



**Dun & Bradstreet
Partner Code of Conduct**

Introduction: It Starts with Integrity

Since 1841, D&B has been the most trusted source of commercial information and insight for businesses large and small, enabling them to Decide with Confidence®. Today, D&B's unwavering commitment to conducting business ethically and in adherence to the letter and spirit of the law is reflected in D&B's Values—Integrity, People, Quality, Customers, Teamwork and Performance Excellence. These Values set the standards by which we must measure ourselves each day. They require D&B to conduct business honestly and with integrity, in every interaction with all of our stakeholders—customers, team members, shareholders, business partners, suppliers and communities.

That same set of standards applies to D&B's third party partners—the suppliers, data providers, vendors, service providers, agents, distributors, business partners, consultants, contractors, licensees and members of the D&B Worldwide Network (or, collectively, “partners”) who work on D&B's behalf and with whom we partner. D&B has created this Partner Code of Conduct (the “Code” or “Partner Code”) to help translate D&B's Values into everyday behavior for you, to guide you when in doubt and to keep all of us working toward a common goal—to conduct ourselves ethically and in accordance with D&B's Values and applicable laws. However, the Code, as well as the policies and procedures your employer may have in place, cannot address every situation you might encounter. When faced with a difficult ethical decision, you may find it helpful to ask yourself certain basic questions. For example:

- Am I compromising my own personal ethics in any way?
- Would I like to see my actions become a general industry practice?
- How would I feel if my actions were reported on the front page of the local newspaper?
- Would D&B lose customers—or shareholders—if they knew their business partners did this?
- Would D&B's brand or reputation be damaged in any way as a result of my actions or failure to act?
- Would I be comfortable explaining my actions to my team members? My spouse? My parents? My children? My friends?
- Are my actions consistent with being “most trusted?”

No matter where we are operating around the world, D&B expects its partners to know and abide by all applicable local, state, federal and international laws, regulations, rules, ordinances and industry standards of the countries in which they operate. D&B further relies on its partners to choose subcontractors that share D&B's Values and to ensure that they likewise conduct business legally, ethically and in accordance with all contractual obligations.

If you become aware of a possible violation of this Code or any applicable law or policy in connection with the services you provide for D&B, whether within your organization or elsewhere, you have a duty to promptly report it to D&B. This includes situations in which your company or another party requests that you do something illegal or improper. Partners (including partners' employees) who become aware of potentially illegal, non-compliant or unethical practices within their organizations are expected to

promptly notify D&B so we can take appropriate actions in conjunction with our partners and in the spirit of the ethical foundation of the business relationship.

Failure to comply with the Code can have severe consequences for both D&B and the parties involved. In addition to damaging D&B's brand and reputation, conduct that violates the Code may also violate the law. This may potentially subject D&B and those involved, whether directly or indirectly, to civil suits and/or criminal prosecution. D&B will take appropriate remedial actions for violations of the Code, applicable D&B policies and/or applicable contracts, up to and including termination of the business relationship and recovery of damages, as warranted by the relevant facts and circumstances.

Raising Questions or Concerns

No one document or code of ethics can provide prescriptive instructions for every possible situation. Therefore, our Partner Code, in conjunction with the policies and procedures your employer has in place, serves as a foundational guide to ethical conduct. In some circumstances, the right thing to do—the action that is in line with this Partner Code and D&B's Values—will be obvious. In others, the right course of action may be more nuanced or complicated to determine.

If you are unsure of what to do in a particular situation, take the time to seek guidance from appropriate parties. Remember—when in doubt, ASK BEFORE ACTING. Asking for help supports our shared goal of doing business ethically and allows us to proactively address potential problems or issues.

