

# Our Code of Conduct

A guide to our responsibilities for ethical behaviour



# A message from Brian Cassin, Chief Executive Officer



## How We Do Business

At Experian, we place the utmost importance on operating with honesty, integrity and high ethical standards. And we are committed to maintaining the highest level of professionalism in the conduct of our business. People and organisations trust us and we've earned this trust over a long period of time. And each of us has a responsibility to ensure we maintain that trust for years to come.

This Global Code of Conduct has been designed to give everyone a clear understanding of our approach to professional and ethical standards as well as to make sure that we all know exactly what's expected of us individually and the role we play in helping Experian live up to those standards. This Code has been approved by the Experian plc Board and we're fully committed to implementing it across our business.

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

If you have any questions about this Code, please contact your line manager or your regional Compliance team. Each of us has an important role to play in maintaining the trust and confidence of our clients, shareholders, business partners and colleagues. So please embrace and follow our Global Code of Conduct.

Best wishes,

A handwritten signature in blue ink, appearing to read 'Brian Cassin', written in a cursive style.

Brian Cassin  
Chief Executive Officer

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# The Experian Way

## What We Do

The Experian Way is our unique and consistent way of working globally, informing how our people act and behave which shapes our culture. The Experian Way is defined across five key areas of strategic importance to continue to align the actions and behaviours of all our people to deliver our business strategy and live up to our brand promise.



## How We Do It

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



**Delight Customers** At Experian, whether your role brings you into contact with customers directly or not, all of us contribute to meeting customer needs. At the heart of what we do are the relationships we invest in and nurture.



**Innovate To Grow** At Experian, it's the responsibility of each one of us to find opportunities and improve the way we do things to help our business and our customers grow.



**Collaborate To Win** 'One Experian' mindset – we work as one united team and use the combined strengths and capabilities of our people, products and services across teams, functions and regions. This translates into seamless experiences for our customers.



**Safeguard our Future** At Experian, each one of us acts as a guardian for the protection of data, information, assets and our people to safeguard our future.



**Value Each Other** We make Experian a great place to work. We treat each other with respect, trust and integrity.

## What We Need to Remember

Our Principles; **Integrity, Fairness, Data Security and Value** are the foundation of our makeup.

The combination of The Experian Way with Our Principles will guide the way we work with each other, our consumers, clients and business partners. Our principles - integrity, fairness, and a strong focus on data security and on creating value for our shareholders – have helped to create a vibrant, ethical performance culture.

We believe in dignity, inclusiveness, and compassion. We respect people of all backgrounds, capabilities and opinions. We encourage a supportive, culturally diverse work environment. This means we are committed to providing a work environment that is free of harassment, intimidation, bias and discrimination of any kind where everyone has an opportunity to contribute and achieve their ambitions.

We take our responsibility to safeguard information seriously. We handle confidential information with great care. We protect the privacy and confidentiality of businesses and individuals' data everywhere at all times, including outside of the workplace and working hours, and even after employment ends.

We have an obligation to perform work responsibly for our shareholders. We deliver high quality work, products and services to build a sustainable, long-lasting business and get the maximum return on our investments. When we do these things, we are able to maintain the trust our shareholders have placed in us.

# Our People

## What We Do

At Experian, we understand the fundamental value diversity and inclusion brings to our business. Many people across the company are working diligently to create a work environment where everyone is treated with fairness and respect, have equal access to opportunities and resources, and can contribute fully to our success.



## How We Do It

### Equal Employment and Prevent Discrimination and Harassment

We do not discriminate against anyone on the basis of race, colour, religion, gender, sexual orientation, gender identity or expression, national origin, disability, age, covered veteran status, or any other characteristic protected by law.

### Maintaining a Safe and Healthy Environment

We are dedicated to providing a safe, healthy and productive work environment for all employees. Acts of workplace violence are not tolerated. We operate an alcohol and drug-free workplace.

**Corporate Responsibility** We carefully consider our impact on consumers, employees, suppliers and local communities as well as customers and investors. It is by considering all our stakeholders that we ensure our growth is both strong and sustainable. We do this by investing in products and services that generate shared value for Experian and society and by empowering our colleagues to volunteer within our communities.

## What We Need to Remember

Never behave in a disrespectful, hostile, violent, intimidating, threatening, or harassing manner.

