

## Code of Conduct

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### Introduction

Bisnode enables people to make smart decisions. We turn data into insights that facilitate decision-making in both strategic issues and daily operations for companies and organizations throughout Europe. We are 2,400 employees in 18 markets.

One of the cornerstones of our strategy is to ensure that Bisnode is a world-class, quality company in every respect. Ethical behaviour is important in and of itself. It is also an important element of our business activities as it earns us one of our greatest assets – the trust of our customers.

### Bisnode's commitments

Bisnode's Code of Conduct is based on the UN Global Compact's ten principles which are in turn based on the UN Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at work, the Rio Declaration on Environment and Development, and the UN Convention Against Corruption. It is Bisnode's conviction that doing business includes compliance not only with local laws and regulations, but also comply with well established and widespread human rights conventions, agreements and ethical standards.

### Scope

The Code of Conduct applies to *all employees in the Bisnode Group* and to all representatives, including board members.

- Bisnode AB is responsible for maintaining and updating the code of conduct
- The Managing Director in each country where Bisnode is active is responsible for providing information about, implementing and monitoring the guidelines in the Code of Conduct as part of the country's CR activities.

Acting in conflict with the statements and requirements in this Code is not acceptable. Non-compliance may be an indication of lack of insight and understanding, and will therefore always be subject to dialogue between the individual in question and the relevant manager. Based on the seriousness of the non-compliance, appropriate action will be taken.

If an employee suspects a possible behaviour that deviates from the Code of Conduct, this should be reported to the immediate manager as soon as possible. If such person is involved or otherwise disqualified, the event should be reported to the next-highest manager.

All reports shall be taken seriously and investigated where necessary. There shall be no form of retaliation (termination of employment, harassment, discrimination, etc.) for reporting in good faith of a violation of the Code of Conduct or participation in the company's investigation of a complaint.

Bisnode will ensure that immediate disciplinary actions, such as termination of employment, are taken against those who violate this Code of Conduct and that circumstances in violation of applicable laws and regulations are reported to the relevant authorities.

## Code of Conduct

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### How to read and use the Code of Conduct

#### **All employees**

As an employee, you must understand and comply with the Code of Conduct. If you have questions, turn to your immediate superior for guidance.

#### **Managers**

As a manager you need to read and understand what the Code of Conduct means for your part of the business and its importance to Bisnode as a whole. It's your responsibility, as a manager, to introduce your employees in the Code of Conduct during the on-boarding process, and to ensure that they understand and are working in accordance with both the letter and the spirit of the Code. You have to maintain a continuous dialogue with your employees on responsibility issues and take these into consideration when creating business plans. And don't forget: lead by example!

### Responsibility in the marketplace

#### **Integrity policy**

We know that information increases efficiency in society. Therefore, we encourage a transparent information society in which businesses have the best possible conditions for doing business while safeguarding the individual's right to privacy.

We are convinced that our society will get better and stronger, more successful, equal and democratic when there is a secure access to information of high quality.

We put strong emphasis on having high quality and relevance in the information that is available through our channels. That quality is essential to our ability to conduct our business in a socially responsible manner.

We believe in the knowledge and the power that information brings. Therefore, we work actively to make sure companies, organizations and individuals have access to information and communication channels in a regulated manner and according to clear, common guidelines.

The right to privacy is according to us one of the most important parts of the freedom of information. It is a recognized human right and a cornerstone in our ability to strike a balance between society's need for efficiency and the individuals right to be treated with respect.

We act in alignment with the following principles:

- We always weigh the public interest against individual's and companies need for integrity.
- We ensure, as far as possible, that the information we purvey is correct, relevant and up-to-date.
- We continuously take organisational and technical measures to avoid disseminating information to parties whose practices are not consistent with Bisnode's principles.
- We do not allow short-term commercial interests to overshadow our respect for individual privacy.
- We evaluate and respond to any reactions and opinions that are directed at our way of handling integrity issues.
- We always protect the information with care against theft and misuse.

#### **Personal information**

Bisnode respects personal information and handles it carefully. Bisnode's management is responsible for ensuring that personal data is handled in accordance with applicable laws and regulations in all operations.

## Code of Conduct

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### ***Corruption, bribes, gifts and benefits***

A Bisnode employee is not permitted to offer or accept gifts, benefits, remuneration or entertainment to or from a third party that would constitute a breach of the law or that might affect, or be thought to affect, the employee's professional judgment during performance of their work or service for Bisnode or a third party.

This does not prevent Bisnode's employees from receiving or offering rewards designed to retain and promote good business relationships with customers and other business partners. This subject to the condition that such rewards are modest, openly accepted and offered and otherwise compliant with this Code of Conduct and local regulations on Gifts, Rewards and other Benefits in Business.

Under no circumstances does Bisnode accept corruption, the abuse of entrusted power or improper gain from an employee's position.

