

Code of Conduct and Ethics for Third Parties

Dun & Bradstreet Holdings, Inc.
2023



Dun & Bradstreet's legacy is a long and successful one, rooted in our commitment to excellence and integrity. Over the course of nearly 200 years, we have built a reputation for always doing the right thing. It's a reputation we work every day to maintain by demonstrating our commitment to integrity and the values that have helped to establish us as the leader in commercial data and insight.

At Dun & Bradstreet, we have designed our compliance and ethics program to support our operations globally in driving differentiated and **Sustainable Growth with Integrity**, helping team members easily know and understand how to **Do the Right Thing**, and showcasing our internal best practices to **Build Client Trust**.

When many people think of compliance, they think of following rules and the penalties that might arise for not following those rules. While laws and policies set forth the requirements that we must follow to ensure appropriate standards of business conduct, we believe that compliance starts with **Our Values and Ethical Principles**.

Our **3 Core Values** are the bedrock of our culture. They shape the way we interact and how we approach our work.

- **Data Inspired** - We are passionate about the power of data. It is at the heart of everything we do, including how we leverage data insights to drive informed compliance and ethics decisions.
- **Relentlessly Curious** - We embrace the change in the world around us. We know it brings new problems to solve, new things to learn, and new ways to grow. We use curiosity to help guide us in applying our ethical principles.
- **Inherently Generous** - We succeed by helping others succeed. We openly share our time and talent, and we confidently welcome the help of others, including how we can continuously improve.

Additionally, we have **5 Supporting Ethical Principles** that guide our decision-making. They help ensure that we balance competing priorities and interests to make the best choices.

- **Accountable** - Senior leadership and our Board of Directors consistently demonstrate the importance of doing the business the right way and complying with our Code of Conduct and applicable laws and regulations. Middle management reinforces this commitment with all team members.
- **Responsible** - We steward our assets and drive growth responsibly so that we can sustain Dun & Bradstreet's success into its third century and beyond.
- **Respectful** - We respect each other and the interests of the individuals and organizations we engage with and others about whom we process data.
- **Transparent** - We are transparent about our conduct, our dealings, and our practices; and we help support the global economy through transparent data practices, processing, and insights.
- **Courageous** - We encourage new ideas, innovation, and speaking up with questions or concerns, and we have zero tolerance for retaliation against those who raise compliance and ethics concerns.

Aligning our decisions and behavior to our values and ethical principles can help us continually do the right thing - even as our business evolves, and the rules change. We apply those same expectations of our team to all parties we do business with and require them to uphold these values and ethical principles in all that they do every day.

Our goal is to build on our legacy and preserve it for years to come. Reaching that goal requires everyone who works with us and on our behalf to live our Values, which is why we partner with companies that share our commitment to excellence and integrity.



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Please read this Code of Conduct and Ethics for Third Parties (hereinafter, Code) carefully and apply its guidance to your everyday decisions and interactions. Then let us know if you see conduct that violates the Code, our policies, or the law. Always ask questions if something isn't clear or doesn't feel right.



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Our Code





OUR CODE

Doing our work with integrity is what has set us apart, and anyone who works on our behalf must demonstrate the same commitment we have made to high ethical standards.

Our “third parties” include our suppliers, data providers, vendors, service providers, subprocessors, agents, distributors, business partners, consultants, contractors, licensees, and members of the Dun & Bradstreet Worldwide Network. We consider each third party to be an extension of Dun & Bradstreet and expect them to conduct business honestly and with integrity. We also expect our third parties to choose subcontractors that share our Values and our commitment to conduct business legally, ethically and in accordance with all contractual obligations.

As our third party, you have a responsibility to understand and uphold this Code and to know and abide by all applicable local, state, federal and international laws, regulations, rules, ordinances, and industry standards of the countries/regions in which you operate.

