

# DUN & BRADSTREET GLOBAL ANTI-CORRUPTION POLICY



JUNE 2015

## ANTI-CORRUPTION POLICY PURPOSE

Dun & Bradstreet is committed to the highest standards of ethics. We believe in conducting business fairly, honestly, and in compliance with the letter and spirit of the law. This Global Anti-Corruption Policy (Policy) extends on this commitment and describes some of the rules and expectations for how we do business.



### SCOPE

This Policy applies to all of our operations globally. It covers our officers, directors, and team members, and includes our dealings with business partners, vendors, independent contractors, customers, and any other entity, governmental or otherwise.

**RESPONSIBILITY** – It is every employee’s responsibility to know they are doing the right thing, all of the time. To aid you in this, always be Relentlessly Curious. So, if you ever have a question about this Policy or a specific situation, please reach out to Corporate Compliance or the Legal department prior to proceeding.



### ANTI-CORRUPTION

**DON’T give, receive, or offer to give or receive anything of value, to gain or provide an improper business advantage.**

- Such as actions taken indirectly, for example authorizing another person or third party to do something you could not do yourself.
- This prohibition extends to all Dun & Bradstreet dealings.
  - Any commercial entity or its representatives.
  - Any government official, political party, candidate, or public international organization
- “Anything of value” includes:
  - Cash and cash equivalents (e.g., gift certificates or vouchers) must never be given.
  - Personal and business benefits, such as
    - -gifts
    - -meals and entertainment
    - -travel
    - -offers of employment
    - -forgiveness of debt
  - Providing anything of value indirectly, for example to a spouse, close relative, friend, or associated entity.
  - Any value, whether such value comes from the company, yourself, or any other source.
  - Any value, no matter how minimal. Even something of small value may result in a violation.

- Our policy is to resist extortion, but your physical safety is most important.
  - “Extortion” means a payment made in response to threats of physical harm. Threats of economic harm do not qualify.
  - If you receive an extortionate demand, notify your supervisor and Corporate Compliance as soon as possible.



## SALES AND MARKETING

**DON’T give or receive any business courtesy or payment for a corrupt or improper purpose.**

- Gifts, entertainment, and hospitality can be consistent with legitimate business objectives, as can promotional and marketing activities, provided they are:
  - Reasonable and not lavish
  - In compliance with all applicable laws
  - Not reasonably viewed as an attempt to gain or provide an improper business advantage
  - In compliance with this Policy, the Dun & Bradstreet Code of Conduct, the Global T&E Policy, and any other Dun & Bradstreet policies
- Offers to pay for team members’ families or friends are not to be accepted.
- Any offers of gifts, entertainment or hospitality valued at USD \$100 (or the local equivalent) must be reported to and approved by your leader, who must keep a record and notify Corporate Compliance.
- Any offers of gifts, entertainment or hospitality from governments or public enterprises require pre-approval and are subject to additional procedures attached to this Policy.



## POLITICAL CONTRIBUTIONS

**DON’T make contributions to political parties or officials to obtain their support for executive, legislative, ministerial, administrative or other action(s) that may be favorable to Dun & Bradstreet.**



## CHARITABLE CONTRIBUTIONS OR SPONSORSHIPS

**DO support charities and engage in corporate sponsorships as long as there is no perceived or actual receipt of tangible business benefit in return, whether directly from the charity or indirectly from any other person or entity.**



## FACILITATION PAYMENTS

### DON'T make Facilitation Payments.

- We cannot give or offer any money, gift or anything else of value to expedite a government official's performance of a non-discretionary action or service that he or she is required to provide, such as:
  - permits or licenses
  - utility services (e.g., electricity, phone, or water)
  - police protection, mail services or government inspections
  - processing official government papers such as visas and work orders



## BOOKS AND RECORDS

### DO properly, fairly and accurately record and maintain all transactions.

- This requirement extends to all original documents, including invoices, receipts and expense reports, and not just general ledgers.
- This applies to any transaction, regardless of the amount.
- Preparation of all financial reports and records must be timely and complete.
- All transactions must be approved at the appropriate level in line with the Dun & Bradstreet Delegation of Authority Policy.
- Prior to paying or authorizing a payment, you must be certain that no part of such payment is to be made to mislead anyone or conceal anything that is improper.
- Never establish undisclosed or unrecorded accounts for any purpose.
- Never make false, misleading or artificial entries in financial books and records for any reason.
- Finally, we cannot use personal or third party funds, either directly or indirectly, to accomplish what is otherwise prohibited by law and by our policies.



