to create a work environment that is secure and where everyone can feel respected and appreciated.

### Preventing harassment

Harassment is any behaviour that is hostile, intimidating or unwanted.

Harassment can include:

- Inappropriate or abusive language, joking, teasing, degrading nicknames, insults or slurs
- Gestures and physical threats
- Unwelcome sexual behaviour (whether verbal, non-verbal or physical)
- Other offensive materials, as perceived by an employee (pictures, cartoons or social media)

We have zero tolerance for harassment in any form.

## How we do what is right

- **Speak up.** If we suspect a health and safety hazard, we notify our manager, Human Resources or facilities.
- **Get involved.** We make it clear to others when their behaviour is unacceptable.
- **Recognise harassment when we see it.** If we witness violence, threatening behaviour or anything dangerous, we report it.
- **Look out for danger.** If we observe an unsafe situation, potential for an accident or other unsafe workplace condition, we report it to any Experian manager.
- **Bring your best self to work.** We don't come to work under the influence of drugs or alcohol, nor do we protect anyone who does.
- **Prevent unauthorised access.** We do not give building access to individuals without an Experian badge. Contact Security or any Experian manager if someone is trying to access the building without authorisation.

A message from Brian Cassin	Table of contents	Committed to the Code	The Experian Way	Global Code of Conduct	Our responsibilities	Speaking up and raising concerns	Respecting the workplace	Working with integrity	Maintaining business relations	Protecting Experian's information	Promoting corporate responsibility
-----------------------------	-------------------	-----------------------	------------------	------------------------	----------------------	----------------------------------	--------------------------	------------------------	--------------------------------	-----------------------------------	------------------------------------



## Preventing workplace violence

We take workplace violence seriously and never allow:

- Threats
- Stalking
- Acts of violence
- Possession of weapons on Experian premises, except in personal locked vehicles as strictly permitted by law, at Experian-sponsored events or in Experian vehicles

## Zero tolerance for illegal drugs or impairment on the job

For a safe and healthy workplace, employees must not consume illegal drugs or be impaired by any controlled substance or alcohol while at work or during any business-related activity.

## Supporting mental health

There are resources available for employees regarding their mental health, including coaching, our Employee Assistance Programme and resources from our health plans. If you want to find further information, access our Global Wellbeing Hub.

If you are a victim of harassment or observe harassment of others, report the violation to your line manager, any Experian manager, Human Resources or the Confidential Helpline.



### Learn More:

- Health and Safety Policy
- Contact your regional Compliance department for regional-specific requirements

# Promoting inclusion and belonging

We believe our unique experiences and diverse backgrounds create a dynamic, innovative and inspiring workplace.

## Why it matters

We embrace the power of inclusion and belonging to enrich the lives of our employees and strengthen the performance of our company. Inclusion and belonging allow us to make positive change in the world and actively support all communities. Our People First culture is open and inclusive, allowing everyone to share their opinions and be themselves.

We do not discriminate against anyone based on:

- Race
- Ethnicity
- Culture
- Religious beliefs
- Gender, sexual orientation, gender identity or expression
- National origin
- Dis(ability)
- Age
- Veteran status
- Parental status or leave
- Marital status
- Physical & mental health
- Political views
- Any other characteristic protected by law



## How we do what is right

We promote inclusion and belonging when we:

- **Seek out** different points of view.
- **Listen** with courtesy and respect.
- **Speak up** if we feel our views or those of others are not being heard.
- **Encourage** team engagement and collaboration.

By treating everyone fairly and respectfully we provide equal access to opportunities and resources.

A message from Brian Cassin	Table of contents	Committed to the Code	The Experian Way	Global Code of Conduct	Our responsibilities	Speaking up and raising concerns	Respecting the workplace	Working with integrity	Maintaining business relations	Protecting Experian's information	Promoting corporate responsibility
-----------------------------	-------------------	-----------------------	------------------	------------------------	----------------------	----------------------------------	--------------------------	------------------------	--------------------------------	-----------------------------------	------------------------------------



## O&A

**Q:** Are there any groups available for employees to join that encourage similar interests or support inclusion and belonging at work?

**A:** We have employee resource groups (ERGs) that help bring people together, offer support and give all employees chances to learn and grow.

