



Dun & Bradstreet Holdings, Inc.
Code of Conduct and Ethics
Do the Right Thing

2022

The Value of Integrity

Dun & Bradstreet was founded 181 years ago on the belief that reliable and trusted business information, obtained with integrity and ethics, would enable the growth of commerce for the benefit of all. The key to our success has been and continues to be an equally strong commitment to doing business ethically and with integrity. Dun & Bradstreet's reputation and continued success depend largely on our support – yours and mine – to this commitment. No success is meaningful if it is not achieved the right way.

Doing things the right way, ethically, with integrity, and in full compliance with the law, is not just a policy at Dun & Bradstreet, it's ingrained in our culture. The Dun & Bradstreet Code of Conduct and Ethics provides company-wide policies and guidelines that Protect the Franchise, Honor the Client and Lead, Develop and Support our People. The principles set out in our Code are integral to our future growth and success and are the bedrock to our vision – to create a global network of trust enabling clients to turn uncertainty into confidence, risk into opportunity, and potential into prosperity.

At Dun & Bradstreet, we strive to protect the data and privacy of our clients, employees, subject companies and individuals, and to maintain the highest standards in the ethical acquisition, aggregation, analysis, curation, delivery, handling, storage, and distribution of data. That means safeguarding the Dun & Bradstreet Data Cloud, technology platforms, and solutions to mitigate ethical, legal, operational, regulatory and reputational risks.

Upholding business principles that honor and protect our colleagues, clients, investors, business partners, subject companies and individuals, and the communities we serve 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. Read the Code of Conduct and Ethics thoughtfully and reflect on its meaning. When you certify to the Code, renew your personal commitment to practice and promote it every day. No excuses.

Thank you for your commitment in upholding Dun & Bradstreet's highest standards of ethics and integrity.

Anthony Jabbour
Chief Executive Officer

Message from Our Chief Ethics & Compliance Officer

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 penalties for not following those rules. While laws and policies set very important rules 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 D&B'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. Please join me in upholding these values and ethical principles in all that we do - every day.

Hilary Wandall
Chief Ethics & Compliance Officer

Table of Contents

- Our Code 6**
 - It Starts with Integrity
 - Scope
 - Compliance with the Code
 - Asking Questions and Raising Concerns
 - Global Fact-Finding
 - Cooperating with Fact-Finding
 - Additional Expectations for Leaders
 - Zero Tolerance for Retaliation
- Our Commitment to Each Other 11**
 - We Put People First
 - Respect for Diversity
 - Respect for Health and Safety
 - Respect for Human Rights
 - Respect for the Environment
- Our Commitment to Our Company 14**
 - Conflicts of Interest
 - Disclosing a Potential Conflict
 - Doing Business with or Supervising Family or Friends
 - Working Outside of Dun & Bradstreet
 - Engaging in a Related Party Transaction
 - Serving on Outside Boards
 - Making Private Use of Corporate Opportunities
 - Gifts and Entertainment
 - Safeguarding our Company
 - Protecting Our Brand
 - Charitable and Political Giving
 - Speaking on Behalf of Dun & Bradstreet and Media Interviews
 - Social Networking
 - Protecting Our Physical and Electronic Assets
 - Leaving Dun & Bradstreet
 - Safeguarding Information
 - Data Governance and Privacy
 - Protecting Confidential Information
 - Protecting Personal Information
 - Using Computer and Network Systems Appropriately
 - Maintaining Financial Integrity
 - Fraud
 - Public Reporting
 - Internal Controls and Procedures
 - Keeping Accurate Records
 - Records Retention and Records Hold
 - Complying with Insider Trading Laws

Our Commitment to Fair and Ethical Business Practices..... 29

- Anti-Corruption
- Export Controls and Trade Sanctions
- Anti-Boycott Laws
- Anti-Money Laundering and Know Your Customer Obligations
- Fair Competition/Antitrust
- Dealing with Competitors
- Collecting Information on Competitors
- Dealing with Third Parties
- Dealing with Customers
- Ethical Conduct is Essential at All Times
- Compliance with Government Contracts

Your Personal Commitment to Always Do the Right..... 37

Seeking Guidance or Reporting Concerns 38

The Code applies to all Dun & Bradstreet employees and directors. You are required to comply with this Code as a condition of your employment. A violation of this Code or other Dun & Bradstreet policy may (i) affect your compensation, including but not limited to eligibility for promotions, increases, bonuses and commission; (ii) make you ineligible for company awards, including non-monetary awards, such as trips or other offsite events; and (iii) result in disciplinary action.

This document does not provide any guarantee of continued employment at Dun & Bradstreet, and, unless otherwise permitted by local law or a written employment contract with the Company stating otherwise, you are employed “at will.” This means that you or Dun & Bradstreet can end the employment relationship at any time, with or without cause, and without prior notice, for any reason not prohibited by law. This Code is reviewed and updated annually, at a minimum. It may be unilaterally modified by Dun & Bradstreet at any time.

Our Code

It Starts with Integrity

Since 1841, Dun & Bradstreet has been a trustworthy partner of global businesses large and small. We have a reputation for integrity—committed to conducting business ethically and in compliance with the letter and spirit of the law in every interaction, with all our global stakeholders, regardless of location or business unit.

Our Code of Conduct and Ethics (the “Code”) keeps us working toward a common goal—a respectful workplace that operates with the highest standards of business ethics and conduct. As an employee, you are expected to follow the Code, all applicable laws and Dun & Bradstreet policies, and to use good judgment at all times. When faced with a difficult ethical decision, you should look to our ethical principles to guide your decision-making.

Ask Yourself:

Am I being Accountable?

Is what I am doing ethical and in accordance with this Code of Conduct?

Am I compromising my own personal ethics in any way?

Am I being Responsible?

Does what I am doing protect and sustain D&B?

Could Dun & Bradstreet lose customers if they knew employees did this?

How would I feel if my action was shared on social media or reported in the news?

Am I being Respectful?

Would I be comfortable explaining my action to other employees? My family? My friends?

Am I being Transparent?

Am I being open and honest in my dealings with our customers, partners, and regulators?

Could my actions violate the law or any company policy?

Am I being Courageous?

If I see something, do I Speak Up and raise concerns?

We believe in only doing business with suppliers, contractors, consultants and other business partners who share our high standards. We seek to establish mutually beneficial, long-term relationship with our business partners and strategic partners such as members of the Dun & Bradstreet World Wide

Follow the Code and all applicable Dun & Bradstreet policies and laws and use good judgment at all times.

Network. Our goal is to direct all our business to partners who share our commitment to do the right thing.

We recognize that laws, local customs, and social standards differ greatly from one place to the next. However, we abide by all applicable laws, including the laws of the countries in which we operate, unless they violate applicable U.S. law. If there is a conflict between local law and U.S. law, seek guidance from Global Compliance & Ethics.

Scope

This Code 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 Code, 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 Code as a designation that includes employees, officers and directors. This Code is reviewed and updated on an annual basis, along with reviews and updates to the Code of Conduct Training and Anti-Bribery and Anti-Corruption Training. Contractors, contingent workers, and other third parties that support Dun & Bradstreet are subject to our [Partner Code of Conduct](#).

Compliance with the Code

Failure to comply with the Code, applicable laws and Dun & Bradstreet policies may have severe consequences for both Dun & Bradstreet and the people involved. In addition to damaging our good name, conduct that violates the Code may also violate the law, subjecting our Company and those involved to legal action. Dun & Bradstreet will impose disciplinary action for violations, including termination of employment, civil and criminal charges, and recovery of damages in appropriate circumstances. Nothing in this Code is intended to restrict or interfere with your rights under applicable labor and employment laws, including but not limited to the National Labor Relations Act.

Asking Questions and Raising Concerns

If you become aware of a possible violation of this Code or any applicable law or policy, you should immediately report it. Remember, no one—not even your Leader—has the authority to make you do something illegal or improper.

Our Code only serves as a guide to ethical conduct. In some circumstances, the right thing to do will be obvious, but in others, it may be difficult for you to determine the right course of action. At Dun & Bradstreet, we have many internal contacts and [resources](#) that will help you get the answer you need. If you are unsure what to do, please reach out to your Leader, another Leader at Dun & Bradstreet, or the appropriate resource linked above and listed on page 39 and ask for help before acting.

