



**EQUIFAX®**

## **Supplier Code of Conduct** v2.0

**JUNE 2025**

## Foreword

At Equifax, we believe in helping people live their financial best. We are committed to using our unique data to create a legacy, making a measurable impact on the financial landscape and creating a more sustainable future.

As a global organisation, we are committed to minimising the impact we have on our planet. We want to work with organisations that share our values and make ethical and sustainable choices. We have pledged to reduce our global environmental impact, committing and committed to net-zero greenhouse gas emissions by 2040, a sustainability commitment enabled by our Equifax Cloud™. Equifax is committed to conducting business in a socially responsible, accessible and ethical manner, and whilst we understand that many of our suppliers are on a similar journey, this Supplier Code outlines the minimum standards of conduct expected of all UK&I Equifax suppliers, regardless of location or size.

Since 2023, we have reported our ESG progress to our stakeholders such as clients, corporate partners and colleagues in an effort to improve our transparency in this area.

As we look to the future, we remain committed to creating lasting and purposeful change, and to hold ourselves accountable for ever-better outcomes for our consumers, our people, our communities, and our planet.

We ask that you share this Supplier Code of Conduct with your employees who work on Equifax activity so they can understand our values, share their thoughts and contribute towards our mutual success. We believe that by defining and evidencing our commitments, and that of our supply chain we can make a real difference together. We also invite you to take advantage of our learnings in key areas such as Carbon Reduction Planning, Social Inclusion and environmental accreditation to support you in those commitments.

**Elizabeth Chapman**  
**VP Customer Service, Operations and Business Transformation**

## **1. Introduction**

The purpose of the Supplier Code of Conduct is to ensure that Equifax creates and communicates a standard expectation around the ethics and conduct of its supplier chain, which can then be monitored and measured for the purposes of (but not limited to) audit, Environment, Social and Governance (ESG) and Social Value reporting.

All suppliers are selected and evaluated beyond the basis of economic criteria. We also look closely at environmental protection, compliance with human rights, labour and social standards as well as anti-discrimination and anti-corruption policies. Equifax has committed to creating a responsible sourcing ecosystem and so, as well as going on our own improvement journey, we are partnering with our suppliers to further develop ESG performance across the supply chain. We expect our suppliers to fully comply with applicable laws, regulatory requirements, and to be guided by internationally recognized frameworks such as the United Nations Sustainable Development Goals or the Science Based Targets Initiative (SBTi). We also expect our suppliers to use their best efforts to implement these standards with their suppliers and subcontractors.

### **1.1. Principles of Ethics and Compliance**

As a company, a supplier or a part of the wider supply chain, we must always act with integrity; when we do, others will know they can trust us and have confidence that we will be honest and fair. When we do the right thing, we protect our reputation and that of our clients. When we treat customers fairly, we protect our client's customers. Promoting these goals in our supplier partnerships will help us all to navigate today's complex and competitive business environment successfully together.

### **1.2. How to use this Code of Conduct**

The Code is designed to set our expectations of our suppliers and provide information about our policies or standards. We understand that we cannot anticipate every question they may have or situation you might face as an Equifax Supplier, so in addition to this Code, Equifax also has other resources that can be of help. We rely on our suppliers to use good judgement and to seek help when needed.

### **1.3. To whom this Code of Conduct applies**

This Code applies to any supplier that provides Equifax with goods or services. They are expected to follow the spirit of the Code, as well as any applicable contractual provisions, when working on behalf of Equifax. They are responsible for ensuring they understand our ethical standards, supported by our Supplier Management Teams. If an external business partner fails to comply with our ethics and compliance expectations and their related contractual obligations, it may result in a disciplinary process which may include the termination of their contract.

## **2. Primary Requirements**

### **2.1. Supplier Policy Expectations**

It is important to us that our suppliers consider the following ESG priorities. The Equifax ESG report gives further insight to the journey Equifax is on and how that reflects on our procurement choices and supply chain. ESG measures are increasingly a consideration in our procurement and compliance practices. We understand that some areas may be part of your development plan and where this is the case it is important we have a roadmap to completion.

#### **2.1.1. ESG priorities**

- Environmental and Energy
- Consumer Impact
- Community engagement
- Culture and Careers
- Security
- Privacy
- Our suppliers
- Values, purpose and ethics
- Corporate governance

Our strategy is guided by these core values and how the Company can create a positive social impact as a good corporate citizen: using the power of its data to create insights and intelligence to drive financial inclusion, working with suppliers, clients and partners to create an equitable consumer experience.

The Company produces an annual ESG report in order to communicate its goals as a business and outline progress made towards company objectives through a mix of quantitative and qualitative data.

### **2.2. How we measure our impact**

Our focus on enabling and measuring ESG performance has evolved with our strategy since 2022 and we now endeavour to formally measure the impact of Equifax projects, and projects throughout our supply chain.

We intend to work with all our external business partners throughout the business to encourage general adoption and enable us to embed ESG considerations into our procurement process end to end.

We measure performance in line with the Impact Evaluation Standard and report metrics including output and Social Return On Investment (SROI) where appropriate.

### **3. ESG Priority Guidance**

#### **3.1. Environment and Energy**

Protection of the environments in which we live and work is a key priority.

Equifax has pledged to reduce its global environmental impact and has committed to net-zero greenhouse gas emissions by 2040.

##### **Expectations from our suppliers:**

- Have an active science-based carbon reduction plan with targeted initiatives to minimise their environmental impact; such as waste management processes.
- Be transparent on their environmental commitments, regularly publishing targets and progress.
- Work with their suppliers to measure and minimise its environmental impact through sustainable sourcing.
- Enable employees to take part in training to make a positive contribution to environmental management.

