

Corporate Policy No. 3: Anti-Bribery and Anti-Corruption

Policy Tier: 1

Team Owner: Global Compliance & Ethics, a Legal Team Function

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OUR POLICY COMMITMENT

At Dun & Bradstreet (D&B), our commitment to doing business with the highest standards of business ethics and conduct means avoiding corruption in any form, including bribery, and complying with the anti-bribery and anti-corruption laws of the countries in which we operate. We believe it is vital for us to maintain our reputation for conducting business with honesty, acting ethically and with integrity, and competing fairly based on the differentiated value in our products and services, to generate confidence in our business and provide a core foundation for doing the right thing.

This Policy establishes our baseline principles and operating standards for anti-bribery and anti-corruption with the necessary governance, oversight, and controls, not only to ensure that D&B continues to do business ethically in compliance with all applicable anti-corruption and anti-bribery laws and regulations, but to encourage and provide guidance for reporting any suspected violations. This Policy provides a framework for compliance and effective risk management under anti-corruption and anti-bribery laws, rules, and regulations. This Policy sets the floor for anti-bribery and anti-corruption practices at D&B. Where an applicable law, rule, regulation, contractual obligation, or other D&B policy requires a higher standard, we will follow the requirements of that law, rule, regulation, contract, or policy.

WHO MUST COMPLY?

This Policy applies to all D&B team members who work for wholly and majority owned subsidiaries of the Dun & Bradstreet Corporation, including employees, contractors, or contingent workers of each of these entities. D&B subsidiaries outside of the U.S. are expected to adopt and implement this Policy or a local version of this Policy in accordance with applicable laws to bring this Policy into effect locally. The Policy Commitment, Principles, and Operating Standards also apply to our vendors and suppliers who process or otherwise handle data for or on behalf of D&B, and any other third parties, whom D&B may obligate by contract or other agreement to comply.

WHAT DO I NEED TO KNOW AND DO?

The following nine Principles and Operating Standards guide the way we work to meet our Policy Commitment.

1. **Bribery and Corruption:** We prohibit engaging in any acts of bribery or corruption, either directly or through a third party. Bribery is offering, giving, promising, soliciting, or accepting anything of value (financial or non-financial) to a public official or any other person, directly or indirectly through a third party, to improperly influence that person in the performance of a duty or to obtain or retain business or any undue business advantage. Bribes often involve payments, or the promise of payments, but can include other benefits or advantages. Corruption is the abuse of entrusted power for personal gain.
2. **Anything of Value:** We prohibit giving or receiving “Anything of Value” to influence a business decision or obtain an improper advantage. Employees and Third Parties are prohibited from offering, authorizing, giving, promising, accepting or agreeing to accept Anything of Value to or from public officials, public enterprises, and commercial entities, for the purpose of influencing decision-making or gaining or providing an improper business advantage. Anything of Value includes:
 - a. Cash and cash equivalents (e.g., gift certificates or vouchers);
 - b. Personal and business benefits, such as gifts, meals and entertainment, transportation and lodging, offers of employment, forgiveness of debt, directing business to a company, or solicitation or providing charitable or political contributions;
 - c. Any value, no matter how minimal. Even something of small value may result in a violation if given for the purpose of influencing decision-making or gaining or providing an improper business advantage; and
 - d. Anything of value given or accepted indirectly, for example to or from a spouse, close relative, friend, or associated entity of the intended party.
3. **Public Officials:** We subject activity with public officials to heightened scrutiny. A “Public Official” is any officer or employee of a government or any department, agency, or instrumentality, or of a public international organization, or any person acting in an official capacity on behalf of any of the above. Any interactions with public officials must comply with this policy and our Code of Conduct and all applicable laws and regulations. Engagements with public officials, including meetings with and presentations to public officials, must be conducted by Legal, at the advice of Legal, and properly reviewed by Global Compliance & Ethics (GCE).
4. **Political Contributions:** We explicitly prohibit political contributions made directly or indirectly to influence, or appear to influence, any external party, including public officials, in exchange for any improper business advantage. We do not make contributions to political parties or

officials on D&B's behalf for any reason, including to obtain their support for executive, legislative, ministerial, administrative, or other action(s) that may be favorable to D&B or that might influence, or be perceived as influencing, a business decision.

- a. D&B will not provide reimbursement for any political or campaign contribution.
- b. D&B team members do not engage in any lobbying activities on behalf of the company or retain a lobbyist on our behalf without obtaining the prior approval of GCE.
- c. Where applicable, employees must follow the Political Activities and Lobbying Policy when making political contributions to a U.S. state or local candidate or committee.

5. **Charitable Contributions or Sponsorships:** We prohibit giving charitable contributions and sponsorships on behalf of D&B to obtain a business advantage. We require that charitable contributions and sponsorship activity on behalf of D&B be reviewed prior to being given. Charitable contributions and sponsorships with Public Officials or entities must be preapproved and necessary due diligence must be performed prior to the contribution being made. We do not solicit, accept, or offer donations to Third Parties in a manner which communicates that a donation is a prerequisite for future business or that the offer of a donation is intended to obtain a business advantage. Although giving to or soliciting on behalf of legitimate charitable organizations in which our Third Party is engaged may be permitted, there must be no business advantage associated with an agreement to give.

- a. All requests by a public official, public enterprise, or commercial entity to make a personal contribution to any charity require prior approval from GCE.
- b. We always ensure that all charitable contributions and sponsorships have been approved and are in line with the [Charitable Contributions and Corporate Sponsorship Events Policy](#).