You can file a report confidentially in multiple ways:

- 1) Directly via the online web platform at helpline.dnb.com;
- 2) Via one of the dedicated helpline numbers in your local language;
- 3) Dun & Bradstreet’s Global Compliance & Ethics team at complianceofficer@dnb.com;
- 4) Contact Dun & Bradstreet’s People Team, Legal Team or Audit Services Team; or
- 5) Raise concerns to your Leader or another Leader at Dun & Bradstreet.

Global Fact-Finding

As a company, we investigate all concerns promptly, thoroughly and fairly, and treat all those involved with respect and professionalism. Based on the facts found, we take appropriate action in accordance with our Global Fact-Finding Protocol (governing the internal investigation process), including, where applicable and/or required by law, notification to the Audit Committee and/or governmental authorities. Nothing in the Code prohibits you from communicating with government agencies or entities about possible violations of federal, state, or local laws or otherwise providing information to or filing a complaint with government agencies or entities, or participating in government agency investigations or proceedings, and the Code does not require you to notify the Company of any such communications.

If a Fact-Finding arises and your participation is requested, understand, first and foremost, that this is a routine business process of the Company. Unless required by law, employees are not permitted to have legal counsel or other representatives present at meetings related to the Fact-Finding. Audio or video recording of calls or meetings concerning the Fact-Finding is not permitted.

Cooperating with Fact-Finding

We each have an obligation to comply with Fact-Findings, whether conducted by the Global Compliance & Ethics team, the Audit Services team or others. If you are asked to cooperate with any Fact-Finding or audit, do so fully and honestly, knowing that Dun & Bradstreet has zero tolerance for retaliation.

If you receive a request for information or notice of an investigation from a government agency, or if you are contacted by an external lawyer or receive a request from an external lawyer, refer the call or request to the Legal team immediately. They will provide you with information on how to proceed.

When you raise a concern, we:

- Make every effort to safeguard your confidentiality and, if applicable, your anonymity; and
- Make every reasonable attempt to communicate back to you once the Fact-Finding is complete.

To view Dun & Bradstreet's Global Fact-Finding Protocol, [click here](#).

To access Dun & Bradstreet's Global Compliance & Ethics Team's Intranet site and Ask for Help, [click here](#).

Zero Tolerance for Retaliation

It is a violation of our Code to retaliate against an employee for reporting a concern in good faith or participating in a Fact-Finding, even if the allegations prove to be inaccurate. Good faith does not mean you have to be right, but it does mean that you are providing all information you have and that you believe it to be true. Individuals who engage in retaliation are subject to disciplinary action, including termination.

If you believe that you have been the subject of retaliation, immediately contact the People team, the Global Compliance & Ethics team or other [resource](#).

Additional Expectations for Leaders

Leaders have an additional responsibility to lead by example and operate with integrity, every day.

If you are a Leader:

- Make sure the Code, all applicable Dun & Bradstreet policies, and laws that impact job duties are communicated to those you lead so they understand their obligations;
- Look for opportunities to routinely role model, communicate and discuss ethical conduct, difficult decisions or other challenging situations with your employees;
- Create an open working environment that encourages employees to come to you with any questions or reports. When they approach you, respond promptly.
- If a potential conflict of interest is disclosed to you, immediately consult with the Global Compliance & Ethics team before it can be approved; and
- Report all other concerns or questions to the People team, the Global Compliance & Ethics team or other [resource](#) immediately.

Leaders have an additional responsibility to lead by example.

Closely monitor what is happening with your employees. If you become aware of any conduct that may violate the law, this Code, or any Dun & Bradstreet policies, report it to the appropriate team or resource immediately. Not reporting a violation by one of your employees when you know or should have known about it may result in discipline, including termination of employment and recovery of damages in appropriate cases.

What If...

A Dun & Bradstreet employee suspects his Leader is making false entries on her expense report. He knows he should report it, but he doesn't want his Leader to get in trouble. He also fears that if she finds out about his report, it will not only affect the good working relationship he has with her but also his future advancement within Dun & Bradstreet. What should he do?

Acts of misconduct, including those that seem small or inconsequential can erode our Company's reputation for operating honestly and with integrity. When someone violates our Code or our policies, it affects all of us. Speaking up isn't always easy—but it's always the right thing to do. The employee should come forward and share his concerns without fear, knowing that our Company will not tolerate retaliation against him for sharing his concern. Where permitted by law, he may report his concerns anonymously.

Our Commitment to Each Other

We Put People First

Our continued success depends largely on our ability to attract and develop a diverse work force. At Dun & Bradstreet, we are committed to providing a work environment that fosters respect for all employees, customers, suppliers, contractors, consultants and other business partners and reflects the diversity of the communities in which we operate. We 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 Diversity

Any unfair employment practice, however inadvertent, ultimately hurts all of us. We make employment decisions based on merit and do not discriminate based on race, color, national origin, religion, creed, gender, sexual orientation, gender identity or expression, civil union or marital status, age, citizenship status, disability status, pregnancy, genetic information, protected military or veteran status, ancestry, medical condition (including cancer or genetic characteristics) or any other characteristic protected by law and as set out in our Equal Employment Opportunity Policy, or any other applicable local policies.

We demand a work environment free from harassment, abusive conduct and bullying and do not tolerate any form of inappropriate conduct that creates an intimidating, hostile, intolerant or offensive work environment. Harassing or bullying conduct can include physical actions or verbal remarks/messages. Sexual harassment can involve unwelcome sexual advances, requests for sexual favors or other physical or verbal conduct of a sexual nature.

All forms of harassment, abusive conduct and bullying are prohibited. This policy extends to vendors, consultants and others with whom we do business and applies in both work-related settings and work-sponsored activities, regardless of when or where the activity takes place.

If you observe, learn of, or are subject to harassment, abusive conduct or bullying, immediately report it to your Leader, the People team, the Global Compliance & Ethics team or other [resource](#). We will review the complaint promptly and discreetly, following the Global Fact-Finding Protocol, when applicable.

For more information, refer to our Global People Policies and the local People policies and Employee Handbooks, where available, where you work. Additional information is also available in our [Human Capital & Diversity, Equity and Inclusion Policy Statement](#).

To view the Dun & Bradstreet U.S. Equal Employment Opportunity and Affirmative Action Policy and the Dun & Bradstreet U.S. Non-Discrimination and Anti-Harassment Policy, [click here](#).

What If...

A Dun & Bradstreet employee has built a strong working relationship with several supplier representatives. One of them has started flirting with her recently and leaves her suggestive notes. She feels uncomfortable but isn't sure what to do since he is not a Dun & Bradstreet employee. What options does she have?

Even though the supplier representative is not a Dun & Bradstreet employee, the employee should report the situation to her Leader, the People team, the Global Compliance & Ethics team or other [resource](#), in accordance with the Partner Code of Conduct. Harassment includes physical actions or remarks made by anyone in our workplace. We take all reports of harassment, abusive conduct or bullying seriously and will investigate them promptly and discreetly.

Respect for Health and Safety

We want to maintain a safe, healthy work environment. You have a responsibility to:

- Follow safe working procedures and applicable laws and regulations, at all times;
- Actively work to prevent accidents;
- Immediately report any unsafe condition to your Leader, local Facilities manager and Corporate Security at physicalsecurity@dnb.com;
- Immediately report any violent behavior, suspicious activity or threats to your Leader, the People team and Corporate Security at physicalsecurity@dnb.com for investigation; and
- Adhere to the Workplace Safety and Security Protocol located at <https://mydnb.sharepoint.com/sites/intranet/workinghere/ouroffices/Pages/shortHills.aspx>.

Because safety comes first, while at work, employees must remain free from the influence of illegal drugs, alcohol or any substance that may impair their ability to work safely and effectively. In addition, employees may not possess, sell, use or purchase illegal drugs or drug paraphernalia on Dun & Bradstreet premises or at Dun & Bradstreet-sponsored events.

In order to ensure a safe environment for team members and customers, to the extent permissible by applicable state law, Dun & Bradstreet prohibits the wearing, transporting, storage, or presence of firearms or other dangerous weapons in our facilities or on our property by team members, consultants or visitors. While concealed weapons are legal in some states, any team member in possession of a firearm or other weapon while on our facilities/property or while otherwise fulfilling job responsibilities may face disciplinary action including termination. In addition, a referral may be made to law enforcement authorities that may result in criminal charges.

For more information, refer to our Global People policies and local People policies where you work. Whether an employee is working from home or is a hybrid worker, concerns regarding a violation of this Code or other Dun & Bradstreet policies should be brought to the appropriate team's attention.