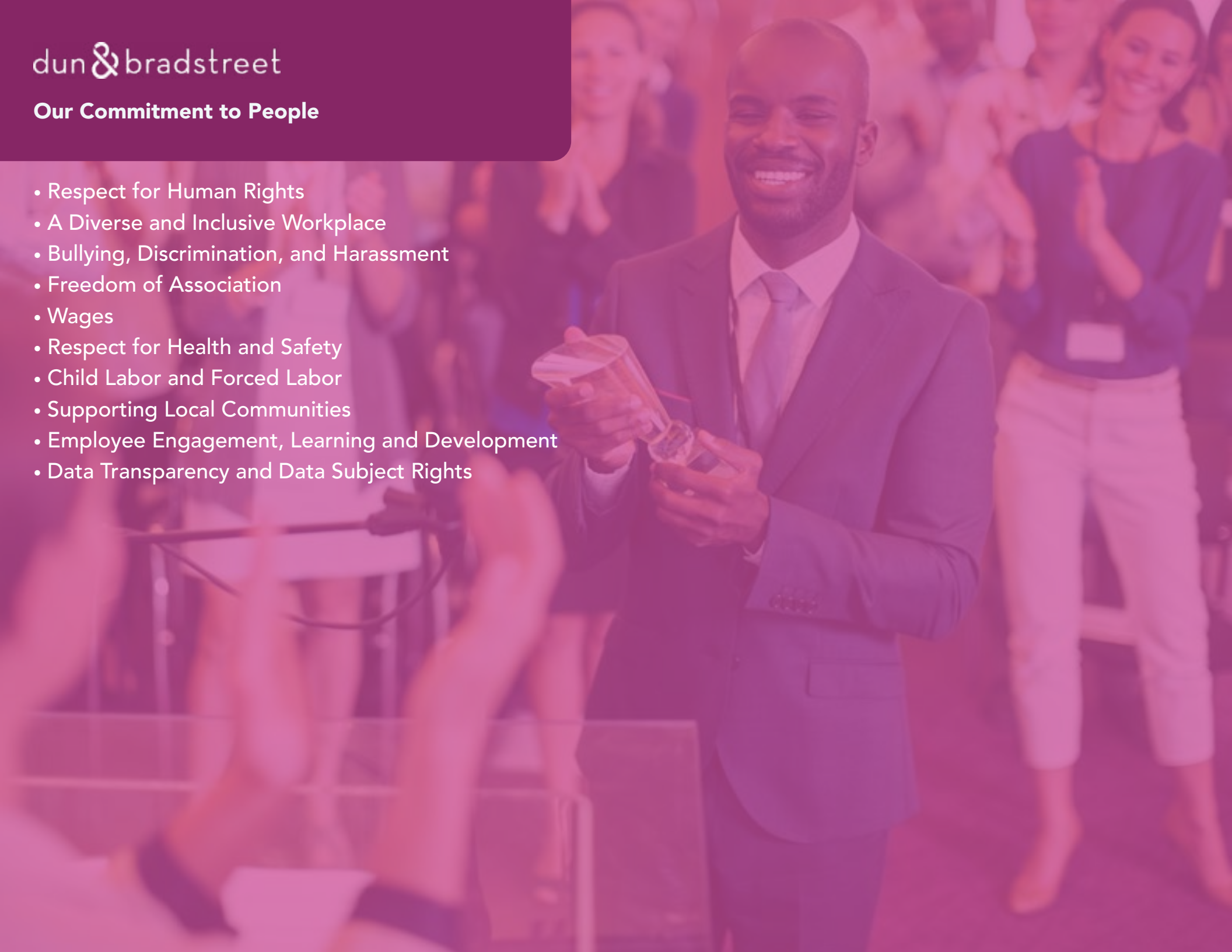
If you become aware of a possible violation of this Code or any applicable law or policy in connection with the services you provide for Dun & Bradstreet, whether within your organization or elsewhere, you have a duty to promptly report it by using the resources below. Failure to comply with the Code can have severe consequences for both Dun & Bradstreet and for you. In addition to damaging Dun & Bradstreet’s brand and reputation, conduct that violates the Code may also violate the law and result in civil suits and/or criminal prosecution.

Dun & Bradstreet will take appropriate remedial actions for violations of the Code, applicable policies or contracts, up to and including termination of the business relationship and recovery of damages, as warranted by the relevant facts and circumstances.

