

UK and Ireland - Code of Conduct

Purpose

To communicate the Company's expectations relating to standards of behaviour and conduct. The Code of Conduct policy outlines a set of behaviours to which all Experian employees and our representatives are expected to adhere. The Company expects its employees and representatives to demonstrate our values, be supportive of our culture and represent who we are and what we believe in at all times. In certain situations this will apply outside of normal working hours. The rules outlined in this policy are designed to promote legal compliance, fairness and consistency. Rather than provide an exhaustive list, the policy aims to provide a number of statements which underpin/communicate the standard of conduct within Experian.

Scope

All employees and representatives of the Company are expected to comply with the standards of behaviour outlined in this policy. Contractors, consultants and agency workers also fall inside the scope of this policy. Visitors are not within the scope of this policy. The Company will however expect their conduct to mirror the commitments made in this policy.

Policy Statement

Experian will not discriminate against anyone on the grounds of age, race, colour, nationality or ethnic origin, religion or belief, gender, marital status, disability or sexual orientation. Everyone is responsible for identifying and managing any situations in which an employee or representative of the Company is not deemed to be adhering to the standards of behaviour outlined in this policy. Where a breach does occur, the employee or representative will be subject to an investigation that may result in disciplinary action being taken in line with the Experian Disciplinary policy.

Standards of behaviour

All employees and representatives of the Company must:

- Comply with Company rules, instructions, procedures and contractual agreements during and after their employment (where contractual obligations apply) with the Company.
- Follow all reasonable requests or instructions given by those supervising or managing their activities or area of work.
- Not behave in an inappropriate way towards other colleagues, clients, suppliers or visitors.
- Comply with the normal hours of work or those specifically applicable to that individual.
- In line with the Experian Absence management policy, employees and representatives are expected to notify their line manager at the earliest opportunity if they are unable to attend work.
- Not damage the reputation of others or the Company.
- Treat clients and work colleagues in a courteous, professional and respectful manner at all times.
- Not be absent from work or late without permission.
- Not discriminate against anyone on the grounds of age, race, colour, nationality or ethnic origin, religion or belief, gender, marital status, disability or sexual orientation, in line with the Experian Diversity and Equal Treatment policy.

- Not engage in any form of abuse, threatening behaviour, bullying or harassment in line with the Experian Bullying, harassment and victimisation policy.
- Not attend work under the influence of alcohol or other non-prescribed drugs in line with the Experian Alcohol and drugs policy.
- Respect the privacy of fellow employees by not taking photographs in the workplace, in line with the Experian Mobile phone policy.
- Not display inappropriate behaviour outside of working hours that contravenes the Experian Code of Conduct policy.
- Not behave in such a way that is contradictory to their terms and conditions of employment.
- Wear appropriate business dress at all times in line with the appropriate dress guide.
- Repay any outstanding monies owed to the Company upon termination of employment in line with the Experian Overpayments process.
- Disclose any previous 'unspent' criminal convictions or any charges that are pending prosecution. (In some instances a full disclosure may be required for specific roles designated by Experian).
- Report any information security incident regarding Experian Data.

Experian property

All employees and representatives of the Company must:

- Only use Experian property or any other property on Experian premises, for the purpose for which it is intended and for which they have authorisation.
- Not remove any articles of Experian property, or any other individual's property kept on Company premises, without authorisation.
- Report immediately to their line manager any loss or damage to Experian property, including Experian owned devices that hold data and information relating to individuals or businesses (i.e. Laptop, Blackberry, USB memory stick).
- Return all property belonging to the Company upon termination of employment.

Conflicts of interest

All employees and representatives of the Company must:

- Not accept gifts or gratuities over the value of £5 which may be considered to be a bribe.
- Not carry out private trading on Company premises without authorisation.
- Not carry out business or employment which is unconnected with Experian, either during or outside of working hours, without permission.
- Not distribute private literature or make any collections for charities without authorisation.

Health and safety

In line with the Experian Health and safety policy, all employees and representatives of the Company must:

- Report immediately to their line manager any accident or injury to themselves or others at work.

- Co-operate with the Security department to ensure the safety and security of Experian employees, premises and property, including information.
- Follow the principles outlined in the Experian Home working policy where a home working arrangement has been agreed.
- Not commit any act which may endanger persons or property or which breaches any health and safety rule.
- Not leave work without permission.
- Not bring children under the age of 14 years onto Experian premises without prior authorisation from their line manager, Security and the Health & safety department.

