



# Modern Slavery Statement

Equifax Australia Group - June 2021

## *Opening statement from senior management*

Equifax is committed to preventing acts of modern slavery from occurring within its business and supply chain.

Every employee has a responsibility to act at all times with honesty and integrity in all business dealings. To reinforce this commitment, Board approved policy, slavery risk management processes, and training have been developed to comply with *Modern Slavery Act 2018 (Cth)* obligations and reporting requirements.

Equifax seeks to impose the same high standards on its suppliers.

## Introduction

This Modern Slavery Statement, pursuant to the *Modern Slavery Act 2018 (Cth)* (the Act), sets out the steps taken by Equifax Australia Holdings Pty Ltd ABN 37 609 497 494 and its subsidiaries (together, the Equifax Australia Group) to address the risk of modern slavery in our business and supply chains during the financial year ending 30 June 2021. This statement has been prepared as a joint statement on behalf of all reporting entities within the Equifax Australia Group.

## Our Structure, Operations and Supply Chains

Equifax Australia Holdings Pty Ltd is a wholly owned subsidiary of Equifax, Inc., a global information solutions company that uses unique data, innovative analytics, technology and industry expertise to power organisations and individuals around the world by transforming knowledge into insights that help make more informed business and personal decisions.

Domiciled in the United States of America and headquartered in Atlanta, Ga., Equifax operates or has investments in 24 countries in North America, Central and South America, Europe and the Asia Pacific region. Combined the companies bring close to 170 years of data and insights experience to the marketplace.

Equifax Australia Holdings Pty Ltd is the group's principal Australian holding company and owner of all subsidiary companies which operate Equifax's business in Australia. Our principal place of business is in North Sydney, New South Wales. We also have offices in Brisbane and Melbourne.

In Australia, there are 821 employees, contractors or casuals (together, **employees**). Contracts are in place for all members of our workforce which set out the terms of engagement.

Within its supply chain Equifax Australia Group as a data, analytics and technology provider procures services comprising recruitment, technology, call centre operations and data services.

These suppliers are mostly large, established suppliers, predominantly based in Australia. Some do have overseas operations, from which services are provided to Equifax, but in these instances, Equifax typically contracts with the Australian entity of the supplier, or through its US domiciled parent.

Equifax's supply chains include outsourcing arrangements in relation to our core recruitment and call centre operations and technology infrastructure.

## Equifax and the Community

In order to support our operations and meet our customers' needs, we work with a range of suppliers, from data providers through to technology providers.

Drawing from the most trusted sources to compile and process data, we see things and make connections that others can't. As a leader in data and analytics Equifax is uniquely placed to leverage our expertise to help improve the wellbeing of the communities in which we operate.

One of our core values is to provide tools and education for financial literacy and inclusion and this is a focus for us around the world.

As part of this commitment, we pursue meaningful long-term relationships that seek to assist and improve the lives of others. We do this by reaching out and helping the economically disadvantaged, the children of our communities, and the next generation of young people poised on the brink of a lifetime of credit and financial decision making.

Equifax works to foster a better understanding of credit and lending. To educate others in the critical role that credit plays in all financial decisions. To provide resources that assist our communities to improve their financial situation. It's here we hope to make a lasting, conscious impact.

To find out more about the nature of our business, please visit [www.equifax.com.au](http://www.equifax.com.au).

## Governance

As part of our commitment to our global communities and combatting modern slavery in our business and supply chains, Equifax Australia Holdings Pty Ltd (in consultation with stakeholders of all members of the Equifax Australia Group) has developed and implemented a specific Modern Slavery Policy that:

- Outlines how the Act has been adopted across the Equifax Australia Group and sets down the requirements for how those requirements should be applied across the Equifax Australia Group; and
- Defines the practices adopted by the Equifax Australia Group in relation to preventing modern slavery in our business and supply chains, and the standards expected from all employees.

We also consider several other Equifax Australia Group policies to be relevant to this area, including our HR and recruitment policies, Procurement and Supplier Diversity Policies, Code of Ethics and Business Conduct, and Whistleblower Policy and Procedure.

These policies are being implemented across the Equifax Australia Group through internal communications, training, and compliance and risk management channels, and we have implemented a program of work to make our suppliers aware of our policies with regard to modern slavery.

## Due Diligence

The Equifax Australia Group regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by reviewing these activities.

We do not, however, consider that we operate in a high-risk sector due to the nature of our business as a data, analytics and technology provider.

As part of our efforts to monitor and reduce the risk of modern slavery occurring within our supply chains, we have developed due diligence procedures in respect of our business-to-business suppliers and our HR and recruitment activities.

These include supplier questionnaires, risk assessments, contractual commitments and the right to conduct due diligence exercises.

Our procedures are designed to:

- Establish and assess areas of potential slavery risk in our business and supply chains.
- Identify and monitor potential slavery risk areas in our business and supply chains.
- Take steps to reduce the risk of slavery occurring in our business and supply chains; and
- Provide adequate protection for whistle-blowers.

Our supplier risk assessment process reviews the supplier's industry, geographic location, commercial significance, use of material 4th parties/subcontractors, and tenure of relationship.

Where a high-risk supplier is identified, additional due diligence will be undertaken to verify that modern slavery controls are included as part of that organisation's structure, operations, and supply chain.

Having regard to these risk-based assessments, we are undertaking a review of our existing suppliers to identify those who may be within the higher risk procurement categories, and are also identifying key suppliers within the higher risk locations, for whom additional due diligence review will be required.

