



illion Modern Slavery Statement

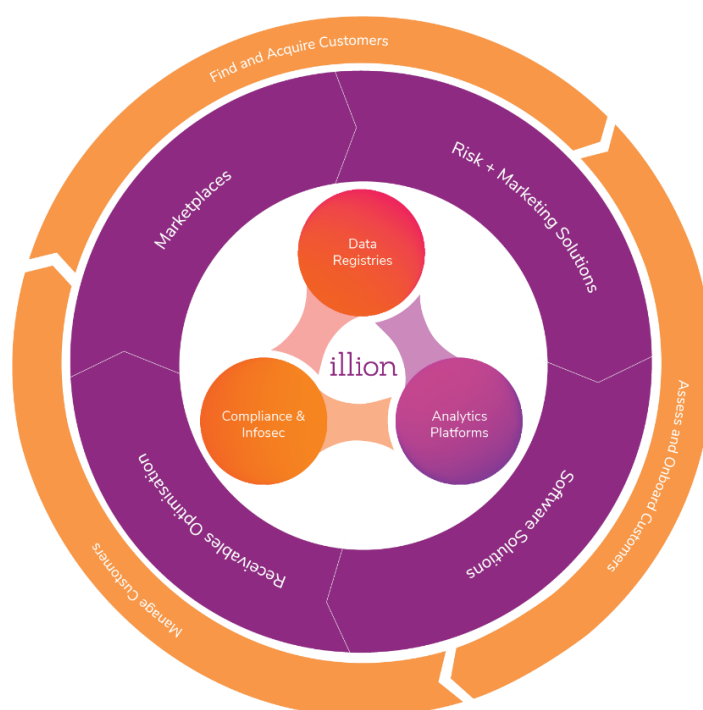


About illion

illion is a leading Australian data and analytics company, providing information and insights for businesses and consumers, with operations in Australia, New Zealand, the United Kingdom, USA and Canada. Our vision is to bring data and analytics to life in order to solve problems for our customers.

Our market leading data solutions and unique insights enable organisations to make confident decisions across the entire customer lifecycle – from customer prospecting, credit originations and identity verification to on-going customer management and collections.

By integrating and optimising our vast store of consumer and commercial credit risk and data assets, we offer off-the-shelf or bespoke solutions that support new customer targeting, ID and company verification, risk assessment, exposure management and collections optimisation.



Our comprehensive data registries

FY2021 Annual Statement

The illion group of companies (together, **we, us, illion or illion group**) acknowledges that modern slavery is a crime and a violation of fundamental human rights. We are committed to conducting our business and all our relationships based on integrity and we join the global response to eradicate the many forms of modern slavery by addressing the risks of modern slavery in our operations.

This Modern Slavery Statement is made pursuant to section 13(1) of the *Modern Slavery Act 2018* (Cth). It is made by Credit Data Solutions Pty Ltd ACN 606 370 576, an Australian proprietary limited company that is the ultimate holding company of the illion group. This annual statement covers the reporting period 1 July 2020 to 30 June 2021.

The illion group shares the same governance framework, the same set of policies, and code of conduct. This Modern Slavery Statement is therefore a consolidated description of the actions taken to address modern slavery risks by the illion group, and is issued as a joint statement on that basis.

This Modern Slavery Statement has been approved by illion's Executive Management Team and the Board of Directors.



Ben Frewin
Executive Chairman

Organisational structure and operations

Structure

illion is headquartered in Melbourne. Its majority shareholder is Archer Capital which is an Australian private equity firm.

We have a total of approximately 680 employees in 11 offices in Australia and overseas. The illion business operates through a number of different legal entities and share the same shared services teams (including finance, procurement, legal, people and culture etc).

Governance framework

Our governance framework comprises:

- Our Code of Conduct
- Our Policy Framework

Our Code of Conduct

Our Code of Conduct establishes the principles of conduct expected from illion team members. It is designed to assist individuals to understand what is acceptable and unacceptable behaviour in the workplace, and when representing illion outside of the workplace.

illion expects its team members, including employees, contractors and individuals working on illion's premises, to comply with the key principles of our code of conduct.

Key Principles			
Honest	Professional	Fair	Respectful

At illion, everyone is encouraged to speak up and say something if things are not right.