Work safely and abide by established safety practices and procedures. Any work-related injuries should be reported to your manager or the Human Resources Department.

While on the job, Experian will not tolerate:

- Impairment from the use of legal drugs
- The use or after effects of alcohol or illegal drugs

### The Experian Way:



We **embrace diversity** and appreciate different perspectives and the unique value each of us brings. We are inquisitive to **learn from each other**.



We support and **invest in each other** to help everyone achieve their potential and aspirations. We are prepared to speak up and take a leadership role. We work together to make a **positive impact on the lives of others** through our commitment to Corporate Social Responsibility and community involvement.

# Helpline

## What We Do

When we have concerns about a possible violation, we take action.

Start by talking to your manager if you have concerns about a possible violation of our Code.

Your manager can assist you with answering questions or helping with resolution.



## How We Do It

### Confidential Helpline

The **Confidential Helpline is available 24 hours a day, seven days a week** for anyone who needs to raise a concern about a potential violation. The information a colleague discloses will be shared only with those who have a need to know, such as those involved in answering questions or investigating and correcting issues raised. The Helpline manages anonymous calls when requested and to the extent possible by law.

Topics may include but are not limited to:

- Activities not in the best interest of our consumers or clients
- Serious breaches of Experian policies and regulations
- Information security threats
- Victimization, harassment or bullying
- Criminal activity
- Modern slavery
- Fraud

If you do not feel comfortable contacting your manager, you may raise your concerns with any of the following:

- Any Experian manager
- Compliance
- Human Resources
- Experian's Confidential Helpline

## What We Need to Remember

### Retaliation is Not Tolerated

Experian will take all reported concerns seriously, address them promptly and provide them with an appropriate resolution. Anyone who knows about a potential violation and doesn't report it, could be subject to disciplinary action.

Experian will not retaliate against anyone for making a good-faith report of actual or suspected violations of our Code, applicable laws or regulations. Anyone who is found to have engaged in retaliation will be subject to disciplinary action up to and including termination of employment.

### The Experian Way:



Each one of us takes responsibility to **understand the risk and compliance obligations** of our role. We plan for what might go wrong as we innovate and collaborate and make decisions in the right way.



We promote a culture of inclusivity and **value diversity** of all kinds including in thinking, knowledge and experience.

# Customers & Third Parties

## What We Do

At Experian, we take extreme pride in the products and services we provide to our customers. Our goal is to deliver what we promise, while maintaining a value chain that complies with local laws and regulations, and meets Experian's standards. We are committed to conducting business in an ethical manner.



## How We Do It

### Customer and Third Party

**Information** Our responsibility to safeguard proprietary information extends to the proprietary data of our clients, suppliers and others with whom we do business.

**Due Diligence** We must follow established processes for evaluating potential third-party agents, partners or suppliers to ensure that they are the type of companies that we want to do business with.

### Truth in Advertising and Marketing

**Practices** We strive to provide useful advertising information that raises awareness about our products and services. We are committed to ensuring that the information provided is transparent and truthful.

### Communication with External Parties

All public speaking engagements that relate to Experian's business or products must first be pre-approved by your manager; followed by the senior manager responsible for the area or department you work for, and your regional Public Relations/Public Affairs team.

**Promoting Fair Competition** We will not engage in any form of agreement with competitors to fix prices, rig bids, allocate customers and/or restrict supply in the market place.

## What We Need to Remember

We are all responsible for protecting and maintaining the confidentiality of any client and third party information we have access to.

Third parties need to adhere to Experian's ethical standards, especially those pertaining to bribery and corruption.

We shall refer any media request to our local public relations and communications team.

We will not make false or illegal claims about competitors or their products and services.

### The Experian Way:



Delight  
Customers

All of us take **accountability** and continue to **improve our service**, making it simple and easy. If things do go wrong, we focus on finding the solution and fixing the issues in a quick and professional manner, rather than assigning blame.



Innovate To  
Grow

For us innovation is both **transformative thinking** and a **continuous process of incremental improvements**. It's not just for products and services, we're innovative in the way we approach and continue to do things better.

# Gifts & Hospitality

## What We Do

Our approach is designed to ensure that providing and receiving gifts and hospitality is made in an open and proportionate manner, in good faith, lawfully and helps enhance and protect Experian's reputation.



