

# Dun & Bradstreet Partner Code of Conduct

2020

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—even being named one of the World's Most Ethical Companies. 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.

The Dun & Bradstreet family is ...

- **Data-Inspired** - We're passionate about the power of data. It's at the heart of everything we do.
- **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.
- **Inherently Generous** - We succeed by helping others succeed. We openly share our time and talent, and we confidently welcome the help of others.

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

Please read this 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.

Remember that each day brings new opportunities to support Dun & Bradstreet's clients and enhance both our legacy and our reputation. Our Partner Code of Conduct will help you make the most of those opportunities and do the right thing, every day, in every way.

Best,  
Executive Leadership Team

## **Table of Contents**

### **Our Code**

#### **Our Commitment to People**

- We Put People First
- Respect for Health and Safety
- Respect for Human Rights
- Respect for the Environment

#### **Our Commitment to Our Company and Our Shareholders**

- Handling Conflicts of Interest
- Complying with Our Gifts and Entertainment Policies
- Speaking on Behalf of Dun & Bradstreet
- Social Networking
- Protecting Dun & Bradstreet Assets
  - Physical and Electronic Assets
  - Confidential Information
  - Intellectual Property
  - Data Privacy
- Maintaining Financial Integrity
- Complying with Insider Trading Laws

#### **Our Commitment to Conducting Business Fairly and Honestly**

- Anti-Corruption
- Global Trade
- Anti-Money Laundering and Know Your Customer Obligations
- Fair Competition/Antitrust
- Compliance with Government Contracts
- Fair and Ethical Sales Practices

### **Raising Questions and Concerns**

## 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've made to high ethical standards.

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

As our partner, 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. 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.

## Our Commitment to People

### **We Put People First**

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 expect our partners to share this commitment and to promote behavior that is free of unlawful discrimination and harassment, abusive conduct and bullying. We also expect that you will recognize and respect an employee's right to form, join (or not join) workers' organizations of their choosing and to enter into collective bargaining, as permitted by law.

### **Respect for Health and Safety**

We work to maintain a safe, healthy and productive work environment, and we look to our business partners to do the same. Follow safe working procedures and comply with all applicable laws and regulations of the countries/regions where you operate. Encourage employees to work safely and to immediately report any unsafe condition.

### **Respect for Human Rights**

We expect partners throughout our global supply chain to support Human Rights and encourage partners to adopt standards consistent with the principles established under the United Nations Declaration of Human Rights. Compensate your employees in accordance with all applicable laws including those that relate to minimum wage and overtime hours. Do not employ underage children or forced labor or allow any form of physical punishment or abuse, and take steps to ensure that slavery and human trafficking are not taking place within your organization or organizations with which you work.

## **Respect for the Environment**

We also expect our partners to follow applicable laws, policies, permits and regulations as they relate to protecting the environment and conserving energy and natural resources. Join us in working to reduce the environmental impact of our operations wherever you do business.

## **Our Commitment to Our Company and Our Shareholders**

### **Handling Conflicts of Interest**

Business decisions about Dun & Bradstreet should always be made in our company's best interests. As our partner, we expect you to recognize 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. Should you have any questions about whether something may be a conflict of interest, raise the issue right away with your internal resources or any Dun & Bradstreet resource.

### **Complying with Our Gifts and Entertainment Policies**

The exchange of gifts and 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.

### **Speaking on Behalf of Dun & Bradstreet**

We want to ensure that accurate information about our company is conveyed to the media, the public, regulatory authorities and others, so we have designated key individuals to serve as our official company spokespersons. Please do not make any statements or speak to reporters on Dun & Bradstreet's behalf.

### **Social Networking**

Engage in social media in a way that is lawful and ethical. Protect confidential business information about our company, our employees, our customers and any other companies with which we work. If you post any content that relates to Dun & Bradstreet or your work with our company, include a disclaimer indicating that the views expressed do not represent those of our company.

### **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.

### **Data Privacy**

Comply with all applicable local, state, federal and international data privacy 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.

### **Maintaining Financial Integrity**

We expect our partners 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.

### **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 Partner 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.

## **Our Commitment to Conducting Business Fairly and Honestly**

### **Anti-Corruption**

Comply with all applicable 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 books and records accurately reflect the nature of all transactions, and seek clarification any time you have any questions.

### **Global Trade**

Dun & Bradstreet complies with all U.S. and international trade laws and regulations that apply to our business and expects our partners 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 business partners 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.

### **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 business partners 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 partners 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 partners 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 that, too, and comply with all contractual terms and obligations. Remember, your contractual obligations also apply to the vendors and subcontractors who fulfill services or perform work on our government contracts.

### **Fair and Ethical Sales Practices**

We always conduct ourselves with the highest standards of integrity and business ethics and expect no less from our partners. Always: act with integrity and never deceive, defraud or misrepresent the facts.

### **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:

<b>Resource</b>	<b>Contact</b>
24/7 Dun & Bradstreet Global Compliance Hotline	Report by phone: In the U.S. and Canada: 1-888-734-0377  Outside the U.S. and Canada,  North America            1-888-734-0377 UK                            0-808-189-1384 Hong Kong                + 800-906-528 Australia                 + 1-300-896-529 Netherlands             00-80077881234 New Zealand            00-80077881234 Denmark                 00-80077881234 France                    00-80077881234 Italy                        00-80077881234 Philippines              00-80077881234 Spain                      00-80077881234 Malaysia                 00-80077881234 Belgium                 00-80077881234 Switzerland             00-80077881234 Ireland                    + 353-766803957 Mainland China         + 400-120-4032 Taiwan                    + 00801-49-1257 India                      + 000-800-050-1460 Japan                     0120-952-594

	Or online: <a href="https://www.integritycounts.ca/org/DNB">https://www.integritycounts.ca/org/DNB</a>
Compliance team:  Chief Compliance Officer Aryeh Friedman  Attorney, Third Party Compliance Leader Spencer Daly	973-921-5535 <a href="mailto:complianceofficer@dnb.com">complianceofficer@dnb.com</a>  973-921-5566 <a href="mailto:dalys@dnb.com">dalys@dnb.com</a>

*The Dun & Bradstreet Global Compliance Hotline 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 partner, you have an obligation to comply with any investigation or audit and to openly and honestly share information. 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 partners to also prohibit acts of retaliation within their respective organizations.*