



# illion Modern Slavery Statement

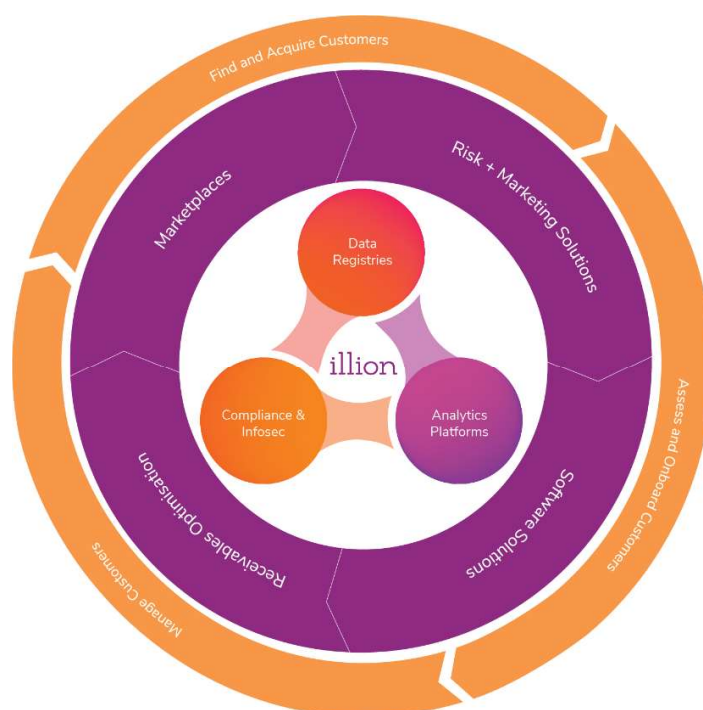


## About illion

illion is a leading Australian data and analytics company, providing information and insights for businesses and consumers, with operations in Australia, New Zealand, the United Kingdom, USA and Canada. Our vision is to bring data and analytics to life in order to solve problems for our customers.

Our market leading data solutions and unique insights enable organisations to make confident decisions across the entire customer lifecycle – from customer prospecting, credit originations and identity verification to on-going customer management and collections.

By integrating and optimising our vast store of consumer and commercial credit risk and data assets, we offer off-the-shelf or bespoke solutions that support new customer targeting, ID and company verification, risk assessment, exposure management and collections optimisation.



*Our comprehensive data registries*

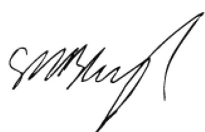
## FY2020 Annual Statement

The illion group of companies (together, **we, us, illion or illion group**) acknowledges that modern slavery is a crime and a violation of fundamental human rights. We are committed to conducting our business and all our relationships based on integrity and we join the global response to eradicate the many forms of modern slavery by addressing the risks of modern slavery in our operations.

This Modern Slavery Statement is made pursuant to section 13(1) of the *Modern Slavery Act 2018* (Cth). It is made by Credit Data Solutions Pty Ltd ACN 606 370 576, an Australian proprietary limited company that is the ultimate holding company of the illion group. This annual statement covers the reporting period 1 July 2019 to 30 June 2020.

The illion group shares the same governance framework, the same set of values, policies, and code of conduct. This Modern Slavery Statement is therefore a consolidated description of the actions taken to address modern slavery risks by the illion group, and is issued as a joint statement on that basis.

This Modern Slavery Statement has been approved by illion's Executive Management Team and the Board of Directors.



**Simon Bligh**  
**Chief Executive Officer**  
March 2021

## Organisational structure and operations

### Structure

illion is headquartered in Melbourne. Its majority shareholders are funds managed or advised by Archer Capital which is an Australian private equity firm.

We have a total of approximately 700 employees in 11 offices in Australia and overseas. The illion business operates through a number of different legal entities and share the same shared services teams (including finance, procurement, legal, people and culture etc).