We are committed to upholding fairness in our employment practices. All decisions relating to recruitment, hiring, training, promotion, pay or any other term or condition of employment are based solely on merit, qualifications and competence. We do not discriminate against any individual or protected class.



### Learn More:

- [The Power of YOU report](#)
- Contact your regional Human Resources department for regional-specific requirements

# Respecting human rights

We uphold a culture that values and protects global human rights. We believe that all people deserve to be treated with dignity and respect.

## Why it matters

Experian is dedicated to protecting and promoting human rights in all our business relationships. We apply international principles on human rights and work practices as the foundation for our Salient Human Rights Statement. We believe that human trafficking, slavery, child labour and other exploitative work practices have no place in today's world. We expect our employees and third parties to share our commitment to human rights.

### Freedom of Association

As a fundamental right to a free society, Experian respects and supports the rights of all employees to freedom of association and complies with all laws and regulations regarding such rights.

## How we do what is right

- **Speak up.** We speak up and report any suspected human rights violation.
- **Understand our commitment.** We incorporate human rights into everything we do, from the way we make decisions to how we talk to and work with others. For example, we consider human rights when we choose which suppliers and partners we work with.
- **Set expectations.** When engaging with customers, third parties or any other group, we communicate that the same human rights standards are to be applied and that all vendors understand they are to follow the Supplier Code of Conduct's standards.
- **Complete training.** We provide training and communications about human rights to raise awareness.



### Learn More:

- Salient Human Rights Statement
- Modern Slavery Statement
- Supplier Code of Conduct

# Working with integrity

- Managing risk.....23
- Disclosing and resolving conflicts of interest.....24
- Preventing bribery and corruption.....26
- Interacting with government and public officials.....28
- Giving and receiving gifts and hospitality.....29
- Complying with anti-money laundering and sanctions laws.....31
- Preventing and detecting fraud.....32



# Managing risk

At Experian, we take risk management seriously. We not only assist our clients in managing their risks through our services, but we also ensure that we handle risks in our own operations with care.

## Why it matters

In any business endeavour, there are inherent risks, but we work to spot and reduce potential risks for both our clients and Experian to support the successful delivery of our strategic goals.

## How we do what is right

- **Identify risks.** We have established procedures for assessing risks, and we diligently work to identify potential risks.
- **Mitigate risks.** Once we recognise potential risks, we collaborate as a team to come up with mitigation strategies. Our aim is to work together to minimise the impact of these risks on our clients and the company.



# Disclosing and resolving conflicts of interest

We uphold a culture where we act in the best interests of Experian. We do not let personal interests interfere, or even appear to interfere, with our responsibilities to the organisation.

## Why it matters

Conflicts of interest could damage our reputation or have legal consequences for our relationships with clients, consumers and third parties.

## Avoiding a conflict of interest

When we recognise a situation where a potential conflict could exist, we actively work to avoid that situation and seek guidance or advice.

A **conflict of interest** can occur when an employee or someone who is authorised to act on the behalf of Experian has an undisclosed personal or financial interest in a matter that could influence their decision-making in their professional role or their responsibility to Experian.



## Q&A

**Q:** I am a member of the decision-making team hiring a new supplier. I learn that my relative works for one of the companies we are considering. Their company is highly rated and is offering the most competitive prices. I believe that recommending them would be in the best interest of Experian.

**A:** In this situation, it is important to acknowledge and disclose your personal relationship with the potential supplier. To maintain fairness and integrity you should remove yourself from the decision-making team. We must always be transparent when it comes to potential conflicts of interest.



## How we do what is right

We disclose and prevent potential conflicts of interest.

**We should recognise common scenarios that can pose a potential conflict of interest:**

- Engaging in outside activities, employment or personal relationships that might affect our ability to remain unbiased
- Being involved in decision-making for hiring, promoting or supervising family, friends or romantic partners
- Having significant financial interests in a current or prospective Experian competitor, customer or business partner
- Using Experian assets or resources for personal gain
- Taking business opportunities for ourselves that we discover in the course of our work for Experian



### Learn More:

- Third Party Risk Management Policy
- Procurement Policy
- Gifts and Hospitality Policy

# Preventing bribery and corruption

We do not bribe nor work with people who do. We refuse any business engagement that would violate anti-corruption laws, our Code of Conduct or be unethical.