## How We Do It

We exchange gifts and entertainment that foster goodwill in business relationships, but never provide or accept gifts, favours, or entertainment that may create undue influence, or even the appearance of undue influence. All gifts or entertainment we give or receive must adhere to the Experian guidelines

**Minimum Standards** We must report and obtain manager's and Compliance approval for any gifts or hospitality, given or received, that exceed the established thresholds.

**Political Contributions** We are not allowed to make political contributions on behalf of Experian without approval of the Experian plc Board of Directors (request submitted via Compliance).

## Monitoring of Expense Reporting

We must observe policies and procedures regarding business expenses, such as meal and travel expenses and submit accurate expense reimbursement requests.

## What We Need to Remember

**Customary** – An item is a customary business gift if its public disclosure would not embarrass Experian. Cash is never an acceptable gift. Giving or receiving cash is viewed as a bribe or kickback and is always against our policy.

**No favoured treatment** – The purpose of the gift is not to obtain special or favoured treatment.

**Legal** – Make sure that giving or accepting the gift is legal in the location and under the circumstances it's given.

**Recipient is not a government official** – Never provide a gift, including meals or entertainment, or other items of value, to a government official without prior written approval from Compliance.

We are required to comply with Experian's travel and expense reporting policies, to submit expenditures in a timely manner and to accurately categorise expenses.

## The Experian Way:



Safeguard Our Future

We understand and apply the **highest standards and rigour** and make sure the data we access and work with is secure. We make sure our partners apply the same standards and rigorous approach.



# Compliance

## What We Do

We will comply with all applicable laws, rules, and regulations in every jurisdiction in which we operate, including but not limited to relevant data privacy and antitrust/competition laws.



## How We Do It

**Anti-Bribery and Anti-Corruption** We must comply with all local and international laws and standards regarding anti-bribery and anti-corruption. It is illegal to bribe an official or anyone acting on an official's behalf.

**Conflicts of Interest** We must avoid situations where judgement could be influenced by the possibility of an unfair advantage or personal benefit. Colleagues may not be in positions where a family member reports to them or where they will report to a member of their family. We must not trade, disclose, or tip others while in possession of material non-public information obtained as the result of your employment.

**Working with Governments** Anyone responsible for managing any type of government relationship should be familiar with applicable rules. There are special considerations that must be taken into account, such as compliance with any laws or regulation related to contractual obligations, procurement, or billing practices.

**Fraud Management** We are all expected to refrain from engaging in fraudulent activities. Managers are required to proactively assess fraud risks, maintain anti-fraud controls to discourage and prevent potential fraudulent activities, monitor and test processes within their area(s) of responsibility and support or conduct fraud investigations, as requested by Compliance.

## What We Need to Remember

Experian complies with anti-money laundering laws by using procedures to avoid receiving cash or cash equivalents that are the proceeds of illegal activity.

We should always disclose potential conflicts of interest, such as outside employment and avoid the appearance of conflicts between personal interests and those of Experian.

We cannot promise, offer, or give anything of value to a customer or government official for the purpose of:

- Influencing a decision
- Securing an advantage
- Obtaining or retaining business

Before bidding for business with the government, consult our Legal or Compliance department to be certain that our rules and applicable laws are adhered to.

We are expected to be open and cooperative with all regulators in all regions.

### The Experian Way:



Each one of us takes responsibility to **understand the risk and compliance obligations** of our role. We plan for what might go wrong as we innovate and collaborate and make decisions in the right way.

# Security

## What We Do

We are all responsible for information security and must take an active role in mitigating security risks, reporting risks, and implementing protective measures in a manner consistent with Experian Information Security Policies and Standards.



## How We Do It

**Data Security** Our businesses are responsible for identifying high risk data that requires protection. We must assign one of the following information classifications to all documents and files: Public, Internal, Confidential or Restricted.

**Equipment and Physical Security** Our facilities are designed to be physically and environmentally secure from intrusion by unauthorised persons. Physical safeguards will be deployed as appropriate.

**Privacy** We are not allowed to access, use, or disclose confidential data, except to the extent necessary to fulfill assigned job responsibilities. Job responsibilities must be carried out in accordance with our privacy policies as well as with any applicable privacy laws and regulations.

**Access Control Management** Access to Experian's information assets will be provided in accordance with a need to know basis.