## BUSINESS PARTNERS AND INTERMEDIARIES

We must exercise due diligence and caution in our dealings with all third party business partners, such as vendors, sales agents, data purchasing agents, distributors, contractors, sub-contractors, consultants and partners. Dun & Bradstreet may be held liable for their actions, even if we are unaware of such improper activity.

Global Third Party Lifecycle Management (TPLM) is responsible for the review process for third party business partners. Before working with any third party, you **must** engage with TPLM.



## COMPLIANCE WITH LOCAL LAWS & REGULATIONS

All Dun & Bradstreet personnel and business partners must comply with all applicable local laws and legal requirements, including, but not limited to, those relating to anti-corruption. It is your responsibility to know the local laws and legal requirements that apply to your business operations, as well as to confer with legal counsel as needed. If there is any difference between local law and this Policy, you should always follow the strictest standard and notify Corporate Compliance.



## PENALTIES & DAMAGES

The consequences of anti-corruption investigations and violations are severe and can be potentially devastating to Dun & Bradstreet's brand and reputation and the individuals involved. Prosecutions can result in imprisonment, sanctions, and fines of millions of dollars. Fines against individuals will not be paid by Dun & Bradstreet.



## ENFORCEMENT & REPORTING

We will take strong disciplinary and legal action, including termination of employment or business relationship, against anyone who violates this Policy. If you suspect or become aware of any potential violation of this Policy, you must immediately report the suspected violation to Corporate Compliance. Dun & Bradstreet encourages customers, third parties and anyone else with whom we have business dealings to report any concerns. We provide several reporting options and you may remain anonymous.



DUN & BRADSTREET  
CORPORATE COMPLIANCE  
HOTLINE EMAIL:  
[complianceofficer@dnb.com](mailto:complianceofficer@dnb.com)



DUN & BRADSTREET  
CORPORATE COMPLIANCE  
SECURE WEB-BASED  
HOTLINE:  
<https://dnb.alertline.com>



DUN & BRADSTREET  
CORPORATE COMPLIANCE  
HOTLINE PHONE NUMBER:  
1-800-261-8552 (US/CA)  
Country Access Number, then  
800-261-8552 (outside US/CA)



## PROCEDURES & TRAINING

We will provide procedures and training to assist you with compliance with this Policy. If you would like additional training for you or your team on any topic, please reach out to Corporate Compliance.



## NO EXCEPTIONS

There are no exceptions to this Policy. Any modifications to processes supporting this Policy will only be made with the prior, written approval of Corporate Compliance.



## POLICY UPDATES

Dun & Bradstreet may update this Policy from time to time to comply with current laws and regulations, and take into account evolving best practices and business policies.

## DEFINITIONS

**Corruption** - The abuse of entrusted power for private gain.

**Facilitation Payments** - A small payment (also called a facilitating, speed or grease payment) made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.

**Government Official** - Any officer or employee of a government or any department, agency or public enterprise. This includes any officer or employee of a public international organization, such as the World Bank. Furthermore, any person acting on behalf of any government agency, department or public enterprise, for example a person hired to review bids on behalf of a government agency, would be covered. The term includes officers and employees of state-owned companies; uncompensated

honorary officials, if such officials can influence the awarding of business; and members of royal families who have proprietary or managerial interests in industries and companies owned or controlled by the government. In addition, the term includes a political party, political party officials and candidates for political office.

Payment - This may involve the transfer of money, stock, bonds or any other property; the payment of expenses; the provision of services of any type; the assumption or forgiveness of any indebtedness; or any other transfer of goods, services, tangibles or intangibles that accrues to the benefit of the ultimate recipient or promotes his/her interests.

Public Enterprise - Any enterprise, regardless of its legal form, over which a government, or governments, may, directly or indirectly, exercise a dominant influence, whether through share ownership, management control, or other means.

Third Party - A third party may be any company or person that is not a party to the primary transaction, such as a sales intermediary between D&B and the final customer or end-user of D&B's products. Additional examples of third parties include agents, brokers and distributors, among others.

