



Dun & Bradstreet Holdings, Inc.

Global Anti-Corruption Policy

D&B-POL-ALL-LEG-0007

Revision: 3

Dated: June 7, 2021

Classification: EXTERNAL USE

Regional Applicability: GLOBAL



1. Introduction

1.1 Document Definition

This Global Anti-Corruption Policy (“Policy”) sets out the rules and expectations for how Dun & Bradstreet does business in compliance with all applicable anti-bribery and anti-corruption laws of the countries in which we operate. Each employee is responsible for knowing and complying with this Policy.

1.2 Why this policy is important to Dun & Bradstreet?

Dun & Bradstreet’s long-standing 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. It is vital for us to maintain our reputation for conducting business with honesty and integrity as it generates confidence in our business and provides a core foundation of DOING THE RIGHT THING.

1.3 Objective and Scope

The Policy defines the overall framework and the conduct expectations required by all applicable parties to ensure that Dun & Bradstreet continues to do business in compliance with the anti-corruption and anti-bribery laws and regulations of each country in which we operate. The Policy includes all activities conducted by, for and/or on behalf of Dun & Bradstreet by all applicable parties as set forth in Section 1.4 and seeks to fulfil our global statutory, regulatory and contractual obligations (including UK FCA obligations).

1.4 Applicability to Team Members

This Policy applies to every employee, officer and director of Dun & Bradstreet Holdings, Inc. and its subsidiaries and controlled affiliates (collectively referred to as “Dun & Bradstreet” or the “Company”). For purposes of this Policy, a “controlled affiliate” means any business in which Dun & Bradstreet has the ability, through equity ownership or otherwise, to direct the policies and practices of the business. For convenience, the term “employee” is used throughout this Policy as a designation that includes employees, officers and directors.

1.5 Related Documents/References

- Dun & Bradstreet’s Code of Conduct and Ethics and Conflicts of Interest Policies
- Global Third Party Compliance Policy
- Global T&E Policy
- Charitable Contributions and Corporate Sponsorship Events Policy
- Global Modern Slavery Policy
- Global Sourcing & Procurement Policy
- FCA Handbook SYSC Chapter 6



2. Complying with Anti-Bribery and Anti-Corruption Laws

2.1 Giving or Receiving “Anything of Value”

You are prohibited from offering, authorizing, giving, promising, accepting or agreeing to accept “Anything of Value” to or from Government 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:

- Cash and cash equivalents (e.g., gift certificates or vouchers);
- 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;
- 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
- Anything of value given or accepted indirectly, for example to or from a spouse, close relative, friend, or associated entity of the intended party.

This prohibition applies to all Dun & Bradstreet interactions with:

- Any commercial or private entity or its representatives;
- Any government official, including employees of government agencies or government-controlled companies, political party, candidate, or public international organization;
 - In many countries, including the U.S., there are regulations that restrict what you may offer government employees. In the U.S. and Canada, federal, state and provincial laws all have different gift-giving bans covering elected leaders, their staffs and government policy makers. Because there are so many gift-giving rules and regulations, nothing of value shall be given, no matter the nature of the item, to any U.S. or Canadian government official. In other jurisdictions, never offer anything to any other government employee, at any level, without seeking approval in advance and ensuring that all reporting requirements are met. See Section 3.1 for approval chart.
 - For additional considerations that arise when transacting with the U.S. Government, refer to the Supplement in the Dun & Bradstreet Code of Conduct.
- Immediate family members (e.g., a spouse, dependent child, parent or household member) of any of the above; or
- Another person or third party (e.g., agent or broker) for the purpose of doing any of the actions identified above.

If you need guidance about a certain situation or are unsure about the interpretation of the above requirements, please contact a member of the Compliance team immediately. If you receive a demand for payment under physical threat, notify your leader and the Compliance team immediately. See Section 9 for contact information on how to report.

Giving or receiving “Anything of Value” may be permissible if it is not given or received for the purpose of influencing decision-making or gaining or providing an improper business advantage AND it meets the following criteria:

- Gifts are reasonable (i.e., nominal in value) and not lavish (i.e., an amount you would feel comfortable spending yourself). Examples of permissible gifts include reasonably priced Dun & Bradstreet souvenirs, such as pens, coffee mugs, umbrellas and golf shirts; and reasonably priced food items, such as muffins and fruit baskets;



- Gifts are unsolicited, infrequent and in good taste;
- Promotional or marketing expenses do not involve attendance by family of government officials or persons representing entities with which we want to do business;
- In compliance with this Policy, the Dun & Bradstreet Code of Conduct, the Global T&E Policy and the Third Party Compliance Policy;
- Reported to and approved by your direct leader and the Compliance team, as required (see Section 3.1 for approval chart); and
- Properly documented in all financial books, records, statements, reports and documentation including the proper designation of recipients or attendees (customer or third party, government or non-government entity).