You can ask questions or raise concerns in several ways:

- Access your internal company resources;
- Call the D&B Compliance Hotline
 - 1-800-261-8552 (US & Canada)
 - Country Code + 800-261-8552 (outside US & Canada);
- Go to D&B's secure, web-based hotline: <https://dnb.alertline.com>;
- Contact the D&B Compliance team:
 - Louis Sapirman, Chief Compliance Officer
 - sapirmanl@dnb.com
 - Aryeh Friedman, Chief Privacy Counsel
 - friedmana@dnb.com
 - Shirin Saks, Senior Attorney
 - sakss@dnb.com
 - Lori Baker, Senior Compliance and Privacy Attorney
 - bakerl@dnb.com
 - Joseph Kwon, Attorney
 - kwonj@dnb.com

- Lisa Schor Babin, Senior Global Compliance Manager
 - babinl@dnb.com
- Compliance E-mail Addresses
 - complianceofficer@dnb.com or complianceofficer2@dnb.com;
- Contact the D&B Legal team; or
- Contact D&B's Vendor Management Office.

To report complaints directly to D&B's Board of Directors, please visit the Investor Relations section of <http://www.dnb.com/> and access the "Contact the Board" link.

The D&B Compliance Hotline is managed by an outside company and is available 24 hours a day, seven days a week. You may report matters anonymously if you prefer, where allowed by local law, although maintaining anonymity may limit our ability to fully investigate your concerns.

D&B will promptly, thoroughly and fairly investigate all reports, and will take appropriate action as warranted by the facts and circumstances. As a D&B partner, you have an affirmative obligation to comply with any investigation or audit and to openly and honestly share information. We will make every effort to safeguard your confidentiality and, if applicable and allowed by local law, your anonymity.

Zero Tolerance for Retaliation

You should feel free to report any suspected (actual or potential) violation of the law, policy or this Code to D&B. D&B strictly prohibits internal acts of retaliation against any individual for reporting a possible violation in good faith. D&B strongly encourages all of our partners to likewise strictly prohibit acts of retaliation within their respective organizations against any individual for reporting possible violations in good faith. Good faith does not mean that you have evidence or that your report has to be correct, but rather that you are providing all of the information you have and that you believe it to be true at the time of the report.

Maintaining Our Business Integrity

Fair Business Practices

D&B is committed to winning based on the quality of our products, our information and our people, including our partners. D&B expects its partners to share D&B's unwavering commitment to conducting business and winning with integrity.

Anti-corruption

Anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business

Transactions, among others, apply to all of D&B's operations around the globe. D&B expects its partners to comply with all applicable anti-corruption laws and regulations, and to conduct their business in an ethical manner. You are strictly prohibited from offering, authorizing, giving, promising, accepting or agreeing to give or receive any form of a bribe, extortion payment or kickback, or from conferring any other improper payment, gift or benefit to anyone, regardless of whether they are a government official or private party and regardless of who may initiate or solicit the bribe. A bribe does not have to be cash, as it can be extending lavish entertainment or travel, directing business to a company owned by a government official or other party, or offering lavish gifts to the family members of a government official or other party. Extortion requests often come in the form of offers of protection in return for something of value, or they can be more straightforward demands for cash. Regardless of the form, no such payments should be made or accepted on D&B's behalf to or from any party. This comprehensive prohibition includes facilitation payments, which are smaller payments made for the facilitation of routine clerical or administrative services.

Gift-giving and entertainment must be handled very carefully and in compliance with all applicable laws, regulations and policies. Remember to never offer or accept anything on behalf of D&B that could appear to bias the recipient or yourself. Due to the complexity of the laws regarding this subject, remember to always seek clarification if you have any questions. You may contact your internal company resources or any D&B resources listed herein.

Q: Arthur, an employee of a D&B Worldwide Network partner, has become friendly with certain government officials. He recently gave a watch to one of his government contacts in Germany to thank him for being a helpful source of information. The government contact did not expressly promise to do anything in return and D&B has no contracts pending with him or his government. Is this okay?

A: No, Arthur should not have given this gift. Anti-corruption laws and our Partner Code of Conduct explicitly prohibit the payment or promise of anything of value to a government official or any other party in order to gain favor or any type of benefit, even if the official never promises to do anything in return. In this situation, D&B will likely have business with this government or government official in the future, even if D&B currently has no business with them. Even the mere appearance of potential impropriety can subject D&B and our partners to possible legal, regulatory and/or brand risks.

Export Controls and Trade Sanctions

D&B complies with all international trade laws and regulations that apply to our business, and expects our partners to do the same. Remember that export laws apply not only to goods but also to technology, software and technical information.

