



GLOBAL ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Version 2.0

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I. Introduction

A. Compliance Policies

Our Creditinfo Compliance Policies define the business and ethical behaviours that we all need to demonstrate when working for Creditinfo Group including any of its entities, subsidiaries, and/or affiliates within the Group umbrella (“Creditinfo”). 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 general 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 Creditinfo shareholders, customers, business partners, and others. In such cases, the Policy will not be available at the URL above.

Creditinfo Employees may request a comprehensive list of Creditinfo’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.

Creditinfo's Central Compliance team can be contacted via email at compliance@creditinfo.com.

This Policy has been reviewed and approved by the Creditinfo Group Chief Executive Officer.

B. Background

As set out in Creditinfo’s *Code of Conduct*, Creditinfo is committed to conducting its business with honesty and integrity, and to complying with all applicable anti-bribery and anti-corruption laws. Creditinfo has a zero-tolerance approach to bribery and corruption and prohibits all forms of bribery or corruption and any business conduct that could create the appearance of improper influence.

The Policy sets forth Creditinfo’s anti-bribery and anti-corruption framework to address potential areas of risk for Creditinfo’s business concerning anti-bribery and anti-corruption, including Third Parties and Gifts and Hospitality. This Policy sets out the minimum standards to be applied but must also be read in conjunction with any

applicable local policies, which may contain supplemental provisions or requirements to this Policy. If applicable, such local policies shall be annexed as an appendix to this policy. Local policies and procedures may expand upon and supplement the requirements set forth herein but may not derogate or relax the provisions of this policy.

All Creditinfo directors, officers, employees (collectively, “**Creditinfo Employees**”) must comply with this Policy at all times and act with the highest ethical standards. In addition, the standards set out in this Policy are applicable to any persons providing services on behalf of Creditinfo, e.g. “Higher Risk Third Parties” or “Associated Persons” (both as defined below).

II. Purpose

The purpose of this Policy is to (1) define the key requirements and obligations regarding anti-bribery and anti-corruption compliance; (2) protect against the possibility of adverse regulatory actions, damages, or other legal enforcement that could result from violations of anti-bribery or anti-corruption laws and regulations; and (3) protect against reputational and social consequences that may be associated with such conduct.

The Creditinfo Legal & Compliance team, which includes all local in-house counsel, local compliance officers, central legal in-house counsel, central compliance officers and the Creditinfo Group General Counsel, is responsible for the review, approval and active oversight of this Policy. Creditinfo Employees should contact their local compliance team as a point of first reference should they have any questions or concerns about any aspect of this Policy.

III. Policy Statement

Creditinfo Employees, and anyone acting for or on behalf of Creditinfo, must not **authorise, offer, promise to provide, or provide**, money, gifts, or Anything of Value, directly or indirectly, to any person:

- intending to induce, or to attempt to induce, a business contact (whether or not the business contact is the recipient of the item) to perform his or her duties improperly (i.e. in breach of an expectation of good faith, impartiality or trust); or
- believing that by accepting the thing of value, the recipient would be performing his or her duties improperly; or
- intending to reward, or to attempt to reward, a business contact for performing his or her duties improperly; or

- while knowing or being aware that the thing of value is intended to influence, or to attempt to influence, any act or decision of a Public Official (as defined below) in his or her official capacity, in order to seek new business or retain existing business or an advantage in the conduct of business; or
- while knowing or being aware that the thing of value is intended to induce a Public Official to use his or her influence to affect any act or decision of a government entity in order to seek new business or to retain existing business or an advantage in the conduct of business, including causing a Public Official *not* to offer business to someone else.

Creditinfo Employees, and anyone acting for or on behalf of Creditinfo, must not **solicit, accept or receive**, money, gifts, or Anything of Value, directly or indirectly, whether for Creditinfo's benefit, your own benefit, or that of your family, friends, associates or acquaintances, from any person in return for providing any improper advantage, or where the acceptance would be otherwise prohibited by Creditinfo's policies or procedures.