- The term corruption refers to abuse of a position of trust for own or the company's gain, for example through the use of bribes.
- It is forbidden to offer, promise or give as well as request, accept a promise of or receive a bribe.
- A bribe is a gift or other benefit that might influence another person, as part of their employment or duties, to show improper favour to the giver.
- Corruption may include giving and receiving bribes, extortion, favouritism and nepotism, fraud, conflict of interest and misappropriation.
- Other abuse of power, neglect and mismanagement may also be regarded as corruption.

### ***Bisnode works systematically to prevent corruption***

- Bisnode's management is responsible for regular analysis of the risks of corruption related to the operations, maintaining an adequate anti-corruption programme and implementing any other measures regarded as necessary in order to prevent the corruption risks identified in the risk analysis.

### ***Tough but fair competition***

In our efforts to increase our market share and earn the loyalty of consumers, we will never waiver on ethics and responsibility. Bisnode complies with the anti-trust and competition laws in each market where we operate.

- We do not enter into or initiate any unlawful forms of anti-competitive agreements.
- We use honest methods in our dealings with customers, suppliers and other business partners.
- We co-operate with the competition authorities.
- We ensure that our employees have the appropriate level of awareness of the applicable competition laws and policies.

### ***Dealing with conflicts of interest***

Bisnode's organisation is politically independent and our employees work in the best interests of the company

- Bisnode's employees shall always work in Bisnode's best interests and avoid all acts that might be perceived as favoring a company, organisations, individuals or other stakeholders at Bisnode's expense.
- Employees shall avoid all types of activity that violate the company's interests or have a negative effect on the employee's judgement and integrity.
- Bisnode does not take a political stand and therefore we do not use funds from the Group to support political campaigns or other political purposes.

## Code of Conduct

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### ***Relationships with external parties, such as suppliers and co-operation partners***

Our business partners must comply with the principles in this code.

- We strive to ensure that our suppliers, agents, co-owners and other business partners comply with the principles of our Code of Conduct.
- When selecting suppliers and partners, the assessment shall include their ability to comply with the requirements in this Code of Conduct.

### ***Accounting, information and financial reporting***

Bisnode aims to provide transparent, accurate, continuous and timely information of the highest quality.

- Bisnode shall have accurate accounting that complies with applicable laws, regulations, accounting standards and norms. Financial information and other share price sensitive information must be communicated in accordance with applicable laws, stock exchange rules and other regulations.

### ***Respect for confidential information***

Bisnode's employees may not spread or abuse confidential information

- This principle may be waived if specific permission has been given by the immediate manager.
- Examples of confidential information include non-public information about Bisnode's operations, financial position, strategies, business transactions, business plans, business processes, etc.
- Bisnode requires employees and other persons who perform services for Bisnode, when relevant, to sign a confidentiality agreement. The obligation to maintain confidentiality survives the termination of employment or consultancy work.

## **Responsibility for people & human rights**

### ***We respect basic human rights***

- Bisnode respects the UN conventions on human rights and accepts the responsibility we have towards our employees and the communities in which we operate.
- Bisnode complies with the laws and regulations that apply in the countries in which we operate.

### ***We offer our employees fair and reasonable working conditions***

- Our employees are one of our most important resources and relationships must be based on mutual respect and trust.
- Bisnode seeks to attract, develop and retain qualified and motivated employees that share our values of a professional environment.
- Our employees shall be offered a safe and healthy work environment that we continuously seek to improve.
- The conditions of employment offered to employees must meet the minimum requirements in national law and/or collective agreements as well as relevant ILO conventions. Bisnode makes every effort to pay fair salaries and remuneration in accordance with relevant norms in the locations in which the Group has operations.

### ***Bisnode rejects child labour and forced labour***

- We do not employ any person under the age of 15 or any applicable higher statutory minimum age.
- We do not accept forced labour, slave labour or other forms of involuntary labour at our workplaces.

## Code of Conduct

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### ***We are a non-discriminatory workplace***

- We offer all individuals equal opportunities regardless of skin color, gender, nationality, religion, ethnicity or other distinguishing characteristics.
- We make active efforts to achieve a corporate culture and workplace free from discrimination and harassment.

### ***We respect our employees' right to be organised***

- Our employees are entitled to form or join a trade union and we respect the rights of our employees and their trade unions to negotiate collective agreements.

### ***Care for the company's assets***

Bisnode has both physical assets (IT-equipment, etc.) and intellectual property (computer systems and programs, concepts, trade secrets, brands, etc.) Bisnode's assets, including communication systems, may only be used for legitimate business purposes and not for personal gain or gain for a third party.

- Use of computer equipment shall be in accordance with prevailing IT policy.

The employee has a duty to protect Bisnode's property and assets against damage, theft and misuse.

### **Responsibility for the environment**

Environmental issues should be natural part of the daily routines for all Bisnode employees. Bisnode is committed to contributing to a better environment in compliance with Bisnode's Environmental Policy and, where possible, work to reduce our environmental impact through active and systematic environmental work.

All managing directors are responsible for environmental activities in their respective country. The managing directors determine the scope and nature of environmental activities in respect of this policy. Bisnode's operations should be sustainable with regard to economy, social responsibility and impact on the environment.