

## Company Code of Conduct

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### INTRODUCTION

Every day, through all its employees and contractors, CRIF contributes to the matching of credit supply with demand, helping institutions manage lending more effectively and efficiently, and providing specific support to millions of households and businesses to access credit more easily.

CRIF provides advanced but easy-to-use solutions to decision-makers in the banking, finance, insurance, utilities and business sectors, which come from listening to them and that focus on their specific needs. In order to provide really effective answers, it is essential that technological skills and expertise are guided at all times by a complete understanding of the resources, processes, targets, objectives and future prospects that differentiate each company and make them unique.

CRIF employees and contractors must always adopt, in their daily work, business practices governed by integrity, honesty and fairness, and in compliance with all applicable laws in order to ensure that corporate reputation remains one of the main resources of the company.

A positive image and reputation are essential to the functioning of the company, and are based in particular on the actions of each and every employee and contractor.

This Code of Conduct has been created with this in mind. It aims to integrate CRIF Group's values and principles, which remain valid, and confirm the general principles of "business ethics" which CRIF and its employees attribute a positive ethical value.

Recipients of this document (as defined below) will find guidelines on the most appropriate behavior to be adopted in certain situations. Such behavior should always be based on common sense, on the principle of fairness, and more generally should be conducted with due diligence.

In any case, recipients of this code must always base their behavior on the following principles:

- behave in a lawful and honest manner;
- avoid any conduct that might harm or endanger CRIF or its reputation;
- put company interests before personal ones.

## **PRINCIPLES AND VALUES**

To accomplish its mission, the company's way of working is based on the following principles and values:

### **CHALLENGING TIME**

Efficiency in anticipating market needs and moving swiftly into action keeps us sharp.

### **LEADING THE WAY**

Always ask yourself "why not" and don't put limits on reaching challenging objectives.

### **PURSUING EXCELLENCE**

In order to ensure the best quality of service at all times, wherever you work in the world.

### **WIDENING OUR VIEW**

By not taking anything for granted and aspiring to be the best.

### **THINKING OUTSIDE THE BOX**

Thanks to your capacity to innovate and understand the needs of global markets. Being at the cutting edge.

### **EMBRACING WORLDWIDE DIFFERENCES**

As citizens of the world, we reach new horizons

## **SCOPE AND RECIPIENTS**

The principles and provisions of this Code exemplify the general duties of diligence, honesty and fairness that characterize the performance of work activities and general behavior in the workplace.

These principles and provisions are applicable to CRIF Group, defined as CRIF S.p.A. and other Italian and foreign companies controlled by it and related to it (herein also referred to as **CRIF** or **Company**), and shall be binding for CRIF trustees, for all CRIF employees and those who work for CRIF, whatever the employment relationship, even temporary, (including short-term contracts), including contractors and interns/trainees (herein also referred to as **Recipients**).

## **INFORMATION AND COMMUNICATION**

In order to ensure the correct understanding of the Code, CRIF is committed to bringing the Code to the attention of internal and external stakeholders through communication activities (e.g. posting on the Company bulletin board, sending to all employees, posting on the intranet and/or the Company website, etc.). Training initiatives are differentiated according to the role and responsibility of the recipients.

## **“OUR OBLIGATION TO COMPLY WITH THE CODE”**

Each Recipient must ensure full compliance with all the provisions of the Code and seek clarification, if necessary, from his/her Manager and/or Human Resources.

"Doing the right thing" and ensuring the highest standards of honesty is a personal responsibility and cannot be delegated.

Compliance with the provisions contained in the Code constitutes compliance with the general duties of care and loyalty required by the legislation in force by CRIF employees.

Failure to comply with the Code may result in disciplinary action, which may also include dismissal, judicial action and criminal penalties in the case of serious misconduct and if this is in compliance with the provisions of the law.

## **REPORTING INAPPROPRIATE BEHAVIOR**

Each Recipient has the duty to report any practice or behavior deemed non-compliant with the provisions of this Code, or even illegal, to their manager and Human Resources. All reports will be properly investigated. CRIF prohibits any retaliation against an employee who makes such reports in good faith, while protecting the rights of the reported person.