## Why it matters

No matter where we work, we are subject to international anti-corruption laws with significant penalties for both companies and individuals who violate them. We prohibit making or accepting any offer that could be a bribe or facilitation payment. Even the perception of impropriety could have reputational, financial and legal impacts to our business.

### Potential risk indicators or suspicious behavior

Check for situations that may indicate a potential bribery or corruption risk:

- Questionable circumstances such as unusual compensation, accounting or invoicing
- Expressions such as “that is the way business is done here” or “that is normal in this country for doing business”

Report any risk indicators to Compliance, Risk, Legal or Experian's Confidential Helpline.



**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

Contact your Compliance or Legal department if you have questions or are unsure about the right course of action. Promptly report any suspected bribery, demands for bribes or the actual payment of a bribe to the Compliance department or Experian's Confidential Helpline.



## How we do what is right

- **Beware of gift-giving.** We never offer anything of value to influence business decisions or secure an unfair business advantage.
- **Do not pay facilitation payments.** We do not make facilitation payments or kickbacks to any official or entity on behalf of Experian.
- **Regularly monitor third parties.** We monitor third parties acting on our behalf and always perform due diligence before engaging with a third party. Third parties cannot bribe on our behalf.
- **Be transparent.** We keep accurate and complete records of all expenses.



### Learn More:

- Anti-Bribery and Corruption Policy
- Gifts and Hospitality Policy
- Fraud Management Policy
- Third Party Risk Management Policy
- Procurement Policy
- Contact your regional Compliance department for regional-specific requirements

# Interacting with government and public officials

We interact with government and public officials with honesty, integrity and in compliance with local and international laws.

## Why it matters

We do not give nor promise to give anything of value to government or public officials to gain an unfair business advantage. Providing anything of value that could influence the decision-making of a government official, including promises of employment, certain travel expenses or the offering of loans or entertainment, could be considered a bribe.

Examples of government or public officials include:

- Members of government or other legislative bodies, whether appointed or elected
- Employees, officers or representatives of a company owned or controlled by a government, whether in whole or in part
- Politicians, candidates for office and members of royal families
- Individuals acting in an official capacity for or on behalf of any government, department, agency, bureau or authority

## How we do what is right

- **Appearances matter.** We avoid even the perception of corruption
- **Follow our policies.** We do not promise, offer or give anything of value to a government or public official for the purpose of:
  - Influencing a decision
  - Securing an advantage
  - Obtaining or retaining business

Contact your Compliance or Legal department if you have questions or are unsure about the right course of action. Promptly report any suspected bribery, demands for bribes or the actual payment of a bribe to the Compliance or Legal department or Experian's Confidential Helpline.



### Learn More:

- Anti-Bribery and Corruption Policy
- Gifts and Hospitality Policy
- Fraud Management Policy
- Procurement Policy
- Contact your regional Compliance department for regional-specific requirements

# Giving and receiving gifts and hospitality

When we give and receive gifts or hospitality, we do so honestly, lawfully and in good faith without risk of reputational harm.

## Why it matters

We exchange gifts and hospitality to build and strengthen business relationships, not for unfair advantage or influence.

## How we do what is right

- **Conduct business with integrity.** We ensure there is a legitimate and legal business reason for the gift or hospitality.
- **Ensure accurate records.** We report and record any gift or hospitality given or received that meets our reporting standards.
- **Do not give cash.** We never provide or accept cash or cash equivalents such as gift cards.
- **Report in a timely manner.** We submit expenditures timely and accurately.

## O&A

**Q:** A client has invited me to a review meeting where lunch will be served. Is it OK for me to attend the lunch?

**A:** Yes, a working lunch at a client office is acceptable as a normal business practice. It is not acceptable to invite the client to a restaurant for contract negotiations because it could give the appearance of impacting a business decision.