Before exporting products or services, be sure to check the applicable regulations that may apply to either the location of delivery or to the recipient. You may be required to obtain a specific license or permit. When traveling abroad on business, it is also important to check the relevant regulations applying to your destination(s), as they may apply to technology, samples or other work products that

you plan to carry with you. If you are unsure or have any questions, please be sure to seek guidance from appropriate internal or D&B resources.

Antitrust and Fair Competition

D&B competes in markets all over the world. D&B wants to ensure that we compete fairly and in a manner that is consistent with D&B's Values. We also want to ensure that we comply with U.S. antitrust laws, as well as the competition laws of the European Union and all other countries where we do business. Our partners are expected to comply with all applicable laws and regulations regarding fair competition and antitrust. It is illegal to enter into any agreement with a competitor regarding pricing and/or allocation of customers or territories, or to enter into other agreements that unreasonably restrict competition. Illegal agreements do not have to be signed contracts, as a simple understanding between two parties may constitute an illegal agreement. Many agreements and various forms of coordination between competitors ("horizontal agreements") may unreasonably restrict competition, as may certain agreements within the supply chain ("vertical agreements"), such as an arrangement regarding resale pricing. Furthermore, predatory or exclusionary conduct by companies that may be viewed as having dominant market power may also raise competition law issues. Such conduct can place both you and D&B at serious risk and is inconsistent with D&B's Values. Always seek guidance from appropriate internal or D&B resources if you have any questions.

Q: Alicia works as a contractor for D&B and Jim, a co-worker of hers, works on a contract basis for a competing organization. They both recently attended a convention and Jim told her that the other company is bidding on the same two high-profile engagements on which D&B is bidding. Jim suggested that if D&B bids a high price for one company, the company he is contracting for would do the same for the other. This way, each company would win a contract. What should Alicia do?

A: Alicia should never discuss dividing customers with a competitor, even if it is with a co-worker of hers. Making any agreement with a competitor that restricts competition, whether verbal or written, is in direct violation of antitrust law. If a situation like this arises, make your disapproval of the suggestion explicitly clear so that there can be no misunderstanding on the other party's behalf. You should then promptly notify your internal resources or any D&B resource listed in this Code.

Conflicts of Interest

D&B expects business decisions regarding D&B to be made in D&B's best interests. Any situation that creates or appears to create a conflict between personal interest and the interest of D&B must be avoided. Conflicts of interest can arise in a number of different ways, but some of the most common include:

- Lavish or inappropriate gifts or entertainment offered by a prospective business partner to a D&B employee or to a third party acting on behalf of D&B.
- Acting upon information you received because of your organization's relationship with D&B to take advantage of a business opportunity that belongs to D&B.

- Doing business with an organization that is partially or fully owned by a D&B (or partner) employee or family member who has a measure of control over your organization's relationship with D&B or the services being provided to D&B by the partner in question.

Partners are expected to disclose actual or potential conflicts of interest to D&B. Should you have any concerns about whether something may be a conflict of interest, raise the issue right away with your internal resources or any D&B resource listed in this Code.

Insider Trading

In performing our jobs, you may occasionally have access to information about D&B and the companies with which we do business that is not available to people outside D&B or your organization. Often, that non-public information or "inside information" is material in that it would influence an individual to buy, sell or hold securities. Material, non-public information includes, but is not limited to, advance notice of acquisitions and divestitures, management changes, pending or threatened litigation, or certain non-public financial results and projections.

In general, it is illegal for any person with material, non-public information about D&B or any company to buy or sell securities (such as stocks or options) of that company. This conduct, known as "insider trading," is a serious violation of both the Partner Code and U.S. securities laws, and it will subject the individuals involved, wherever located, to potential criminal prosecution and significant monetary fines.

"Tipping" is also a violation of both the Code and U.S. securities laws, and it carries the same consequences. Tipping occurs when you provide material, non-public information to someone else and that person acts on the information to buy or sell securities of the company for which you provided such information. Even if the tipping occurs inadvertently or if you did not trade in that security yourself, you could still be found guilty of tipping. As such, caution is always required when dealing with material, non-public information of D&B or any company.

Should you have any concerns about whether the information you have is material, non-public information, raise the issue right away with your internal resources or any D&B resource listed in this Code.