To view Dun & Bradstreet's U.S. Drug & Alcohol Policy and U.S. Possession of Weapons Policy, [click here](#).

Respect for Human Rights

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 labor, as well as any form of physical punishment or abuse. We expect suppliers throughout our global supply chain to share our commitment to the same high standards.

Respect the human rights of people in communities that are impacted by our activities.

We take steps to help ensure that slavery and human trafficking is not taking place within our organization. Do your part to respect the human rights of people in communities that are impacted by our activities and report any human rights abuse that you see or suspect either in our operations or in those of our business partners. Further information can be found in the [Global Modern Slavery and Human Trafficking Policy](#).

Respect for the Environment

We follow applicable laws, policies, permits and regulations as they relate to protecting the environment and conserving energy and natural resources, and we work to reduce the environmental impact of our operations everywhere we do business through water and energy conservation and recycling programs, just as a few examples. Your commitment helps our Company and the companies we work with to be good stewards, to reach our goals and to make positive environmental change.

Our Commitment to Our Company

Conflicts of Interest

Dun & Bradstreet’s stockholders expect business decisions to be made in the best interest of the Company. Therefore, all actions must be based on sound business judgment and not motivated by personal interest or gain. A “conflict of interest” occurs when an individual’s personal or family interests interfere—or appear to interfere—with our interest and/or our ability to make sound business decisions on behalf of Dun & Bradstreet. We need to avoid any situation that creates even the appearance of a conflict of interest.

It is not possible to list every situation that could present a potential conflict, but there are some areas where conflicts often arise:

- Conducting business with—or supervising—spouses, partners, family members, friends or others with whom you have a close personal relationship (“family or friends”);
- Having business interests or employment outside of Dun & Bradstreet;
- Having a business arrangement or transaction between two parties who have a relationship outside of the business transaction—this is referred to as a related party transaction;
- Serving on boards of directors outside of Dun & Bradstreet;
- Pursuing opportunities that belong to Dun & Bradstreet; and,
- Exchanging gifts and entertainment.

Each of these situations is described in more detail in the [Conflict of Interest Policy](#).

Disclosing a Potential Conflict

If a real, potential or perceived conflict of interest arises, you must disclose it to your Leader or the Global Compliance & Ethics team immediately once you become aware of the situation.

As part of the Code certification process, each employee generally certifies that except as otherwise reported, he or she has no interest that might be deemed a conflict of interest. If you become aware of a conflict of interest, you must disclose it immediately to your Leader or the Global Compliance & Ethics team.

To refer to the Conflict of Interest Policy for more information, including a list of areas where conflicts often arise, [click here](#).

Safeguarding Our Company

The protection of Dun & Bradstreet’s assets is a critical responsibility. We must each work diligently to respect these assets, protect them from misuse, damage, loss or theft and preserve our reputation and highly-respected brand.

Protecting Our Brand

We are each responsible for maintaining and building our Company’s greatest asset—our brand—as well as our trademarks, copyrights, patents and other intellectual property. Our logos and the name “Dun & Bradstreet” are examples of our trademarks recognized around the world.

We also must take the appropriate steps to protect our brand identity—how Dun & Bradstreet looks and sounds to all our audiences. We have set out specific guidelines covering logos, color palette and the other components that make Dun & Bradstreet’s brand instantly recognizable in the marketplace. These guidelines can be found at Dun & Bradstreet’s Online Brand Center; the standards must be followed at all times on all Dun & Bradstreet materials.

Internal Dun & Bradstreet publications and even software programs developed for or by our Company are also materials that can be protected by copyrights or otherwise.

In performing your job, you may receive, develop or be exposed to information, practices, methods, inventions, written materials, programs, word algorithms, processes or other works. These creations belong to Dun & Bradstreet. Although such “intellectual property” may not be tangible like our buildings and equipment, it is among the most valuable of our assets, and you are expected to protect it. If you are unsure about a proposed use of Dun & Bradstreet trademarks, copyrights or patents, consult the Legal team.

To view the Dun & Bradstreet Brand Center, [click here](#).

Charitable and Political Giving

As a company, we make decisions about charitable support and corporate sponsorships based on a fair, unbiased decision-making process. From time to time, we may collect donations or provide benefits in kind to contribute to a charity, but participation in these initiatives must be carefully evaluated and permitted by our policies.

Always ensure that all charitable contributions and/or sponsorships have been approved and in line with the [Donation Matching Guidelines](#) and [Charitable Contributions and Corporate Sponsorship Events Policy](#).

All requests by customers or vendors or any other third party to use our name or brand in communications related to contributions or events, including listing Dun & Bradstreet as a participant or sponsor of the event, must follow the guidelines, which can be found at Dun & Bradstreet’s [Brand Center](#).

Never suggest or imply that your donation of time, resources or money to political candidates or committees is from—or endorsed by—Dun & Bradstreet. You may not give political contributions on our behalf or use corporate funds for such purposes, and Dun & Bradstreet will not reimburse you for any political or campaign contribution. You will never be favored or punished for making or not making a personal political contribution, except as noted below.

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, please refer to the [Global Lobbying policy](#) for further information and approval requirements prior to making the contribution.

Strict laws and regulations exist regarding lobbying activities. No Dun & Bradstreet employee may retain a lobbyist or engage in any lobbying activities on our behalf without first having obtained the approval of Dun & Bradstreet’s Chief Ethics & Compliance Officer.

Compliance with the U.S. Foreign Agents Registration Act

Dun & Bradstreet is committed to compliance with the U.S. Foreign Agents Registration Act (“FARA”). No Dun & Bradstreet employee shall engage in activities on behalf of a foreign government or political party to influence U.S. Government officials or the American public either with respect to the domestic or foreign policies of the U.S. or with respect to the political or public interests, policies, or relations of a foreign country or a foreign political party. Any questions regarding compliance with FARA should be directed to the Global Compliance & Ethics team.

Speaking on Behalf of Dun & Bradstreet and Media Interviews

To ensure that accurate information is conveyed to the media, the public, to regulatory authorities and others, we have designated key individuals to serve as our official company spokespersons. Unless you are authorized to do so, do not make any statements nor speak to reporters on the Company’s behalf.

Refer all media inquiries and public requests for information (including questions about—and requests for —financial performance) to the Global Communications team at prteam@dnb.com. All requests to speak from an outside organization on behalf of Dun & Bradstreet should also be referred to prteam@dnb.com.

Social Networking

Social media offers a wonderful forum for exchanging ideas, building relationships and increasing brand awareness for our business. Always use good judgment and engage in social media in a way that is thoughtful, lawful and consistent with our policies. Note that nothing in the Code should be interpreted to prevent employees from exercising of any employee rights protected under law, including the right to discuss the terms and conditions of their employment.

To view the Global Social Media Policy, [click here](#).

Protecting Our Physical and Electronic Assets

Our physical and electronic assets, such as our facilities, equipment, supplies and computer hardware, operating systems and software are company property and provided for business use. We owe it to our customers, shareholders, suppliers, contractors, consultants, business partners and ourselves to safeguard all Dun & Bradstreet property against damage, loss or theft and ensure that only

Safeguard all Dun & Bradstreet property against damage, loss or theft.

Dun & Bradstreet-authorized assets (hardware and software, including IaaS (Cloud environments) are used. Immediately report any suspicious activity to the global Physical Security Hotline, 973-921-6200 (physicalsecurity@dnb.com), 24 hours a day, seven days a week; and immediately report any suspicious electronic activity to security@dnb.com. If you receive an email you suspect to be a phishing attempt, do not open or click on any attachments and report the issue by clicking on the “Report Phish” button on your outlook bar. Failure to remain vigilant regarding phishing may result in remediation and discipline.

Access to Dun & Bradstreet electronic devices is provided to assist employees in their job-related functions. Although occasional personal use is permitted, Dun & Bradstreet may review, audit and access all information stored or accessed through the Company’s devices, with or without notice, to the extent permitted by applicable law.

You may not store your personal information on Dun & Bradstreet’s electronic devices and there should be no expectation that this information is backed up or can be retrieved after separation from the Company. Furthermore, there should be no expectation of privacy in information stored on Dun & Bradstreet’s devices, except where required by applicable law and/or D&B policies and procedures.

Dun & Bradstreet employees must complete the required Information Security training course annually, as well as review, acknowledge and adhere to our Global Information Security Policies.

To view the Dun & Bradstreet Global Information Security policies on the Global Security Intranet site, [click here](#).