**Record Management** Every document we create at Experian is considered a company record. All records, electronic or hard copy, are information assets that should be appropriately safeguarded.

## What We Need to Remember

We are all responsible for maintaining security over Experian's information assets within the context of our defined roles.

We must execute security controls (e.g., encryption) based on the assigned information classification.

We must secure laptops and other equipment assets taken offsite to prevent loss or misuse.

We can make personal use of Experian's assets, as long as the personal use is occasional and within reason. We will not use Experian's resources for personal gain, political purposes or solicitation of any kind.

We must conform to requirements for retention and disposal of equipment and data (e.g., shredding) in accordance with our Information Security policies.

Experian is only required to retain certain documents for specified periods of time. We should dispose of or destroy any documents that don't need to be retained.

### The Experian Way:



We ensure that **everyday security measures are always in place** to protect ourselves and our assets – screens locked, secured printing, organised and clutter free environment, sharing on social media.

# What is expected of Colleagues and Managers

## What is expected of all Experian colleagues?

We are all expected to understand and comply with our Code of Conduct and to the law. To do this, we should:

- Read and understand the information contained in this Code
- Certify that you will behave in accordance with our Code
- Use good judgement and avoid even the appearance of improper conduct
- Raise questions and concerns about possible violations of our Code or the law
- Cooperate fully when responding to an investigation or audit

## What is expected of managers?

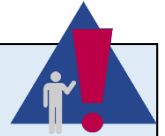
Managers have additional responsibilities. They are expected to:

- Be positive role models for ethical behaviour
- Ensure their teams understand their responsibilities under our Code
- Create an environment that is respectful and inclusive
- Encourage open communication and serve as a resource for questions and concerns
- Take immediate action to stop potential or actual violations that they are made aware of
- Monitor conduct and support employees who seek guidance or report misconduct or concerns

## What is expected of contractors, suppliers and third parties at Experian?

The Code applies to everyone at Experian, including contractors, suppliers and others who do business with us. Contractors and suppliers performing work on behalf of Experian are expected to comply with the law and the portions of the Code that apply to them. We will take appropriate action if our expectations have not been met.

### What we do



If you see something going wrong, you must speak up. When you speak up, the company will listen and act. It is important that any misconduct, wrongdoing, bribery or fraud is reported – either to your line manager or to the Confidential Helpline.

# Administration of the Code of Conduct



## Consequences of not following the Standards

Violations of the Standards are not tolerated. Violations of this Code, any of Experian's policies or a relevant regulation or law, may be subject to corrective action up to and including an unpaid suspension, termination of employment or possible civil or criminal liability. Individuals who have willingly failed to report known violations of others may also be subject to disciplinary action.

## Administration and enforcement

Our Code of Conduct is approved by the Experian plc Board of Directors. Compliance is responsible for administration of the Global Code of Conduct. It also oversees business ethics and compliance with applicable laws, regulations and relevant policies across Experian.

## Complaints, resolution and communication

When we are made aware that a possible breach of the Code of Conduct has occurred, Experian will act quickly, fairly and confidentially. We conduct fair and prompt investigations. If required, we will inform the appropriate authorities of any breach of the law. We cooperate fully with law enforcement and governmental agencies. Where practical, we will respond to the individual who reported the issue.

## Applicability, waivers & exceptions

Our Code of Conduct is mandatory and applies to all our colleagues and anyone doing business on our behalf. Waivers or exceptions will be extremely rare and require the approval of the regional or global risk management committee, as applicable.

The Code of Conduct cannot cover every business situation or ethical dilemma where the right decision is unclear. However, it is a guide to help us make the right ethical decisions and resolve issues that may arise.

# Global Experian Locations

## Corporate headquarters

Newenham House  
Northern Cross  
Malahide Road  
Dublin 17  
D17 AY61  
Ireland

## Corporate office

Cardinal Place  
80 Victoria Street  
London  
SW1E 5JL  
United Kingdom

## Operational headquarters

The Sir John Peace Building  
Experian Way  
NG2 Business Park  
Nottingham  
NG80 1ZZ  
United Kingdom

Experian  
475 Anton Boulevard  
Costa Mesa  
CA 92626  
United States

Serasa Experian  
Alameda dos  
Quinimuras, 187  
CEP04068-900  
Sao Paulo Brazil