Ethical Business Practices

D&B's Values require that we and our partners always conduct ourselves with the highest standards of integrity and business ethics with all of our constituents. Ethical business practices encompass all areas of our operations, though they tend to speak most directly to the area of sales. We adhere to the following sales practice guidelines, among others:

- We engage in sales to meet our customers' interests and needs, not just to meet sales or compensation goals.
- We communicate honestly and truthfully, and we make terms of sale clear, accurate and easy to understand.
- We rely on the quality of our products and our people to win business, and we do not disparage competitors or provide untruthful information.

Ethical sales practices are vital to the success of D&B's business and the strength of our brand. Furthermore, the honesty and integrity of D&B's and our partners' dealings with customers and others can be regulated by the U.S. Federal Trade Commission, U.S. state Attorneys General and other regulatory entities.

Q: Daniel, a sales representative employed by a D&B partner, was in negotiations with a customer for a one-year data subscription product, but the customer was not convinced that they needed the service. Daniel was able to convince the customer to purchase the product with the option of cancelling after the three-month trial period. However, Daniel only quoted the customer the three-month minimum commitment price and did not mention that the customer would need to cancel at the end of the three-month minimum commitment term to avoid being billed for a full year. Did Daniel do anything wrong?

A: Yes, Daniel should have provided the customer with complete and accurate pricing and billing information and he should have clearly notified the customer that they need to cancel the subscription within the three-month trial period if they do not want to continue for the full year. D&B and its partners must not engage in any form of deception or fraud when dealing with customers, vendors or any other parties, even if it means losing a sale. We engage in sales to meet our customers' needs, not just to meet sales or compensation goals. This means that we always communicate honestly and truthfully, and make terms of sale clear, accurate, transparent and easy to understand.

Contract Compliance

D&B's relationships with its partners are governed by contractual terms and obligations that are negotiated by both parties. You should ensure that you are familiar with the requirements of the agreements in place between your organization and D&B, and that you comply with those terms and obligations at all times. You should note that your D&B contractual obligations likewise apply to the vendors and subcontractors who fulfill services or otherwise perform work on the services that you are providing to D&B. If there is a conflict between this Code and the language in a given contract, you should promptly raise the issue with your internal resources or any D&B resource listed in this Code.

Confidential Information

In today's business world, information is the lifeblood of any company. The effective collection, management and exchange of information are particularly critical to D&B's success. However, much of the information regarding our own and our customers' business operations is highly confidential and must be properly safeguarded at all times. The unauthorized disclosure of, or access to, this information could seriously damage D&B's brand, reputation and success. Safeguarding this information is everyone's responsibility. D&B is strongly committed to maintaining the privacy and security of all of our information assets, and to meeting our legal and regulatory requirements everywhere we do business throughout the world.

Much of the information that we handle on a daily basis needs to be protected from unauthorized access or disclosure. Trade secrets, confidential company information and sensitive personal

information about D&B and our customers, team members and partners must be adequately safeguarded from loss, theft, damage, manipulation or exposure to unauthorized parties. These restrictions include anyone within or outside of your company and D&B who does not have a legitimate business-related need to receive such information. You must make sure that you follow all data privacy and information security measures and internal controls for your computer systems, portable electronic devices, laptops and other storage devices, electronic or otherwise. This includes not leaving such information or devices in places where they could be lost, stolen, damaged, manipulated or inappropriately accessed, as well as backing up critical information to your secured share drive. In the event that you become aware of an actual or potential data security breach involving D&B or D&B customer information, you must immediately report it to your internal resources and to D&B.

You must fully comply with all applicable local, state, federal and international data privacy laws, regulations, rules and ordinances regardless of what services you provide for D&B. You must additionally comply with all applicable information security laws, regulations and industry standards regardless of what services you provide for D&B.

Be cautious when discussing sensitive information in public places, such as elevators, airports and restaurants, as well as in open workplace areas, such as office break rooms and restrooms. Your obligation to protect D&B information continues even after our business relationship with your organization may end. You may never share confidential D&B or D&B customer information or sensitive personal information with a third party without D&B's express written permission.