We also expect our third parties to act in a precautionary manner to ensure that steps are taken to minimize risk to the environment, people, business, and society.

Our Commitment to People

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Respect for Human Rights

We expect third parties throughout our global supply chain to protect human rights and adopt applicable standards, laws, policies, permits, and regulations relating to human rights. In situations of conflicting laws and regulations, a higher standard should be followed.

We expect our third parties to have policies and processes in place that cover the steps that stakeholders should follow to report cases of human rights violations. These policies and processes should promote the prevention, investigation, and addressing of violations, as well as the protection of reporting stakeholders from retaliation

A Diverse and Inclusive Workplace

Dun & Bradstreet is committed to a work environment that fosters respect for all people and reflects the diversity of the communities in which we operate. We promote an inclusive work environment, where all demographics and communities feel respected and supported. As part of this, we have created Employee Resource Groups who organize Diversity, Equality, and Inclusion (DEI) initiatives and activities. We encourage our third parties to track and monitor diversity data and strive to create a fair and inclusive workplace. Please see our [Diversity, Equity and Inclusion and Human Capital Policy Statement](#) for more information.

Bullying, Discrimination, and Harassment

Dun & Bradstreet does not tolerate bullying and harassment of any kind, as clearly stated in our [Code of Conduct and Ethics](#). This includes all forms of verbal, digital, or physical bullying and harassment. We expect you to share this commitment and to promote behavior, whether in your own workplace or when engaging with our employees, that is free of unlawful discrimination, harassment, abusive conduct, or bullying in any form.

Freedom of Association

We expect our third parties to recognize and respect an employee's right to form, join (or not join) workers' organizations of their choosing, and enter into collective bargaining, as permitted by law.

Wages

We expect our third parties to compensate their employees fairly and in accordance with all applicable laws, including those that relate to minimum wage and overtime hours.

Respect for Health and Safety

We work to maintain a safe, healthy, and productive work environment, and we expect our third parties to do the same, as well as follow safe working procedures and comply with all applicable laws and regulations. We also require our third parties to encourage employees, contractors, visitors, and subcontractors to work safely and to immediately report any unsafe conditions through their internal reporting channels or through the channels listed in the section “Raising Questions and Concerns” below. Third parties should take appropriate steps to prevent risks to human health and safety, as well as promptly investigate and address any incidents reported.

