Modern Slavery and Human Trafficking Statement

This is the Dun & Bradstreet Limited (“D&B”) modern slavery and human trafficking statement for the financial year ending November 30, 2018 (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 Europe Limited.

Richard Mattesich, Chief Compliance Officer, states, “We remain strongly committed to human rights and employees’ rights and are supportive of the UK Government’s objective of eradicating modern slavery and human trafficking. We will play our part in the furtherance of this objective and we expect the same from all our business partners, including our suppliers and contractors. This statement describes the steps we have taken in the last year to help ensure modern slavery and human trafficking does not occur in our supply chain or business. We intend to build on our policy and processes in the coming years as we work to deliver on our commitment and implement the steps described below.”

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’s global business database contains more than 300 million business records.

Dun & Bradstreet is listed on the New York Stock Exchange and is headquartered in Short Hills, New Jersey in America. We have around 5000 employees in wholly owned subsidiaries throughout the world. The UK entity has three office sites – London, Marlow and Cardiff and employs around 450 people in office-based roles. We are authorised and regulated by the Financial Conduct Authority for our credit referencing activities in the UK.

In the Reporting Period we have around 2000 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 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.

Our Partner Code of Conduct 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 helps ensure that slavery and human trafficking is not taking place anywhere within our organization or our supply chain.

We have ensured consistent messaging of these policies is distributed throughout our business and management at all levels and our supply chains, and will work to ensure this messaging is continuously improved.

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 undergoes a level of due diligence, both at the time of on-boarding and contract renewal. 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.

All risk ratings are checked at an entity level 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
To ensure that our staff understand and can identify modern slavery and human trafficking risks in our supply chains and our business, we have included a section on modern slavery in the Dun & Bradstreet Code of Conduct. This training is compulsory for employees globally (including all employees in the UK), available in four languages and must be completed annually. We have achieved full completion by employees for the Reporting Period.

We have also introduced training for our Partners on our Code of Conduct which contains our position on “Respect for Human Rights”. This is a 40 minute online training that accompanies our written Code of Conduct.

Personnel in our Global Sourcing and Procurement team remain accredited by the Chartered Institute of Procurement and Supply and are required to undertake an annual course on Ethical Procurement and Supply which incorporates training on modern slavery and human trafficking issues.

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

3. RECRUITMENT AND EMPLOYMENT
Dun & Bradstreet has comprehensive recruitment processes and procedures in place, including conducting checks on eligibility to work in the UK for all employees to safeguard against human trafficking or forced labour. The majority of our colleagues are full time and all colleagues 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.

4. WHISTLEBLOWING
We have comprehensive whistleblowing policies which encourage all our employees to speak out if they have concerns about any activity, breach of law, breach of our Code of Conduct, dangers to the public and any concealment of information. We ensure it is easy for all team members to speak up and report anonymously by providing a global confidential helpline that is available 24 hours a day. We guarantee that 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. No calls have been received concerning modern slavery for this Reporting Period.

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.
- High risk companies must certify their compliance with the UK Modern Slavery Act

We further utilize the Dun & Bradstreet Human Trafficking Risk Index to provide an overview of our third party portfolio. High risk third parties are then subject to additional scrutiny. It is company policy to work with third parties to ensure their modern slavery policies are sufficient, 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 in ensuring that 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) the completion rate of or Code of Conduct training, in date accreditation by the Chartered Institute of Procurement and Supply, reviewing numbers of third parties that have committed to our Partner Code of Conduct and confirmed compliance with the UK Modern Slavery Act, our own compliance with the Modern Slavery Act, reviewing or Global hotline for reports of modern slavery and reviewing local adherence to our recruitment and onboarding policies and procedures.

Signed

Director, Dun & Bradstreet Limited

Date: 21st December 2018

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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