### Governance framework

Our governance framework comprises:

- Our Values
- Our Code of Conduct
- Our Policy Framework

### Our Values

At illion, we live and breathe our values every day. We are committed to creating a values-based organisation that our people are proud of. Our values guide our business, our decisions and our choices and reflect how we interact with each other.

- **BE BOLD** – We dare to challenge, to lead. And we accept the risk of failure to innovate.
- **RAISE THE BAR** – We don't settle. We set standards that others aspire to. We are accountable, no excuses.
- **WE ARE THE SAFE KEEPERS OF DATA** – When it comes to our data, we look left, we look right, and we proceed with caution.
- **WE FIND SMART WAYS TO GET SH\*T DONE** – Keep it positive. Collaborate, don't be a roadblock. We debate, not assassinate.

### Our Code of Conduct

Our Code of Conduct establishes the principles of conduct expected from illion team members. It is designed to assist individuals to understand what is acceptable and unacceptable behaviour in the workplace, and when representing illion outside of the workplace.

illion expects its team members, including employees, contractors and individuals working on illion's premises, to comply with the key principles of our code of conduct.

Key Principles			
Honest	Professional	Fair	Respectful

At illion, everyone is encouraged to speak up and say something if things are not right.

## Our Policy Framework

Each of our values and key principles of conduct is supported by a range of policies such as anti-corruption, anti-discrimination, anti-harassment and bullying, health and safety, equal employment opportunity and diversity, recruitment, corporate social responsibility, and whistleblower policies, which form the basis of our dealings with employees, contractors, suppliers and other third parties.

The policy framework sets out clear and accountable management policies and practices of illion. Our policies are reviewed regularly to ensure they remain relevant and reflect conduct expected of our employees and contractors.

The policies cover the illion group of companies.

## Operations

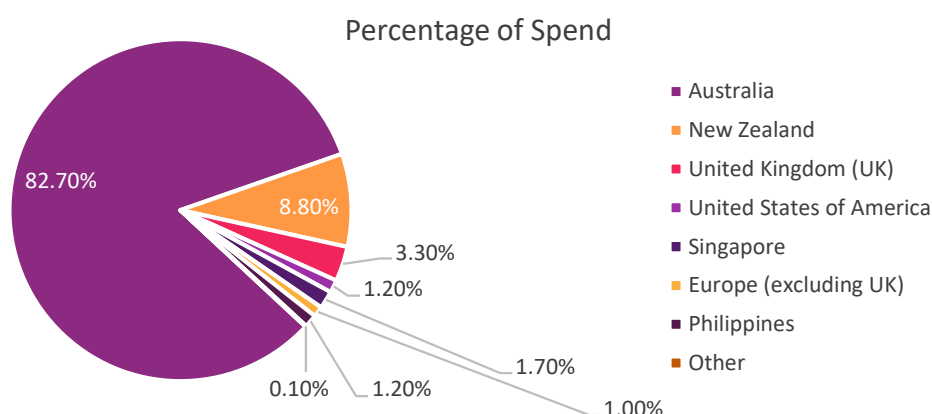
### Our Supply Chain

illion is committed to socially and environmentally responsible procurement and acknowledges that this responsibility extends beyond our own operations and into our supply chains. illion sets high standards for the way we do business so our suppliers and customers have clear expectations about the way we conduct business.

At illion, how we do business and support our customers is just as important as the business outcomes. We take our duty to operate our business responsibly seriously and we expect our suppliers to do the same. illion has contractual arrangements with all of its key direct suppliers.

In the reporting period, we engaged directly with 460 key suppliers across various sectors including technology, computer hardware, software, telecommunications, professional services, specialised data and non-core activities (such as office services, travel and employee related matters).

The bulk of services illion procures are predominantly provided within low risk modern slavery risk countries in Australia, New Zealand and United Kingdom, while the products that illion procured are manufactured across the world. The main source locations are Singapore, United States of America and Philippines. The following countries are source countries for these products and services:



## Risk Management and Due Diligence

### Modern Slavery Working Group

An internal working group (**Modern Slavery Working Group**), reporting to the Chief Financial Officer, was established to develop and/or uplift our policy framework and processes, to assess illion's modern slavery risks and implement anti-modern slavery practices and policies throughout illion.