Child Labor and Forced Labor

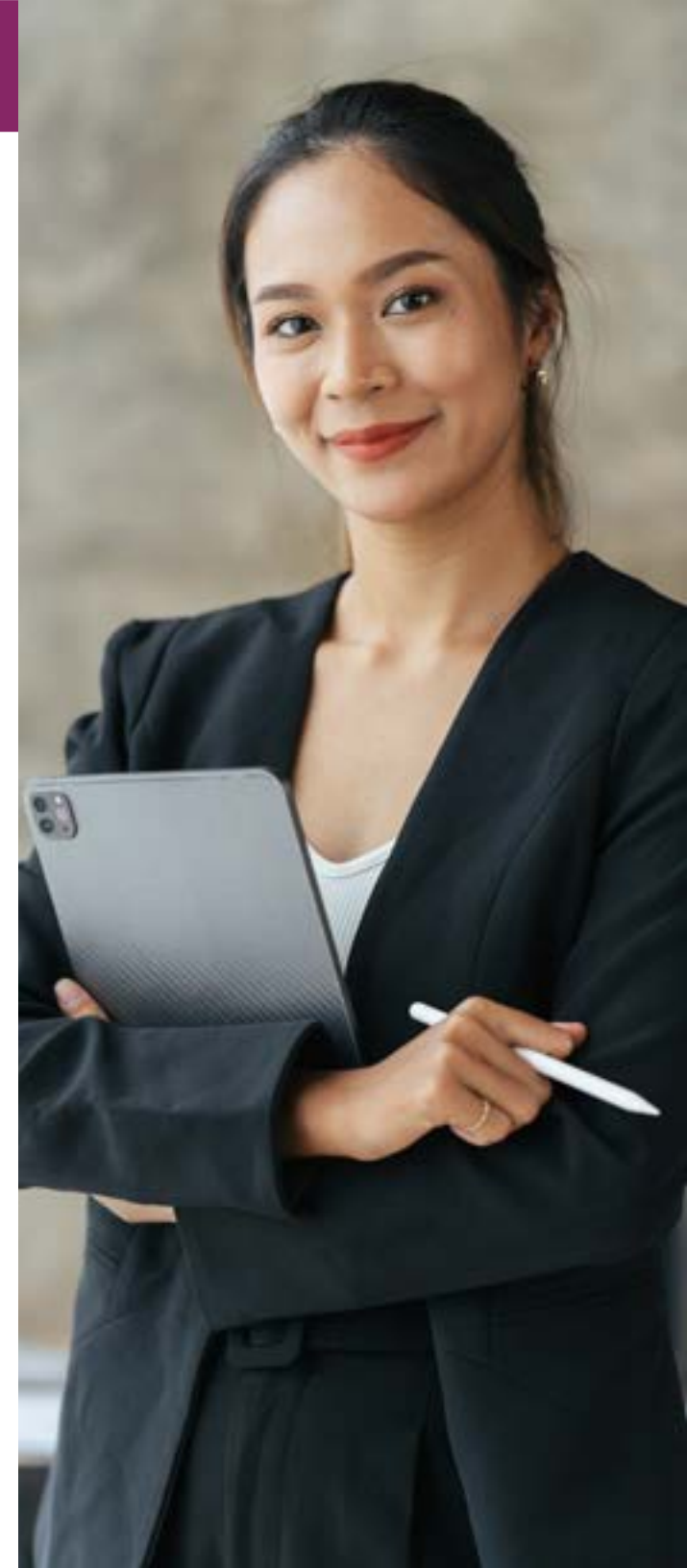
We do not employ children, undertake forced labor, or allow any form of physical punishment or abuse and expect our third parties to do the same. We also expect our third parties to take steps to ensure that slavery and human trafficking are not taking place within their organization or in organizations with which they work, whether upstream or downstream. Please see our [Modern Slavery and Human Trafficking Policy Statement](#) for more information.

Supporting Local Communities

Through our community service and philanthropy, we hope to have a positive impact and spread awareness of critical causes. We are proud to be a responsive and engaged corporate citizen and encourage our team members, third parties, and clients to get involved in our Corporate Social Responsibility (CSR) program and similar programs within their own organizations. For more information about our CSR programs, please refer to our [Sustainability Reports](#).

Employee Engagement, Learning and Development

Through a wide range of learning and development programs, we seek to encourage and inspire a culture of learning, curiosity, respect, and integrity at all levels, and we expect the third parties with which we engage to promote the development of their employees and create an environment of shared knowledge. We believe an engaged workforce is an effective workforce. At Dun & Bradstreet, our employees are the face to our clients, our third parties, and the market, as well as the innovators of the solutions and platforms serving businesses globally. Just as we listen to our clients and third parties on what solutions are most important to them, we also listen, learn, and understand what our employees value about our company, and their work experience.





OUR COMMITMENT TO PEOPLE

Data Transparency and Data Subject Rights

We believe that transparency and data quality are fundamental to the trust we wish to build and preserve in connection with our role as a leading business-decisioning data and analytics provider. We are committed to respecting the data and digital rights of individuals and we strive to provide transparent and accessible opportunities for individuals to exercise data subject rights in accordance with rights enshrined in applicable laws and risks to human rights and civil liberties. We expect third parties that process data about individuals to be transparent about their practices and to honor data subject rights consistent with the nature of their engagements with Dun & Bradstreet.

Please see our [Data Compliance and Ethics Policy Statement](#), [Privacy and Personal Data Protection Policy Statement](#) and our [Data Subject Rights Policy Statement](#) for more information.