**Q:** A current supplier offered a day at a local sporting event for me and my team. Is it OK to accept?

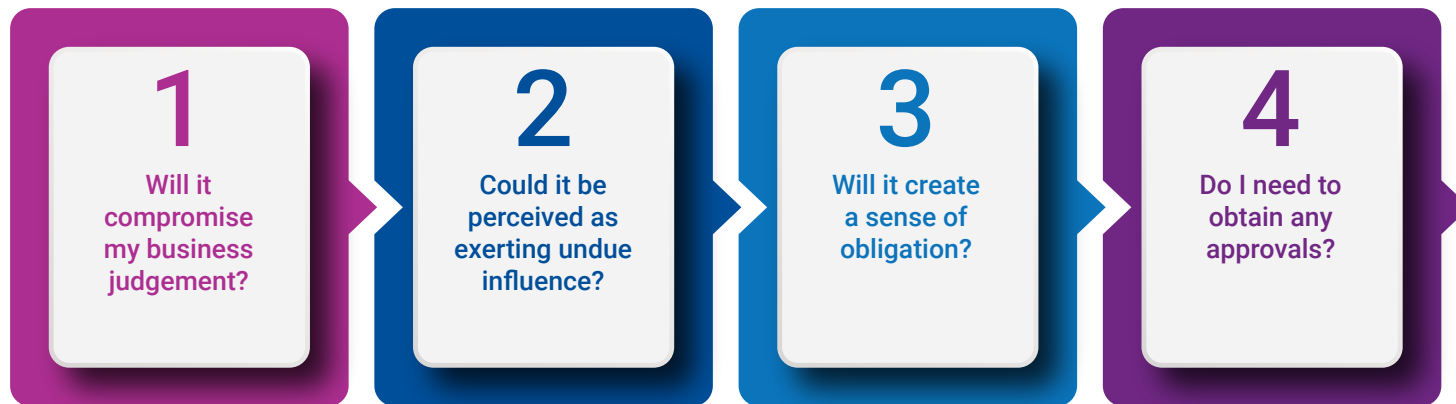
**A:** Would the offer appear to influence your decision-making as part of your role? If yes, then it should be declined. All gifts and hospitality must be appropriate, reasonable and given and received in good faith. They must not be given or received with the intent or prospect of improperly influencing the recipient's decision-making or other conduct.



### Learn More:

- Gifts and Hospitality Policy
- Anti-Bribery and Corruption Policy
- Third Party Risk Management Policy

## Ask yourself when giving or accepting gifts or hospitality:



If you answered “**yes**” to any of these questions, do not give or accept the gift or hospitality.

If it is offered, politely decline.

If you answered “**no**,” review the gifts and hospitality thresholds to see if formal approval is required. If approval is not required, then give or accept the gift or hospitality in accordance with Experian’s Gifts and Hospitality policy.

# Complying with anti-money laundering and sanctions laws

We do not conduct business with terrorists or any sanctioned entities, individuals or countries.

## Why it matters

National and international authorities (e.g., United Nations, US and UK Governments, European Union) impose strict rules for conducting business with specifically named individuals, businesses, governments and countries. Failure to comply, or failure to avoid facilitating money laundering activity, could result in substantial reputational risk impact, criminal penalties and fines for Experian and the individuals involved.



## How we do what is right

- **Check.** We follow applicable anti-money laundering and sanctions laws.
- **Confirm and apply.** We take steps to ensure transparent business relationships, apply due diligence requirements before we conduct business and keep an eye out for red flags.

**Money laundering** – The process of concealing the proceeds of a crime or making them appear to be legitimate proceeds.

**Sanctions** – Measures that prohibit business dealings with specifically named governments, individuals and entities related to terrorism, international crime, weapons of mass destruction, illegal narcotics and more.



### Learn More:

- Industry Watchlist Policy
- Client Due Diligence Policy
- Fraud Management Policy
- Contact your regional Compliance department for regional-specific requirements

# Preventing and detecting fraud

We develop, implement and monitor controls to help prevent and mitigate fraud risk.

## Why it matters

Fraud prevention increases confidence in our organisation and strengthens trust with our stakeholders. We conduct business with the highest ethical standards and never condone any act of fraud, tax evasion, the criminal facilitation of tax evasion, corruption or deception by our employees or any third party acting on our behalf.

### We don't engage in fraudulent activities.

Managers assess fraud risks, maintain anti-fraud controls, monitor and test processes within their area(s) of responsibility and support or conduct fraud investigations.