Bribery can take many forms. In addition to cash in exchange for business, bribes can be in the form of gifts, travel, entertainment, offers of employment or internships, charitable donations, or anything else that has value to the recipient. Bribes can also include offers to secure new contracts, speed up approval processes, obtain licenses or permits, or reduce tax or other liabilities.

This Policy does not prevent reasonable and proportionate gifts and hospitality being offered in accordance with the *Creditinfo Group Gifts and Hospitality Policy*, as summarised in Section VII below, and any relevant legal or regulatory limitations and prescriptions. However, you should be mindful that the giving of gifts, hospitality and other benefits can give rise to bribery risks and you should therefore take particular care that any benefits given are reasonable in size and appropriate in nature and could not be perceived to be a bribe.

In particular, if you are considering transferring Anything of Value, including any gifts or hospitality, to a Public Official, you should be aware that prior approval will be required from your local in-house counsel or compliance officer. If your local market does not have an in-house counsel or compliance function, you should instead seek approval from the central Legal & Compliance team.

Breaches of this Policy may lead to:

- reputational damage and criminal, civil and regulatory sanctions against Creditinfo;
- criminal, civil and regulatory sanctions against Creditinfo Employees, Higher Risk Third Parties, or Associated Persons; and

- disciplinary actions against relevant Creditinfo Employees and Higher Risk Third Parties, with sanctions up to and including termination of employment or services contract.

IV. Key Definitions

The following definitions shall apply to this Policy:

Anything of Value is a broad term and can mean any transfer of value from one party to another, including, but not limited to, money, stocks, bonds, or any other property, payment of expenses, political or charitable contributions, sponsorships or intangible benefits, such as inside information, stock tips, or assistance in obtaining a business transaction or other advantage. It can even include providing someone's child with work experience at Creditinfo, or helping them to get into university, the assumption of a debt or release from an obligation to pay a debt, hiring individuals related to a customer or Public Official, or sponsored activities such as entertainment or travel.

Anti-Bribery Law means any bribery, fraud, kickback, or other similar anti-corruption law or regulation of any relevant country, including the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977, and applicable local laws and regulations in jurisdictions in which Creditinfo operates or conducts business.

Associated Person means individuals or entities who perform services for or on behalf of an organisation. The conduct of an associated person may be imputed to Creditinfo either as a matter of law or regulation, or reputationally. Associated Persons may include: brokers, insurance agents, intermediaries, Creditinfo Employees, non-executive directors, joint venture partners, distributors, sub-contractors, employees of outsourcing partners, suppliers, Higher Risk Third Parties, or other agents involved in helping Creditinfo conduct its business.

Government Entity means any (i) local, regional or national agency, department or ministry; (ii) state-owned or -controlled entity, including a commercial enterprise or company, such as a national oil company or a central bank; (iii) entity serving a public function as an instrumentality of a government, such as a public utility; or (iv) public international organisation, such as the United Nations or the World Bank.

Public Official means (i) any officer, employee, representative or official of any national, federal, or local Government Entity, or any person acting in an official capacity for or on behalf of a Government Entity; (ii) any individual in the legislative, administrative, military or judicial branches of government; (iii) any officer, employee, or representative of a political party or any candidate for or holder of public office; (iv) any employees of law enforcement or regulatory agencies, exchanges, and listing

authorities, (v) any member of a royal family; and (vi) any other person discharging a public function.

Higher Risk Third Party means any third party that is engaged to win or retain business for Creditinfo (e.g. agents, introducers, distributors), or to interact with Public Officials on behalf of Creditinfo (e.g. tax advisors, customs agents, advisors assisting with license requests).

V. Anti-Bribery and Anti-Corruption Laws

Creditinfo requires Creditinfo Employees, and those who act for or on behalf of Creditinfo (Associated Persons) to comply with all applicable Anti-Bribery Laws. This includes adherence to all laws made with a view to implementing the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions 1997 and any other laws, rules, or regulations of similar purpose and effect, including the US Foreign Corrupt Practices Act 1977 (the “**FCPA**”) and the UK Bribery Act 2010 (the “**Bribery Act**”), as amended.

