



ANTI-BRIBERY & ANTI- CORRUPTION POLICY

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Approved by Creditinfo Group CEO

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I. Countering Corruption

A. Compliance Policies

Our Creditinfo Compliance Policies define the business and ethical behaviours that we all need to demonstrate when working for Creditinfo Group hf. and any other 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.

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 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.

The Group's Compliance Officer, Carly Souther, can be contacted at +34.691.043.161, or via email at c.souther@creditinfo.com.

B. Definition of a Bribe

Creditinfo does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give, or receive any gift or payment which is, or may be construed as being, a bribe.

*A "bribe" is defined as **directly or indirectly offering, paying, seeking or accepting a payment, gift or favour to improperly influence a business outcome. It may be in cash or anything else of value.***

Bribery is only one form of corruption. Do not participate in or tolerate other forms of corruption, e.g. kickbacks, improper benefits, facilitation payments,

conflict of interests with Creditinfo, improper recordkeeping, unapproved company charitable or political contributions or inappropriate hospitality or expenses.

II. Anti-Bribery

To support global efforts to fight corruption, most countries have laws that prohibit bribery: Many apply these 'internationally' to behaviour beyond their borders. A breach of such laws may result in fines for Creditinfo and in personal penalties for individuals. Dealings with public officials are particularly high risk: Even the appearance of illegal conduct could cause significant damage to Creditinfo's reputation.

Creditinfo's commitment to doing business with integrity requires consistently high global standards: our zero-tolerance approach towards bribery and corruption applies to all Creditinfo operations, regardless of local business practices. This Anti-Bribery & Countering Corruption Policy covers what employees must and must not do to meet Creditinfo requirements.

MUSTS

All Creditinfo employees **must**:

- Always make clear, internally and when dealing with 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 to improperly influence a business outcome;
- Immediately notify their Supervisor/Manager and the Group's Compliance Officer 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 contracts with any third parties to represent Creditinfo or its interests externally, relevant Creditinfo teams have undertaken appropriate due diligence checks to assess the third party's integrity. See Appendix 1. The outcome of

such checks must be considered carefully before deciding whether to appoint the third-party: Employees must inform their Supervisor/Manager of any concerns.

In exceptional situations where employees cannot escape imminent threat of physical harm without meeting a demand for payment, such a payment may be made but those involved must immediately report full details of the demand and any payment to the Group's Compliance Officer; for the purposes herein this paragraph, "immediate" reporting means as soon as safely possible, but absent extraordinary, exigent circumstances, within twenty-four (24) hours of the incident. This is to ensure that the matter can be fully investigated, necessary financial records kept, and further steps taken where appropriate. See also the Group's *Policy on Accurate Records, Reporting and Accounting*.

MUST NOTS

All Creditinfo employees **must not**, directly or indirectly (e.g., via suppliers, agents, distributors, consultants, lawyers, intermediaries, or anyone else):

- Offer or give bribes or improper advantages (including facilitation payments) to any public official or other individual or third-party, which are, or give the impression that they are, intended to influence decisions by any person about Creditinfo;
- Request or receive bribes or improper advantages from any third-party, which may, or give the impression that they may be, intended to influence decisions by Creditinfo about that third-party.

Where an employee considers that a bribe, improper advantage or facilitation payment has been given or received, they must not conceal this or take any steps that could delay information being passed to their Supervisor/Manager and Compliance Officer.

III. Gifts & Hospitality

All Creditinfo's relationships must reflect its 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.

This Policy sets out responsibilities of employees 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.

Employees must apply this Policy in good faith to ensure gifts and hospitality are never considered to be excessive, confer improper advantage or create an actual or perceived conflict of interest (see, e.g., Sections I and II, *supra*, and the Group's *Conflicts of Interest Policy*).

All Creditinfo leadership must ensure that except as otherwise provided in this Policy, gifts and hospitality either given or received do not exceed Group monetary limits, as set by the Compliance Department, and approved by Group leadership. These limits must be clearly and regularly communicated by leadership in each Creditinfo entity/country and will apply equally to the offer and receipt of gifts and hospitality. The current Group monetary limits are **one-hundred Euros and zero Cents (100,00.00 EUR)**.