## Q&A

**Q:** I reviewed my manager's expenses from a recent trip and it looks like she claimed expenses twice for the same hotel room. I asked her about the expenses and she insisted that her report is correct. Should I say anything?

**A:** Yes. You should report the discrepancy. We keep accurate records and do not condone any potential acts of fraud.

**Q:** I've been contacted by an outside source that claims he is an attorney for the estate of a woman whose credit report he would like us to provide. When I ask for details about the consumer in question, he doesn't seem to know them and is acting suspicious. What should I do?

**A:** Do not provide the credit report. Credit reports are confidential and should only be viewed by authorised persons with a valid business reason. This should be reported immediately to your manager, Compliance or Experian's Confidential Helpline.

## How we do what is right

- **Watch out.** We monitor, detect and prevent acts of fraud against Experian by third parties or employees, or through the unlawful use of or access to our products, services or data.
- **Speak up.** We report any potential incidents of fraud.
- **Follow our policies.** We take appropriate disciplinary and legal action for any fraud incidents.

**Beware of social engineering:** Always question unusual requests. Make sure you know who is asking, and do not rush into taking action. If you are unsure, refer to your manager.

For fraud-related questions or to report suspected fraud activity, contact your manager, Human Resources, Risk, Compliance, Legal or Experian's Confidential Helpline.



### Learn More:

- Fraud Management Policy
- Anti-Bribery and Corruption Policy
- Tax and Mobility Guide
- Tax Management Standards
- Group Tax Policy



▪ Promoting fair competition.....	35
▪ Third party and supplier relations.....	37

# Maintaining business relations



## Promoting fair competition

We conduct business in an ethical manner and comply with antitrust and competition laws.

### Why it matters

A fair, open and competitive marketplace benefits our customers, our business and the economy. Violating competition laws could lead to penalties for our business or the individuals involved. It could also damage our reputation and limit business innovation.

#### Following Competition Laws

The aim of competition law is to ensure that each company doing business decides independently how, when and where to carry out its business in a given market. Problems arise when companies work together to manipulate markets. Market allocation, price-fixing, bid rigging, output restrictions and group boycotts are the most common violations.

We deal fairly with customers, suppliers, third parties and competitors. We hold ourselves to the same ethical standards of teamwork and respect with every partner we encounter while doing business.



### O&A

**Q:** At a trade conference, an old friend who now works for a competitor approached me and started asking about our new product and service plans for the next year. What should I do?

**A:** You should avoid discussing any confidential or competitive information with them. Instead, promptly report the conversation to Compliance.



## How we do what is right

- **Act with integrity.** We treat customers and third parties fairly and with integrity.
- **Respect the market.** We are factual and honest when discussing our products and services.
- **Gather intelligence the right way.** We gather information about competitors in an honest and legal manner.
- **Provide truthful marketing.** We do not use misleading or unfair comparative advertising or deceptive trade practices.
- **Foster a competitive marketplace.** We never discuss competitively sensitive topics such as sharing information about pricing, bidding processes, market strategies or dividing markets.
- **Be honest.** We avoid using our market strength or our information in a way that unfairly harms or prevents competition.
- **Exercise caution.** Even informal actions could be considered unethical and potentially violate competition law.



### Learn More:

- by speaking to the Compliance department

## Third party and supplier relations

We work with third parties and suppliers who share our commitment to the highest ethical standards.

### Why it matters

Responsible and reliable third parties and suppliers are key for our growth and success. We also understand our own obligations to our third parties. Relationships founded on trust and respect benefit our consumers, our partners and us.

Governments around the world enforce laws that require us to properly manage third party risks. We protect our company's reputation and secure our data and systems by regularly monitoring third party performance.

### O&A

**Q:** I'm conducting a due diligence review of a new supplier, and the supplier refuses to provide identifying information for the principal owners of the company. What should I do?

**A:** You should report the red flag to your manager or Procurement. We only work with suppliers who respect our rules and provide information transparently.