Many Anti-Bribery Laws, including the Bribery Act and the FCPA, are extra-territorial, which means that the legislation may apply wherever in the world Creditinfo conducts business, even where that business is not directly connected to the jurisdiction enacting the law.

Creditinfo may be exposed to bribery and corruption risks through the actions of Creditinfo Employees, or those of Associated Persons. Creditinfo may become criminally liable as a result of an act of bribery or corruption by Creditinfo Employees or Associated Persons.

Most countries have enacted anti-corruption legislation criminalising, at least, the offer of bribes and kickbacks to Public Officials and local laws may also impose limits on the gifts and hospitality which Public Officials may accept. You should take account of this Policy and local laws in place wherever you are working for Creditinfo. If you are unsure of the position, you should consult your local in-house counsel or local compliance team. If your local market does not have an in-house counsel or compliance function, you should instead consult with the central Legal & Compliance team.

VI. Dealing with Public Officials

Engaging with Public Officials presents a heightened risk of bribery and corruption. This can arise because of the function being performed by a Public Official, the powers that the Public Official has to direct state funds or other resources, or the jurisdiction in which the Public Official is based. In many countries the laws applicable to bribery

of Public Officials, including the Bribery Act and FCPA, may apply stricter controls to the way in which individuals and organisations interact with Public Officials versus those applicable to the commercial sector. In some countries there are strict legal limits on the value of any gifts or hospitality that can be provided to Public Officials. Providing gifts or hospitality above those limits could cause you and/or the Public Officials to commit an offence both under local law and under laws such as the Bribery Act. The risk therefore that certain actions by Creditinfo, such as providing hospitality, may be considered improper or illegal is also heightened when Public Officials are involved. Creditinfo Employees and Associated Persons should take added care when dealing with Public Officials, talk to their managers or legal/compliance and ensure that any payments or other benefits provided to Public Officials are consistent with our ethical standards, in line with local laws, this Policy, and with the *Gifts and Hospitality Policy*.

VII. Gifts & Hospitality

All of Creditinfo's relationships must reflect Creditinfo's ongoing commitment to doing business with integrity.

Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of promotional events or product discounts, launches, bundles. However, as accepting or receiving gifts and hospitality can be open to abuse or generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of Creditinfo's business activities.

The **Gifts and Hospitality Policy** and attached **Gifts and Hospitality Declaration Form** sets out the responsibilities of Creditinfo Employees and Associated Persons in relation to gifts and hospitality. It makes clear what forms of gifts and hospitality are always prohibited. It also explains in what circumstances gifts or hospitality may legitimately be given or received.

Creditinfo Employees must apply the Gifts and Hospitality Policy in good faith to ensure gifts and hospitality are never excessive, and do not confer an improper advantage or create an actual or perceived conflict of interest (see, e.g., Sections I and II, above, and Creditinfo's *Conflicts of Interest Policy*).

See the Creditinfo *Gifts and Hospitality Policy*, and also Creditinfo's *Travel and Business Expenses Reimbursement Policy*.

VIII. Per diems

A per diem is a fixed amount of money provided to an individual to cover expenses such as meals and local transportation. The payment of per diems can give rise to bribery risks, particularly where Public Officials are involved, due to the risk that a per

diem may be intended to improperly influence a Public Official. It is Creditinfo's policy not to pay per diems.

If you are asked to provide a per diem to a customer, supplier or any other third party, please inform them of Creditinfo's policy on per diems and refuse the request. You should also notify your local in-house counsel or compliance officer of the request, even if not paid, so that a record is maintained of the refusal of the request. If your local market does not have an in-house counsel or compliance function, you should instead inform the central Compliance team.

