

A woman with long, wavy brown hair is looking down at a tablet computer she is holding. She is wearing a dark blue or black patterned shirt. The background is a blurred city street at night with warm, bokeh lights. In the upper left corner, there is a red circular logo with the word "EQUIFAX" in white, bold, italicized capital letters.

**EQUIFAX<sup>®</sup>**

**Supplier Code of Conduct**

**March 2026**

## Supplier Code of Conduct

At Equifax, our purpose is simple: to help people live their financial best. Our Responsible Business strategy—centered on **People, Planet, and Purpose**—remains the driving force behind every decision we make, including who we partner with.

Building a truly sustainable future requires a responsible sourcing ecosystem where transparency and ethics are paramount. We have pledged to reduce our global environmental impact via a science based pathway however, we cannot achieve this alone.

Beyond our environmental footprint, we are focussed on creating meaningful social value. This means fostering a diverse and resilient supply chain that actively supports SMEs, minority-owned businesses, and social enterprises. We believe that a strong supply chain is one that reflects the rich diversity of the communities we serve.

Since 2023, we have reported our Responsible Business progress to our stakeholders such as clients, corporate partners and colleagues in an effort to improve our transparency in this area. In 2024, we were ratings provider Ecovadis achieving a Bronze rating. In 2025 we moved to silver with a 15% increase in sustainable procurement.

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.

Our new audit framework helps us to understand more about the corporate partners in our supply chain so we can not only report more effectively but also begin to monitor and report progress on supplier diversity, ethics and sustainability too.

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

## 1. Introduction

The purpose of our Supplier Code of Conduct is to ensure that Equifax creates and communicates a standard expectation around the ethics and conduct of our supplier chain, which can then be monitored and measured for the purposes of (but not limited to) audit, Responsible Business Priorities (RBP) 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 (Environmental, Social & Governance) 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 you 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. You are expected to follow the spirit of the Code, as well as any applicable contractual provisions, when working on behalf of Equifax. You are responsible for ensuring you 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 the contract.

Additional guidance is included in Appendix A to ensure that Debt Services suppliers have clear visibility of the specific guidance from TDX and any additional expectations Equifax holds of them. For the purposes of this document, a Debt Services supplier is any Equifax supplier that has a TDX Master Services Agreement (MSA).

## **2. Primary Requirements**

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

It is important to us that our suppliers consider the following Responsible Business Priorities. The Equifax Responsible Business report gives further insight to the journey Equifax is on and how that reflects on our procurement choices and supply chain. Responsible Business 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. Responsible Business Priorities**

Our Responsible Business Priorities fall into seven categories:

- Financial Inclusion
- Consumer Impact
- Environment
- Culture and Values
- Security
- Privacy
- Corporate Governance

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

Equifax produces an annual Responsible Business report in order to communicate its goals as a business and outline progress made towards our objectives through a mix of quantitative and qualitative data.

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

Our focus on enabling and measuring Responsible Business / ESG performance has evolved with our strategy since 2022. We 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 Responsible Business considerations into our end to end procurement process.

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

### 3. Responsible Business Priority Guidance

#### 3.1. Financial inclusion

Equifax's purpose is to help people live their financial best. We strive to create economically healthy individuals and communities everywhere we do business.

##### Expectations of our suppliers:

- Where appropriate, use data to enable financial inclusion such as better access to products and services and offer affordable and accessible products and services.
- Support financial wellbeing within your own organisation.

#### 3.2. Consumer Impact

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

##### Expectations of 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. Environment

Protection of the environments in which we live and work is a key priority. The environmental priorities and actions of Equifax are informed by using data to evaluate our footprint as well as input from our corporate partners and clients on their environmental priorities.

##### Expectations of our suppliers:

- Have an active science-based carbon reduction plan with targeted initiatives to minimise your environmental impact; such as waste management processes.
- Be transparent on your environmental commitments, regularly publishing targets and progress.
- Work with your 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.

### **3.4. Culture and Values**

Equifax's social purpose is to champion a working environment in which our employees can achieve their true potential, grow, live fully, and be a force for good. We recognise 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. We are also supportive of community volunteering to improve skills within the business and diversify future talent pipelines.

#### Expectations of our suppliers:

- Promote an inclusive culture; driven from the top through leadership and development, with clear initiatives to drive change for example through employee networks and groups.
- Be a signatory to appropriate standards to demonstrate your commitment to better working environments for your 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. Provide benefits to all employees, and use a range of data points including gender pay reporting and pay analysis to inform on pay decisions and drive pay equity.
- Support employee volunteerism, philanthropy and employee giving, and engage in strategic partnerships to support community engagement.
- Work with the community to broaden your candidate pool and create social mobility for future generations.

### **3.5. Security**

Equifax is proud to be an industry leader in security.