Q: Tabitha, a D&B consultant, receives an e-mail from Marcus, who works in a different department for the same company. He asks for information about D&B that Tabitha knows she would not be able to give to an outsider. Plus, Tabitha knows that Marcus works closely with a major competitor of D&B. Even though they work for the same company, can Tabitha share this information with Marcus?

A: No, Tabitha should not give Marcus the information because she is obligated to protect D&B's confidential and proprietary information. Tabitha should ask Marcus why he needs the information and also check the agreement that her employer signed with D&B, looking specifically at the provisions for confidential information and data security. Tabitha should then bring the issue to the attention of her manager, additional resources within her company or a D&B resource listed in this Code.

D&B customers routinely share their own confidential information with D&B and our partners. We each have an obligation to protect that information just as carefully as we protect our own information. D&B's customers expect this from D&B and our partners, and the integrity of D&B's brand demands it. Be sure to follow the same privacy and data security measures for D&B customer information that you do for D&B company information. Accordingly, confidential information of D&B's customers should not be disclosed to any other parties without prior written authorization from D&B.

Finally, D&B expects that its partners will fully respect the intellectual property rights of D&B and take all necessary steps to protect D&B's trademarks, copyrights, patents and other intellectual property

assets. This includes, but is not limited to, internal D&B publications and software programs developed for or by D&B. Additionally, in performing your responsibilities for D&B, you may sometimes receive or develop information, practices, methods, inventions, written materials, programs, word algorithms, processes or other works. In other cases, you may develop materials of this kind that are not part of your specific job-related responsibilities but that arise from information or resources that are available to you in connection with your organization's relationship with D&B. All of these materials belong to D&B and must be protected and managed accordingly. If you are unsure about a proposed use of D&B's trademarks, copyrights, patents or other assets, you should promptly consult your internal resources or a D&B resource listed in this Code.

Accurate Books and Records

D&B expects its partners to record and report information in an accurate and transparent manner.

D&B's records are used to report on its financial results, to make required legal filings and to make business decisions. Therefore, it is critical that you do not hide, fail to record or make false entries in connection with any business records prepared for D&B. All records prepared for D&B, including financial and operational results, are expected to accurately reflect all associated transactions, payments and events; to be filed in a timely fashion; and to conform with all applicable laws and any requirements that D&B makes known to its partners.

No matter where we are located around the world, we each have to do our part. For example, you must make sure that the information you submit on time cards, expense reports, invoices and bills, production data, sales reports, monthly and quarterly reports, and other documents is entirely true and complete. In addition, under no circumstances are unrecorded or "slush" fund accounts permitted for any purpose.

Falsifying financial or business records and making false statements to D&B's internal or external auditors are both against the law, and the legal, financial and brand consequences can be serious. If you become aware of any actual or potential financial, accounting, or other books and records issue regarding your relationship with D&B, you must immediately raise the issue with your internal resources or a D&B resource listed in this Code.

Community Engagement

D&B seeks to do business with partners who share its commitment to fostering social and economic development and to contributing to the sustainability of the communities in which we all live and operate. Although such initiatives are the discretion of our partners, D&B strongly encourages its partners to proactively and positively engage with their communities.

In addition, D&B believes in doing business with partners who are committed to protecting the quality of the environment around the world through environmentally conscious business practices. Partners are expected to comply with all applicable environmental laws and regulations. We likewise encourage partners to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations.

Commitments Expected of Management

We expect our partners to establish effective policies and procedures to ensure compliance with this Code and all applicable laws and regulations. At a minimum, such policies and procedures should be effectively designed to:

- Communicate D&B's Partner Code to their employees and partners, and to establish effective training and monitoring programs for relevant supervisors and employees.
- Provide for the effective oversight and management of our partners' respective contractors, consultants, suppliers, service providers, vendors, agents, distributors and other partners.
- Provide feedback to D&B on the processes and practices related to this Code in order to foster continuous improvement.
- Identify and mitigate key risks.
- Periodically evaluate compliance with this Code and ask for guidance from D&B, as needed.