IX. Facilitation Payments

The payment of any "facilitation" or "grease" payments is **strictly prohibited** under this Policy. Facilitation payments are small, unofficial payments made to secure or expedite the performance of a routine action to which the payor is entitled. Usually these involve payments to Public Officials, such as to speed up obtaining a visa or clearing goods through customs. The only exception to this prohibition is where the payment is made to avoid a risk to the health or liberty of Creditinfo Employees or Associated Persons.

If Creditinfo Employees or Associated Persons have doubts about a payment to be paid by or on behalf of Creditinfo and suspect that it might be considered a facilitation payment, **they must** obtain advice from their local in-house counsel or compliance function and **must not** make the payment unless advised that it is not a facilitation payment. If your local market does not have an in-house counsel or compliance function, you should instead consult with the central Legal & Compliance team. Local counsel or compliance functions should report any payments that are requested and which they consider to be facilitation payments to the central Legal & Compliance team, and should seek guidance from the central Legal & Compliance team for any queries regarding payments if they are unsure whether the payment would constitute a facilitation payment.

In exceptional situations, such as where Creditinfo Employees or Associated Persons cannot escape imminent threat of physical harm without meeting a demand for payment, such a payment may be made but those involved must report full details of the demand and any payment to the local legal & compliance function (or Central Legal & Compliance in the absence of a local legal & compliance function) as soon as safely possible, but absent extraordinary, exigent circumstances, within twenty-four (24) hours of the incident. The local legal & compliance function must promptly make a report to the central Legal & Compliance team. This is to ensure that the matter can be appropriately investigated, necessary financial records kept, and further steps taken where appropriate.

X. Due Diligence

Certain third parties pose a higher risk of bribery and corruption to Creditinfo than others.

Proper due diligence is the cornerstone both of effective compliance under Anti-Bribery Laws and of successful defence of enforcement actions. Robust due diligence in connection with third parties engaged to assist Creditinfo can prevent violations or assist in mitigating the risk of liability under applicable Anti-Bribery Laws.

The specific amount of due diligence and follow-up necessary may vary according to certain risk factors such as the type of transaction or relationship contemplated, the nature of the industry and services, and the location of the third party.

See also Creditinfo's *Sanctions and Anti-Money Laundering Policy*.

1. Suppliers and Service Providers

Prior to employing or entering into a relationship or agreement with any supplier or service provider ("**Supplier**"), Creditinfo Employees responsible for onboarding that Supplier must review and comply with the Creditinfo *Procurement and Responsible Sourcing Policy*.

For Suppliers that would be considered **Higher Risk Third Parties** under this Policy, please see the next section.

2. Higher Risk Third Parties

Third parties that are engaged to win or retain business for Creditinfo (e.g. agents, introducers, distributors), or to interact with Public Officials on behalf of Creditinfo (e.g. tax advisors, customs agents, advisors assisting with license requests), can carry significant bribery and corruption risks for both Creditinfo and Creditinfo Employees. As a result, such third parties are always considered higher risk under this Policy ("**Higher Risk Third Parties**").

Prior to employing or entering into a relationship or agreement with a Higher Risk Third Party, Creditinfo Employees and anybody acting for or on behalf of Creditinfo must review and comply with the Creditinfo *Higher Risk Third Party Due Diligence Procedures*.

As set out in the Creditinfo *Higher Risk Third Party Due Diligence Procedures*, Creditinfo Employees must always refer Higher Risk Third Parties to their local legal & compliance team (or Central Legal & Compliance in the absence of a local legal & compliance function) for review and sign off before engaging with the Higher Risk Third Party. If the local legal & compliance team has concerns about the relationship, it must

refer the Higher Risk Third Party to the Creditinfo central legal & compliance team for review before approving the relationship.

In all instances, the local legal & compliance team must provide the Creditinfo central legal & compliance team with copies of the due diligence documents obtained to approve any relationship with a Higher Risk Third Party. See also Creditinfo's *Anti-Money Laundering and Sanctions Policy*.