Our Commitment to the Environment

- Respect for the Environment
- Measuring of GHG Emissions
- Use of Natural Resources and Renewable Energy
- Waste Management and Reduction
- Environmental Solutions in our Facilities



Respect for the Environment

As a responsible corporate citizen, we are committed to doing our part to protect the environment and minimize our impact on the natural world. At Dun & Bradstreet, we follow applicable laws and regulations as they relate to protecting the environment and conserving energy and natural resources, as well as report on our progress in accordance with international frameworks and standard-setting agencies, such as the Sustainability Accounting Standards Board (SASB), Global Reporting Initiative (GRI), Greenhouse Gas (GHG) Protocol, the Carbon Disclosure Project (CDP), and Task Force on Climate-Related Financial Disclosures (TCFD). We expect third parties to put in place sufficient measures to mitigate environmental risks.

We expect third parties to have in place processes for reporting violations of applicable environmental laws and regulations, and to ensure that appropriate steps are taken promptly to prevent, investigate, and address these breaches.

Please see our [Environmental Policy Statement](#) and [Product Governance & Sustainability Policy Statement](#) for more information.

Measuring of GHG Emissions

We recognise that measuring our Greenhouse Gas (GHG) emissions is the first step towards tracking, monitoring, and reducing our carbon footprint. We measure, based on the GHG Protocol, our Scope 1 (direct GHG) and Scope 2 (electricity indirect GHG) emissions, taking steps towards improving our Scope 3 (other indirect GHG) reporting. We encourage our third parties to monitor, report and address their GHG emissions and other climate impacts in accordance with applicable laws and standards.

Use of Natural Resources and Renewable Energy

Reducing our consumption of natural resources, saving energy, and moving towards sustainable energy sources is an important part of improving our environmental impact. We already use 100% renewable energy in some locations and continue towards using renewable energy sources where the option is available. We encourage third parties to participate in the transition towards renewable energy usage where such option is available.

Waste Management and Reduction

At Dun & Bradstreet, we understand the environmental damage waste can cause if not disposed of properly. We have implemented an electronic waste (e-waste) management program across the majority of our operations and offer recycling stations to increase the reuse and recycling of our waste and decrease the amount of waste that we send to landfill. Third Parties are encouraged to track waste generated by their operations, ensure the proper handling of this waste, and take adequate steps to reuse, recycle, and decrease the amount of waste sent to landfill.



Environmental Solutions in our Facilities

To make our offices more environmentally friendly, many of our sites have eliminated single-use plastics from their kitchens and installed eco-friendly appliances, such as dimmable lighting, controlled heating, and low-water appliance solutions. Third parties should consider the use of environmentally friendly solutions in their facilities to minimize environmental impact.





Our Commitment to Conducting Business Fairly and Honestly

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- Fair Competition/Antitrust
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- Fair and Ethical Sales and Marketing Practices





OUR COMMITMENT TO CONDUCTING BUSINESS FAIRLY AND HONESTLY

At Dun & Bradstreet, we strive to conduct business honestly and comply with applicable laws, policies, permits, and regulations. Upholding business principles that honor and protect our colleagues, clients, investors, and third parties is something we take seriously, and we trust that you will do your part to uphold these high standards for conducting business ethically, respectfully, and with integrity. We expect third parties to implement adequate measures to mitigate risks in relation to these topics. In situations of conflicting laws and regulations, the higher standard should apply.

We expect our third parties to have processes in place for reporting violations of applicable laws and regulations, and ensure that appropriate steps are taken to prevent, investigate, and address these breaches.

Please see our [Business & Partner Ethics Policy Statement](#) and [Speak Up and Non-Retaliation Policy Statement](#) for more information.

Anti-Bribery and Anti-Corruption

We require our third parties to comply with all applicable anti-bribery and anti-corruption laws and regulations in the country/region (or countries/regions) in which you operate. Never offer, authorize, give, promise, accept or offer to accept, anything of value in exchange for an improper advantage. This includes facilitation payments, which are smaller payments made for the facilitation of routine clerical or administrative services. Gift-giving and entertainment must be handled very carefully and in compliance with all applicable laws, regulations, and policies. Make sure that your books and records accurately reflect the nature of all transactions and seek clarification any time you have any questions.