#### Expectations of 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 your approach to data security through Policies and Technical Requirement Standards.
- Maintain and demonstrate appropriate security measures and certifications applicable to your contract.

### **3.6. Privacy**

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

#### Expectations of our suppliers:

- Process Data in accordance with applicable data protection laws, processing Personal Data lawfully, ensuring you are fair and transparent about your processing, including collecting and using data for limited and specific purposes.
- Maintain adequate records of your processing; keeping the data you 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 3.5 Security), and to identify and respond to the exercise of individual Rights by Data Subjects.

### **3.7. Corporate 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 our governing processes run smoothly and efficiently and we are prepared to adequately and timely meet the challenges and opportunities posed in the competitive environment.

We advocate seeking and providing fair opportunities for a wide range of suppliers to compete for procurement of goods and services; upholding our business imperative to deliver innovative and differentiated service solutions for customer challenges, and profitable growth for the company, our suppliers, and service providers.

#### Expectations of our suppliers:

- Adherence to industry standards of governance and ethics.
- Communicate your standards with relevant stakeholders through reporting where appropriate.
- 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.
- Have clearly defined internal Code of Ethics and Business Conduct expectations.

- Monitor your 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 your business and through third party suppliers.

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

To ensure compliance with this Code, Equifax may conduct audits of our suppliers. Equifax and our 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 our suppliers with an understanding of the expectations in this Code through group consultation and training. It is a 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](#)

## Appendix A - Debt Services Suppliers

### I. Supplier Policy Expectations

It is important to us that our suppliers consider the following policies and areas of responsibility. Whilst not currently a mandatory requirement, it will increasingly be a consideration in our procurement practices. We understand that some documents on the list may require development and so may have a roadmap to completion. Expected documentation should include:

- Equality and Diversity
- Modern Slavery
- Labour Standards
- Environmental Management
- Health and Safety
- Anti Corruption

Debt Services suppliers on the public sector Debt Resolution Services (DRS) panel should refer to the DRS specific guidance to identify any current mandatory items.

### II. Social Value Measures

Our investment in Social Value projects has evolved and as well as hosting collaborative supplier events to share best practice, initially on public sector work, we now endeavour to formally measure the impact of those projects, even through our supply chain.

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

#### **Our social value vision**

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

Our UK priorities flow down from our global priorities aligned to our Purpose of helping people live their financial best. We are committed to working with our clients and corporate partners to create a more equitable financial future for all, and to being transparent about our journey. Our key imperatives are:

- Creation of training and learning opportunities to grow new skills
- Drive diversity in our industry and create more equity
- Promoting health and wellbeing, including physical and mental health
- Engage with our communities to help them thrive
- Champion sustainable business practices and minimise the impact on your environment

### III. Unallocated Funds

Firms that receive payments from consumers will, on occasion, receive payments that cannot be allocated to the correct account, usually as a result of the consumer omitting or using an incorrect reference number when making ad hoc or additional payments. Equifax expects suppliers to take reasonable steps to ensure consumers are made aware of the importance of including the correct reference number and the consequences if they don't, to minimise the risk of receiving payments that cannot be allocated appropriately.

In the event that payments are received that cannot be allocated to the correct account Equifax expects appropriate arrangements are made to identify the correct account, or to return the payment promptly to the original payee.

Arrangements could include (this is not an exhaustive list):

- Searching internal systems using any details that have been provided, such as name, amount of payment, number plate, post code.
- Returning the payment to the originating bank.
- Multiple and repeated searches over a period of time, where possible checking against accounts with missed payments and against queries from customers about missed payments.

In the event that it is not possible to allocate a payment, payments should be held in a segregated suspense account until information is obtained to facilitate allocation of payment.

In the event that payments remain unallocated after a period of time to be confirmed by the supplier, the funds could be paid to an appropriate charitable organisation after consultation with Equifax. Under no circumstances should funds be absorbed into a supplier's revenue stream.

The above approach aligns with the CSA code of practice and to what the FCA expects of firms who are covered by the Client Assets (CASS) Handbook. For firms that are not covered by CASS, the FCA has supported the same approach.

### IV. Vulnerability

#### A. Overview

We recognise that any individual can experience vulnerability at any time. Our approach to vulnerability is not, therefore, limited to the stereotypical "vulnerable" groups such as the elderly and disabled.

The Financial Conduct Authority (FCA) defines a vulnerable customer as *"someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care."* Similarly the Solicitors Regulation Authority (SRA) defines vulnerability as *"someone is vulnerable if they are at a higher risk of harm because they face barriers to participating effectively in court proceedings"*.

Identifying Vulnerability and Financial Hardship as different circumstances is key to ensuring a good consumer outcome and ensuring that you have enough time to identify and meet their needs. Whilst it is understood that financial hardship can come as a result of a consumer's vulnerable circumstance or indeed be magnified by it, the appropriate treatment path or resolution offered to the consumer is not necessarily the same.