All Creditinfo Employees must:

- Always make clear, internally and when dealing with Higher Risk Third Parties, that Creditinfo has a zero-tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek or accept a payment, gift or favour or Anything of Value to improperly influence a business outcome;
- Immediately notify their Supervisor/Manager and their local legal & compliance team (or Central Legal & Compliance in the absence of a local legal & compliance function) if they become aware of any suggested or actual payment or other transaction which has the potential to be in breach of this Policy;
- Ensure that before employing or entering into a relationship or agreement with any Higher Risk Third Party to represent Creditinfo or its interests externally, the relevant local legal & compliance team (or Central Legal & Compliance in the absence of a local legal & compliance function) has undertaken appropriate due diligence checks to assess the Higher Risk Third Party's integrity. See the *Higher Risk Third Party Due Diligence Procedures*. The outcome of such checks must be considered carefully before deciding whether to appoint the Higher Risk Third Party.

Where a Creditinfo Employee considers that a bribe, improper advantage or Facilitation Payment has been given or received by or through a Higher Risk Third Party, he/she must not conceal this or take any steps that could delay information being passed to his/her Supervisor/Manager and local legal & compliance team (or Central Legal & Compliance in the absence of a local legal & compliance function). The legal & compliance team (or Central Legal & Compliance in the absence of a local legal & compliance function) will review the matter and consider next steps.

Contractual Arrangements

Written contracts must be entered into with Higher Risk Third Parties, and Higher Risk Third Parties may be required to provide periodic anti-bribery certifications/attestations in writing. The central compliance team will provide local compliance teams with sample clauses for different scenarios, and local compliance may consult central compliance if any doubt arises on which type of representations are required. Your

local legal & compliance function (or Central Legal & Compliance in the absence of a local legal & compliance function) may advise on applicable provisions to be included in the contractual arrangements and any relevant anti-bribery certifications/attestations which are required. All agreements with Higher Risk Third Parties must include representations regarding anti-corruption compliance.

3. Red flags

If you are involved in the selection or monitoring of Suppliers or Higher Risk Third Parties, you should be aware of general warning signs or “red flags.” These are examples of matters that should be highlighted to your Supervisor/Line Manager or Legal & Compliance when referring to a Higher Risk Third Party.

Some examples of red flags which may indicate that a relationship is potentially higher risk for bribery and corruption include:

- The country or industry in which the Supplier or third party operates has a reputation for or a history of corruption and bribery;
- The third party or a family member of a representative or owner of the third party is connected in some way to a Creditinfo Employee;
- The third party is involved in meetings, discussions, negotiations, or transactions with Government Entities;
- The third party exhibits unusual characteristics, e.g. insists on operating in anonymity or does not appear to have the background, expertise or appropriate resources to carry out its retained duties;
- The third party does not want its involvement disclosed to other parties, especially any party it is introducing;
- The fees requested by the third party are not commensurate with the services being provided;
- Reputational research on the third party (due diligence) identifies past allegations or incidents of corruption or illegality;
- Public Officials (or their immediate family members) serve as directors, officers, employees or agents of the third party, or otherwise receive compensation or other benefits, directly or indirectly, from the third party;
- Public Officials are known or suspected to be shareholders or beneficial owners of a third party entity;

- The third party is or was a Public Official;
- There is a potential conflict of interest with any other role or position of the third party;
- A Public Official (or the private sector counterparty from whom the third party may be seeking business) recommended the third party;
- The third party is new to the business, unable to provide references, or unable to document their claimed experience;
- The third party appears to be in significant financial difficulties or have a history of insolvency;
- The third party has been the subject of allegations or convictions for slavery or trafficking; or
- Any other fact or circumstance which indicates that the third party is a high risk for bribery, corruption, or another compliance concern.

Some examples of red flags which may arise in the context of contractual arrangements include:

- The third party is unwilling to confirm in writing that it will operate within anti-corruption law, regulations and conventions and/or refuses to disclose fees to its clients under any applicable regulation relating to the disclosure of inducements.
- The third party makes an inappropriate payment request, where the size and/or method of payment seems unduly large or out of place, e.g. requests for payments made in cash or to bearer, or made payable in a country other than the one in which the services are provided, or where the payment is to be made to a different counterparty.