2.2 Political Contributions

Do not make contributions to political parties or officials on Dun & Bradstreet's behalf for any reason, including to obtain their support for executive, legislative, ministerial, administrative or other action(s) that may be favorable to Dun & Bradstreet and/or that might influence, or be perceived as influencing, a business decision.

- Dun & Bradstreet will not reimburse you for any political or campaign contribution.
- 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 Dun & Bradstreet's Chief Compliance Officer.
- If you are a Dun & Bradstreet Executive or Government Business Unit employee and intend to make (or your spouse or minor child intends to make) a personal political contribution to a U.S. state or local candidate or committee in the form of a gift, meal or travel, you are required to obtain prior approval from the Compliance team before making the contribution. To do so, submit the approval form to the Compliance team. After review, you will be notified if the contribution is permitted or not. See Section 3.1 for approval chart.

2.3 Charitable Contributions or Sponsorships

Do not solicit, accept or offer donations to Covered 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 Covered Third Party is engaged may be permitted, there must be no business advantage associated with an agreement to give.

- Do support charities and civic and political activities on your own behalf, as long as there is no perceived or actual receipt of tangible business benefit for Dun & Bradstreet in return, whether directly from the charity or indirectly from any other person or entity and as long as they are in compliance with all applicable laws.
- Decisions to make a charitable contribution on behalf of Dun & Bradstreet should be made by a leader who is not directly involved in the day-to-day relationship with the Covered Third Party. Always ensure that all charitable contributions and/or sponsorships have been approved and in line with the Charitable Contributions and Corporate Sponsorship Events Policy.
- All requests by a government official, public enterprise or commercial entity to make a personal contribution to any charity requires approval from the Compliance team before agreeing to or making the donation. See Section 3.1 for approval chart.

2.4 Facilitation Payments

Do not make facilitation payments. Facilitation payments are payments of any size made to expedite the performance of a routine or necessary action to which the payer has legal or other entitlement. This can include (but not limited to) issuing permits or licenses; providing utility services, mail services or police protection; or approving immigration



documents or releasing goods held in customs. This does not include legally required or permitted administrative fees for expedited service.

Facilitation payments are not permitted even if they are permissible under laws of certain countries where Dun & Bradstreet operates.

3. Books & Records

Record all our transactions, regardless of the amount, in a complete, accurate and detailed manner so that the purpose and amount of the transaction is clear.

- All financial reports and records must be prepared and recorded timely, completely, accurately and with sufficient detail so that the purpose and amount of any such payment is clear. Do not make false, misleading, or artificial entries in the books and records of the company for any reason. This requirement extends to all original documents, including invoices, receipts and expense reports, and not just general ledgers.
- Do not establish undisclosed or unrecorded funds or assets of the company for any purpose.
- Get all transactions approved at the appropriate level outlined in the Delegation of Authority Policy.
- Be certain that no part of such payment is inappropriate, to be made to mislead anyone or conceal anything that is improper, prior to paying or authorizing a payment.
- Do not use personal or third party funds, either directly or indirectly, to accomplish what is otherwise prohibited by law and by our policies.

3.1 Submissions and Processing for T&E-Related Expenses involving Government Officials, Public Enterprises and Commercial Entities

Follow these guidelines when submitting T&E-related expenses that involve interaction with government officials, public enterprises or commercial entities:

- Obtain all required approvals in accordance with the approval guidelines in Section 3.1, Dun & Bradstreet's Global T&E Policy and the local market T&E policies;
- Include all necessary documentation required by this Policy and Dun & Bradstreet's Global T&E Policy;
- Explicitly and accurately identify the type of expense that is being recorded so that the documentation reflects the exact nature of the expense;
- If there is any conflict between the Global or local market T&E policies and this Policy with regard to T&E expenses in connection with government officials, public enterprises, or commercial entities, this Policy shall govern; and
- Leaders approving a T&E expense report that results in reimbursement for expenses incurred directly or indirectly involving government officials, public enterprises or commercial entities must carefully review all T&E expense reports and reimbursement requests to assess them for accuracy, completeness and timeliness, and to ensure that all required approvals are included. If you discover any red flags (see Section 4.4), while reviewing the reports, immediately raise the issue to the Global T&E team and the Compliance team. See Section 9 on how to report.



