



Code of Conduct



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Compliance Policies

Our Creditinfo Compliance Policies define the business and ethical behaviours that we all need to demonstrate when working for the Creditinfo Group, including any entity, subsidiary, and/or affiliate within the Group umbrella (the "Group" or "Creditinfo Companies"). They are mandatory. While these are for internal use, we also publish them externally in support of transparency.

Our Compliance Policies are available to the public at <http://www.creditinfo.com/policies>. However, in certain circumstances, a Policy may use or reveal information which is not available to the general public and which could be considered of some importance internally and/or to Group shareholders, customers, business partners, and others. In such cases, the Policy will not be available at the URL above.

Employees may request a comprehensive list of the Group's Compliance Policies (including any policies that are unavailable at the URL above) via email at compliance@creditinfo.com. Any compliance-related questions may be directed to this inbox.

Policy Overview: What does it mean and how should we apply it?

The Creditinfo Code of Conduct (the "Code") provides guidance on how to carry out our daily activities in line with our purpose, our values, and the highest standards of integrity. The Code also helps us to comply with the letter and spirit of applicable legal requirements and Creditinfo Compliance Policies.

Our Code applies globally to all Creditinfo employees, including officers and directors, irrespective of borders and jurisdictions. We also expect all of our suppliers, assigned workers, agents, consultants and others doing business with Creditinfo, or acting on our behalf, to adhere to equally high standards.

Thus, we urge you to familiarize yourself with the Code and refer to it regularly.

While we embrace diversity and respect cultural differences, if a local custom or business practice is not in line with the Code, we still must follow the Code. If something permitted or required by our Code violates local law, we must follow the local law. In those rare circumstances where it appears that the Code conflicts with local law, contact the Group's Legal & Compliance team for guidance (see relevant contact information at the end of the Code).

If you aren't sure whether an activity is in keeping with the principles of our Code, then discuss it with someone beforehand – firstly, your immediate supervisor or local compliance officer. While Creditinfo believes in discussing responsible conduct in an informal way, with the focus on improvement, breaches of the requirements set out in our Code and the Creditinfo Compliance Policies will be investigated accordingly and may lead to internal disciplinary action, or in serious cases dismissal.

Framework: The Creditinfo Code and Our Standard of Conduct

Values

Our Values of **Respect**, **Innovation** and **No Nonsense** are the simplest statements of who we are. They govern everything we do.

Respect symbolizes all our work, both within Creditinfo and towards our customers. We are dependable, we follow standard procedures, ensure the quality of the data that we provide, and we are always professional and honest in our work.

Innovation refers to our ambition in our work and initiative in completing our projects. We think in solutions and create value for our customers. We take responsibility for our own performance and maintain a positive workplace.



No Nonsense refers to our aim to find the essence in all that we do. The purpose is what matters and that we provide value in our services. We prioritize projects correctly and spend time and resources in such a way that we maximize their potentials. That is how we get things done.

The Code of Conduct

1. STANDARD OF CONDUCT

We conduct our operations with honesty, integrity and openness, and with respect for the human rights and interests of our employees. We shall similarly respect the legitimate interests of those with whom we have relationships.

2. OBEYING THE LAW

Creditinfo Companies and employees are required to comply with the laws and regulations of the countries in which we operate.

3. EMPLOYEES

The Group is committed to a working environment that promotes diversity and equal opportunity and where there is mutual trust, respect for human rights, and no discrimination.

We will recruit, employ, and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We will adopt and enforce guidelines, policies, and procedures on diversity, equality, and inclusion to ensure this principle is made effective. We are committed to safe and healthy working conditions for all employees.

4. CUSTOMERS

Creditinfo companies are committed to providing credit information and risk management products, services, and solutions to facilitate access to finance in both developed and emerging markets. Our products, services, and solutions consistently offer value in terms of price and quality.

In order to maintain high business standards, ensure compliance with financial and trade sanctions laws and regulations as well as applicable anti-money laundering and counterterrorist financing laws and regulations, the Group Companies carry out know-your-customer checks in accordance with the Group's Anti-Money Laundering and Sanctions policy and the companies' local policies and procedures.