The principles and guidelines of conduct relating to the general obligations of diligence, honesty and fairness that characterize the performance of work activities and behavior in the workplace are detailed below.

## **CONFLICTS OF INTEREST, BRIBERY AND CORRUPTION**

A conflict of interest occurs when the personal interests of a Recipient or the interests of a third party are in conflict with the interests of CRIF.

CRIF does not intend to profit in any way from the incorrect use of professional favors or other incentives, and does not tolerate any form of bribery, including improper offers and payments made to or by employees. Everyone has the responsibility to avoid any behavior that may give rise to or suggest a conflict of interest between his or her activities and those of CRIF.

If there is a conflict of interest or if a Recipient believes that a situation may involve or lead to a conflict of interest, he or she should report this to his or her Manager and/or Human Resources in order to resolve the situation in a fair and transparent way.

**Prohibited behavior:** you must not, either personally or through third parties:

- receive, demand, offer and pay, directly or indirectly, payments of any kind, including gifts, hospitality, financial benefits or any other benefit from or to a public official or a private individual, with the expectation or hope of receiving an improper commercial advantage or to repay a commercial advantage that has already been obtained;
- accept requests, solicitations or authorize anyone to solicit or accept, directly or indirectly, a financial or other benefit, from a public official or an individual;
- give, promise or offer a payment, gift or hospitality to a public official, agent, representative or other individual in order to induce them to carry out their activities in an improper manner, to influence their decisions, or to obtain, secure or maintain a business or unfair advantage in relation to business activities; - accept a gift, hospitality or payment from third parties if it is known or suspected that it was offered with the expectation of obtaining a commercial advantage;
- threaten or retaliate against a colleague or against any other person who has refused to engage in corruption; - violate, in any way, applicable local laws regarding corruption.

**Special care should be taken in the following situations:**

**a) Families and Relatives:**

Employees are encouraged to communicate any personal situations that may cause conflicts of interest to their manager who will ensure compliance with internal rules with the help of the Human Resources Department.

The Company reserves the right to implement all legitimate actions to avoid any kind of conflict of interest due to kinship and romantic relationships between employees or employees and managers assigned to the same Department/Area/production unit.

The actions taken will be targeted to avoid favoritism and special treatment compared to other employees and to ensure the highest degree of organizational transparency.

**b) Executive positions and other external activities:**

It is forbidden to engage in activities outside of CRIF if these could interfere with the responsibilities of employees to the Company or if they create risks to the reputation of CRIF or may in any way conflict with the interests of CRIF. If an employee has any doubts about the legality of an activity, he or she should seek advice from the Human Resources Department.

Permission will not be granted if the position or activity could be in conflict with the interests of CRIF or employee responsibilities, or be regarded as an activity in violation of non-compete obligations.

**c) Gifts and Hospitality:**

It is forbidden to receive, request, offer and pay for, directly or indirectly, gifts, hospitality or other benefits, which are not low in value or which exceed the limits of reasonable professional courtesy or that could be interpreted as such by a third party observer, as if they were aimed at compromising the integrity of the parties, or unduly influencing the relationship between the Company (and the parties involved in

it) and the person/organization involved. These gifts are prohibited regardless of their purpose, even if for the exclusive benefit of the Company. For this reason, it is necessary to judge any kind of donation according to the principles of good faith and reasonableness, taking care to respect the law as well as assessing the consequences that might arise.

**d) Facilitating Payments:**

We do not make, and will not accept, facilitating payments or "kickbacks" of any kind unless refusal is likely to endanger life, physical safety or personal freedom.

Everyone must avoid any activity that might lead to, or suggest, that a kickback will be made or accepted by CRIF. If you are asked to make a payment on our behalf, you must always consider what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt detailing the reason for the payment. If you have any suspicions or concerns regarding a payment, you should immediately raise these with your line manager.

