



CONFLICTS OF INTEREST POLICY

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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 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. Transparency in these policies is fundamental to maintaining ethical standards and stakeholder trust, highlighting Creditinfo's commitment to integrity across all operations

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.

B. Background on Conflicts of Interest

As part of the daily activity of the Group, a number of external and internal interactions and transactions take place. During the course of these interactions and transactions, actual, potential, or perceived conflicts of interest may arise. It is essential that all Group employees understand where such situations can arise and promptly disclose any such situation to designated compliance officers within the Group, as outlined in this policy in order to avoid or manage any actual, potential, or perceived conflict.

In order to protect the Group, its employees, shareholders and other stakeholders against conflicts of interest, the Group has established a policy and a declaration procedure. These aim to manage actual, potential, and perceived conflicts of interest and clearly state the principles with which the Group approaches any such situations.

II. Purposes

The purposes of this Policy are to: (A) set out what constitutes an actual, potential or perceived conflict of interest, and (B) establish principles and procedures regarding the declaration and management of conflicts of interest. This ensures that all disclosures are handled through established compliance processes in line with Creditinfo's standards for integrity and transparency.

III. Scope

The Creditinfo Code of Conduct defines the rules and guiding principles that apply to Conflicts of Interest. This document provides further details on what constitutes a conflict of interest and how these conflicts need to be managed.

This Policy is applicable to all Group employees and representatives of the Group and applies to a situation where an actual, potential, or perceived conflict of interest occurs between an employee's personal interests and the interests of the Group. Please see Section V for guidance on what may be a conflict of interest.

IV. Definitions

The following definitions are provided to assist you in completing the Conflict of Interest Disclosure form (see Appendix 1).

“Close Personal Relationships” are relationships that may affect the objectivity and impartiality of an employee or a representative of the Group, including but not limited to family relationships, friendships (especially those involving frequent or intimate contact or personal favors), romantic relationships, business or financial relationships or professional or academic relationships (such as mentorship, sponsorship, etc.) and any other relationships that may reasonably compromise objectivity or perceived impartiality;

“Competitor” includes companies involved in the same businesses as those in which the Group is involved, for example credit reporting agencies; credit solutions providers; business data resellers; financial services companies; credit software developers; digital financial services providers;

“Customer” is defined as a company with an ongoing business relationship with any Creditinfo Company, including, but not limited to, a company that is bound to an existing agreement with a Creditinfo Company; a company that has taken active steps to enter a business relationship with a Creditinfo Company (i.e., has requested an NDA from a Group employee, has expressed written interest in negotiating a potential agreement with a Group company, etc);

“Substantial direct or indirect ownership interest” is defined as any interest in another company that could impair, or reasonably appear to impair, your ability to act solely in the best interest of the Group provided that a holding of less than 1% of the voting stock of another company will, in general, not be viewed as significant.

V. General Principles

1. What is a “Conflict of Interest”?

A conflict of interest can occur when a Group employee has multiple interests, one of which could possibly distort, influence, or corrupt the motivation for actions related to the employee’s role with the Group.

Points of reference to understand when an interest may distort, influence or corrupt the motivation for action within the employee’s role include the following:

- The employee or the representative has a personal interest that is different from or opposed to the interest of the Creditinfo Group or its stakeholders.
- The personal interest influences (or appears to influence), the employee’s or the representative’s judgment, objectivity, or loyalty to the Creditinfo Group or its stakeholders.
- The personal interest creates (or appears to create) an unfair advantage or disadvantage for the employee, the representative or someone they have a Close Personal Relationship with, in relation to the Creditinfo Group or its stakeholders.
- The personal interest exposes (or appears to expose) the Creditinfo Group or its stakeholders to legal, financial, reputational or ethical risk.

Typical situations may include e.g.

- Your spouse works for a competitor.
- You serve on the board of a software supplier.
- You work, invest, or have financial involvement with any customer, contractor, supplier, or competitor of the Group, or with a government official outside your capacity as a Group employee.
- You have, in your role, direct dealings with customers, contractors, suppliers, or competitors that are family members.
- You have a close personal relationship with somebody in the office.

2. Outside Positions

A personal interest, as described in the previous section, may involve an outside position that could influence, or be influenced by, the employee’s or the representative’s work for the Creditinfo Group or its stakeholders.

An outside position is any role or activity that an employee or a representative performs or engages in outside of their employment or contractual relationship with the Creditinfo Group. This includes being a director, officer, employee, consultant, partner, owner, shareholder, trustee, or board member of another organization, whether for-profit or non-

profit, or being a candidate for public office. It can create a conflict of interest when, for example, the outside position:

- Competes or conflicts with the interests, goals, or activities of the Group or its stakeholders;
- Uses or discloses confidential or proprietary information of the Group or its stakeholders without authorization;
- Involves the use of the Group's resources, assets, name, or reputation without authorization;
- Influences or affects the employee's or the representative's decisions, actions, or recommendations for the Creditinfo Group or its stakeholders;

Creates an appearance of impropriety or bias that could damage the reputation or trustworthiness of the employee, the representative, the Creditinfo Group, or its stakeholders.