5. SHAREHOLDERS

The Group will conduct its operations in accordance with internationally accepted principles of good corporate governance. We will provide timely, regular, and reliable information on our activities, structure, financial situation, and performance to all shareholders.



6. BUSINESS PARTNERS AND SUPPLIERS

The Group is committed to establishing mutually beneficial relations with our suppliers, customers, and business partners. In our business dealings, we expect our partners to adhere to business principles consistent with our own.

In order to maintain high business standards, where applicable, we carry out due diligence and the selection process of suppliers is also conducted in line with the Group's Procurement Policy.

7. COMMUNITY INVOLVEMENT

The Group strives to be a trusted corporate citizen and, as an integral part of society, to fulfil our responsibilities to the societies and communities in which we operate. Creditinfo has been a vital piece of social sustainability in multiple regions of the world since it was founded. To know more about our sustainability focus areas please see our dedicated Sustainability Policy.

8. PUBLIC ACTIVITIES

Creditinfo Companies are encouraged to promote and defend their legitimate business interests while maintaining ethical standards and transparency. The Group will co-operate with governments and, non-governmental organizations, and other relevant bodies, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations, which may affect legitimate business interests, ensuring all

engagements are conducted ethically and transparently. The Group neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

9. THE ENVIRONMENT

The Group is committed to making continuous improvements in managing environmental impact, aiming for sustainability and adopting green practices across all our operations.

Creditinfo Companies will actively engage with stakeholders, including partners, customers, and employees to promote environmental care, increase understanding of environmental issues and disseminate good practice. The Group will implement initiatives to reduce carbon footprint, conserve resources, and support biodiversity as further set out in the Group's Sustainability policy.

10. INNOVATION

In the Group's aims to meet evolving needs at the intersection of banking and FinTech, we will respect the concerns of our customers and society.

We will listen; think long-term, and prioritize innovation, taking the lead in developing new services and methods in the Credit Bureau industry. We commit fostering a culture of continuous improvement and creativity, striving to enhance business performances and improve consumers' lives by transforming data to intelligent decisions.

11. DATA PROTECTION AND PRIVACY

Creditinfo is committed to protecting personal data in compliance with applicable data protection laws. All Creditinfo Companies and employees must handle personal data securely and lawfully, following their respective data protection policies. We will implement appropriate measures to safeguard data and promptly report any data breaches to the local and Group-level Compliance Departments. Third parties handling personal data on behalf of Creditinfo must adhere to our data protection standards. Creditinfo promotes a culture of privacy and transparency, respecting individuals' rights regarding their personal data. Employees are required to complete regular training on data protection.

12. COMPETITION

The Group believes in vigorous, yet fair, competition, and supports the development of appropriate competition laws. Creditinfo Companies and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

13. BUSINESS INTEGRITY

The Group does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment, which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Creditinfo Companies' accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

See the Group's *Anti-Bribery & Anti-Corruption Policy*, which defines the rules and guiding principles that apply to gifts and hospitality.

14. CONFLICTS OF INTEREST

All employees and others working for Creditinfo Companies are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the Group.

Employees must not seek gain for themselves or others through misuse of their positions. All potential conflicts of interest must be disclosed to management to ensure transparency and appropriate action.

See the Group's Conflicts of Interest Policy, which defines the rules and guiding principles that apply to Conflicts of Interest.

15. COMPLIANCE – MONITORING – REPORTING

Compliance with these principles is an essential element in our business success. Creditinfo Group's Board of Directors (the "Board") is responsible for ensuring these principles are applied throughout the Group. The Group Executive team is responsible for implementing and enforcing these principles.

Day-to-day responsibility is delegated to all senior management of the geographies, categories, functions, and operating Creditinfo Companies. They are responsible for implementing these principles, supported by all supervisors/managers; local and Group-level Human Resources' teams; local and Group-level Finance teams and, local and Group-level Compliance Departments.

Assurance of compliance is given and monitored each year. Compliance is subject to review by the Board, supported by the Group CEO, the Group CFO and the Group's General Counsel.

Any breaches of the Code must be reported to the Group's Legal & Compliance department via email at compliance@creditinfo.com.

The Board will not criticise management for any loss of business resulting from adherence to these principles and other mandatory policies. Provision has been made for employees to be able to report in confidence as further set out in the Group's *Whistleblowing Policy*.