Protecting our company from corruption and bribery is paramount to our business integrity. We therefore require all employees to complete annual training regarding bribery and corruption, and we expect the same of our third parties. We also have clear reporting channels and processes for employees to follow if they become aware of incidents of corruption and bribery, including with any third parties. We expect our third parties to monitor reported incidents of corruption or bribery, to investigate and address these incidents, and if any incident relates to activities conducted for or on behalf of Dun & Bradstreet, to immediately inform using the channels listed in the section “Raising Questions and Concerns” below. Third parties should also raise awareness on anti-bribery and anti-corruption issues and risks to their employees, contractors, and subcontractors. Please see our [Anti-Bribery and Anti-Corruption Policy Statement](#) for more information.

Handling Conflicts of Interest

Business decisions that impact Dun & Bradstreet should always be made in our company's best interests. Third parties must disclose a conflict as part their engagement with us immediately once they are aware. We expect third parties to monitor and recognize future situations that can present a conflict, avoid even the appearance of bias and, if you become aware of a potential conflict, to disclose it immediately to Dun & Bradstreet using the channels listed in the section "Raising Questions and Concerns" below. Should you have any questions about whether something may be a conflict of interest, raise the issue right away with your internal resources or Dun & Bradstreet resource. To report a conflict, contact your Dun & Bradstreet representative or use our [Global Helpline](#). See Speaking Up and Seeking Guidance section below and our [Conflict of Interest Policy Statement](#) for more information.

Complying with Our Gifts and Entertainment Policies

The exchange of gifts and providing of entertainment is also an area where conflicts of interest and improper conduct can arise. Ensure that anything you give or receive complies with the law and does not compromise—or even appear to compromise—your ability or the ability of our employees to make fair and unbiased decisions on behalf of Dun & Bradstreet. Do not provide any unreasonable or substantial gifts or entertainment to anyone in the context of your relationship with Dun & Bradstreet. Please see our [Anti-Bribery and Anti-Corruption Policy Statement](#) for more information.

Social Networking

We expect our third parties to engage in social media in a way that is lawful, professional, and consistent with our Values and ethical principles. All third parties must coordinate and seek approval to use the Dun & Bradstreet name, to make any statements or express any views attributable to Dun & Bradstreet in any external correspondence or communications, including social media, prior to doing so. Permission can be requested by contacting the Corporate Communications department.



Protecting Dun & Bradstreet Assets

Respect our assets, protect them from misuse, manipulation, damage, loss, theft or, in the case of information, exposure to unauthorized parties. We also count on you to preserve our reputation and our highly respected brand.

Physical and Electronic Assets

Our physical and electronic assets are company property and provided for business use. Do not use them for personal benefit or outside work, and do not use them in an unlawful or unauthorized manner.

Confidential Information

Never share confidential information with anyone who is not authorized to view or use it as part of their job. Remember, your obligation to protect our company's information continues even if our business relationship with your organization ends.

Intellectual Property

Respect our trademarks, copyrights, patents and other assets (including internal Dun & Bradstreet publications and software programs developed for or by our company). This intellectual property belongs to Dun & Bradstreet and must be protected and managed appropriately, in the manner prescribed by your contract or non-disclosure agreement.

Privacy and Data Protection

Comply with all applicable local, state, federal and international privacy and data protection laws, regulations, rules and ordinances regardless of what services you provide to us. You must also comply with all applicable information security laws, regulations, and industry standards. We depend on your compliance to support our Privacy Information Management System. Please see our [Data Compliance and Ethics Policy Statement](#) and [Privacy and Personal Data Protection Policy Statement](#) for more information.

Information Security and Privacy Risks

Third parties are expected to identify, track, and mitigate risks associated with information security and privacy information, communication technology services, and product supply chain to maintain the Confidentiality, Integrity, and Availability of information. We depend on your management of information security and privacy information risks to support our Information Security Management System.





OUR COMMITMENT TO CONDUCTING BUSINESS FAIRLY AND HONESTLY

Responsible Artificial Intelligence

We are committed to responsible use of Artificial Intelligence (AI), development of AI systems, and implementation of responsible AI solutions that accelerate innovation, improve efficiency, and contribute to sustainable growth. We expect our third parties to use AI responsibly by informing us of data and solutions provided to us that have been generated substantially (at least a majority) by AI; by ensuring that the AI systems they use to provide any services to us are fair, robust, safe, and resilient; by ensuring that D&B data is not used in publicly available AI tools; by not using D&B data to train any AI system; and by respecting our intellectual property rights and the intellectual property rights of others. Please see our [AI Ethics Policy Statement](#) for more information.