The Group monetary limits must be adhered to by each Creditinfo Company/subsidiary; however, leadership in each country is authorised to set more restrictive monetary limits than those established by the Group.

A. GIFTS

Employees must ensure that any gifts offered (other than Creditinfo branded merchandise) or received do not exceed Group monetary limits and are one-off or irregular in nature and at all times comply with the Group's *Conflicts of Interest Policy*.

- If employees are offered a gift that exceeds the Group's monetary limits or, if applicable, more restrictive monetary limits established in their country, they **must** politely decline and explain the Creditinfo rules. In exceptional situations where such gifts have to be accepted to avoid causing serious offence, or circumstances genuinely preclude their return, Creditinfo employees must:
 - Consult their Supervisor/Manager and the Group's Compliance Officer; and,
 - Where appropriate, take steps for the gift to be donated to charity.
- All gifts by employees that take the form of Creditinfo branded merchandising materials **must** be legitimate and proportionate.

B. HOSPITALITY

Employees **must** ensure that hospitality is only offered or accepted if:

- There is a legitimate business interest in doing so;
- It is in the form of a locally hosted meal, attendance at, or participation in an organised 'team-building' occasion, local cultural or sporting event, local industry award ceremony, or similar responsible activity;
- Usual business contacts from Creditinfo and other parties are physically present;
- Its value does not exceed the Group's monetary limits; and,
- It remains one-off or irregular in nature.

Employees are not required to record such hospitality within the Group's monetary limits (or the more restrictive monetary limits of their country, if applicable) centrally, but **must** keep their own records for inspection and ensure expenditure associated with any hospitality provided by, or on behalf of, Creditinfo is approved using Creditinfo's standard expense processing and clearance systems.

In exceptional circumstances where employees seek to offer or accept hospitality above the Group's monetary limits (or the more restrictive monetary limits of their country, if applicable), they must:

- Check that their Supervisor/Manager supports the proposal;
- Complete and submit the Gift and Hospitality Declaration Form to the Group's Compliance Officer for prior approval. See Appendix II; **and**,
- Once approval is received, ask the third-party to confirm that the offer or acceptance of such hospitality also complies with its equivalent gifts and hospitality policy.

In other circumstances where employees are offered or asked for hospitality that exceeds Group (and, if applicable, more restrictive local) monetary limits), they must politely decline by reference to this Policy.

MUST NOTS

All Creditinfo employees **must not** discuss, offer or receive any gifts or hospitality activity involving public officials or their family members without prior clearance from their Supervisor/Manager or the Group's Compliance Officer.

All Creditinfo employees **must not**:

- Offer or accept any gifts or hospitality, or any other favours which are intended or might be seen to influence business decisions or create an obligation to do something in return;
- Offer or accept any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees or any other granting of credit, shares or options;
- Offer or accept any hospitality involving overnight stays or foreign travel without prior written clearance from their Supervisor/Manager;
- Offer or accept any hospitality that may cause offence under local norms and customs.

IV. Record-keeping

All persons working on Creditinfo's behalf must maintain accurate and complete accounts, invoices, and other records relating to dealings with third parties including suppliers, distributors and customers. Transactions must be accurately described, and accounts must not be kept "off-book" to facilitate or conceal improper payments. 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.

V. Reporting – Contact Information

All 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 third party, 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. Employees must report their concerns immediately to their Supervisor/Manager and the Group's Compliance Officer, in accordance with the Group's *Whistleblower Policy*.

In case of uncertainty or doubt as to whether a certain act is considered a violation of the Code, you must consult the Group's Compliance Officer, and in case the Compliance Officer is unfit to manage such a request, the Group's General Counsel.

Group Compliance Department

compliance@creditinfo.com

Group Compliance Officer

Ms. Carly Souther

c.souther@creditinfo.com / +34.691.043.161

Group General Counsel

Mr. Johannes Eiriksson

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Appendix I.

ANTI-BRIBERY & COUNTERING CORRUPTION QUESTIONS FOR RESPONSIBLE SOURCING OF CREDITINFO SUPPLIERS

The purpose of this Questionnaire is to support both Group Teams' and Suppliers' understanding of the qualifications an entity must meet to become a third-party provider.

