



# Modern Slavery and Human Trafficking Statement

This is the D&B Europe Ltd. modern slavery and human trafficking statement for the financial year ending November 30, 2020 (the “Reporting Period”). In addition to stating our company’s position on modern slavery and human trafficking, the statement has also been produced to comply with the requirements of section 54 of the Modern Slavery Act 2015. It has been approved by the board of directors of Dun & Bradstreet Limited.

Aryeh Friedman, Chief Compliance Officer, states: “We remain strongly committed to human and employee rights. We continue to play our part in the furtherance of eradicating modern slavery and human trafficking and are proud of the positive actions outlined in this statement taken throughout 2020 to contribute towards this. We will now maintain and continuously improve on our policy and processes throughout 2021 to continue to deliver on our commitments.”

## OUR BUSINESS

Dun & Bradstreet (D&B) helps companies around the world improve their business performance. The global leader in commercial data and analytics, we glean insight from data to enable our customers to connect with the prospects, suppliers, clients and partners that matter most. Dun & Bradstreet owns the world's largest commercial database with more than 330 million business records and global coverage of 30,000+ data sources from over 200 countries. On 1<sup>st</sup> July 2020 we became a public company and were relisted on the New York Stock Exchange. The company remains headquartered in Short Hills, New Jersey in America. In the Reporting Period we have had around 4000 employees in wholly owned subsidiaries throughout the world. In the Reporting Period the UK entity has moved its head office from Marlow to London and announced plans to close its Cardiff office, but still retains around 350 staff in the UK. We continue to be authorised and regulated by the Financial Conduct Authority for our credit referencing activities and a designated credit reference agency.

We currently have around 2900 active third-parties globally, and these can range from independent contractors to large multi-national companies.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

As a commercial data and analytics organisation, we consider the risk of modern slavery within our industry to be relatively low. However, we recognise no business is immune and are committed to ensuring that modern slavery, human trafficking, bonded and forced labour are not present in any part of our business. We also expect the same standards from our suppliers and contractors (“third-parties”). As stated in the Dun & Bradstreet Code of Conduct, we support the principles established under the United Nations Declaration of Human Rights and are committed to conducting business in a way that respects the rights and the dignity of people. We prohibit the employment of underage children or forced labour, as well as any form of physical punishment or abuse. We have also produced a Partner

Code of Conduct, which outlines that we also expect third-parties throughout our global supply chain to support human rights and encourage third-parties to adopt standards consistent with the principles established under the United Nations Declaration of Human Rights. We make clear that we expect our third-parties to compensate their employees in accordance with all applicable law, not to employ underage children or forced labour or allow any form of physical punishment or abuse and take steps to ensure that slavery and human trafficking are not taking place within their organization or organizations with which they work. Our company modern slavery policy draws on various other company policies outlined in this statement and describes the steps we take to help ensure modern slavery and human trafficking does not occur in our supply chain or business. We ensure consistent messaging of these policies is distributed throughout our business and management at all levels and our supply chains.

## DUE DILIGENCE PROCESSES

In order to identify and mitigate modern slavery and human trafficking risks, we have adopted a risk-based approach and have put in place processes to:

- Identify and assess potential risk areas in our business and supply chains;
- Monitor potential risk areas in our business and supply chains;
- Mitigate the risk of modern slavery and human trafficking occurring in our business and supply chains; and
- Protect whistle blowers.

### 1. SUPPLY CHAIN

As part of D&B's global third-party compliance process, every third-party within scope undergoes a level of due diligence, both at the time of on-boarding and contract renewal by our Third-party Compliance team. The level of due diligence applied to the third-party depends on the risk rating it has been assigned (low, medium or high), taking into account the contracted activity and local market risks. Across all levels of due diligence, the Third-party Compliance team check all third-parties for any recorded involvement in people trafficking, human rights violations, trafficking or distribution of drugs, illegal prostitution or promotion of illegal prostitution, kidnapping, abduction, sex offences or abuse. Medium and high risk third-parties will be subject to further checks around their family tree – including shareholders, principals and beneficial owners.

### 2. TRAINING

We train team members to do their part to respect the human rights of people in communities that are impacted by our activities and report any human rights abuse that they see or suspect either in our operations or in those of our business partners.

We do this by including in the Dun & Bradstreet Code of Conduct a section on “respect for Human Rights”. Training on our Code is compulsory for all team members globally, available in five languages and must be completed annually. We have achieved full completion by employees for this Reporting Period.

In the Reporting Period we have strengthened our team member training by rolling out dedicated Human Trafficking and Modern Slavery training to specific employees whose role requires a greater level of understanding in Canada, mainland China, Hong Kong, India, Ireland, Japan, Malaysia, Taiwan, UK and USA.

Throughout the Reporting Period, our global personnel responsible for EU sourcing and procurement team have remained accredited by the Chartered Institute of Procurement and Supply (CIPS).