### How we do what is right

- **Choose wisely.** We perform due diligence reviews to ensure suppliers' practices align with our policies and meet our business needs.
- **Act responsibly.** We follow our procurement processes. This means we do not restrict or affect the competitive process for selecting suppliers.
- **Be transparent.** We disclose potential conflicts of interest involving a supplier or business partner.
- **Set expectations.** We monitor our third parties and suppliers to make sure they are following the law, contractual commitments and the Supplier Code of Conduct.

If you have questions about information requests or concerns about a third party or supplier not meeting our standards or contract obligations, please contact Procurement for guidance.



#### Learn More:

- Third Party Risk Management Policy
- Procurement Policy
- Supplier Code of Conduct Policy

▪ Data privacy and protection.....	39
▪ Protecting and securing our assets.....	41
▪ Confidential and proprietary information.....	42
▪ Record management .....	44
▪ Communicating with the public.....	45

# Protecting Experian's information

# Data privacy and protection

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

## Why it matters

We treat data – and those it belongs to – with great care and respect. Living up to this responsibility is fundamental to securing the trust Experian has built. We depend on this trust to exist, grow and create a better tomorrow where we use data to increase financial inclusion and help people improve their financial lives.

To do this, we protect the data we hold, use it fairly and make sure it's as accurate as possible. We are open about the data we collect, how we use it and who we share it with.

The loss or inappropriate use of data and systems poses serious risks, including loss of business, legal liability and significant harm to our reputation.

## How we do what is right

- **Follow our policies and standards.** We are all responsible for securely maintaining Experian's information assets.
- **Safeguard our data.** We use secure controls (e.g., encryption, authentication) to protect all data.
- **Follow classification standards.** We ensure any information we produce is labeled with the appropriate information classification.
- **Protect our information.** We do not share Experian data or information on social media or shared workspaces.
- **Stay alert.** When working outside of an Experian office, we always connect to the network securely and ensure we cannot be overlooked or overheard.

## O&A

**Q:** I am working on an urgent deliverable and will need to work on a document over the weekend. Is it OK to send the internal Experian document to my personal email account?

**A:** No, never send internal Experian documents to your personal email account.

A message from Brian Cassin	Table of contents	Committed to the Code	The Experian Way	Global Code of Conduct	Our responsibilities	Speaking up and raising concerns	Respecting the workplace	Working with integrity	Maintaining business relations	Protecting Experian's information	Promoting corporate responsibility
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## Experian's Global Data Principles

Our business is built on clear commitments to treat data with respect:

**Security.** Data security is critical. Securing and protecting data against unauthorised access, use, disclosure and loss are key priorities for us.

**Accuracy.** We will make data as accurate, complete and relevant as possible for the manner in which it is used, always in compliance with legal requirements.

**Fairness.** We collect and use data fairly and for legitimate purposes, balancing privacy expectations with the social and economic benefits derived from the responsible use of data for individuals, businesses and clients.

**Transparency.** We are open and transparent about the types of data we collect, where we get it, how it is used and where it is shared. Where appropriate, we provide individuals with access to the data we collect about them and the ability to correct, restrict or delete data.

**Inclusion.** We seek to improve financial health and inclusion for all through the innovative use of relevant data to help individuals improve their financial lives.

### Personal Data

"Personal data" can be information about:

- Employees
- Consumers
- Suppliers
- Contractors
- Clients/Customers
- Shareholders

Personal data can include names, identification numbers, addresses, phone numbers, IP addresses, photos, location data or more factors specific to a person's physical, physiological, genetic, mental, economic, cultural or social identity.



**Learn More:**

- [Global Data Principles](#)
- [Experian plc – Privacy](#)

# Protecting and securing our assets

We prevent unauthorised access, use or modification of our systems, equipment and other company assets.

## Why it matters

We use Experian assets to serve our customers and meet our goals. When our assets are misused, damaged or stolen our operations, networks and information may become at risk.



## How we do what is right

- **Take care.** We take special care when using and managing Experian assets, such as equipment, computers, mobile devices and supplies. We ensure that robust security measures are always in place to protect ourselves and our assets.
- **Follow procedures for physical assets.** We follow all security processes related to physical assets, including proper storage, disposal and off-site management.
- **Prevent unauthorised access.** We do not give building access to individuals without an Experian badge. We also do not allow unauthorised access to Experian devices. Contact Security or any Experian manager if someone is trying to access buildings, devices or other assets without authorisation.
- **Report it.** We contact the Experian Helpdesk and/or report a security incident if our laptop or mobile device is stolen or lost.
- **Prioritise cybersecurity.** We follow all security processes, such as maintaining and not sharing passwords or network access.