3.1 Approval Chart

	<\$50 PP ¹	>\$50 PP or >\$500 total
Personal political contributions to a U.S. state or local candidate or committee (by Dun & Bradstreet Executives or Government Business Unit employees)	Approval from the Compliance team prior to contributing	
Requests for personal contributions to charitable organizations by government officials, public enterprises or commercial entities	Approval from the Compliance team prior to agreeing to contribute	
Requests for corporate contributions to charitable organizations by government officials, public enterprises or commercial entities	Follow approval procedures in Charitable Contributions and Corporate Sponsorship Events Due Diligence Policy	
Gift, entertainment or promotional/marketing event offered to a U.S. or Canadian government official or public enterprise	Prohibited	
Gift, entertainment or promotional/marketing event offered to a government official, public enterprise or commercial entity outside of the U.S. or Canada , whether done so directly or indirectly	Approval by direct leader prior to incurring expense	Approval by direct leader and the Compliance team prior to incurring expense
Gift, entertainment or promotional/marketing event offered by a government official, public enterprise or commercial entity	Approval by direct leader prior to agreeing to accept	Approval by direct leader and the Compliance team prior to agreeing to accept

4. Due Diligence for Third Party Contracts

4.1 Third Party Compliance Program

We must exercise prudent due diligence and caution when dealing with third parties, including vendors, suppliers, partners, independent consultants; any entity acting on Dun & Bradstreet’s behalf, such as intermediaries, agents, resellers and distributors; and partners, such as Dun & Bradstreet’s World-Wide Network Partners, Alliance Partners and other strategic alliances, joint ventures and mergers and acquisitions. Dun & Bradstreet must work only with responsible and reputable entities and individuals.

Third parties are held to the same legal requirements, standards and rules that we are, and Dun & Bradstreet may be held responsible for their improper actions, including (but not limited to) any anti-bribery violations, even if we are unaware of such activity. Accordingly, it is your responsibility to ensure the third parties you work with are operating according to the high standards we set as an organization.

Third parties need to be screened and approved by the Third Party Compliance team prior to being engaged by the business. The Third Party compliance program is owned and executed by the Third Party Compliance team, which reports into Dun & Bradstreet’s Chief Compliance Officer.

¹ Per person



4.2 Who is a Third Party?

Broadly, any entity with whom Dun & Bradstreet conducts business is considered a third party. This is a global program and includes third parties from any country, both public and private entities. Examples of third parties are suppliers, data providers, vendors, service providers, agents, distributors, business partners, consultants (including lobbyist consultants), contractors, licensees and members of the Dun & Bradstreet, Worldwide Network, intermediaries, prospective partnerships, joint ventures, strategic alliances and mergers and acquisitions.

For purposes of the Third Party Compliance Program, Dun & Bradstreet customers are currently deemed out of scope. However, the Global Third Party Compliance team reserves the right to inquire about specific transactions that may fall outside the usual scope.

4.3 Why do we screen Third Parties?

Third Parties are screened to ensure the following:

- Our third parties are held to the same set of standards as Dun & Bradstreet employees and stakeholders;
- We understand the entire 'family tree' so Dun & Bradstreet has full transparency with whom we are doing business, and the ultimate beneficial ownership;
- Dun & Bradstreet is compliant with the US Department of Treasury OFAC regulations and any other relevant governmental entities, including international laws and initiatives where relevant and prudent; and
- Compliance with the relevant regulations, including but not limited to FCPA, the U.K Bribery Act, as applicable to Dun & Bradstreet being a US-based entity with a presence in the UK, and other global anti-corruption laws of various countries that we operate in.

4.4 Red Flags Related to Third Party Engagements

From first contact until the end of the relationship, everyone should be on the alert for “red flags” that may indicate suspicious or inappropriate activity.