1. **Is your Company's main trading bank account located in a different country to its operations?**
2. **Is your Company subject to regular financial audit by an independent auditor or certified public accountant?**
3. **Do you plan to use any other entities, individuals, or third parties to perform services under the proposed agreement to Creditinfo, or to represent Creditinfo?**
 - Possible Additional Info. Required: Type of third-party/subcontractor, interactions with government or public officials by third-party/subcontractor.
4. **Does your Company have a code of conduct or policy that includes zero tolerance of bribery? (A "bribe" is defined as *directly or indirectly offering, paying, seeking or accepting a payment, gift, or favour to improperly influence a business outcome. It may be in cash or anything else of value.*)**
 - Possible Additional Info. Required: Provide code of conduct or policy and any other relevant materials.
5. **Do you provide any kind of training in relation to bribery and corruption?**
 - Possible Additional Info. Required: Training description and details.
6. **To the best of your knowledge, is your Company in any way, owned, managed, controlled, or funded by any Government Entity/Public Official?**
 - Possible Additional Info. Required: Description of relationship with government organization or public official; name of organization or public official.
7. **To the best of your knowledge, is any key employee or senior management member of your organization a government or public official?**
 - Possible Additional Info. Required: Information regarding the government or public official: name, job title, government entity, home country.
8. **To the best of your knowledge, does any Public Official or a member of a Public Official's family have any interest, or stand to benefit in any way, as a result of the proposed agreement?**

- Possible Additional Info. Required: Explain the nature of any benefit or compensation.
- 9. Will your company be representing Creditinfo in interactions with Government or Public Officials?**
- Possible Additional Info. Required: Provide description of representation and country where it will occur.
- 10. Please list all Principal Officers/Executive Directors of your company in your country of operation. These are the principal decision and policy makers in your country of operation.**
- Possible Additional Info. Required: Full legal name, nationality, date of birth.
- 11. Have you, any key employee, any individual with ownerships of more than 5%, or senior management member of your organization, been subject to investigations or prosecutions concerning: bribery, corruption, money laundering, anti-trust, fraud, exports and customs regulations, or data privacy? Are there any related, pending legal proceedings?**
- Possible Additional Info. Required: Describe charges, provide: legal name of employee, date of charges, country, and if this is an active proceeding.
- 12. Has your organization, affiliates, or any current or former owners, managers, directors or employees ever been placed on an international or national sanctions list, including the U.S. OFAC Specially Designated Nationals (SDN) and Blocked Persons List?**
- Possible Additional Info. Required: List all sanctions, provide: date placed on sanctions list, full legal name or individual or company involved, name of sanctions list, details on sanction list placement.
- 13. Has your organization, affiliates, or any current or former owners, managers, directors or employees, ever been debarred from competing for or bidding on government contracts in any territory in which you have done business, or contracts with non-governmental bodies (e.g. World Bank)?**
- Possible Additional Info. Required: List all occurrences, provide: date of debarment, full legal name of individual or company involved, country or organization where debarment occurred, details on the debarment.
- 14. Are any of your company's owners, managers, directors or employees barred from acting as Directors in any country?**
- Possible Additional Info. Required: List all occurrences, provide: date of debarment, full legal name of individual, country or organization where debarment occurred, details on the debarment.

Appendix II.

GIFT & HOSPITALITY DECLARATION FORM

NAME & TITLE OF RECIPIENT:	
CREDITINFO ENTITY:	
DATE OF OFFER:	
NATURE OF GIFT, INDUCEMENT, OR HOSPITALITY:	
NAME & ADDRESS OF OFFERER:	
OFFERER'S LINK TO CREDITINFO:	
ACCEPTED/DECLINED (& reason(s) for doing so):	ACCEPTED/DECLINED (circle one)
COMMENTS (any additional/useful information):	

Signature: _____ Date: _____

AUTHORISATIONS

Approval of Supervisor/Manager	
Name: _____	Title: _____
Signature: _____	Date: _____
Approval of Group's CEO/Compliance Officer	
Name: _____	
Signature: _____	Date: _____

SIGNATURE PAGE

Name: Mr. Stefano M. Stoppani

Title: Creditinfo Group CEO

Date: 9 April 2019

Signature: _____

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal line and a few trailing strokes.