**e) Donations:**

From time to time, it is possible to donate to charities. Charitable donations can be made if they are legal and ethical under local laws and practices, and no donation must be offered or made on CRIF's behalf without the prior approval of your line manager.

**f) Record-keeping:**

It is fundamental to keep financial records and have appropriate internal controls in place that will provide evidence of the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts made or offered by you, which will be subject to review.

You must ensure all expenses claims relating to hospitality, gifts or expenses offered to third parties are submitted with clear reasons for the expenditure.

All accounts, invoices, memoranda and other documents relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

No "off-book" accounts must be kept to facilitate or conceal improper payments.

No payment should be made if you are concerned that the payment may constitute bribery or endanger the reputation of CRIF. In these circumstances, you should avoid making the payment and report the situation to your line manager.

**g) Responsibility:**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all of us. We must all avoid any activity that might lead to, or suggest, a breach of this Policy.

If you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future, if you suspect any breach of this Code and/or Company Policies or believe that you are a victim of another form of unlawful activity, you should speak to your line manager.

We will investigate all concerns that are raised, even if they are raised anonymously. However, we would encourage you to give us detailed information about your concerns, including your name, your position and details of the malpractice, including comments about how you found out about the malpractice. All data will be treated confidentially and with respect in order to protect your identity. We will not reveal

your identity, unless it is required by the law or we are required to reveal your identity to relevant professionals dealing with the matter.

It may be that a concern that you have raised turns out to be unfounded when investigated.

However, you should never minimize these kinds of circumstances or assume that you could suffer a disadvantage as a result of raising your concern.

## **MANAGEMENT OF RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS**

All dealings with customers and suppliers are based on the principles of fairness and honesty, professionalism, transparency and, in any case, based on maximum collaboration (e.g. by not supplying false or incomplete information about a product or service so that the customer can make informed decisions).

## **PROTECTION AND PROPER USE OF RESTRICTED DATA**

In order to maintain positive results, CRIF depends on the use of its confidential information, and the nondisclosure to third parties. Recipients must not disclose this confidential data, or permit its disclosure, unless this is required by law or authorized by CRIF. This obligation continues after the termination of the employment relationship.

Each Recipient must do everything possible to avoid inadvertent data disclosure, paying particular attention when carrying out data recovery operations or transmitting confidential data.

CRIF guarantees third parties the same level of care in protecting their confidential data.

In cases where third parties, such as joint venture partners, suppliers or customers, share confidential information with CRIF, this will be treated with the same care given to CRIF data.

In the same spirit, employees must protect the confidential information that has come into their possession during previous working relationships.

**Confidential Information** means any information or data relating to past, present and future activities of CRIF Group and its customers or suppliers, such as for example: news (written or verbally acquired), data, documents (in any format) received during ordinary working activities and which are not in the public domain (for example, disclosed in a press release), trademarks, patents, inventions and technical know-how, financial data and information, marketing plans, customer and/or supplier lists, customer requests and/or any amendments, reports, internal studies, tables, records, business plans and strategies, internal communication studies or projects, drawings, data sheets, company policies, information on business costs, employee information, etc.

In any case, information is considered confidential if classified by CRIF as:

- for internal use
- confidential
- strictly confidential

## **PROPER USE OF COMPANY EQUIPMENT**

To enable staff to perform their work activities correctly, CRIF makes all the equipment considered necessary available to users, primarily computers and supporting electronic-IT equipment.

Recipients who are provided with company equipment for business purposes are responsible for its use as well as its storage and safekeeping.

All equipment purchased by the Company is managed within the appropriate software by the systems office and help desk; it is prohibited to use company assets other than for approved uses.

## **INTERNET ACCESS AND PROPER USE OF COMPANY E-MAIL**

Recipients, if working on CRIF premises, may be provided with access to the company Internet network in order to better carry out the tasks assigned. Internet access is granted for purposes of a business nature; the Company employs profiling solutions and Internet access control, through which it regulates Internet use so that the most acceptable and secure level of access is given. Access to the Internet should be considered exclusively as a business resource and must be used as such by employees and third parties.