#### **3.2. Consumer impact**

Equifax's stated business purpose is to help people live their financial best - through its range of products and services and also working across the financial services industry to improve standards.

##### **Expectations from our suppliers:**

- Where applicable, provide an inclusive service for all consumers, through provision of a flexible approach that is respectful of each individual regardless of their personal circumstances, where everyone is treated fairly.
- Monitor and continually improve products and services to remain inclusive.

#### **3.3. Community engagement**

Equifax's social purpose is aligned to its business purpose of helping people live their financial best through strengthening capability - having the opportunity to act, and the ability to act.

##### **Expectations from our suppliers:**

- Support employee volunteerism, philanthropy and employee giving, and engage in strategic partnerships to support community engagement.
- Work with the community to broaden our candidate pool and create social mobility for future generations.

#### **3.4. Suppliers**

Equifax's social purpose is to seek and provide fair opportunities for a wide range of suppliers to compete for procurement of goods and services; upholding its business imperative to deliver

innovative and differentiated service solutions for customer challenges, and profitable growth for the company, its suppliers, service providers and local economy.

**Expectations from our suppliers when choosing their suppliers:**

- Procure goods and services in an ethically and socially responsible way; working with a range of suppliers to help local economies such as new businesses, entrepreneurs, start-ups, SMEs (Small & Medium Enterprise), VCSEs (Voluntary, Community or Social Enterprise) and mutuals, with respect for the environmental impact and regard for commercial obligations.
- Encourage competition and a fair and objective evaluation of all potential suppliers when engaging in purchasing.
- Be working towards or have achieved an award from the government's voluntary Fair Payment Code in the UK and adhere to similar principles / regulation in other jurisdictions to demonstrate prompt payment terms.

**3.5. Culture and Careers**

Equifax's social purpose is to champion a working environment in which its employees can achieve their true potential, grow, live fully, and be a force for good. It recognises that talented employees and individuals that represent the consumers we serve are essential for long-term sustainable growth and that encouraging a broad range of perspectives leads to higher levels of innovation for customers and consumers, strong engagement levels and ultimately better business outcomes.

**Expectations from our suppliers:**

- Promote an inclusive culture; driven from the top through leadership and development, clear initiatives to drive change for example through employee networks and groups.
- Be a signatory to appropriate standards to demonstrate its commitment to better working environments for its employees (for example Disability Confident in the UK, and disability legislation).
- Offer flexible working to eligible employees.
- Demonstrate a commitment to complying with legislative minimums and/or real living wage alternatives where appropriate, benefits to all employees, and using a range of data points including gender pay reporting and pay analysis to inform on pay decision and drive pay equity.

**3.6. Security**

Equifax is proud to be an industry leader in security.

**Expectations from our suppliers:**

- Where applicable, ensure that all employees understand their role in protecting data and systems, as well as the importance of treating security as a personal priority.
- Document their approach to data security through Policies and Technical Requirement Standards.

- Maintain and demonstrate appropriate security measures and certifications applicable to their contract.

### **3.7. Privacy**

Equifax processes large volumes of Personal Data relating to the majority of the adult population as part of its business activities, and is committed to the responsible and appropriate use of Personal Data at all times.

#### **Expectations from our suppliers:**

- Process Data in accordance with applicable data protection laws, processing Personal Data lawfully, ensuring they are fair and transparent about our processing, including collecting and using data for limited and specific purposes.
- Maintain adequate records of their processing; keeping the data they hold accurate and up to date, whilst retaining it for no longer than is necessary.
- Have appropriate technical, organisational and physical measures to keep Personal Data secure (See section 3.6 Security), and to identify and respond to the exercise of individual Rights by Data Subjects.

### **3.8. Values, purpose and ethics**

Equifax's purpose is to help people live their financial best. It strives to create economically healthy individuals and communities everywhere it does business. The Company's values express who it is, how its employees work and the behaviours that support the company, its vision and purpose.

#### **Expectations from our suppliers:**

- Have clearly defined internal Code of Ethics and expectations Business Conduct.
- Monitor their employees' conduct to ensure it is in a manner consistent with the stated values and codes; addressing instances of inappropriate conduct when it occurs.
- Prevent acts of modern slavery and human trafficking from occurring within their business and through third party suppliers.

### **3.9. Governance**

As a trusted global leader in data, advanced analytics, and technology, good corporate governance is vital to meeting Equifax's performance goals. This ensures its governing processes run smoothly and efficiently and it is prepared to adequately and timely meet the challenges and opportunities posed in the competitive environment.

#### **Expectations from our suppliers:**

- Adherence to industry standards of governance and ethics.
- Communicate their standards with relevant stakeholders through reporting where appropriate.

#### **4. Monitoring and Testing**

To ensure compliance with this Code, Equifax may conduct audits of its suppliers. Equifax and its suppliers may from time to time also be audited by clients. The cadence of such audits will be appropriate to the supplier type.

#### **5. Training and Communication**

Equifax will provide all its suppliers with an understanding of the expectations in this Code through group consultation and training. It is the supplier's responsibility to ensure their own policies are adequately cascaded to their own staff through regular training.

#### **6. Administration and Governance**

This Code will be subject to review every twelve months or when material change occurs, to ensure it continues to meet requirements.

#### **References:**

[Equifax Code of Ethics and Business Conduct](#)

[Equifax Modern Slavery Statement](#)