Living the Code

Creditinfo Companies' reputation for doing business with integrity and respect for others is an asset, as valuable as our people and our products, solutions, and services. To maintain our reputation requires the highest standards of behavior and ethics.

References in the Code and Creditinfo's Compliance Policies to 'employees' include the following, irrespective of borders and jurisdictions:

- Employees, whether full-time, part-time, fixed-term, permanent or trainees, including officers and directors.
- Contractors, temporary staff, secondees, work-experience placements.
- Persons with statutory director roles or equivalent responsibilities.
- Employees of joint ventures and approved third-party labour providers where Creditinfo has direct management control.
- Employees of new acquisitions

The Code and Creditinfo's Compliance Policies cannot cover every eventuality, particularly as laws differ between countries.

If specific situations are not expressly covered, the spirit of the Code and Creditinfo's Compliance Policies must be upheld by exercising common sense and good judgement, always in compliance with applicable laws.

All employees are encouraged to seek guidance from their supervisors or the

Group's General Counsel when in doubt about the application of the Code.

Regular training sessions will be conducted to ensure all employees understand and adhere to the Code. Communication channels will be established to address any questions or concerns regarding the Code and its implementation.

Musts

All employees must:

- Ensure they know and understand the requirements of our Code and Creditinfo's Compliance Policies.
- Undertake relevant training as required by their Supervisor/Manager, Human Resources, or local compliance officer.
- Follow the Code and Creditinfo's Compliance Policies. If an individual is unsure of how to interpret the Code or policies, or has any doubts about whether specific behaviors meet the standards required, they must seek the advice of his/her Supervisor/Manager, Human Resources, or the Group's Legal & Compliance department.
- Immediately report actual or potential breaches of the Code or Creditinfo's Compliance Policies, whether relating to the individual, colleagues, or people acting on the Group's behalf, and whether accidental or deliberate. This includes instances where business partners' behavior may not meet our standards.

The Supervisor/Manager is usually the appropriate person to whom potential or actual breaches should be reported.

If this individual is inappropriate, for whatever reason, please contact the Group's Legal & Compliance department at compliance@creditinfo.com or follow the Group's Whistleblower policy.

In addition, those at Supervisor/Manager level and above must:



- Lead by example, setting a strong tone from the top, showing they are familiar with the Code and Creditinfo's Compliance Policies, and taking steps to embed a culture of integrity across all operations.
- Ensure that all their team members, including new joiners:
 - Have read the Code and Creditinfo's Compliance Policies
 - Have completed any and all mandatory training
 - Understand how to raise concerns and/or report actual or suspected breaches.
 - Deliver training that Human Resources, Legal & Compliance, or their respective supervisor/manager has asked of them, e.g. annual compliance training, face-to-face briefings and team discussions.
 - Offer guidance and support about the Code and Creditinfo's Compliance Policies to their team where needed and escalate unresolved questions to the Legal & Compliance department.
- Ensure that anyone who raises concerns, or highlights potential or actual breaches, receives support and respect and that there is no retaliation against them.
- Ensure that concerns raised are taken seriously and addressed promptly, treating related information with discretion, and discussing them with a local (where possible) or Group-level Human Resources as soon as possible to determine the appropriate course of action, including whom else to inform.
- Collaborate further and complete any documentation (e.g., case information and lessons learnt) as may be required of them by the Legal & Compliance department.
- Insofar as a breach may have occurred within their operations, consider what additional communications, training or changes to business controls and procedures are necessary to reduce the likelihood of similar breaches occurring. Discuss such considerations with the Group's Legal & Compliance department.

Must Nots

All employees must not:

- Ignore or fail to report situations where s/ he believes there is, or may be, a breach of the Code or Creditinfo's Compliance Policies.
- Attempt to prevent a colleague from reporting a potential or actual breach or ask a colleague to ignore an issue.
- Retaliate against any colleague who reports a potential or actual breach.
- Discuss any potential or actual breach under investigation with other colleagues unless this has been cleared with the investigation team.



Contact Information

Group Compliance Department
compliance@creditinfo.com

Group Executive team
ci.group.directors@creditinfo.com