Supplier questionnaires have been completed or are in progress for 175 (99%) of our active outsourced service providers (covering recruitment, technology support, call centre operations and data services), and no high risk suppliers have been identified with regard to modern slavery risk.

In addition, due diligence procedures for modern slavery risks have been incorporated into the process for onboarding new suppliers.

In addition, we are currently reviewing and updating contract terms that will require our suppliers to comply with our policies, including our Code of Ethics and Business Conduct and Modern Slavery Policy.

## **Impact of Covid-19 on human rights**

Equifax reaffirms our respect of human rights during the COVID-19 crisis in our operations and supply chain.

Equifax has identified the residual risk of human rights violations in Equifax operations as low. The Group manages human rights issues in its operations under its Code of Ethics and Business Conduct, Procurement Policies and Inclusion and Diversity Program.

### ***In our operations***

As the COVID-19 crisis began to unfold in early 2020 COVID-19 the Equifax Covid Task Force was set up with senior managers across the Group. This team identified protecting the health and safety of our team members and customers, while supporting government efforts to limit the spread of the virus as the highest priority. This unrelenting focus put the human rights impacts related to COVID-19 in our own operations front and centre of the company's response.

All our businesses put in place measures to protect the health and safety of team members and customers.

- We shifted nearly 10K team members to remote work in a matter of days last March.
- We amped up the volume on all our communications –to employees, customers and investors – to stay tightly connected as the COVID pandemic unfolded.
- Equifax worked directly with governments in Canada, India, Australia and Latin America to help design and implement direct relief efforts and help get people back to work, faster.
- And we continued to support consumers and businesses with our unique and differentiated data so they could access loans, mortgages, credit cards, auto loans or personal loans.

### ***In our supply chain***

As part of its Third-Party Risk Management program, Equifax A/NZ has undertaken a review of its critical suppliers to confirm that the supplier has reviewed and considered the implications of COVID-19 on both its operations and their extended supply chain to identify any significant risks.

With the escalating COVID-19 outbreak in 2021, Equifax ANZ have been working with our off-shore outsourcing partners based to mitigate the risk including through COVID-19 vaccination program for all at risk staff and contractors.

In addition, in 2020 Equifax actively expanded its Supplier Diversity program to create shared value and to be an integral component of Equifax's Environmental, Social and Governance (ESG) strategy and priority.

The Global Supplier Diversity Program allows for a renewed focus on ethical and sustainable inclusion which will drive our internal growth and development and, as important, have a positive impact on the global economy.

Under its Supplier Diversity Policy Equifax actively engages and encourages diverse suppliers to compete, on a fair and equal opportunity basis, for the Company's business; and establishes the foundation to ensure their inclusion in the Company's outsourcing and procurement process.

## **Training**

We are educating our staff to recognise the risks of modern slavery in our business. Through our training programmes, employees are encouraged to identify and report any potential breaches of our Modern Slavery Policy.

Staff are encouraged to 'Report It, Don't Ignore It', and are able to report or escalate any Modern Slavery concerns through the Equifax Compliance Incident Reporting Tool, or anonymously by contacting the Whistleblower Protection Officer.

## **Assessing the effectiveness**

As part of our commitment to managing modern slavery risk in our supply chain, we have a continuous improvement approach and will assess the effectiveness of our approach on an ongoing basis.

The Equifax Australia Group has an existing third-party risk management process as part of its Enterprise Risk Management framework, which will provide the basis of monitoring modern slavery risk.

Our Enterprise Risk Management framework will be used for identifying and recording supplier risks and any issues that may require review and/or remediation. Risks are reviewed quarterly by the Risk, Compliance and Security Committee.

The Head of Enterprise Risk Management will be responsible for overseeing an annual review of the effectiveness of all actions, and will report to the Risk, Compliance and Security Committee, and the Board. The evaluation of the effectiveness of actions will include an annual review of:

- Risk registers and modern slavery risk assessments to identify any changes over time, such as risks relating to new products or suppliers;
- The responses to our Supplier Questionnaires and steps taken to scrutinise high risk suppliers;
- The number and nature of any reports submitted under the Compliance Incident Reporting Tool, and Whistleblower Policy and Procedure; and
- Any corrective actions or remediation that has taken place to ensure the learnings can be taken and used in the prevention of future cases.

We will continue to evolve the methods used to assess the effectiveness of our Modern Slavery management process as we progress its implementation and will report our progress and the

effectiveness of the actions implemented in Equifax Australia Group's annual Modern Slavery Statements.

### **Future Commitments**

Our focus will be on continuing to develop the maturity of our supplier due diligence program within our risk management framework. This will include the development of an additional due diligence process for new suppliers to undertake an assessment of their modern slavery compliance at the time of on-boarding.

We will also be enhancing our employee training so that employees are even better aware of modern slavery risk, and the appropriate company policies in relation to slavery and understand that they have a responsibility to identify any potential breaches of those policies.

### **Statement Authority**

This statement is made as a joint modern slavery statement on behalf of Equifax Australia Holdings Pty Ltd and the Equifax Australia Group in accordance with Part 2 of the Modern Slavery Act 2018 and constitutes Equifax's Modern Slavery Statement for year ending 30 June 2021.

The Statement has been approved by the Equifax Australia Holdings Pty Ltd Board of Directors at its meeting on 17 June 2021, and is signed for and on behalf of Equifax Australia Holdings Pty Ltd and each member of the Equifax Australia Group by:

A handwritten signature in black ink, appearing to read 'Lisa Davis', is written over a horizontal dotted line.

**Lisa Davis**  
**Director, Equifax Australia Holdings Pty Ltd**  
2 September 2021