Our Policy Framework

Each of our and key principles of conduct is supported by a range of policies such as anti-corruption, anti-discrimination, anti-harassment and bullying, health and safety, equal employment opportunity and diversity, recruitment, corporate social responsibility, and whistleblower policies, which form the basis of our dealings with employees, contractors, suppliers and other third parties.

The policy framework sets out clear and accountable management policies and practices of illion. Our policies are reviewed regularly to ensure they remain relevant and reflect conduct expected of our employees and contractors.

The policies cover the illion group of companies.

Operations

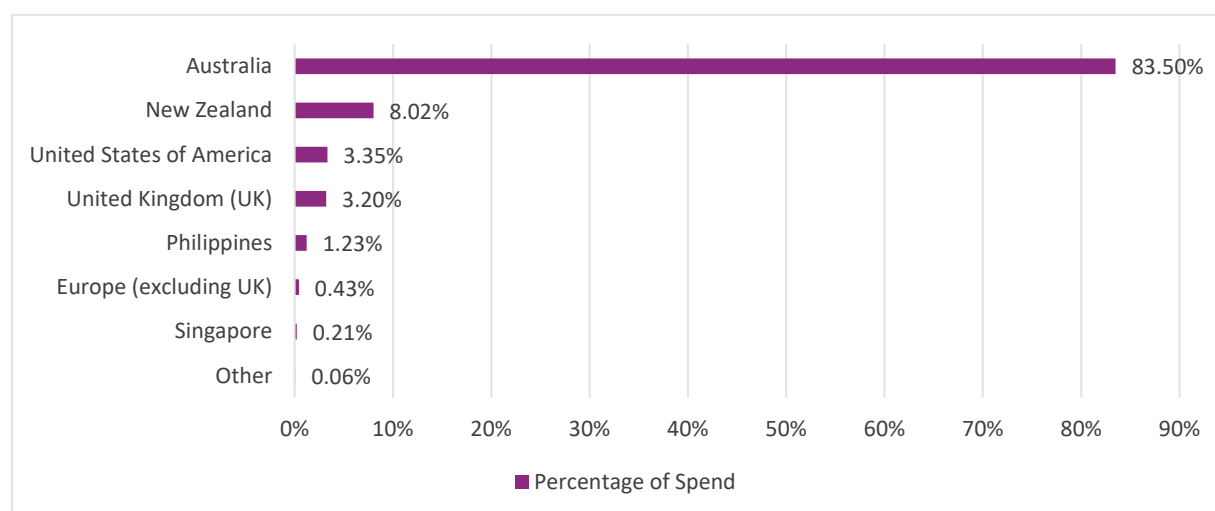
Our Supply Chain

illion is committed to socially and environmentally responsible procurement and acknowledges that this responsibility extends beyond our own operations and into our supply chains. illion sets high standards for the way we do business so our suppliers and customers have clear expectations about the way we conduct business.

At illion, how we do business and support our customers is just as important as the business outcomes. We take our duty to operate our business responsibly seriously and we expect our suppliers to do the same. illion has contractual arrangements with all of its key direct suppliers.

In the reporting period, we engaged directly with 300 key suppliers across various sectors including technology, computer hardware, software, telecommunications, professional services, specialised data and non-core activities (such as office services, travel and employee related matters).

The bulk of services illion procures are predominantly provided within low risk modern slavery risk countries in Australia, New Zealand and United Kingdom, while the products that illion procured are manufactured across the world. The main source locations are Singapore, United States of America and Philippines. The following countries are source countries for these products and services:



Risk Management and Due Diligence

Approach

illion adopts a risk-based approach to the assessment of modern slavery risks in its business operations and supply chain.

Suppliers

Our Supplier Code of Conduct

The illion Supplier Code of Conduct is based on the Responsible Business Alliance Code – a set of social, environmental and ethical industry standards in line with international norms and standards including the:

- Universal Declaration of Human Rights
- ILO International Labour Standards
- OECD Guidelines for Multinational Enterprises
- ISO Standards Australia standards

It forms part of our approach and policy framework to address and manage modern slavery risks in our supply chain.