Fraud

In line with the Experian Fraud statement, all employees and representatives of the Company must not be involved in any activity involving fraud, dishonesty or deception whether or not there is a personal benefit to the individual. Fraud can include (but is not limited to):

- Fraudulent financial reporting.
- Forgery or alteration of a document or account belonging to the Company.
- Misappropriation of assets (internal or external).
- Improper expenditures.
- Fraudulently obtained revenue and assets obtained or costs/costs expenses avoided.
- Profiteering as a result of insider knowledge of Company activities. This includes any acts which knowingly facilitate fraud or theft by others, and any acts designed to hinder detection or investigation of fraud.

A Fraud management process exists to ensure that all suspected, attempted and actual cases of fraud against the Experian business are consistently notified, professionally investigated, appropriately escalated and effectively resolved. The process also seeks to improve fraud awareness, prevention and control systems on an ongoing basis.

Security of Experian owned/managed information'

In line with the Global Information Security policy and the Data Protection Act, all employees and representatives of the Company must maintain absolute confidentiality with regard to Experian owned/managed information and records or data collected and used in the course of work. All employees and representatives of the Company must:

- Not produce, copy, delete, disclose, modify or proliferate any information in a manner that is in breach of Experian policy or could reasonably lead to damage to the Company's reputation or financial loss to Experian, or that is in breach of our legal/ regulatory obligations.
- Ensure that any documents marked 'confidential' or, any information which you have been told is confidential or which you might reasonably expect Experian would regard as confidential, should be treated as such.
- Only access or use information within the scope of their individual, authorised duties. If employees are permitted to remove information or other confidential documentation from the

premises, they must ensure that it is used for the intended purpose and take all the necessary steps to protect the security of the documentation.

- Report immediately any data or information, relating to individuals or businesses, that is suspected to be or is actually lost, misdirected, stolen or accessed without the correct authorisation.
- Protect the confidentiality of our clients' affairs. They should not accept invitations for publicity or speaking engagements without prior approval from their line manager. Any lecture or article should not refer to any factual situation drawn from experience with Experian and/or its clients and the identity of any client may not be revealed unless the client has given their express consent in writing.
- Be responsible for any documentation issued to them whilst in Experian's employment. On the termination of employment, all documentation, equipment, records, specification, software, notes, reports and copies of any other documents belonging to Experian should be returned to Experian.
- Ensure that all access to Experian owned/managed information has a very clear business justification. No individual may access this information for personal reasons or on behalf of someone else.
- Notify their line manager in the first instance if they come into possession of information accidentally or indirectly or they believe that there has been a leak of published or confidential information.
- Ensure that all confidential papers or documentation are securely locked away when not in use or when employees are not at their desks.
- Ensure that all confidential information or documentation that needs to be destroyed should be shredded or placed in the confidential waste receptacles.

Our Global Information Security policy sets out the procedures employees must follow to protect the confidentiality of all information. This policy is available on the UK intranet. Regular audits are undertaken to check how effectively employees are complying with these procedures. As part of this process, we maintain a log of everyone who accesses Experian's databases. This means an employee may occasionally be asked to explain his or her reasons for accessing certain information. Employees must take reasonable care in protecting Experian's business and ensure that they understand its significance and do nothing that will undermine the Company's business.

Overpayments

There is a formal procedure that should be followed by line managers in all overpayment situations.

Breaches

If a breach of the Code of Conduct is suspected, it will be investigated and action may be taken in accordance with the Company's Disciplinary policy. The Company will not tolerate any proven breaches

of the Code of Conduct policy and serious breaches may be considered to be gross misconduct and result in summary dismissal.

Related policies

This policy is linked to and must be read in conjunction with all Experian policies, which can be found on the UK Intranet.

Responsibility

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions.

All those working with and for the Company have an obligation to ensure and contribute towards a safe and equitable working environment and ensure their colleagues are treated in line with the principles of this policy. Individual managers are responsible for promoting this policy and ensuring that it is applied within their own area. Any queries on the application or interpretation of this policy must be discussed with HR Shared Services (HRSS) prior to any action being taken.

HRSS has the responsibility for ensuring maintenance, regular review and updating of this policy. Revisions or alterations to this policy can only be implemented following consideration by and the approval of, the HR Director UK & Ireland.

Any grievance with regard to this Code of Conduct should be made through Experian's Grievance procedure.