6. **Facilitation Payments:** We explicitly prohibit the use of facilitation payments. Facilitating payments and kickbacks, whether legal or not in a country, are prohibited under this Policy. Facilitation payments are a type of bribe and are defined as payments made to expedite or facilitate the performance of a public official for a non-discretionary, routine governmental action, such as issuing permits or licenses. This does not include legally required or permitted administrative fees for expedited services. Employees must notify Global Compliance & Ethics when identifying a facilitation payment request.

7. **Gifts, Hospitality, Travel and Entertainment:** We prohibit using gifts, hospitality, travel, and entertainment to influence any person or to obtain or retain an improper business advantage for the Company. Employees and Third Parties must not offer, give, promise, solicit, or accept any gift, hospitality, or any other thing of value to any person that could be regarded as illegal or improper, or which violates the recipient's policies, or which was intended to improperly

affect or influence the business transaction. Pre-approval by GCE is required when gifts, hospitality, travel, or entertainment is to be offered or extended to a Public Official and should be requested and obtained prior to extending any gift or invitation and must be in accordance with the [Gifts and Entertainment Policy](#).

8. **Third Parties:** We conduct due diligence on third parties to identify bribery and corruption red flags and mitigate risks. We must exercise prudent due diligence and caution when dealing with third parties, including vendors, suppliers, partners, independent consultants; any entity acting on D&B's behalf, such as intermediaries, agents, resellers and distributors; and partners, such as D&B's World-Wide Network Members, Commercial Alliances and other strategic alliances, joint ventures and proposed mergers and acquisitions. We only work with responsible and reputable entities and individuals. We hold third parties to the same legal requirements, standards and rules that apply to D&B for a particular activity through obligations set forth in written agreements with those third parties. The standards for Third Parties regarding anti-bribery and anti-corruption are set forth in D&B's Partner Code of Conduct.

We recognize that D&B may be held responsible for the improper actions of the third parties it engages, including (but not limited to) any anti-bribery violations, even if we are unaware of such activity. Accordingly, it is our responsibility to ensure the third parties we work with are operating according to the high standards we set as an organization. We screen third parties and obtain approval through the Third Party Engagement process prior to engaging them. Additional details and policy requirements for engaging with third parties are found in the [Third Party Engagement Policy](#).

9. **Books and Records:** We maintain accurate books and records. We do not make false, misleading, or artificial entries in the books and records of the company for any reason. We record all transactions, regardless of the amount, in a timely, complete, accurate and detailed manner so that the purpose and amount of the transaction is clear. This requirement extends to all original documents, including invoices, receipts and expense reports, and not just general ledgers.
 - a. We get all transactions approved at the appropriate level outlined in the [Travel and Expense \(T&E\) Policy](#).
 - b. We verify that no part of such payment is inappropriate or inaccurate or is made to mislead anyone or conceal anything that is improper, prior to paying or authorizing a payment.
 - c. We do not use personal or third party funds, either directly or indirectly, to accomplish what is otherwise prohibited by law and by our policies.

- d. We obtain all required approvals in accordance with the approval guidelines in D&B's Gifts and Entertainment Policy, [Travel and Expense \(T&E\) Policy](#), and the local market T&E policies.
- e. We maintain a system of internal accounting controls to ensure our books and records have reasonable detail and accuracy. This includes the approval, representation, and documentation of all transactions in a fair and accurate manner.

YOUR RESPONSIBILITIES – ACCOUNTABILITY AND ASSURANCE

Governance: The standards set forth in this Policy are overseen by Global Compliance & Ethics and implemented through processes managed in partnership with other Legal Teams, Enterprise Data Governance, Technology, Global Sourcing & Procurement, and Global Security & Risk. Refer to the Implementation References Appendix to this Policy for more details.

Demonstration of Accountability: At least annually, we will review our compliance with this Policy, and we will update this Policy to reflect any changes in D&B practices or the obligations under applicable laws.

Workforce Competence and Accountability: D&B team members must ensure that they have read, understand, and comply with this Policy. D&B team members are accountable for avoiding unethical practices or activities that may lead to or suggest a violation of this Policy.

Speaking Up and Seeking Guidance: Prevention, detection, and reporting any unauthorized or inappropriate processing or handling of D&B data assets are the responsibility of all D&B team members and those working for or with us. If you are unsure of what to do, take the time to seek guidance. You can ask questions, seek guidance, or raise concerns in the strictest confidence by reaching out to the following D&B resources:

- Global Compliance Hotline: <https://helpline.dnb.com>
- Compliance Officer Inbox: complianceofficer@dnb.com
- Incident Mailbox: incident@dnb.com

You can request an impact assessment or a review to determine whether one is needed by contacting impactassessment@dnb.com. If you contact us with a request for further guidance, we will direct you to resources who can help.

Monitoring: Depending on the issues, Global Compliance & Ethics, Enterprise Data Governance, and Internal Audit will conduct, or engage a third party to conduct, reviews of the relevant practices, systems, and records to ensure that D&B can demonstrate its compliance with this Policy.

Enforcement: Any employee who is found to have violated this Policy will face disciplinary action, up to and including termination of employment, in accordance with and as permitted by applicable laws. Contractors and organizations with whom D&B has a contractual relationship will face termination of our contractual relationship and other remedies available under the applicable contract for violations

of this Policy.

APPENDIX: IMPLEMENTATION REFERENCES

Tier 1 References:

- [Code of Conduct and Ethics](#)
- [Code of Conduct and Ethics for Third Parties](#)
- [Third Party Engagement Policy](#)
- [Conflict of Interest Policy](#)

Tier 2 Implementation References:

- Political Activities and Lobbying Policy
- [Gifts and Entertainment Policy](#)
- [Charitable Contributions and Corporate Sponsorship Events Policy](#)
- [Travel and Expense Policy](#)

Tier 3 Implementation References:

- UK FCA Compliance Manual