Some of the common red flags include (but are not limited to):

- Lack of bona fide business credentials for specific services;
- Lack of transparency in ownership structure;
- The third party is in a high-risk country;
- Requests to delete or alter our standard anti-corruption contractual language;
- Press reports or persistent news or rumors involving unethical behavior;
- Requests unusual payments in advance or immediately prior to a business decision/transaction;
- Introduces unknown and/or suspicious parties/intermediaries into a transaction, including individuals/parties with limited experience in the specific industry or with unnecessary skills for the given transaction;
- Assesses fees that exceed customary payment for services rendered in the local region or economy and/or seeks payment in manners that appear suspicious or non-customary;
- Provides incomplete or inaccurate documentation to justify cash disbursements or other expenses; and
- Invoices do not match work completed or agreed to terms.

4.5 Business Owners' responsibility related to Third Party Engagements

All business owners who are responsible for identifying, assessing, negotiating, approving, signing, processing, managing or otherwise accounting for third party contracts or relationships, prior to entering into any such third party business relationship, must ensure the following:



- Identify and confirm the “business owner” who owns the business relationship; and
- The Third Party Compliance and the Compliance team have performed the required third party review, which may include:
 - Due diligence activities (e.g., screening);
 - Completion of the Third Party Compliance Questionnaire (either on-line or via email, depending on your location);
 - An assessment of the third party’s compliance with local and/or global anti-corruption laws and requirements conducted either internally by our Compliance team or by local outside counsel; and
 - Formally define the scope of the relationship in a written contract.

After entering into any Third Party business relationship, the business owner must:

- Ensure all anti-corruption required language is included in applicable contracts;
- Only remit payments for bona fide services rendered by the third party that are properly authorized with no concerns or warning signs of red flags, as outlined in Section 4.4;
- Only provide disbursements and credits where there is a valid business reason and proper documentation;
- Assist with ongoing periodic third party certifications of anti-corruption compliance and third party participation in training sessions that may be required; and
- Assist with periodic audits of the third party’s books, records and expense reports (particularly disbursements).

5. Policy Compliance and Reporting

Dun & Bradstreet will impose disciplinary action for violations of this Policy, up to and including termination of employment and recovery of damages.

If you suspect or become aware of any potential violation of this Policy, you must immediately report the suspected violation to the Compliance team. Dun & Bradstreet encourages employees, Covered Third Parties, and anyone else with whom we have business dealings to report their concerns. We provide several reporting options and you may remain anonymous. See Section 9 for information on how to report.

6. Issue Treatment & Exception Process

There are no exceptions to the Dun & Bradstreet Global Anti-Corruption Policy. Any modifications to processes supporting the Policy will only be made with the prior, written approval of the Chief Compliance Officer.

7. Document Management

7.1 Document Revision Log

Date	Editor	Revision #	Description of Change
June 10, 2019	Lisa Schor Babin	1	Updated 2019 Policy
April 1, 2020	Lisa Schor Babin	2	Updated 2020 Policy
June 7, 2021	Anna Maria Charalambous	3	Updated 2021 Policy



7.2 Document Owner and Approver

This Policy is owned by the Chief Compliance Officer.

Approver Name	Signature	Date
Aryeh Friedman		

8. Glossary

Corruption	The abuse of entrusted power for private gain.
Facilitation Payments	A small payment (also called a facilitating, speed or grease payment) made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.
Public or Government Official	Any officer or employee of a government or any department, agency, ministry or public enterprise. This includes any officer or employee of a public international organization, such as the World Bank. Furthermore, any person acting on behalf of any government agency, department or public enterprise, for example a person hired to review bids on behalf of a government agency, would be covered. The term includes officers and employees of a company wholly or partially controlled by a Government; uncompensated honorary officials, if such officials can influence the awarding of business; and members of royal families who have proprietary or managerial interests in industries and companies owned or controlled by the government. In addition, the term includes a political party, political party officials and candidates for political office. The term also includes any immediate family member (meaning a spouse, dependent child, parent or household member) of any of the above.
Anything of Value	“Anything of value” includes cash and cash equivalents, personal and business benefits, such as gifts, meals and entertainment, travel, offers of employment, forgiveness of debt, directing business to a company, solicitation or providing charitable contributions, or any other transfer of goods, services, tangibles or intangibles that accrues to the benefit of the ultimate recipient or promotes his/her interests.
Public Enterprise	Any enterprise, regardless of its legal form, over which a government, or governments, may, directly or indirectly, exercise a dominant influence, whether through share ownership, management control, or other means.
Third Party	Broadly, any entity with whom Dun & Bradstreet conducts business is considered a Third Party. Our Third Party Compliance program is a global program and provides for the screening of third parties from all over the world, as required by any engagement. Third Parties include vendors, suppliers, partners, independent consultants, any entity acting on Dun & Bradstreet’s behalf, such as intermediaries, agents, resellers and distributors and partners such as Dun