The company e-mail address is a means of exchanging information that must only be used for the purposes authorized by Company itself and in particular by the user's direct manager.

## **SOCIAL MEDIA**

CRIF requires that Recipients adopt the correct behavior in the use of Social Media, dealing with personal, confidential and proprietary information with the utmost care and respect. The Internet has significantly increased the risk of CRIF Group breaching intellectual property rights, and damaging its reputation resulting from inappropriate online behavior, acts of defamation, harassment and claims, etc. These risks are further increased by the use of Social Media.

Recipients are required to use Social Media in an appropriate way, which is consistent with their role and with the values and policies of CRIF Group. Everyone is personally responsible for the content posted on Social Media. Ensure that the content you publish online is consistent with how you would present yourself to colleagues and potential clients..

## **RESPECT OF INDIVIDUAL DIFFERENCES – PROHIBITION OF ANY FORM OF HARASSMENT AND DISCRIMINATION**

CRIF respects the dignity, privacy and personal rights of all employees and is committed to avoiding any cases of discrimination and harassment in the workplace.

Employees should therefore not discriminate on the basis of origin, nationality, religion, race, gender, sexual orientation, or engage in any kind of verbal or physical harassment based on any of the factors mentioned above, or on other grounds, as well retaliation of any kind.

Harassment is any improper or unwelcome conduct that might reasonably be expected or be perceived to cause humiliation to another person. Harassment in any form because of gender, gender identity and expression, sexual orientation, physical ability, physical appearance, ethnicity, race, national origin, political retaliation, age, religion or any other reason as well as any form of bullying is prohibited in CRIF.

Employees who believe that the above principles are not respected in their workplace are encouraged to report the matter to the Line Manager and/or Human Resources, according to the following procedure.

*Grievance procedure*

The following procedure is set out for lodging a complaint of harassment, discrimination or retaliation raised by an employee against one another. CRIF will treat all aspects of the procedure confidentially to the extent reasonably possible.

The employee should initially raise the grievance informally with his/her manager or, where it is inappropriate to raise it with his/her manager, then the employee may raise it with his/her manager's manager. The grievance can be made either verbally or in writing.

The employee should then allow five working days for the person with whom he/she raised the issue informally to respond to his/her grievance, subject to any extension previously agreed by both parties.

If the matter is not resolved at the first stage, the employee should refer the grievance formally in writing to HR. A grievance hearing will be arranged with the involvement of HR.

The employee will have the right to be accompanied to a grievance hearing by a trade union representative or work colleague. At any stage of the grievance procedure, the employee may seek advice from the HR by requesting a confidential interview.

HR will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of the above principles of the Code of Conduct occurred.

If necessary, the complainant and the respondent will be separated during the course of the investigation; during the investigation, HR will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.

Upon conclusion of the investigation, HR will inform both the complainant and the respondent with the outcome. If it is determined that a violation of the above principles of the Code of Conduct has occurred, HR will carry out the appropriate disciplinary action.

*Right to appeal*

An employee will have the right to appeal against any decision made by submitting, in writing, his/her grounds of appeal to HR Manager and the Director. This must occur within five working days of receiving the decision of the grievance hearing or any subsequent disciplinary hearing.

If new evidence arises during the appeal, then the employee will be given the opportunity to comment on it before any action is taken.

The HR Manager and the Director shall reserve the right to uphold the appeal or confirm the action to be taken (as issued at the grievance hearing): such decision will be the final one.

## **PREVENTION OF LABOR ABUSES**

No form of forced, compulsory or child labor is tolerated in CRIF.

## **APPROVAL AND OWNERSHIP**

<b>Owner</b>	<b>Title</b>
HR Department	
<b>Checked by</b>	<b>Title</b>
HR Department	

Approved by	Title
HR Department	

## REVISION HISTORY

Version	Revision Date	Description	Approver Name
1.0	10/01/2013	Initial Version	
1.1	01/02/2017	Added "Prevention of Labor Abuses"	HR
1.2	27/08/2020	Added "Grievance procedure"	HR