### Approach

illion adopts a risk-based approach to the assessment of modern slavery risks in its business operations and supply chain.

The following summarises the actions that we have undertaken in the reporting period.

### Suppliers

#### Our Supplier Code of Conduct

The Modern Slavery Working Group developed a Supplier Code of Conduct that is based on the Responsible Business Alliance Code – a set of social, environmental and ethical industry standards in line with international norms and standards including the:

- Universal Declaration of Human Rights
- ILO International Labour Standards
- OECD Guidelines for Multinational Enterprises
- ISO Standards Australia standards

It forms part of our approach and policy framework to address and manage modern slavery risks in our supply chain.

Our suppliers are required to read and adhere to illion's Supplier Code of Conduct, which is available [here](#). A supplier's ability to meet the requirements in the Supplier Code of Conduct forms part of our selection criteria.

Where appropriate and possible, we secure suppliers' contractual compliance with our Supplier Code of Conduct.

#### Contracts Uplift

Our standard supplier contracts have been revised with anti-modern slavery provisions to require suppliers' compliance with modern slavery laws and assist illion with:

- Ensuring supplier's employees, contractors, and sub-contractors are aware of modern slavery risks through training
- Taking reasonable steps to monitor and notify illion of any modern slavery compliance issues in their supply chain
- Providing information to inform illion's assessment, reporting and compliance with modern slavery laws

Where reasonably practicable and possible, we obtain contractual audit rights to inspect supplier's premises and records. On our request, suppliers are required to provide evidence of its compliance with illion's Supplier Code of Conduct and anti-modern slavery laws.

## Due Diligence

We conduct due diligence prior to the engagement of a new supplier and on contract renewal of our existing suppliers to assess how they contribute to illion's modern slavery risks. Our objective is to understand the supplier's business operations, labour practices and policy framework, in order to determine if the supplier represents a risk of non-compliance with laws, including anti-slavery laws, and with illion's policies.

As part of the decisioning process in awarding contracts to our supply chain, illion assess suppliers against six categories of risk. The risk categories include:

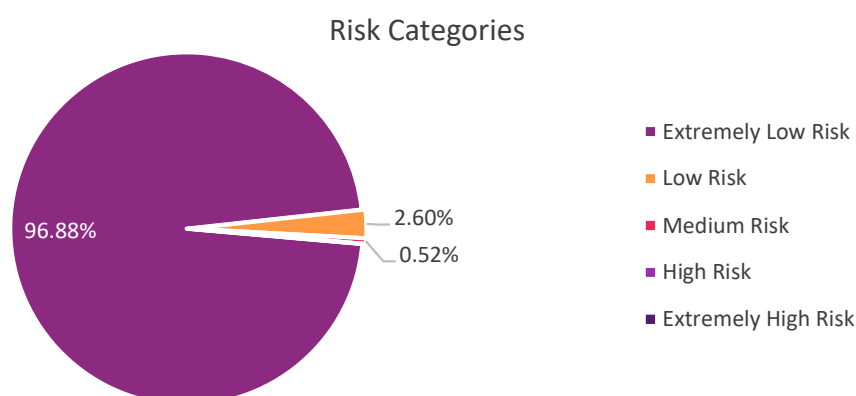
- Labour Practices
- Lines of Business
- Regions of Operations
- Policies & Procedures
- Security & Privacy
- Environmental practices

We use a mix of screening, including questionnaires, quarterly meetings, onsite audits (where necessary), desk-top documentary review, checks with public records, media, litigation/adverse findings, criminal, financial, and bankruptcy checks, that cover the supplier's parent company and related parties. We review a supplier's contract compliance in quarterly meetings.

In particular, we seek to understand whether a supplier has established standards and procedures to tackle and remediate modern slavery in its own supply chain and if its employees and contractors are held accountable for non-compliance.