	<p>& Bradstreet's World-Wide Network Partners, Alliance Partners and other strategic alliances, joint ventures and mergers and acquisitions.</p> <p>The exception to the Global Third Party Compliance Policy is Dun & Bradstreet's customers, which are currently deemed out of scope. However, the Global Third Party Compliance organization reserves the right to inquire about specific transactions that may fall outside the usual scope.</p>
Due Diligence	<p><i>Process</i> to further assess the nature and extent of the <i>risk</i> and help <i>organizations</i> make decisions</p>



9. Seeking Guidance or Reporting Concerns

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

Resource	Contact																																																																				
<p>24/7 Dun & Bradstreet Global Compliance Hotline</p> <p>The Dun & Bradstreet Global Compliance Hotline is staffed by an outside company and is available 24 hours a day, seven days a week. You may report anonymously to the extent permitted by applicable law, although maintaining anonymity may limit our ability to effectively investigate your concerns.</p>	<p>To access our Global Compliance Hotline please use the following link: https://www.integritycounts.ca/org/DNB</p> <p>Report by phone: **NOTE: please dial the numbers exactly as they appear below.</p> <table border="0"> <tr><td>North America</td><td>1-888-734-0377</td></tr> <tr><td>UK</td><td>0-808-189-1384</td></tr> <tr><td>Hong Kong</td><td>800-906-528</td></tr> <tr><td>Australia</td><td>1-300-896-529</td></tr> <tr><td>Netherlands</td><td>00-80077881234</td></tr> <tr><td>New Zealand</td><td>00-80077881234</td></tr> <tr><td>Denmark</td><td>00-80077881234</td></tr> <tr><td>France</td><td>00-80077881234</td></tr> <tr><td>Italy</td><td>00-80077881234</td></tr> <tr><td>Philippines</td><td>00-80077881234</td></tr> <tr><td>Spain</td><td>00-80077881234</td></tr> <tr><td>Malaysia</td><td>00-80077881234</td></tr> <tr><td>Belgium</td><td>00-80077881234</td></tr> <tr><td>Switzerland</td><td>00-80077881234</td></tr> <tr><td>Ireland</td><td>353-766803957</td></tr> <tr><td>Mainland China</td><td>400-120-4032</td></tr> <tr><td>Taiwan</td><td>00801-49-1257</td></tr> <tr><td>India</td><td>000-800-050-1460</td></tr> <tr><td>Japan</td><td>0120-952-594</td></tr> <tr><td>Sweden</td><td>46 10 750 27 69</td></tr> <tr><td>Finland</td><td>358 75 3255884</td></tr> <tr><td>Norway</td><td>800 62 306</td></tr> <tr><td>Poland</td><td>800 005 074</td></tr> <tr><td>Hungary</td><td>(80) 088 370</td></tr> <tr><td>Czech Republic</td><td>800 143 808</td></tr> <tr><td>Slovenia</td><td>386 828 80146</td></tr> <tr><td>Slovakia</td><td>0800 002 594</td></tr> <tr><td>Estonia</td><td>372 668 0311</td></tr> <tr><td>Austria</td><td>43 720 022351</td></tr> <tr><td>Serbia</td><td>0800 210104</td></tr> <tr><td>Germany</td><td>0800 1816160</td></tr> <tr><td>Bosnia Herzegovina</td><td>387 70 311 090</td></tr> <tr><td>Croatia</td><td>0800 790 014</td></tr> <tr><td>Latvia</td><td>80 205 310</td></tr> </table>	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	Sweden	46 10 750 27 69	Finland	358 75 3255884	Norway	800 62 306	Poland	800 005 074	Hungary	(80) 088 370	Czech Republic	800 143 808	Slovenia	386 828 80146	Slovakia	0800 002 594	Estonia	372 668 0311	Austria	43 720 022351	Serbia	0800 210104	Germany	0800 1816160	Bosnia Herzegovina	387 70 311 090	Croatia	0800 790 014	Latvia	80 205 310
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People Team	Email PeopleServiceCenter@DNB.com for your People Business Partner's name
Compliance Officer Inbox	complianceofficer@dnb.com
Privacy Notification Mailbox	privacynotification@dnb.com

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.

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.

dun & bradstreet

