

## Introduction

Verisk Analytics, Inc. and its affiliates (collectively, Verisk) works diligently to protect the single most important asset of its business: integrity. Integrity underlies the professional expertise of its team, the quality of its analytics and services, and its reputation to thousands of customers worldwide. Suppliers likewise have a duty to demonstrate the highest standards of business conduct, ethics, integrity, and compliance.

This Verisk Analytics Supplier Code of Conduct (Code) sets out the basic principles and expectations for Suppliers. Suppliers are responsible for knowing and operating in accordance with its requirements, and periodically checking to see if any updates or changes have been made to the Code.

The Code does not constitute an employment contract, and nothing contained herein is intended to convey any rights, actions, or remedies to Suppliers or to create an employment relationship between Verisk and the Supplier or its employees. To support the terms of a Supplier's contract with Verisk, the following provisions set forth the resulting obligations and behavioral expectations governing the business relationship.

## Scope

A Supplier is any third party, firm, or individual that provides a product or service to Verisk. The following persons, entities, and organizations (collectively, Suppliers) are covered by and subject to this Code:

- Suppliers, vendors, consultants, agents, brokers, distributors, facilitators, contractors, temporary workers, and third parties working on Verisk's behalf
- The owners, officers, directors, employees, and contractors and subcontractors of these organizations and entities
- Supplier's own extended supply chain

## Acknowledgment

By accepting any Verisk contract, the Supplier acknowledges acceptance of this Code and represents that it complies with its provisions. The Supplier understands that Verisk may refuse to continue doing business with the Supplier if the Supplier fails to comply with this Code, subject to the contract's terms and conditions.

## Audit

Verisk reserves the right to audit compliance with each individual aspect of this Code and to require certification of compliance to this Code. Verisk expects our suppliers to accurately and completely record all relevant business transactions and deal with financial data accurately, promptly and with due care. Verisk may require the Supplier to complete an annual Supplier Attestation acknowledging compliance with all requirements outlined in this Code.

## Anti-Bribery and Corruption

Verisk is subject to the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act as well as other anti-bribery and corruption laws adopted by the countries where it conducts business. It is Verisk's policy that Suppliers are prohibited from offering or paying, directly or indirectly, any bribe to any employee, official, or agent of any government, commercial entity, or individual in connection with Verisk's business or activities. Likewise, in accordance with Verisk's [Anti-Bribery and Corruption Policy](#), acceptance of any bribe in connection with Verisk's business or activities is also prohibited. Suppliers are also required to refrain from offering or providing gifts, hospitality or anything of value (Gifts) to any Verisk employee, director, officer, contractor, subcontractor or other third party connected to its engagement with Verisk unless such Gifts comply with all applicable laws, are made openly and transparently, are not lavish and do not create the appearance of impropriety or an attempt to improperly influence Verisk's relationship with such Supplier.

## Anti-Fraud

Verisk is subject to anti-fraud laws adopted in the countries where it conducts its business including but not limited to the UK's Economic Crime and Corporate Transparency Act 2023 and the Fraud Act 2006. It is Verisk's

policy that all Suppliers have in place reasonable policies and procedures to prevent fraud from being committed in breach of the fraud laws and a mechanism to report and investigate any reports of suspected fraud. Suppliers also agree to not act in any way in breach of the fraud laws including in dishonestly making any false representations with the intent to make a gain or cause loss to another; dishonestly failing to disclose any information where under a legal obligation to do so; or dishonestly acting or failing to act in abuse of a position there is an obligation to safeguard the financial interests of another person.

## Business Conduct and Ethics

Verisk strives to foster a culture of honesty and accountability and expects the parties with which it engages to do likewise. This commitment to the highest level of ethical conduct should be reflected across our supply chain's business activities including, but not limited to, relationships with employees, customers, suppliers, competitors, the government, and the public, including stockholders. All Suppliers must conduct themselves according to the language and spirit of Verisk's [Code of Business Conduct and Ethics](#) and seek to avoid even the appearance of improper behavior. Even well-intentioned actions that violate the law or this Code may result in negative consequences for all parties involved.

## Business Records

Consistent with Verisk's commitment to engage in fair and transparent transactions and refrain from bribery and corrupt activities, Verisk Suppliers are expected to keep complete and accurate books and records accurately reflecting their transactions or other expenses relating to Verisk or its business. Suppliers are prohibited from creating "slush funds" or otherwise engaging in any false, fraudulent, improper or misleading accounting practices.

## Compliance with Laws and Regulations

Verisk commits to doing business in an ethical and sustainable manner and expects its Suppliers to do likewise. Supplier will comply with all Verisk Governance Policies (or its own similar policies) available on Verisk's [Governance Website](#). Verisk expects all Suppliers to operate in full compliance with all laws and regulations wherever they conduct business. No Supplier shall commit an illegal or unethical act, or instruct others to do so, for any reason.

## Conflicts of Interest

Verisk is committed to operating under the strictest integrity. Staff are trained to recognize conflicts of interest, report them and recuse themselves from any negotiations and decision making. Suppliers are expected to raise any conflicts of interest in their dealings with Verisk and notify [ssp@verisk.com](mailto:ssp@verisk.com) at the earliest opportunity.

## Environmental Responsibility

Verisk seeks to do business with Suppliers that exercise good judgment in preserving the natural environment, limiting resource consumption, reducing emissions, and recycling waste. Additionally, Verisk requires Suppliers to comply with all applicable laws and regulations, and have an accountable person or body appointed to assure compliance and proactively reduce any negative environmental impact of supplier operations. Preferential status is given to Suppliers who can evidence operation and compliance to an Environmental Management System.