To view the Dun & Bradstreet Privacy policies on the Privacy intranet site, [click here](#).

What If...

My company laptop was stolen out of my car. What should I do?

Immediately report the incident to [Global Security](#) so that action can be taken to prevent access to our networks and information. Remember, you have a responsibility to protect the devices entrusted to you. The best practice for preventing loss is to either take your laptop with you or lock it in your car, out of sight or in the trunk.

What If...

I have been storing some of my personal documents and emails on my computer including all my employee evaluations, my professional certifications, the death certificate of my parent, my child’s school report, my draft tax return and a draft invitation for my daughter’s wedding. Can I do that? And if I have my personal information on my computer, can I retrieve that information when I leave Dun & Bradstreet? If not, can I just forward all the material now to my personal computer?

You should not be storing any personal information on your computer, and you generally will not be able to retrieve any information from your computer when you leave. You are also not permitted to forward emails from your business computer to your personal email address. In addition, our security team monitors unsanctioned transfers of data out of our environment (e.g., uploading to cloud storage) and will flag such transfers as serious violations of this Code and our security policies. If you are unsure whether documentation constitutes personal information, you can ask the Global Compliance & Ethics team.

Leaving Dun & Bradstreet

At the end of your employment with Dun & Bradstreet, all corporate assets and Dun & Bradstreet property must be returned, secured and/or disposed of promptly and appropriately. Your obligation to protect Dun & Bradstreet, customer and third party confidential and personal information continues even after your working relationship with Dun & Bradstreet has ended.

Work with your Leader to transition your responsibilities, including any processes you are responsible for. Do not email, download, upload, forward or share any business information (i.e., documents, emails or any other data) that resides on company systems, devices or assets prior to your departure. Our security team monitors and flags such activity for appropriate investigation.

If you are subject to an active Records Hold Notice, ensure that all records or materials (electronic or otherwise) subject to the Hold are preserved and provided to the Legal team upon your departure Dun & Bradstreet. You and your Leader should consult with the Legal team for assistance with the preservation.

Work with your Leader to transition your responsibilities, including any processes you are responsible for.

Remember, your obligation to protect Dun & Bradstreet, customer and third party confidential and personal information continues even after your working relationship with Dun & Bradstreet has ended.

Safeguarding Information

We have become a Leader in the information service industry through a constant focus on data quality and customer experience. Our customers trust us to provide them with high-quality, reliable information and to protect confidential information. We also comply with regulatory requirements around the globe associated with collecting, using, transferring, selling, storing, securing and disposing specific categories of data.

Data Governance and Privacy

All employees manage Dun & Bradstreet data. Examples include: company documents, emails, chats, SharePoint use, proposals, customer meetings, contracts, procedures and policies, new employee onboarding, source code, usage trends and so much more. Data is everywhere.

Dun & Bradstreet collects and receives data from many sources, and these sources may have specific restrictions on what data may be collected, how the data can be used and for what purpose, and how and where the data may be stored and transmitted. You have a responsibility to:

- Always collect, manage, protect, transmit, store, disclose, share and dispose of data in accordance with applicable laws and restrictions and company policies;
- Learn to properly categorize and classify the data you manage, understand the permissible use and disclosure of that data and follow the rules on how it must be collected, managed, protected, transmitted, stored and disposed of. To learn more on how to properly classify data, [click here](#) to view our Information Governance Policy
- Identify the legitimate business purpose for the data assets that are being processed.
- Only collect and use the data we need to support specific business purposes.

- Only use vendors or business alliances that have gone through the required [Third Party Engagement process](#) and have agreed to meet our privacy and personal data protection standards.
- Once a vendor or alliance party has been onboarded, continually assess their commitment to upholding our privacy and personal data protection standards.
- Store documentation only in a centralized location for all employees authorized to access it to the extent permitted by applicable law. Dun & Bradstreet's authorized storage tool is Microsoft 365 SharePoint, OneDrive or Teams for Business;
- Do not transfer Dun & Bradstreet information from the Dun & Bradstreet system by using any tools or methods not approved for such purpose, including but not limited to downloading to a personal device or by emailing it to a personal email address;
- Be transparent when asked about our data practices and processing by providing the appropriate product documentation from [SalesSpot](#);
- Report individual concerns about privacy and their privacy and data protection rights by forwarding to complianceofficer@dnb.com; and
- Never use customer supplied information for any purpose other than what the customer has agreed to or requested.

If you are developing a new data source or product using a new or existing data source, using a new technology within a product or using a new technology for the purposes of processing our data in any way (including employee or health data), you must complete a Impact Assessment review with the Global Ethics & Compliance team. Please fill out an intake [form](#) to commence the review of your project. For additional information, please contact impactassessment@dnb.com. For direct access, please go to My Apps ([My Apps \(microsoft.com\)](#)) and click on the TrustArc icon. Once the intake form is complete you will be contacted by a member of the Global Ethics & Compliance team to complete the process.

This is an essential requirement for Dun & Bradstreet to remain compliant with global data protections laws.

To view the Data & EDG Policies, Procedures, Guidelines and Standards, [click here](#).

To view the Data Compliance and Ethics Policy, [click here](#).

To view the Data Classification Standard, [click here](#).

To view the Privacy and Personal Data Protection Policy, [click here](#).

What If...

An existing data set that an employee is using for a new product has contact name, telephone number and address. What should they do first?

They should fill out an intake [form](#) to determine if an Impact Assessment needs to be completed.

Protecting Confidential Information

We are committed to maintaining the security of the confidential information belonging to Dun &

Know the kinds of information considered confidential and protect it from unauthorized disclosure.

Bradstreet, its employees, its customers and other third parties. Make sure you know the kinds of information considered confidential and protect it from unauthorized disclosure.

Some examples include new customer wins, trade secrets, unreleased product information and internal reports. Remember these are only examples.

In addition to the above guidance, safeguard confidential information by:

- Never sharing confidential information with anyone—inside or outside of Dun & Bradstreet—who is not authorized to view or use it as part of their job. Anyone outside of Dun & Bradstreet must have Dun & Bradstreet’s express written permission to access confidential information;
 - Never provide any Dun & Bradstreet data, such as DUNS numbers, reports or company information, to anyone outside of our normal sales and delivery channels; it must be protected by a valid contract or legal agreement; and
 - Safeguard access to Dun & Bradstreet information systems.
- When disclosure is authorized, only disclose data on a “need to know” basis and only when protected under a non-disclosure agreement. Be sure to conduct the appropriate due diligence and have the appropriate agreement in place before you disclose the information;
- Properly secure and label confidential Dun & Bradstreet material along with confidential information we receive from others under non-disclosure agreements according to the correct data classification;
- Keep trade secrets and other confidential intellectual property secret; and
- Only use customer supplied information in accordance with their Master Agreement or order form.

You also have an obligation to protect the confidential information of others (including our customers, suppliers, contractors, consultants and business partners). This includes information provided to Dun & Bradstreet in confidence, such as business records, credit card or e-check information, financial results, sales figures and information that is subject to a non-disclosure agreement.

To view the Dun & Bradstreet Technology Standards, Policies and Procedures on the Global Security Intranet site, [click here](#).

What If ...

A Dun & Bradstreet employee is approached by a friend who is starting a new business. Since the new business does not relate to—or compete against—Dun & Bradstreet’s business, the friend asks if the employee will share names and contact information of Dun & Bradstreet customers and prospects to help get her business going. Is that a problem?

Yes. Regardless of whether the new business impacts Dun & Bradstreet's business, the list they have asked for is confidential information and must not be shared.

Protecting Personal Information

We are committed to collecting, using and securing personal information entrusted to us by our employees, customers and other third parties in accordance with all legal requirements. Many jurisdictions in the United States, Europe, and around the world where we do business now have privacy and data security legislation and Dun & Bradstreet policies and procedures address these requirements. You have an obligation to review, understand and follow both your regional and team-specific Dun and Bradstreet policies and procedures, as this is how you will fulfill global and local legal and security obligations.

“Personal Information” (“PI”) is any information relating to an identified or identifiable person. PI includes information about individuals (e.g., employees, consultants and contractors) and in some countries about sole proprietorships and other unincorporated business entities. Some types of PI, such as national identification numbers, financial records or intimate personal information such as religious and political beliefs can be deemed high risk and sensitive (depending on the jurisdiction), so it is critical all Personal Information is classified in accordance with our [Data Compliance and Ethics Policy](#) and [Data Classification Standard](#) (see also: Safeguarding Information).