### Learn More:

- Corporate Security Standard
- Acceptable Use Policy

# Confidential and proprietary information

We are committed to safeguarding and protecting the privacy and confidentiality of our information and any other information that is entrusted to us.

## Why it matters

Our confidential business information, ideas and knowledge give us a competitive advantage. We maintain our competitive advantage and have a positive impact on the communities we serve by protecting the confidential information and knowledge we own.

## Q&A

**Q:** I received an internal request to review and provide feedback on a confidential/restricted Experian document. I would like to get feedback on it from my colleague who is not on the authorised distribution. Is it OK to share?

**A:** You can only share Experian restricted information with authorised individuals who have a need to know the information. Contact your manager to ask about sharing the document before doing so.

## How we do what is right

- **Know how to identify information.** We ensure all information is assigned to one of the following classifications:
  - Public
  - Confidential
  - Internal
  - Restricted
- **Protect our information.** All "inside," or non-public information is restricted to authorised parties only, so we never share confidential information with anyone outside Experian.
- **Stay alert.** We safeguard against security threats (such as phishing attacks or fraudulent emails).
- **Be aware of your surroundings.** We protect against unintentional exposure of confidential information in public settings. For example, we lock computer screens and never discuss confidential information where others may overhear.
- **Safeguard our systems.** We do not install any unapproved applications or software.
- **Be smart.** We lock and securely store our PC or laptop when not in use. When traveling for business, we ensure that all our devices remain secure.



### Examples of confidential information

**Intellectual Property.** Employees' creative work, designs and brands that result in patents, trademarks, copyrights and trade secrets.

**Proprietary Information.** Business plans, product development and marketing strategies.

**Financial Information.** Company performance results, budgets and upcoming investments.

**Consumer Data.** Personal, non-public information specific to a consumer, such as names, addresses, phone numbers, financial details, etc.

### System access control

We are not allowed to access, use, or disclose confidential or non-public data, except to the extent necessary to fulfill assigned job responsibilities. Our responsibilities must be conducted in accordance with any applicable privacy laws and regulations.

Experian employees and third parties should only be given access to systems that are needed to complete their tasks.

### Insider trading

As employees, we may have access to non-public information about Experian, other companies, customers or third parties. This knowledge makes us insiders, and using it to buy, sell, or reallocate stock or other types of company securities is called insider trading. Insider trading is a serious offence that is illegal. Passing along this information to someone else so they may trade is also a criminal offence. Insider trading violates our Code, our policies and the law.

Immediately report any suspected security incidents for investigation to Experian's Global Security Office.



#### Learn More:

- Corporate Security Standard
- Data Security Standard
- Access Control Standard
- Information Security Policy

## Record management

All Experian records are information assets that should be acquired, created, maintained, managed and destroyed in accordance with Experian policy and legal requirements.

### Why it matters

We are required by law to retain certain records for a set time period. Stakeholders must trust that our records and data are accurate and secure. Keeping records longer than necessary increases the risk of data being compromised or inaccurate.

### How we do what is right

- **Ensure all records are current.** We maintain records in our possession and control for the time periods set forth in the Record Retention schedule and policy.
- **Know the retention rules.** We destroy records after the retention period unless a Legal Hold, or instructions to maintain, provide or defer destruction of records, is in place.

## O&A

**Q:** I have been given some documents from a co-worker who left the company. I noticed that some of the documents are old. Should I dispose of them?

**A:** Check with your colleagues and manager. Confirm there is no Legal Hold or an approved business reason for keeping the documents before disposing of them.

### Records can include:

- Correspondence
- Software code
- Calendars
- Brochures
- Notes
- Charts
- Reports
- Photographs
- Spreadsheets



### Learn More:

- Record Retention Policy
- Email Retention Policy
- Contact your regional Compliance department for regional-specific requirements

# Communicating with the public

Communicating consistently and providing a cohesive message is our top priority.

## Why it matters

We protect our reputation and trustworthiness by giving the public clear, complete and consistent information.