Maintaining Financial Integrity

We expect our third parties to maintain accurate and complete books and records and to ensure all financial information shared with Dun & Bradstreet will likewise be accurate and complete. All records prepared for or in any way relating to Dun & Bradstreet, including financial and operational results, must: accurately reflect all associated transactions, payments, and events; be filed in a timely fashion; and comply with all applicable laws as well as any internal controls and procedures. We expect our third parties to notify Dun & Bradstreet if they are financially unable to fulfil their contracted obligations.

Complying with Insider Trading Laws

In general, it is illegal for any person with material, non-public (“inside”) information about Dun & Bradstreet or any company to buy or sell securities (stocks, options, etc.) of that company. Providing material, non-public information to someone else so that they may trade (called “tipping”) is also a violation of both this Code and U.S. securities laws, and it carries the same consequences—even if the tipping occurs inadvertently or if you did not trade in that security yourself.

Global Trade and Due Diligence

Dun & Bradstreet complies with all U.S. and international trade laws and regulations that apply to our business and expects our third parties to do the same. Before exporting products or services, be sure to check the applicable regulations that may apply to either the location of delivery or to the recipient. You may be required to obtain a specific license or permit. Before engaging with new third parties or customers, you must conduct appropriate screening and due diligence to ensure that there is no respective entry on any national or international sanctioned party lists.



OUR COMMITMENT TO CONDUCTING BUSINESS FAIRLY AND HONESTLY

Anti-Money Laundering and Know Your Customer Obligations

We abide by all laws designed to deter criminal enterprise, prevent terrorism, and protect the security of the countries/regions where we do business. Exercise good judgment when dealing with customers or other third parties to prevent inadvertent use of Dun & Bradstreet's business activities for money laundering or terrorist financing.

Fair Competition/Antitrust

We compete fairly and expect our third parties to share our unwavering commitment to conducting business and winning with integrity. Comply with all antitrust and global competition laws wherever you operate, and never enter into any agreement that unlawfully restricts competition.

Compliance with Government Contracts

In many cases, our third parties are assisting us with fulfilling government contracts. Accordingly, and wherever applicable, we recognize that the requirements related to government contracts are generally stricter than those governing our commercial contracts. It's important that you recognize this issue and comply with all contractual terms and obligations. Remember, your contractual obligations also apply to the vendors and subcontractors who fulfil services or perform work on our government contracts.

Fair and Ethical Sales and Marketing Practices

We always conduct ourselves with the highest standards of integrity and business ethics and expect no less from our third parties. Always act with integrity; never deceive, defraud or misrepresent the facts; and don't engage in practices that are unfair to prospects, customers, or other individuals.

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Raising Questions and Concerns



If you are unsure of what to do in a particular situation, take the time to seek guidance. You can ask questions or raise concerns by reaching out to the following Dun & Bradstreet resources:

Resource	Contact
Dun & Bradstreet Global Compliance and Ethics Helpline	Directly via the online web platform at: https://helpline.dnb.com
Dun & Bradstreet Compliance Officer	complianceofficer@dnb.com

The Dun & Bradstreet Global Compliance Helpline is managed by an outside company and is available 24 hours a day, seven days a week. You may report matters anonymously if you prefer, where allowed by local law, although maintaining anonymity may limit our ability to fully investigate your concerns.

We will promptly, thoroughly, and fairly investigate all reports and take appropriate action as warranted by the facts and circumstances.

As a Dun & Bradstreet third party, you have an obligation to comply with any investigation or audit and to share information openly and honestly. We will make every effort to safeguard your confidentiality and, if applicable and allowed by local law, your anonymity.

We strictly prohibit internal acts of retaliation against any individual for reporting a possible violation in good faith and strongly encourage our third parties to also prohibit acts of retaliation within their respective organizations.