In terms of data privacy and security:

- Access, collect, use, store, secure, transmit, retain and dispose of personal information in accordance with our legal obligations, customer agreements, order forms and our internal Corporate Policies;
- Only collect and use personal information for a specific, defined and documented legitimate business purpose that is recorded as the processing purpose for that personal information.
- Never access, without prior authorization, any system or database containing PI, such as customer files, employee or personnel records; information about incentive programs; or email, text messages, instant messages, pager or voicemail messages of your coworkers;
- Safeguard PI from loss, theft, damage or exposure to individuals who are not authorized; be careful not to improperly reveal PI on your mobile phone, in social media or with a coworker in public places (such as elevators, airports or restaurants, as well as open areas within Dun & Bradstreet, such as break rooms or restrooms);
- Do not share an employee's personal information with other employees, including any information related to a medical condition, reasons for a leave of absence, or hospitalization or doctor visits. Treat this information as confidential even if it has been disclosed to you personally by the employee. If you are a manager, do not share personal information that you learned about your employee in your role as manager;
- Never use customer supplied information for anything other than the customer has agreed to or requested; and
- Immediately report any incident involving a breach or potential breach of our data to our Chief Ethics & Compliance Officer and Dun & Bradstreet Global Security at security@dnb.com.

To view the Global Breach Response Procedure, [click here](#).

To view the Dun & Bradstreet Global Security policies on the Global Security Intranet site, [click here](#).

To view the Dun & Bradstreet Privacy policies and notices on the Privacy intranet site, [click here](#).

What If...

An employee in Sales needs to share a large contract document with a prospect and is unable to send it by email. She decides to use her personal Dropbox account to share this document. Is this OK?

No. Dun & Bradstreet documents are not to be shared through personal emails or file-share utilities such as Dropbox, Google Drive, etc. unless they have been specifically approved by the Security and IT teams. Dun & Bradstreet's authorized internal file storage and sharing tool is either SharePoint or Microsoft 365 OneDrive for Business. To share Dun & Bradstreet information with external parties, STP (Safe Transport) should be used. She should use web-conferencing tools such as Microsoft Teams to review documents with external parties if possible and contact the Security team or IT Support if she needs to send these documents outside our network. In all cases, Dun & Bradstreet information is to be shared with external parties only if the necessary confidentiality agreements or contracts are in effect.

What If...

A Dun & Bradstreet employee finds information left behind in a conference room that contains employee names, social security numbers and payroll information. What should she do?

She should immediately report the incident to her Leader and to [Global Security](#) so the information can be properly secured.

Using Computer and Network Systems Appropriately

Computers and electronic information are essential tools to support our business. We all must use technology for business purposes only. Although limited personal use is permitted, it must not interfere with your job duties. *You may use technology for business purposes only. Incidental personal use is permitted only insofar as it does not interfere with your job duties and does not pose a risk to D&B systems. Personal documents should not be placed on D&B systems.*

You must not use Dun & Bradstreet's computer systems or mobile devices to:

- Advance personal interests, causes or political views;
- Communicate jokes or content which may be construed as inappropriate, sexually explicit or offensive statements;
- Create or send unauthorized solicitations; or
- Conduct business for another organization.

To view the Dun & Bradstreet Mobile Device Policy, [click here](#).

The use of profanity, derogatory remarks, discriminatory or harassing comments, innuendo and threatening or abusive language is strictly prohibited. Dun & Bradstreet's computer systems or mobile devices cannot be used to store or access sexually explicit or other inappropriate content.

We reserve the right, in compliance with applicable laws, to filter Internet access, as deemed appropriate, and to monitor, intercept or recover the entire contents of any messages or files accessed,

transmitted or stored on our systems or devices, including information that has been deleted by users.

We continuously monitor our network environment to ensure that only authorized resources are used and that they are used appropriately, responsibly and professionally. Any information and records produced by the use of these resources is also subject to Dun & Bradstreet's review. Unauthorized hardware or software assets are subject to removal. Monitoring activities, when undertaken, comply with any applicable legal requirements.

During the course of the monitoring, any traffic on a Dun & Bradstreet network or a Dun & Bradstreet-issued device may come into the scope of an investigation and as such may be examined as part of that investigation. Be aware that any information you create, send, receive, download or store on our systems is company property, and we reserve the right to monitor, review and disclose data as we deem appropriate, subject to applicable laws and regulations. You should not have any expectation of privacy when using Dun & Bradstreet resources, including email, instant messaging, voice, data, mobile and the Internet.

To view the Dun & Bradstreet Global Security policies on the Global Security Intranet site, [click here](#).

To view the Dun & Bradstreet Privacy policies on the Privacy intranet site, [click here](#).

What If...

An employee gets an email from a coworker making fun of men. She wants to send it to a friend outside Dun & Bradstreet who she thinks will also find it funny. Can she forward it on?

No. She should never use our computer or network systems to send potentially offensive material to anyone in or outside of Dun & Bradstreet. Sending such materials can also qualify as harassment and is in direct violation of our Code. She should delete the email immediately and refrain from sending it to anyone else. The employee should then [report](#) this matter, to ensure it is handled appropriately.

Maintaining Financial Integrity

A company's credibility is judged in many ways; one very important way is through the integrity of its books and records. Each of us has an obligation to follow all internal controls in recording and maintaining Dun & Bradstreet's books, finances and records. In every transaction, whether we are filing an expense report, preparing a financial statement, contract or simply completing a time sheet, we must be honest, accurate and complete.

Fraud

All employees are expected to be vigilant in discovering evidence of possible fraud that might impact Dun & Bradstreet. Fraud is the material misrepresentation or deliberate act of an employee, customer, or service provider with the purpose of deceiving or cheating Dun & Bradstreet, its shareholders, customers, employees, lenders, regulators or business partners. Employees are required to report evidence of suspected fraud in accordance with the reporting provisions of this Code.

Examples of Fraud:

- Forgery or alteration of checks, securities, invoices, policies, contracts or accounting records;
- Any misappropriation of Dun & Bradstreet funds, securities, supplies, furniture, equipment or other assets; or
- Any misuse of Dun & Bradstreet corporate credit cards or expenses.

Public Reporting

We are committed to providing our investors with complete, accurate, timely and clear information about Dun & Bradstreet's financial transactions and results of operations, in accordance with applicable financial reporting and accounting laws, rules and regulations.

Internal Controls and Procedures

We file our financial results on a timely basis. We have a series of procedures and controls in place to help our operations run more effectively and safeguard our assets. These controls also help us ensure the accuracy, completeness and reliability of our financial reports and assure compliance with all applicable laws and regulations.

Our internal controls cover financial reporting (and certain other related controls in technology, compliance and operations) and include policies and procedures that:

- Require the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of our assets;
- Provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with U.S. generally accepted accounting principles (GAAP) and in accordance with any applicable local accounting principles; and
- Provide reasonable assurance of prevention or timely detection of unauthorized access, use or disposition of our assets that could have a material effect on our financial statements.

Employees who are requested to provide, review or certify information in connection with Dun & Bradstreet's internal controls or disclosure controls and procedures must provide the requested information and respond in a complete, accurate and timely manner. In addition, designated Leaders must sign the Management Representation Letter to our external auditors representing that they have communicated and recorded appropriately all applicable information in the financial statements. Further, designated Company Officers are required to certify to the United States Securities and Exchange Commission that the Company's annual and quarterly reports are accurate and complete, that they have established and maintained adequate internal controls, and that they have disclosed to our external auditors and Audit Committee of the Board of Directors any internal control significant deficiencies or material weaknesses, and any instances of fraud involving employees who have a significant role in our internal controls. If you have any concerns about the accuracy of Dun & Bradstreet's financial results, you have an obligation to immediately report those concerns.

Keeping Accurate Records

Our financial statements are read by investors, analysts and other third parties. Every one of us, regardless of our position within Dun & Bradstreet, has an obligation to make sure that the information we record is complete, accurate and timely.

It is critical that we:

- Report our financial information in accordance with U.S. GAAP and in accordance with any applicable local accounting principles;
- Maintain a system of internal controls that will provide assurances to management regarding the reliability of financial reporting;
- Maintain books and records that fully, accurately and fairly represent our transactions in all material respects;
- Maintain a system of disclosure controls and procedures to allow timely communication of material information about Dun & Bradstreet to management, particularly when preparing reports or other required filings; and
- Comply with Dun & Bradstreet requirements with respect to accurately reporting our expenses.