XI. Political Contributions

Creditinfo Employees are prohibited from making political contributions to or soliciting them for an elected official or any campaign or candidate on behalf of or in the name of Creditinfo without the prior written approval of Creditinfo Group CEO. In addition, under no circumstances are Creditinfo Employees allowed to make political contributions to elected officials or other Public Officials for the purpose of obtaining or retaining business or otherwise influencing such official with regard to an act or decision made in his or her official capacity.

XII. Charitable Contributions

Charitable contributions include donations, sponsorships, and financial or other advantages given, promised or offered to another for which no goods or services will be received in return. Such contributions allow Creditinfo to help others in need and support causes which align with our values. However, they can also create a bribery and corruption risk due to the potential for bribes being made under the guise of a legitimate charitable act.

Creditinfo therefore only makes charitable contributions which are legal and ethical and in accordance with this Policy. If you have questions about whether a particular charitable contribution is appropriate under the Policy, please contact your local legal & compliance function (or Central Legal & Compliance in the absence of a local compliance function).

Creditinfo Employees should consult their local head of marketing and finance for an assessment of any suggested charitable initiatives. Following this assessment, the charitable initiative should be referred to the local compliance function (or Central Compliance in the absence of a local compliance function) for approval. Any charitable contribution made in accordance with this policy should be recorded by the appropriate local finance department.

XIII. Training and Awareness

All Creditinfo Employees must be aware of, and understand, Creditinfo's commitment to complying with this Policy. The level of awareness should be appropriate and proportionate to the role of the employee, and take into consideration the inherent risks associated with his or her role.

All Creditinfo Employees will receive a copy of this Policy.

Your local or central legal & compliance team will provide training on this Policy to Creditinfo Employees, including to country managers, business unit directors, and sales managers, on a risk-based approach and attendance records will be kept.

XIV. Monitoring

Compliance with this Policy will be monitored periodically as part of Creditinfo's routine audits.

XV. Record-keeping

It is Creditinfo's policy to make and keep books, records and accounts which, in reasonable detail, accurately and fairly reflect the transactions and dispositions of its assets. Transactions must be accurately described, and accounts must not be kept "off-book" to facilitate or conceal improper payments. Creditinfo Employees must also

submit all expense claims relating to hospitality, gifts or payments to Third Parties in accordance with applicable expense policy and record the reason for the expenditure.

XVI. Reporting Improper Conduct and Concerns

Creditinfo encourages Creditinfo Employees to speak up and report conduct that they, in good faith, believe violates laws, regulations, or internal policies and does not tolerate retaliation against any employee who reports such concerns in good faith.

All Creditinfo Employees are expected to raise concerns about any issue or suspicion of bribery or corruption, or if an employee is i) offered a corrupt payment or bribe by an Associated Person or customer; ii) is asked to make a corrupt payment or bribe; or iii) suspects that a corrupt payment or bribe may be requested or made in the future.

Creditinfo Employees must report their concerns immediately to their Supervisor/Manager, their local legal & compliance function (or Central Legal & Compliance in the absence of a local legal & compliance function), or via the other methods set out in Creditinfo's **Whistleblower Policy**.

In case of uncertainty or doubt as to whether a certain act is considered a violation of this Policy or Creditinfo's *Code of Conduct*, you must consult either your line manager, local legal & compliance function (or Central Legal & Compliance in the absence of a local legal & compliance function), or, the Group's General Counsel.

See also Creditinfo's *Code of Conduct*, *Whistleblower Policy*, *Higher Risk Third Party Due Diligence Procedures*, and *Gifts and Hospitality Policy*.

Contact Information

Group Compliance Department

compliance@creditinfo.com

Group Executive team

ci.group.directors@creditinfo.com