The consumer's current circumstance may make them vulnerable at any given particular moment without having a material impact on their financial situation.

This section is applicable to all suppliers providing either debt collection or litigation services across the Recoveries Management service and is applicable to all debt types or treatment paths.

## **B. Expectations**

Each supplier shall have their own documented policy and standard that covers the identification and treatment of vulnerability - that enables consumer-facing staff to show judgement. This should align to both the regulatory expectations and the expectations of TDX and its Clients.

Each supplier shall have dedicated training for agents that builds and maintains knowledge around the identification and support for vulnerable consumers - including processes to follow to record each interaction and a clear escalation process for agents to use where additional support is needed (for example in "crisis" situations where the consumer is threatening self-harm or is in danger of abuse.)

These documents and processes will be assured by TDX through our regular Audit process (call audits and on-site visits).

## **C. Supporting Staff**

Agents will handle calls that are particularly distressing. This may be connected to a consumer disclosing suicidal thoughts or disclosing the extent of their vulnerability / personal circumstances. The content of these calls can be varied and far-reaching and there is no binary way of stating when an agent either does or does not require additional support after a call has taken place.

We expect suppliers to offer a working environment whereby an agent is free to ask for additional support without fear of judgement or indeed time pressures to return to their job. We also expect trained support staff to be available to talk to an agent if they are distressed. This could be in the form of a HR professional, a senior manager or a member of staff who excels at providing emotional support. For example, we have seen first-hand the success of using mental health 'first aiders' who are on hand to talk to a member of staff experiencing a personal crisis in a calm and confidential manner.

## **D. Notifying TDX Clients of Vulnerability**

There are several different approaches to vulnerability adopted by TDX Group's client base once a consumer has been identified as vulnerable by a supplier. Although clients' individual in-house processes may be different, TDX Group expects a standardised way of suppliers reporting vulnerability back to clients. This is to enable the best possible end to end journey for a consumer but

also to allow for greater assurance that a conversation about vulnerability is translating to suitable written notification back to clients.

Notification of vulnerability should be raised on the Query Portal system under the 'vulnerability' category using the following information:

- **Consent.** The client will need assurance that consent was gained from a consumer to notify them of their circumstances. Using the **TEXAS** (Thank, Explain, Xplicit consent, Ask, Support) protocol will ensure that this has been discussed between agent and consumer. If the consumer does not give consent, we would expect the agency to refer the consumer back to the client directly.

We expect this to be recorded simply as "Yes/ No" to note information.

- **Timeliness.** The client needs to know the timeliness of the consumer's vulnerability. To ensure that the level of data captured is appropriate, the supplier is asked to simply provide the words 'short-term', 'long-term' or 'sporadic':
  - **Short-term** – The circumstances are occurring over or involving a relatively short period of time. This could, for instance, include the birth of a baby, a bereavement, or a physical illness with a prognosis which suggests it is of short term nature. Equally, this could also be a long term set of circumstances which now have a short term resolution. For example, someone who has had a lengthy period of unemployment but is shortly returning to work, or an illness which has been suffered over a long period of time which now has a definite resolution in the short term i.e. a waiting list for an operation.
  - **Long-term** – a set of circumstances that are occurring over or involving a relatively long period of time seeking long-term solutions. This could be an illness with a lengthy treatment schedule, or limited work opportunities with no immediate line of sight to them changing.
  - **Sporadic** – these are circumstances that happen sometimes; not regular or continuous. Examples of these could be a medical condition that has intermittent symptoms or irregular income.
- **Extent.** The client needs to know the extent of the consumer's vulnerability. Again, to ensure that the level of data captured is appropriate, the supplier is asked to simply and provide the words 'potentially', 'vulnerable' or 'especially':
  - **Potentially vulnerable** – if a customer is currently able to manage their finances and make informed financial decisions, but there is evidence that their personal circumstances are about to change. For example, an expectant mother, someone coming to the end of a fixed term employment contract.
  - **Vulnerable** – these are consumers who are currently more exposed to harm, loss, or disadvantage than other consumers.
  - **Especially vulnerable** – these are consumers who are currently at a greatly heightened risk of experiencing detriment compared to the majority of consumers in vulnerable

situations. This detriment could also be far more serious in terms of its negative impact on the consumer's situation, and could be far more imminent.

- **Rationale for non standard recovery.** The supplier needs to articulate, based on the conversation and information gathered, why it is not appropriate for standard recoveries activity to continue. This needs to be provided in free text with sufficient depth to enable the client to make the right choice as to what to do next with that consumer to ensure delivery of good outcomes.

#### **E. Signposting**

Suppliers are expected to hold their own lists of relevant third party charities to signpost to in different eventualities. TDX Group acknowledges that the specialist support is much broader than money advice.

Please also refer to the call handling guidelines for a list of relevant third parties.