No matter where we are located around the world, we each have a responsibility to follow all applicable internal controls and procedures referenced in our finance and sales policies.

Falsifying financial or business records or making false statements to Dun & Bradstreet's external and internal auditors, is against the law, and the consequences are serious. If you become aware of a potential issue with Dun & Bradstreet's accounting

We each have a responsibility to follow all applicable internal controls and procedures.

or a company audit, you should raise that concern immediately, by notifying your Leader, the People team or other [resource](#). In addition, if you have any questions about whether to report or how to report or record a transaction, contact your local market Controller promptly.

What If...

In a department that has met its quarterly sales target, a Leader asks an employee to delay sending an invoice so that the transaction can be reflected in the next quarter's quota. Does this violate our Code or policies?

Yes. All goods and services must be accounted for in the period in which they occur. Every employee has a responsibility to be honest and accurate and to record entries in a way that fully and accurately reflects the transaction. If the employee is feeling pressured to do otherwise, he or she should report the incident to the local market Controller or other [resources](#).

Records Retention and Records Hold

Properly maintaining corporate records—in electronic and paper format, including email—as long as legally or operationally required, and disposing of records in a systematic and appropriate manner when retention is no longer required, is imperative for legal and compliance purposes.

Our Records Management and Retention Policy:

- Describes the procedures for appropriate records maintenance;
- Addresses the Records Holds process and requirements;
- Provides a schedule of retention periods; and
- Includes instructions for destroying records when they are no longer needed.

When Dun & Bradstreet receives notice of a threatened, anticipated or pending legal claim, litigation, investigation or audit, we have an obligation to save all records relevant to the matter. Failing to do so could have significant adverse consequences for Dun & Bradstreet, including the imposition of severe penalties for non-compliance. If you receive a Records Hold Notice from the Legal team, you must:

- Read the notice carefully and review records within your possession or control, so that you have an understanding of what relevant records you have and where they are;
- Make sure that you do not delete, modify or throw away relevant records;
- Respond promptly, advising the Legal team that either you have no relevant records or acknowledging your awareness of an obligation to preserve relevant records;
- Provide information regarding other potential sources of responsive records;
- Interpret the subject matter as broadly as possible—if you think a record might be included by the hold (whether created by you or someone else), save it;
- Remember that the hold applies to all records, whether paper, electronic (such as email) or other media (such as voicemails, text messages or photographs); and
- Save all forms of a record, whether drafts or copies, and any new relevant records created after the imposition of the hold.
- The record hold obligation applies whether you work from home or in the office.
- You may also receive a Records Hold Notice if you are the owner of a system on which relevant records reside.
- If you have any questions regarding the scope of a hold, contact the Legal team.

Once the Legal team has issued a Records Hold in a matter, Dun & Bradstreet's records retention guidelines are suspended until the Records Hold is released by the Legal team. If you are leaving Dun & Bradstreet or are upgrading any electronic equipment, you must provide any records or materials covered by the hold or electronic equipment (e.g., your laptop or company issued phone) that contain records covered by the hold to the Legal team for further preservation.

Follow proper disposal procedures for records that are no longer required and that do not need to be retained under our Records Management Policy or a Records Hold. If you have any questions regarding the scope of a hold, contact the Legal team.

To view Dun & Bradstreet's Records Management Guidelines, [click here](#).

To view Dun & Bradstreet's Data Handling Standard for how to dispose of electronic and physical information, [click here](#).

What If ...

An employee receives a Records Hold Notice because a customer sued Dun & Bradstreet over a contract dispute. They have a box of papers concerning the negotiation of the contract that a former employee gave her when he left Dun & Bradstreet. She also has emails she exchanged with the customer regarding a product not covered by the contract in dispute. In addition, they have many drafts/redlines/non-final versions of the contract. Which of these should they preserve?

They should retain all of them. The Records Hold Notice must be interpreted broadly to maintain all relevant records. Don't try to think of reasons why records/materials would be an exception to the hold—if the records/materials seem to be related to the matter at issue, they must be preserved. When in doubt, contact the Legal team to discuss your ongoing obligations as it relates to a hold.

Complying with Insider Trading Laws

As a function of your job, you may occasionally have access to information about Dun & Bradstreet and the companies with which we do business that is not available to others. Often, non-public information or “inside information” is material, or something that would influence an individual to buy, sell or hold securities. Examples of inside information include advance notice of acquisitions and divestitures, certain management changes, pending or threatened litigation, or non-public financial results and projections.

It is illegal for any person with material, non-public information about Dun & Bradstreet or any company to buy or sell securities (stocks, options, etc.) of that company. “Insider trading” is a serious violation of both the Code and U.S. securities laws and could subject the individuals involved to immediate termination, potential criminal prosecution and significant monetary fines. Do not trade in the securities of any company if you have material, non-public information about that company.

"Tipping" is also a violation of both our Code and U.S. securities laws, and carries the same consequences. Tipping occurs when you provide material, non-public information to someone else, even if inadvertently and even if you did not trade in that security yourself, and that person buys or sells securities of the company based on the information you provided. Be careful not to disclose any non-public information to anyone, including family members or friends.

In the event of a government investigation into trading activity, all trades will be viewed after the fact with the benefit of hindsight. Carefully consider every transaction you make in securities or the stock of any company that we have a business relationship with, including any of our suppliers, contractors, consultants and business partners.

We have adopted an Insider Trading and Tipping Policy that provides more information on what types of information may be considered “insider information,” trading blackouts and other related matters. Please refer to our Insider Trading and Tipping Policy [click here](#) or consult the Legal team if you have questions.

What If...

My job responsibilities don't include any work with stocks or securities. Do I need to be concerned about insider trading laws?

Yes. Anyone at any level of our organization who has material, nonpublic information about companies with which we do business must protect that information. Do not use information you learn about through your job with Dun & Bradstreet to trade or tip others to trade. Exercise caution, even in informal conversations with friends and family, to make sure you do not disclose any inside information.

Our Commitment to Fair and Ethical Business Practices

Anti-Corruption

We comply with the anti-bribery and anti-corruption laws of the United States, the United Kingdom and all the countries in which we operate. You are prohibited from offering, authorizing, giving, promising, receiving, accepting or offering to accept anything of value to influence decision-making or to gain an improper advantage. Each employee is responsible for knowing and complying with our anti-corruption policies.

Stricter rules apply when working with “government officials”—a term that is broad and not only refers to elected officials, but also to employees of government agencies or government-controlled companies. Be careful when interacting with anyone who can be considered a government official and avoid the appearance of anything improper.

A bribe does not have to be cash. It could also be:

- Extending lavish entertainment, travel or gifts;
- Giving a cash equivalent including a gift card;
- Directing business to a company; or
- Soliciting or providing a charitable or political donation.

Certain acceptable gifts, travel and entertainment payments, whether received or provided to others, and charitable contributions require appropriate approvals to assure that they follow local and global anti-corruption laws and with the Dun & Bradstreet Global Anti-Corruption policy. All other gifts, payments or charitable contributions are strictly prohibited.

We also cannot hire or use a third party to offer or give a bribe or a facilitation payment while acting on our behalf or in our name—we will be held responsible for the actions of our suppliers, agents, contractors, consultants and other business partners. All third parties used or retained by Dun & Bradstreet must go through the Third Party Engagement onboarding and due diligence process to ensure compliance with our anti-corruption and export controls policies.

Our books and records must accurately reflect the true nature of the transactions represented and we must maintain internal accounting control systems. In all our operations, it is against our policy, and may be illegal, for any employees to cause books and records to be inaccurate in any way.

Books and records must accurately reflect the nature of the transactions represented.

Never create or participate in the creation of any records that are intended to mislead anyone or conceal anything that is improper. Contact the Global Compliance & Ethics team if you have any questions.

To view the Global Anti-Corruption policy, [click here](#)

What If...

A Dun & Bradstreet employee often works overseas and has become friendly with some government officials. He recently gave a watch to one of them to thank him for being so hospitable and generous. The official did not expressly promise to do anything in return and the employee has no contracts pending with him or his government. Was that okay?

No. Anti-corruption laws prohibit the payment or promise of anything of value to a government official or any other entity to gain favor, even if the official never promises to do anything to help you. In this situation, he will likely have business with this government official in the future, even if he has no business with them now.

What If...