UK staff are regularly reminded through office communications and activities about the government's 24-hour modern slavery public telephone helpline (0800 0121 700).

### Third-parties

We continued to build on our training for our third-parties through our Partner Code of Conduct, which contains our position on "Respect for Human Rights" and makes our expectations clear. We continue to maintain and make available an online training module to accompany our written Partner Code of Conduct. We are currently working with a new training provider to redraft this module which we plan to release in 2021.

Despite difficult conditions due to the Covid-19 pandemic, we were able to complete on site training to various third parties in mainland China. The planned onsite third-party training for India, Hong Kong and Taiwan was switched to virtual training to better manage current safety issues. The virtual training was run in addition to our online training and was conducted through video chat to ensure maximum interactivity.

## 3. RECRUITMENT AND EMPLOYMENT

We have comprehensive team member recruitment and onboarding processes and procedures in place, including (where required by law) conducting checks on eligibility to work in a jurisdiction for all employees. Such checks safeguard against human trafficking or forced labour. Where required by law team members have employment contracts in place which are regularly reviewed in line with employment law and best practice.

In addition, all our employment agencies are thoroughly vetted and we only use reputable companies, most of whom we have long standing arrangements in place.

## 4. WHISTLEBLOWING

Our whistleblowing policies actively encourage all team members to speak out if they have concerns about any activity, breach of law, breach of our Code of Conduct, dangers to the public or any concealment of information. We guarantee that whistleblowing reports can be made without any risk to the team member's employment or suffering any form of retribution. All reports are immediately reviewed by our Global Compliance and Ethics Leader.

Whistleblowing reports can be made in a number of ways, such as speaking to any manager, Human Resources or the Compliance teams. However, we help ensure it is easy for all team members to speak up and report anonymously by providing a confidential helpline that is available 24 hours a day, seven days a week. Reports can be made in local language to regional helplines in each of our jurisdictions. Web reporting is available for individuals wishing to make written reports. Hotline contact numbers are always available through our company intranet, documented within our Code of Conduct and are included in the annual Code training for global employees.

We have also formalized how members of the public can communicate any concerns over modern slavery and human trafficking occurring within our business or third-parties – details are provided below.

No whistleblowing reports have been made concerning modern slavery or human trafficking within the Reporting Period.

## 5. IDENTIFYING, ASSESSING AND MANAGING RISK

As a commercial data and analytics organisation, we consider the risk of modern slavery within our industry to be relatively low. Medium and high-risk suppliers are obliged to commit to our Partner Code of Conduct before onboarding. Within this Reporting Period around 1100 medium and high risk third parties have committed to our Partner Code before being onboarded. High risk third-parties are then subject to additional scrutiny. Such scrutiny includes forensic data analytics, and compliance audits. In the Reporting Period we again carried out audits of third-parties in mainland China, India, Hong Kong but had to postpone audits in Taiwan because of the global pandemic. It is company policy to work with third-parties to ensure their modern slavery policies are sufficient, but we reserve the right to ultimately terminate the commercial relationship if they cannot demonstrate sufficient commitment to anti-slavery policies.

### OUR EFFECTIVENESS IN ELIMINATING SLAVERY AND HUMAN TRAFFICKING

We review the effectiveness of the measures we take to ensure there is no modern slavery or human trafficking taking place in any part of our business or supply chains. Effectiveness monitoring includes (but is not limited to)

- Monitoring completion rates by team members of our Code of Conduct training,
- Reviewing accreditation of key personnel by the Chartered Institute of Procurement and Supply,
- Reviewing volumes of third-parties that have committed to our Partner Code of Conduct and undertaken our training,
- Monitoring our compliance with the UK Modern Slavery Act,
- Reviewing whistleblowing reports for reports of modern slavery and human trafficking,
- Reviewing local adherence to our recruitment and onboarding policies and procedures,
- Reviewing volumes of third-party onsite training and audits.

### CONTACTING DUN & BRADSTREET

Anyone can contact Dun & Bradstreet to inform us of modern slavery or human trafficking concerns they have connected to our business at any time by emailing [complianceofficer@dnb.com](mailto:complianceofficer@dnb.com). Reports will be treated confidentially and investigated appropriately.

Signed  \_\_\_\_\_

Director, Dun & Bradstreet Europe Limited

Date: 17<sup>th</sup> December 2020

#### ABOUT DUN & BRADSTREET

Dun & Bradstreet, the global leader in commercial data and analytics, enables companies around the world to improve their business performance. Dun & Bradstreet's Data Cloud fuels solutions and delivers insights that empower customers to accelerate revenue, lower cost, mitigate risk, and transform their businesses. Since 1841, companies of every size have relied on Dun & Bradstreet to help them manage risk and reveal opportunity. Twitter: @DnBUS

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