

WHISTLEBLOWING POLICY

Purpose

This policy has been introduced to ensure that any potentially serious risk to the public, our customers, colleagues, or the Company is raised early and addressed appropriately. This policy is to encourage all Experian staff to raise any such concern by reassuring them that it is safe and acceptable to do so.

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Scope

This policy applies to all of Experian's permanent and temporary employees and any contractors, consultants or persons acting in the name of Experian.

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Policy statement

Experian is committed to achieving the highest possible standards of quality, honesty, openness and accountability in all of its practices. This policy has been introduced to help you raise a concern you may have about malpractice in the right way and without fear. Malpractice could include a concern about possible criminal or financial conduct, a breach of a legal obligation or a regulatory or internal requirement (e.g. consumer credit, data protection, code of conduct), or a danger to health, safety or the environment.

We all have, at one time or another, concerns about what is happening at work. Usually these concerns are easily resolved. However, when the concern is about malpractice, it can be difficult to know what to do. You may feel worried about raising an issue and decide to keep your concern to yourself, perhaps feeling that it is none of your business or that it's only a suspicion. Or you may feel that raising the matter would be disloyal to colleagues, managers or Experian itself. Perhaps you have tried to raise the matter, but found out you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

Experian would prefer that you raise any concern about malpractice at an early stage. This policy has been introduced to help you raise any concern about malpractice in the right way.

This policy is not for grievances (i.e. about your employment or the way you have been treated). If you want to bring a complaint or grievance about your personal position, please use the Experian Grievance policy.

If in doubt, please raise it.

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Assurances

The Board of Experian is committed to this policy.

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Your safety

You will not be at risk of losing your job or suffering retribution as a result of raising a genuine concern under this policy. Provided that you are acting in good faith it will not matter if your concern proves to be mistaken.

Anyone who abuses this policy by maliciously raising a matter they know is untrue may be liable to disciplinary action.

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Your confidence

With these assurances, we hope you will raise any genuine concern openly. However, we recognise that there may be some circumstances when you would prefer to speak to someone in confidence. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

Please remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter. We will not be able to protect your position or to give you feedback. Accordingly you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

If you are unsure about raising a concern openly or in confidence, you can get independent advice from Public Concern at Work or ask them to pass on your concern to us (see details below).

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How to raise a concern

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Step One

Experian hopes that you will feel able to first raise your concern openly with your manager. This may be done orally or, if you prefer, in writing.

Step Two

If you feel unable to raise the matter with your manager for whatever reason, or if you think the concern has not been properly addressed at step one, please raise it with your Human Resources contact, or a senior manager or director.

Step Three

If you still have concerns, or feel that the matter is so serious that it cannot be dealt with through steps one or two, then please call the Expolink help line on **0800 374 199**.

The helpline is available 24 hours a day / 7 days a week and the process works as follows:

1. Calls go through to operators at Expolink's call centre in Chippenham. You will be told you have reached Expolink and asked which company you work for. (Expolink provides helpline services for many of the largest UK companies)

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2. If you do not speak English, a translator can be brought into the call in a matter of minutes.
3. The call handler will ask you to describe the issue and will note the information on a handwritten call sheet. The handler will give you a unique call number in case you want to call back at a later stage (either with additional information or to obtain a status report.)
4. You will be encouraged to provide your name and contact details, but may remain anonymous if you wish.
5. At the end of the call, the handler will repeat back the information to ensure that it is correct and then prepare a typed report,.
6. Expolink will call the first nominated contact at Experian. (This is Greg Coleman, the Head of Global Audit) and, having confirmed his identity will send him a copy of the report. If Greg is not available for some reason, the second nominated contact (Leigh Hodges, UK Audit Manager) will be contacted instead.
7. Once Expolink receives acknowledgement that the report has been received, all records of the content of the call are destroyed. The only information which Expolink keeps will be the unique call number [see 3 above], the type of issue being reported, the caller's name and contact information.
8. Greg Coleman/Leigh Hodges will pass the information onto the relevant senior manager (Human Resources, Legal, or Finance – depending on the nature of the issue) and will monitor to ensure that the issue is resolved.

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How the concern will be handled

Once you have told us of your concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal enquiry or a more formal investigation. Within seven days, we will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask we will summarise your concern in writing and agree it with you. We can also write to you setting out how we propose to handle it and giving approximate timelines.

When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within the Grievance or some other procedure, we will tell you.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we will not be able to tell you about disciplinary, or other action, when it would infringe a duty of confidence Experian owes to another person.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will handle the matter fairly and properly. By using this policy, you will help us to achieve this.

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Further guidance

You can also contact the HR Service Centre (HRSC) to seek more information about this policy or how it interacts with our data protection policy.

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Responsibility

All managers and staff have a responsibility to fulfil the terms of this policy in good faith. Anyone who maliciously raises a concern they know to be untrue will be liable to disciplinary action.

Individual line managers are responsible for ensuring that employees within their own area are aware of this policy and understand it.

The nominated contacts referred to under How to Raise a Concern have overall responsibility for the application of this policy.

The HRSC has the responsibility for ensuring the maintenance, regular review and updating of this policy.

This policy complies with the Public Interest Disclosure Act 1998, which sets out protection for genuine public interest whistleblowing.

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