A long-time, trusted supplier offers a Dun & Bradstreet employee a commission in exchange for securing an annual contract for his company. Is there any problem with this?

Yes. In this case, a “commission” for doing business is another word for a bribe. The employee should advise the supplier that she is not permitted to accept the commission and that she is required to follow Dun & Bradstreet’s standard policies and procedures in making a supplier selection. The employee should also report the incident to her Leader, the Legal Team and the Third Party Compliance Team.

Export Controls and Trade Sanctions

U.S. and international trade laws determine whether a product, data or technology may be exported, from which country and companies Dun & Bradstreet can collect data, and with whom we may do business. These determinations depend on the nature of the item, the country of origin and destination and the end use or end user. In some cases, the U.S. government bans all trade, and in others, an export license is required.

Each of us must comply with all U.S. and international export control laws and regulations. We are all charged with ensuring that we understand who our customers are, how our data is ingested, how our products will be used and where the end destination for our products is. We must not trade with prohibited countries, individuals and entities.

The export of controlled technology including some encryption software may violate export control laws. Release of controlled technology to foreign persons, even in the U.S. or Europe, are “deemed” to be an export to the person’s country or countries of nationality. Consult with the Global Compliance & Ethics team before transferring encryption software to another country via mail, courier, email, Internet or any other method of transmission.

In addition to the restrictions on the export of certain products and services to certain countries, Dun & Bradstreet—similar to all global companies—must comply with the Office of Foreign Assets Control (“OFAC”) and Specially Designated Nationals (“SDN”) procedures developed by the U.S Government. These regulations include lists of individuals and organizations with which we cannot do business, because the U.S. Government has identified them as being involved in terrorism, money-laundering or other criminal activity. We must also comply with the requirements of other applicable export control laws; if you think there may be a conflict please contact the Global Compliance & Ethics team.

Remember that we cannot hire or allow a third party to violate export control and trade sanctions laws on our behalf. If we cannot conduct business with a certain country or person, no one else can do so for us.

Exporting goods, data or technology without the appropriate government approvals can result in the loss of export privileges and the imposition of both civil and criminal penalties. Be careful whenever you are considering a potential export—the rules are complex. Be sure to consult the Global Compliance & Ethics team for OFAC/SDN procedures for screening third parties, if you have any questions about the end user or destination, or for information about the application of export control laws to Dun & Bradstreet, its products and services.

To view the Export Controls and Economic Sanctions Policy, [click here](#).

Anti-Boycott Laws

A boycott occurs when one person, group or country refuses to do business with certain people or countries. U.S. anti-boycott laws prohibit U.S. companies and their subsidiaries from participating in or cooperating with any international boycott not approved by the U.S. Government, such as the Arab League boycott of Israel. While Dun & Bradstreet always complies with the legal economic sanctions and trade embargoes imposed or approved by the U.S., we never cooperate with boycotts that are illegal in the U.S.

Requests for boycott cooperation may be oral or written and often appear in bid or proposal materials from countries that support a boycott. The requests are often not obvious. If you receive a request that you might think in any way is an invitation to participate in an illegal boycott, contact the Global Compliance & Ethics team. We are required by law to report requests to participate in an unsanctioned boycott or for information supportive of an unsanctioned boycott, even if such requests are declined. Please note that merely ignoring a request is not sufficient and is often treated in the same way as if you had agreed to it.

Anti-Money Laundering and Know Your Customer Obligations

We abide by all laws designed to deter criminal enterprise, keep us safe from terrorism and protect the national security of the countries where we do business.

Money laundering is the process by which funds generated from criminal activity, such as drug trafficking, are moved through legitimate businesses to hide their criminal origin. Terrorist financing refers to funding for terrorist activities and can come from legitimate or criminal sources.

Employees must never knowingly facilitate either money laundering or terrorist financing and must take steps to prevent inadvertent use of Dun & Bradstreet's business activities for these purposes. Be vigilant and exercise good judgment when dealing with customers or business partners. All third parties should be reviewed by the Third Party Engagement onboarding and due diligence process.

Immediately report:

- Any unusual or suspicious activities or transactions;
- Arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer; or
- Unusually complex deals that do not reflect a real business purpose or attempt to evade recordkeeping or reporting requirements.

If you have questions, contact the Global Compliance & Ethics team.

Fair Competition/Antitrust

Dun & Bradstreet competes in markets all over the world. We want to ensure that we compete fairly and in compliance with U.S. antitrust laws and the competition laws of the European Union and other countries where we do business.

Competition law applies to dealings between competitors, but also the dealings of third parties within the supply chain, especially with respect to price, output and allocation of markets and customers. Competition laws also place special restrictions on “dominant companies” in properly defined economic markets. Before adopting marketing practices in a market where Dun & Bradstreet may have market dominance, consult with a member of the Legal team.

Dun & Bradstreet also complies with all competition laws that govern how we deal with customers. It is illegal to enter into any agreement with a customer that unreasonably restricts competition. For example, you should not make a decision to license or sell our goods or services at prices below cost or enter into reciprocal or exclusivity agreements with customers to buy their products if they buy ours, without consulting with the Legal team in advance.

Comply with all antitrust and global competition laws. If you have any questions about the lawfulness of conduct you are contemplating, you must contact the Legal team immediately.

To view Dun & Bradstreet’s Global Competition Law Compliance Policy, [click here](#).

Dealing with Competitors

While there are situations where it may be appropriate to conduct business with companies considered to be Dun & Bradstreet competitors, it is illegal to enter into any agreement with a competitor that unreasonably restricts competition. Illegal agreements do not have to be signed contracts; they might be as simple as an understanding between two parties or even a verbal agreement. Such conduct can place both you and Dun & Bradstreet at serious risk. Therefore, before meeting or otherwise communicating with competitors, consult with a member of the Legal team.

There are circumstances where, in the normal course of your duties, you could be in the same room with a competitor or in the same webinar. Industry and trade associations are one such example. While these associations provide excellent opportunities for networking and discussing industry-related issues, they pose challenges as well. When attending

Avoid even the appearance of unlawful business practices.

these events, be careful to avoid even the appearance of unlawful business practices. If, at any trade association meeting, you become aware of any formal or informal discussion regarding prices, discounts, a proposal to refuse to conduct business with a third party for anti-competitive purposes (a “group boycott”), terms and conditions of sale, product specifications or any other topic that appears to constitute coordination between competitors, you should voice your disapproval of the discussion and then leave the meeting immediately and contact the Global Compliance & Ethics team.

What If...

A friend of a Dun & Bradstreet employee works for a competitor. At a recent convention, the friend said his company is bidding for business with the same two, high-profile companies that Dun & Bradstreet is bidding for. He suggests that if Dun & Bradstreet bids a high price for one company, his company would do the same for the other, and this way both would win a contract. What should the employee do?

He should not discuss dividing customers with a competitor, nor enter into any formal or tacit agreement with a competitor that restricts competition, whether verbal or written. If a situation like this arises, make your disapproval of the suggestion loud and clear. In addition, make it clear that you cannot discuss anything further related to the matter and contact the Legal team immediately.

Collecting Information on Competitors

To compete in the marketplace, it is necessary and appropriate to gather information about competitors. Some forms of gathering information on competitors are wrong and can even violate the law. At Dun & Bradstreet, we are committed to avoiding even the appearance of improper information gathering. Theft of confidential business information and trade secrets is prohibited.

Unacceptable methods of data collection include:

- Eavesdropping;
- Bribery;
- Secretly taping conversations with a customer;
- Secretly recording meetings via Teams, Zoom or other web-based platforms;
- Removing documents from the offices of a third party; or
- Making calls under false pretenses to gain information (“pretexting”).
- Taking a screenshot of a presentation without the presenter’s permission.

All of these practices violate our Code. Competition laws may also apply to certain information exchanges between competitors and therefore, should not be undertaken without first consulting with the Legal team.

You may accept information about competitors from coworkers, customers, consultants, contractors, internet sources, suppliers or business partners that they are otherwise free to share. However, you cannot do so if they would violate a non-disclosure agreement or if the disclosure seems improper. For example, do not seek confidential information from a new employee who formerly worked for a competitor or who is otherwise subject to a non-disclosure agreement with the former employer.

If you have questions about whether to use information about a competitor you have gathered or been offered, seek guidance from the Legal team, even if you are reasonably certain that the information was gathered appropriately.