## Our Assessment

illion issued a Supplier Risk Questionnaire to over 100 suppliers to gain a more in-depth view of their supply chain and risks to modern slavery. The results of the questionnaire showed that the majority of our key suppliers are in the low risk category. There were a small number of suppliers who due to geographical location or type of business were rated as a low to medium risk.



Any suppliers rated as medium or higher risk categories are continually monitored by illion through monthly meetings with its representatives. There were no notable concerns during the reporting period. To monitor our modern slavery risks, we conduct an on-going annual risk assessment of our top 100 suppliers.

## Employees

Our employees are required to comply with our codes and policies which requires them to act lawfully, ethically and with integrity and encourages them to raise compliance and ethics concerns. Our Code requires that illion employees comply with all applicable laws and regulation, and follow illion policies. Any illion employee who violates our standards may be subject to disciplinary action up to and including termination of employment.

We ensure that no under aged people are employed within our company.

At illion, all new illion employees are subjected to the following strict hiring policies and processes devised by the business in conjunction with the People & Culture team and subject to Business Unit Leaders input and review, including:

- Mandatory police checks for all employees
- Mandatory employment reference checks for all employees
- Strict 'conflict of interest' employee policy

We have in place a whistleblowing policy which ensures that anyone who has concerns, for example, about how staff are behaving, has a means of raising their concerns confidentially including when this concerns suspicion of Modern Slavery.

## Covid 19

Our strong business continuity planning ensured that we were able to follow official health guidelines and advice, and our staff were able to safely work from home. We adopted an over-communication strategy to ensure our staff are informed and supported. We followed the advice provided by Fair Work Australia to understand any potential and/or temporary changes to relevant industrial instruments.

We incorporated the monitoring of the impact of COVID-19 on our supply chain into our Supplier Performance Management program. During the reporting period, we did not identify any significant impact on our supply chain that increased our risk of modern slavery or the requirement to re-negotiate any existing agreements.

Our organisation did not experience any significant disruption that would increase the risk of modern slavery in our operations as a result of COVID-19.

## Remediation

### Supplier Audit

We conduct supplier audits regularly. When a situation of non-compliance with modern slavery or our Supplier Code of Conduct is identified, or a supplier finds it difficult to undertake appropriate measures, we require the supplier to report and share compliance issues with the relevant



representative of illion. Suppliers may contact illion to discuss any compliance issues at [procurement@illion.com.au](mailto:procurement@illion.com.au)

As a preferred course of action, illion commits to work with suppliers to develop and implement a corrective action plan to improve the situation. Should there be instances of repeated non-conformance, illion will regard such conduct as a serious failure to adhere to our Supplier Code of Conduct and we may terminate supply contracts.

For the reporting period, we conducted 4 supplier audits. There were no issues raised by the audits with respect to modern slavery.

## Further Work

At the end of the reporting period, the Modern Slavery Working Group was developing further modern slavery and human rights policies, including a remediation policy to outline ways that illion may remediate where modern slavery is found to exist in our business and supply chain.

## Reporting and Effectiveness

illion assesses the effectiveness of the actions it is taking to assess and address the risks of modern slavery practices in its operations and supply chains in the following ways:

- Where reports are made through our grievance or notification mechanisms, it indicates that our mechanisms are effective in bringing issues to light for illion's attention and for the opportunity to remediate.
- Regular risk assessment of key suppliers ensures continued monitoring and management of supplier compliance.
- Where suppliers are identified in our supplier audits as operating in high risk industries or regions, these high risk suppliers will be flagged for high care management, and we consider this as a means of addressing illion's modern slavery risks.

## Consultation with Owned or Controlled Entities

The business and illion group companies share the same policies and shared services functions (including a centralised procurement function).

illion's Modern Slavery Working Group includes representatives from procurement and legal who regularly liaises with other management and operational teams across the illion group of companies and the businesses that operate through them.