Our suppliers are required to read and adhere to illion's Supplier Code of Conduct, which is available [here](#). A supplier's ability to meet the requirements in the Supplier Code of Conduct forms part of our selection criteria.

Where appropriate and possible, we secure suppliers' contractual compliance with our Supplier Code of Conduct.

Contracts Uplift

Our standard supplier contracts contain anti-modern slavery provisions which require suppliers' compliance with modern slavery laws and assist illion with:

- Ensuring supplier's employees, contractors, and sub-contractors are aware of modern slavery risks through training
- Taking reasonable steps to monitor and notify illion of any modern slavery compliance issues in their supply chain
- Providing information to inform illion's assessment, reporting and compliance with modern slavery laws

Where reasonably practicable and possible, we obtain contractual audit rights to inspect supplier's premises and records. On our request, suppliers are required to provide evidence of its compliance with illion's Supplier Code of Conduct and anti-modern slavery laws.

We are continuing to update our existing supplier contracts with modern slavery provisions and audit rights (where reasonably practicable) as and when they are due for renewal.

Due Diligence

We conduct due diligence prior to the engagement of a new supplier and on contract renewal of our existing suppliers to assess how they contribute to illion's modern slavery risks. Our objective is to understand the supplier's business operations, labour practices and policy framework, in order to determine if the supplier represents a risk of non-compliance with laws, including anti-slavery laws, and with illion's policies.

As part of the decisioning process in awarding contracts to our supply chain, illion assess suppliers against six categories of risk. The risk categories include:

- Labour Practices
- Lines of Business
- Regions of Operations
- Policies & Procedures
- Security & Privacy
- Environmental practices

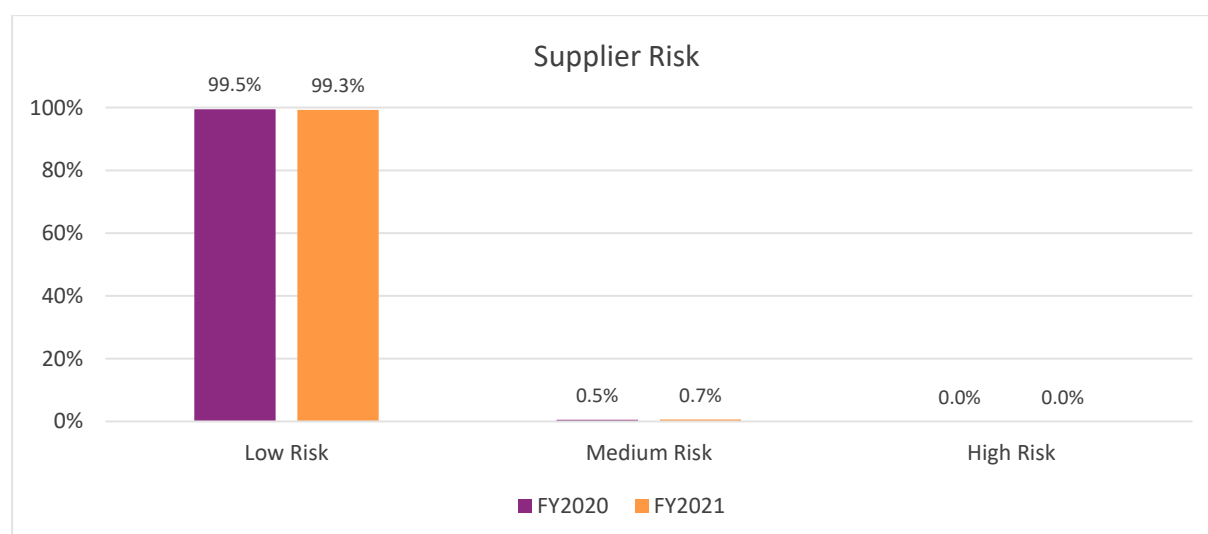
We use a mix of screening, including questionnaires, quarterly meetings, onsite audits (where necessary), desk-top documentary review, checks with public records, media, litigation/adverse findings, criminal, financial, and bankruptcy checks, that cover the supplier's parent company and related parties. We review a supplier's contract compliance in quarterly meetings.

In particular, we seek to understand whether a supplier has established standards and procedures to tackle and remediate modern slavery in its own supply chain and if its employees and contractors are held accountable for non-compliance.