Dealing with Third Parties

To deliver the best possible solutions and services to our customers, Dun & Bradstreet engages with third parties who provide us with content, capabilities, services and goods. These third parties are suppliers, agents, distributors, business partners, consultants, contractors, licensees and members of the Dun & Bradstreet Worldwide Network with whom we engage.

Dun & Bradstreet has developed specific procedures and processes to ensure our engagement with these third parties is undertaken in a way that protects the Dun & Bradstreet brand and is in accordance with our policies. The Global Third Party Engagement process and the Global Sourcing & Procurement Policy protect Dun & Bradstreet by helping us source for and contract with viable third parties, manage risk, enforce compliance and monitor our relationships with third parties.

If you have responsibility for engagements with third parties, directly or indirectly, you should ensure you:

- Recommend or select third parties strictly based on their ability to deliver the highest quality goods and services to D&B and its customers at the best value.
- Research and understand the industry reputation and the operational and financial viability of a third party to ensure they meet the needs of your project .
- Obtain and execute a non-disclosure agreement (NDA) prior to initiating any discussions of a proprietary nature;
- Negotiate and contract for goods and/or services per the [Global Sourcing & Procurement Policy](#);
- Where appropriate, ensure a [Conflict of Interest Certification form](#) has been completed by the relevant Dun & Bradstreet employee and their Leader/decision-maker and counter-signed by the Third Party Compliance team; and
- Secure Third Party Compliance, Privacy and IT Security approvals to ensure screening and other due diligence processes necessary to validate the third-party entity and any information concerning its principals and affiliates is completed.

All third parties should have a contract which governs all legal terms and conditions and includes Dun & Bradstreet's Partner Code of Conduct as appropriate. Make sure any third parties with which you deal understand our Partner Code of Conduct and their obligation to comply with it. All third party engagements must adhere to Dun & Bradstreet's Global Delegation of Authority Policy.

The Global Compliance & Ethics team aims to support these business transactions in a collaborative manner, protecting Dun & Bradstreet's most vital assets while acting efficiently in support of the business owners' goals.

Business owners are responsible for building the appropriate amount of time into the business plan to account for each possible step.

If you have any concerns or questions, contact either the Global Compliance & Ethics team for screening and due diligence and [Global Sourcing and Procurement](#) for supplier sourcing, negotiations and contracting.

To view the Global Third Party Compliance Policy, [click here](#).

To view the Global Sourcing & Procurement Policy, [click here](#).

Dealing with Customers

We treat customers fairly, and we provide quality products and superior customer experience. We engage in sales that meet our customers' needs, and not just because they may meet our sales goals. We communicate with customers honestly and truthfully and review with them all the important aspects of our products and services, with an aim to make terms of sales clear, accurate and easy to understand.

We ensure the confidentiality and integrity of customer records and transactions, including, for example, meeting industry standards when processing electronic payments. We are also transparent in our customer outreach and comply with local law and regulations in our marketing and solicitation efforts—we follow the rules, no matter where in the world we conduct business.

Our commitment to fair dealing starts from the point of introduction and endures, whether a customer purchases from us or not. To preserve our commitment, you must:

- Act with integrity;
- Make decisions that serve the best interests of Dun & Bradstreet and our customers;
- Never deceive, defraud, exaggerate, inflate, or misrepresent facts or sales;
- Never make untrue, unfounded or misleading statements about our or our competitors' products or services, or make untrue comparisons with our own products and services;
- Never make commitments, promises or statements regarding the features or quality of our products that you or Dun & Bradstreet cannot keep;
- Always act in a professional manner; and
- Abide by applicable laws, regulations and policies.

We don't just treat our customers fairly; we treat each other fairly as well and we adhere to internal sales policies that allocate sales between sales teams. We recognize that ignoring sales policies not only erodes our trust in each other but may hurt the customer and our brand.

Ethical Conduct is Essential at All Times

Ethical conduct is critical not only in helping us to maintain the reputation we have earned as a trusted partner but also in minimizing legal and regulatory risk. Everyone at Dun & Bradstreet, including non-sales team members, such as those in marketing or finance, has an obligation to make sure our sales practices are fair and ethical and compliant with local law or regulation. Customers, suppliers, contractors, consultants or business partners may cease doing business with us if they feel we are unethical or have mistreated them.

If you have any questions about Dun & Bradstreet's commitment to fair and ethical sales practices, contact the Global Compliance & Ethics team. Failure to maintain ethical practices can affect compensation and subject an employee to additional consequences.

What If...

A Dun & Bradstreet employee completes a sales presentation and is asked a question to which she does not know the answer. She really wants to make a good impression and does not want to seem as if she is not prepared, so she glosses over the facts and skirts around some issues. Did she do the right thing?

No. Employees cannot make claims about a product that are not based on facts. It is always better to be honest and uphold our reputation for integrity and ethical conduct. She would have better served our Company and the prospective customer by explaining that she would need to do more research on those topics and then follow up with them promptly.

What If...

An unsolicited voicemail is left at an employee's extension from a current customer who wants to discuss another solution we offer. The employee believes the customer is outside his sales channel, but the customer wants a response urgently. Should he call the customer back and potentially process a sale?

No. He must abide by all rules of engagement outlined in our sales policies. He should send the information to the appropriate person as soon as possible, so that he or she may contact the customer in a timely manner. If you aren't sure who should reach out to the customer, escalate the issue to your Leader or to sales operations.

Compliance with Government Contracts

Dun & Bradstreet regularly contracts with government agencies around the world at national, federal, state, regional and local levels. Accepting the obligation of performance under government contracts normally includes the acceptance of significant regulatory and contractual compliance requirements, including procurement integrity, most favored customer pricing, security, confidentiality of government data, audit and reporting obligations, and applicable lobbying laws and regulations.

All contracts with the U.S. Government require review by Dun & Bradstreet's Government Business Unit to take into account governmental requirements. For additional information on U.S. and non-U.S. contracts, consult your local Sales Policy or your local Dun & Bradstreet Legal team.

Consult the Global Compliance & Ethics team regarding applicable lobbying policies, lobbying activity and political contributions tracking and regulations.

Be aware that different countries have their own specific regulations designed to prevent conflicts of interest from arising for government contractors. Don't assume that the rules in one country are the same as those in any other country—they may be different and, in some cases, very different. If you work on a government contract or are involved in bidding for government contracts, familiarize yourself with these rules and consult with the Legal team.

Your Personal Commitment to Always Do the Right Thing

At the outset of employment and every year thereafter, every employee must affirm their commitment to Dun & Bradstreet's Code when taking our annual Protect the Franchise Training. At these times, as a condition of employment, you must certify that:

- You have read the Code and understand your responsibility to comply with its principles and policies;
- Except as you may have otherwise reported:
 - You have no interest that might be deemed a conflict of interest and you will disclose any conflicts of interest that may occur in the course of your employment;
 - You abide by the Company's policies prohibiting discrimination, harassment and retaliation;
 - You are not aware of, nor have undertaken, any transaction or arrangement that might be deemed to be a related party transaction;
 - You have not violated the Code or any applicable laws in connection with Dun & Bradstreet's business; and
 - You are not aware of any violations of the Code or any applicable laws in connection with Dun & Bradstreet's business by others, including employees or business partners.

Dun & Bradstreet takes the compliance with our Code of Conduct and doing the right thing seriously.

Except as otherwise provided herein and in compliance with applicable law, any waiver of the provisions of our Code for the Company's executives or directors must be made by our Board of Directors or Board Committee.

Dun & Bradstreet takes the compliance with our Code of Conduct and doing the right thing seriously.

Seeking Guidance or Reporting Concerns

You can ask questions or raise concerns relating to this Code of Conduct, our policies, or any other concern in several ways at any time and, anonymously, where permitted by law. As a Dun & Bradstreet employee, you should promptly report potential violations of the Code, our policies, or the law.

Dun & Bradstreet is committed to supporting its employees. You can talk to your immediate Leader if you are comfortable doing so. You can also reach out to the following resources:

Resource	Contact
<p>Dun & Bradstreet Global Compliance & Ethics Helpline</p> <p>The Dun & Bradstreet Global Compliance & Ethics Helpline 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>Directly via the online web platform at https://helpline.dnb.com</p>
<p>People Team</p>	<p>Email PeopleServiceCenter@DNB.com for your People Business Partner's name</p>
<p>Compliance Team</p>	<p>Click here</p>
<p>Compliance Officer Inbox</p> <p>Privacy Officer Mailbox</p>	<p>complianceofficer@dnb.com</p> <p>privacyofficer@dnb.com</p>