Providing a Safe and Supportive Work Environment for All

Labor and Human Rights

D&B has a strong commitment to treating team members and all constituents with fairness, dignity and respect. Any unjust employment or personnel practice, however inadvertent, ultimately hurts all of us. We cannot tolerate or afford to deprive ourselves of capable people for reasons based on unlawful or unjust discrimination. We believe in doing business with partners who share this commitment, and we expect our partners to comply with all applicable employment laws and to support human rights for all people.

Our expectations include:

- Compliance with child labor laws—Our partners shall not employ individuals in violation of the local mandatory school age or the legal employment age in any country where they operate.
- Compliance with wage and hour laws—Our partners shall comply with applicable wage and hours laws and regulations, including those relating to minimum wages. Under no circumstances will our partners use any form of forced, bonded, indentured or prison labor, or require employees to surrender any government-issued identification, passports or work permits as a condition of employment.
- Freedom of association—We expect our partners to respect the right of employees to associate freely, form and join workers' organizations, and choose or not choose collective bargaining representation.
- Fair treatment—Our partners must be committed to a workplace free of all forms of harassment. Harassment is any form of inappropriate conduct toward another person that creates an intimidating, hostile or offensive work environment. Harassing conduct includes both physical actions and verbal remarks or messages, whether made by an employee or a

non-employee. Sexual harassment involves unwelcome sexual advances, requests for sexual favors, or other physical or verbal conduct of a sexual nature. All forms of harassment can interfere with an individual's work performance and adversely affect an individual's employment opportunities.

- Anti-discrimination—Our partners shall not discriminate against employees or their partners for any reason, and will make all employment decisions based on merit and without respect to race, color, national origin, ethnicity, religion, gender, sexual orientation, age, marital status, disability, veteran status or any other characteristic protected by applicable laws and regulations.

As previously noted, you should feel free to report any suspected (actual or potential) violation of the law, policy or this Code to D&B. D&B strictly prohibits internal acts of retaliation against any individual for reporting a possible violation in good faith. D&B strongly encourages all of our partners to likewise strictly prohibit acts of retaliation within their respective organizations against any individual for reporting possible violations, whether labor/employment-related or otherwise, in good faith. If you are concerned that you have been the victim of retaliation, you should promptly contact your appropriate internal company resources or any D&B resource listed in this Code.

Health and Safety

D&B is committed to maintaining a safe, healthy and productive environment for all of us. Therefore, we must all follow safe working procedures at all times and proactively work to prevent accidents. D&B expects our partners to share this commitment and to comply with all applicable laws and regulations of the countries in which they operate. This includes, but is not limited to, the need to implement effective working condition and injury prevention programs that ensure adequate safety policies and procedures.

Conclusion

D&B continually seeks to do business with partners who share D&B's Values and who consistently apply the foundational principles addressed in this Code. Each of us must take responsibility for contributing toward the maintenance of an ethical culture, but none of us have to do it alone. When you encounter a difficult or complicated situation, there is a wide array of people who can help you to determine the best course of action. You should consider the D&B contacts listed in this Code as resources upon whom you should call when you have legal or ethical questions or concerns that may arise during your work with D&B. D&B exhibits an unwavering commitment to conducting business with the utmost integrity in all of our dealings and interactions, and we expect the same level of commitment from all of our trusted and valued partners.

Partner Certification

By signing below, I acknowledge that I have received the Dun & Bradstreet Partner Code of Conduct ("Code") on behalf of my organization. I understand that my organization is responsible for knowing and adhering to the principles and standards of the Code.

I further acknowledge and agree that:

The Code of Conduct is intended to provide a general overview of D&B's policies and it does not necessarily represent all such policies and practices in force at any particular time, or all policies and procedures that my employer may separately maintain. My organization's employees and representatives are responsible for knowing all of the policies and procedures that apply to our jobs regarding D&B-related work.

I will contact my supervisor, an authority figure in my company or one of the D&B contacts listed in this Code, as appropriate, if I have any questions regarding this Code or any behavior or situation concerning D&B.

I will promptly report any violations of the Code, as appropriate, either to D&B or to my company's internal reporting resources.

Failure to follow the Code may result in disciplinary action, up to and including termination of the relationship between my organization and D&B.

Signature: _____

Print Name: _____ Date: _____

Title: _____

Company: _____