Our Public Relations team is the sole contact authorised to deal directly with the media. In addition, all public speaking engagements, publishing of articles and other public communications that relate to our business or products require prior approval from the Public Relations team.

## Q&A

**Q:** I like to share information about my work at Experian and personal life on my social media feeds. Is that OK, since it is a big part of my life?

**A:** Be careful to protect Experian's internal information and follow guidance in Experian's External Communication Policy before posting work information.

## How we do what is right

**We do not discuss with the media topics such as:**

- Our competitors, clients and consumers (except with their written permission)
- Financial, operating, compliance and competitive data about Experian

We want our employees to be proud of Experian and to connect with family, friends, peers, clients and consumers via social media. However, we must be aware that the content we post on social media could have impacts on our business and reputation.

- **Think before you post.** Always use good judgement when posting online and on social media.
- **Protect our information.** Be mindful not to disclose any confidential information.
- **Follow our Code and our policies.** Ensure that you understand and follow any local policies or guidelines related to social media.
- **Know where to go.** All media inquiries should be directed to the Public Relations team.
- **Gain appropriate approvals.** Never speak for the company on your personal accounts without prior approval from the Public Relations team.



**Learn More:**

- External Communications Policy

▪ Community involvement .....	47
▪ Protecting the environment .....	48
▪ Political activities .....	49

# Promoting corporate responsibility



# Community involvement

We are committed to supporting the communities where we live and work.

## Why it matters

We value our place in the global community. When we create our products and services, we consider the effects on consumers, employees, suppliers, third parties, investors and local communities. We aim to improve the financial health of people across the globe through our core products and through our charitable activities.

## O&A

**Q:** Where can I find out more about volunteering activities available locally?

**A:** Locate volunteering activities by logging into Benevity. If your country is not yet using Benevity, please contact your regional Community Champions.

**Q:** Can I take part in volunteer opportunities that are not listed on the Benevity volunteer platform?

**A:** Yes, you can arrange your own volunteer activity if the non-profit or charity is registered.

## How we do what is right

- **Choose wisely.** We invest in products and services that create a positive impact for both Experian and societies.
- **Volunteer.** We empower our employees through various volunteer and matching programmes. Employees may participate by:
  - Joining a company-sponsored volunteer event. Throughout the year Experian hosts various events in which any employee may join.
  - Volunteering time (in and outside working hours) to a non-profit of our choice
  - Giving eligible donations

Do not forget to track your paid volunteer time and any additional volunteer time in your Experian Benevity account even if you have reached your max limit rewards.



### Learn More:

- Reach out to your regional Community Champions.

# Protecting the environment

We are committed to reducing our environmental impact.

## Why it matters

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.



## How we do what is right

We continue to minimise our environmental footprint while complying with local laws.

- **Learn more.** Follow all applicable environmental laws and internal policies.
- **Minimise our environmental footprint.** Reduce waste, recycle and re-use where possible. Limit business travel by utilising technological alternatives to support communication. Support our goal to have carbon neutral operations by 2030.
- **Expect the same from third parties.** Ensure our third parties and suppliers comply with Experian environmental standards through contractual agreements.

Through these actions, we can contribute to a healthier environment and a more sustainable future.



Learn More:

- [Environmental Policy](#)

# Political activities

We respect everyone's right to engage in political activities.

## Why it matters

While we are all encouraged to participate in political causes and activities that make a positive impact, it is with the understanding that we keep such activities separate from work life and never claim that we represent Experian.

Employees are not allowed to make contributions to political affiliations on Experian's behalf without pre-approval from the Board.



## How we do what is right

- **Keep personal political activities personal.** We make sure we clarify that our personal political views and actions do not represent Experian. We do not make political contributions on behalf of Experian without approval of the Experian plc Board of Directors.
- **Inform.** We inform our manager or Human Resources when deciding to run for political office.
- **Speak up.** We speak up if a client or business partner pressures us to contribute to or support a political party or candidate.
- **Follow our policies.** We comply with all laws and all Experian policies that involve working with governments or public officials, including:
  - Anti-bribery and corruption
  - Gifts and hospitality



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2 Cumberland Place  
Fenian Street  
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