In the reporting year, illion updated its Procurement Policy with policies, processes and procedures to support the screening, assessment, monitoring, and remediation of modern slavery risks of its supply chain.

Our Assessment

illion completed Supplier Risk Assessments on a total of 196 suppliers (since illion commenced modern slavery risk assessments in FY 2020) to gain a more in-depth view of their supply chain and risks to modern slavery. The results of the assessments showed that the majority of our key suppliers are in the low risk category. There were a small number of suppliers who due to geographical location or type of business were rated as a medium risk. 14 new suppliers were assessed during this reporting period.



Note: Number of risk categories were consolidated in FY2021. Risk categories for FY2020 adjusted accordingly.

Most of the new suppliers on-boarded and assessed this reporting year fall into the Low Risk Category.

Suppliers rated as medium risk category will be continually monitored.

To monitor our modern slavery risks, we conduct on-going annual risk assessment of our key suppliers.

Employees

Our employees are required to comply with our codes and policies which requires them to act lawfully, ethically and with integrity and encourages them to raise compliance and ethics concerns. Our Code requires that all employees comply with all applicable laws and regulation, and follow all policies. Any employee who violates our standards may be subject to disciplinary action up to and including termination of employment.

We ensure that no under aged people are employed within our company.

All new employees are subjected to the following strict hiring policies and processes devised by the business in conjunction with the People & Culture team and subject to Business Unit Leaders input and review, including:

- Mandatory police checks for all employees
- Mandatory employment reference checks for all employees
- Strict 'conflict of interest' employee policy

We have in place a whistleblowing policy which ensures that anyone who has concerns, for example, about how staff are behaving, has a means of raising their concerns confidentially including when this concerns suspicion of Modern Slavery.

Covid 19

Over FY2021, COVID-19 related health guidance continued to evolve and change across Australia. As our organisation was able to successfully transition to a work from home model in the FY2020 reporting period, we did not experience any disruptions as we have been able to continue working flexibly based on relevant and applicable government directions.

Returning back to the offices when and where applicable, has been done so in a COVID-Safe manner. We have continued to follow advice provided by Fair Work Australia on relevant temporary changes to processes or industrial instruments.

As a result of the ongoing changes in the COVID-19 landscape, our organisation has not experienced any significant disruption that would increase the risk of modern slavery in our operations.

We continue to monitor the impact of COVID-19 on our supply chain through our Supplier Performance Management program. During the reporting period, we did not identify any significant impact on our supply chain that increased our risk of modern slavery or the requirement to re-negotiate any existing agreements.

Remediation

Supplier Audit

We conduct supplier audits regularly. When a situation of non-compliance with modern slavery or our Supplier Code of Conduct is identified, or a supplier finds it difficult to undertake appropriate measures, we require the supplier to report and share compliance issues with the relevant representative of illion. Suppliers may contact illion to discuss any compliance issues at procurement@illion.com.au. No compliance issues were raised by suppliers for the reporting period.

As a preferred course of action, illion commits to work with suppliers to develop and implement a corrective action plan to improve the situation. Should there be instances of repeated non-conformance, illion will regard such conduct as a serious failure to adhere to our Supplier Code of Conduct and we may terminate supply contracts.

For the reporting period, we conducted 4 supplier audits. We reviewed the suppliers' anti-modern slavery policies and their operations. There were no issues raised by the audits with respect to modern slavery.

Reporting and Effectiveness

illion assesses the effectiveness of the actions it is taking to assess and address the risks of modern slavery practices in its operations and supply chains in the following ways:

- Where reports are made through our grievance or notification mechanisms, it indicates that our mechanisms are effective in bringing issues to light for illion's attention and for the opportunity to remediate.
- Regular risk assessment of key suppliers ensures continued monitoring and management of supplier compliance.
- Where suppliers are identified in our supplier audits as operating in high risk industries or regions, these high risk suppliers will be flagged for high care management, and we consider this as a means of addressing illion's modern slavery risks.

Consultation with Owned or Controlled Entities

The business and illion group companies share the same policies and shared services functions (including a centralised procurement function).

Procurement and legal regularly liaises with other management and operational teams across the illion group of companies and the businesses that operate through them.