VI. How to Proceed

We all must be vigilant to any situation that could jeopardize interest priorities and promptly raise these situations with your respective Supervisor/Manager or to the applicable compliance department.

If not resolved adequately, Conflicts of Interest could lead to fraudulent situations; business decisions favoring private interests rather than Group interests; or even corruption affecting the Group's reputation, financial results, company culture, work environment, and the individual employee.

From time to time, situations may arise that will not be clear-cut. If you are uncertain about a specific situation and whether it constitutes a Conflict of Interest under this policy, you can take the following steps.

Where an employee or representative identifies an actual, potential or perceived Conflict of Interest in accordance with Section V, or if there is any doubt or uncertainty about how this policy may apply to a particular situation, the employee or representative should disclose it and seek guidance from their line manager, the HR department or the Legal & Compliance department on how to avoid or manage the conflict. Many actual and potential conflicts of interest can be resolved in an acceptable way for both the individual and the Group when they are disclosed promptly.

To avoid or manage potential conflicts of interest arising from outside positions, the employee or the representative should:

- Disclose any outside position that could create, or appear to create, a conflict of interest to their manager or the Human Resources department as soon as possible;

- Seek approval from their manager or the Human Resources department before accepting, continuing, or changing any outside position that could create, or appear to create, a conflict of interest;
- Follow any conditions or limitations imposed by their manager or the Human Resources department in their outside position to ensure compliance with the Creditinfo Group's policies and values;
- Refrain from participating in any decision, action, or recommendation for the Creditinfo Group or its stakeholders that could be affected by their outside position, or that could affect their outside position, unless authorized by their manager or the Human Resources department;
- Report any changes or developments in their outside position that could create, or appear to create, a new or increased conflict of interest to their manager or the Human Resources department promptly.

Line managers or the Human Resources department may involve local or central Legal & Compliance teams to address any issue or seek clarifications with respect to this Policy.

Disclosing Conflicts of Interests

Attached to this Policy is a disclosure form. See Appendix 1.

You may use this form as a checklist to identify if you have a personal interest which should be reported to your line manager or the HR department in accordance with this Policy. You may use it to disclose a potential Conflict of Interest to your line manager, the HR department or Legal & Compliance.

VII. Responsibility

It is the responsibility of each Group employee to promptly disclose any actual, potential, or perceived conflicts of interest in accordance with the rules and principles laid out in this Policy. It is the responsibility of all Supervisors/Managers and other senior leadership to manage disclosed conflicts of interest in accordance with this Policy and find a suitable solution for the Group and the relevant employee.

In case of doubt as to whether a conflict really exists or how to resolve any such issue, the Compliance departments can provide guidance. Any actual, perceived, or potential conflict of interest declared will be discussed with your Supervisor/Manager, who will be responsible for identifying a suitable solution in accordance with the terms of the *Code of Conduct*.

In case of doubt on whether a conflict really exists or how to resolve any such issue, please contact the Group's Compliance department at compliance@creditinfo.com

Failure to disclose known, suspected, actual, potential, or perceived conflicts of interest may be subject to investigation and potential disciplinary actions which may include:

- Verbal or written warnings
- Mandatory retraining
- Suspension
- Reduction in duties
- Dismissal

For more details on raising concerns, please refer to the Group's *Code of Conduct* or the Group's *Whistleblower Policy*.

New employees will be provided with this Policy upon joining the company.

All employees will be provided with and must take annual training.

Appendix 1.

CONFLICT OF INTEREST DISCLOSURE FORM

Please tick the appropriate boxes and complete the information requested. **Where you answer “Yes”, please disclose the relevant information.**

1. **A family member or a close personal relationship works for, or has a position that interacts with positions of authority at, a competitor, a customer, contractor, or supplier of the company).**

Yes No

2. **During my employment with the company, I am, or intend to be, a director, trustee, officer, or similar position (paid or unpaid), of a business not belonging to any companies within the Creditinfo Group.**

Yes No

3. **I, a family member, or a close personal relationship, have a substantial direct or indirect ownership interest or other relationship with a company, firm, or organization that currently has business dealings with the Group or is otherwise a competitor or customer of the Group.**

Yes No

4. **I am connected to one, or more, person(s) (family member or close personal relationship) who hold(s), or has previously held, a government, political and/or military position (national, federal, local or provincial), or is a civil servant in a Public Entity, with which the Group has dealings (e.g. Regulatory Authority/Agency to obtain permits or licenses).**

Yes No

5. **I have another type of potential Conflict of Interest not mentioned above or information that may be relevant in relation to the Code of Conduct.**