Verisk encourages Suppliers to suggest options that lessen the associated environmental impacts, particularly in areas such as air emissions; waste reduction; recovery and management; water use and disposal, including responsible wastewater disposal; proper disposal of hazardous materials; and greenhouse gas emissions.

## Fair Competition; Antitrust

Verisk commits to fair competition and conducting its operations in compliance with all applicable antitrust and fair competition laws where it does business (Competition Laws). Verisk likewise expects its Suppliers to comply with all Competition Laws and refrain from engaging in any actions that may unreasonably restrain trade, including without limitation attempts

to: (a) fix or control prices; (b) improperly obtain or share competitively sensitive information; (c) coordinate bidding activities; (d) boycott customers or suppliers; (e) divide or allocate markets; (f) limit the production or sale of products or services; or (g) otherwise engage in anticompetitive conduct.

## Human Rights

Verisk supports the protection of internationally proclaimed human rights and consistent with its [Human Rights Policy](#), will not engage in business or supplier relationships that make it complicit in human rights abuses. Verisk expects its Suppliers to conduct their activities in a manner that respects human rights as set out in the United Nations Universal Declaration of Human Rights and International Labor Organization Declaration on Fundamental Principles and Rights at Work. In addition, Suppliers shall uphold the following labor practices:

- **Freedom of Association:** Suppliers shall respect workers' rights to associate or not associate with any groups, as permitted by and in accordance with applicable laws and regulations.
- **Employment Status:** Suppliers shall employ workers who are legally authorized to work in their location and facility. Suppliers are responsible for validating employees' eligibility-to-work status through appropriate documentation.
- **Employment Practices:** Suppliers employ all employees on a voluntary basis and shall not use any form of slave, forced, bonded, indentured, or involuntary labor. Suppliers shall ensure employees do not exceed maximum working hours and that no illegal disciplinary practices are undertaken. Suppliers shall not engage in human trafficking or exploitation and shall not retain employees' government-issued identification, passports, or work permits as a condition of employment.
- **Zero Tolerance for Harassment:** Verisk has a zero-tolerance policy for harassment of any kind. No form of physical, sexual, psychological, or verbal harassment or abuse shall be tolerated. Verisk's zero-tolerance policy covers all forms of harassment, including sexual harassment and unwelcome verbal, visual, physical, or other conduct that creates an intimidating, offensive, or hostile work environment. Suppliers shall create a work environment in which employees feel valued and respected for their contributions.
- **Antidiscrimination and Fair Treatment:** Verisk is an equal opportunity employer. Suppliers working with Verisk shall not discriminate in worker recruitment, compensation, advancement, or retention based on any criteria prohibited by law. The Supplier's employment decisions must be based on qualifications, skills, performance, and experience. Suppliers shall ensure that employees are treated, and treat each other, fairly and with respect and dignity.
- **Underage Labor:** Suppliers shall ensure that no underage labor is being used or has been used in the production or distribution of their goods or services.
- **Wage and Benefits:** Suppliers shall ensure that their workers are paid lawful wages and benefits, including overtime, premium pay, and equal pay for equal work, without discrimination and in accordance with all applicable laws.
- **Safe Workplace:** Suppliers shall ensure they comply with all employee health and safety laws and regulations in all areas where they have responsibility for workers. Suppliers shall have systems to prevent, detect, and respond to potential risks to the safety, health, and security of all employees and ensure that all workers receive communication and training on emergency planning and safe work practices.
- **Communities:** Suppliers shall respect and support the communities in which they operate, ensuring that they protect the rights of indigenous peoples in accordance with international law. Suppliers warrant that they operate within the boundaries of all local and international Land, Property and Housing Rights.

## Inclusion

Verisk is committed to inclusion and seeks to do business with a broad mix of Suppliers. Verisk encourages its Suppliers to also seek greater inclusion through their subcontracting engagements.

## Insider Trading

Verisk expects all Suppliers to refrain from divulging or trading in securities

or providing a family member, friend, Verisk employee or any other person with a "tip". All such nonpublic information should be considered inside information and never be used for personal gain.

## Privacy and Confidentiality

Suppliers are expected to comply with all privacy and security laws and regulations and all other applicable confidentiality laws and regulations governing the protection, use, and disclosure of Verisk proprietary, confidential, and personal information. Suppliers may use confidential Verisk information to perform work on Verisk's behalf. Suppliers must safeguard third parties' confidential information, including anything Suppliers learn or create while providing services.

Where Suppliers may provide personal data to Verisk, compliance with applicable laws includes without limitation ensuring that data subjects were provided appropriate notice of collection and intended uses and sharing of their information, and any appropriate consents were obtained from them for its collection, as well as its disclosure to third parties and its use as contemplated by Verisk's agreement with Supplier.

Suppliers must be aware of and follow all local laws and regulations regarding the privacy of individuals, including employees and customers. Suppliers should never disclose personal information to anyone outside of Verisk except as required by legal or regulatory process and permitted by the Supplier contract.

## Security

Suppliers have a duty to protect Verisk confidential, proprietary and personal information. Suppliers are expected to use appropriate physical, technical and administrative safeguards to protect this data, in compliance with applicable privacy and security laws and regulations and in alignment with industry best practices and standards applicable to their operations and as may be referenced in their Supplier agreement.

## Supplier Communications

By doing business with Verisk, Suppliers acknowledge an obligation to:

- Communicate this Code's expectations to all employees, contractors and subcontractors, and third parties assigned to service the Verisk account.
- Ensure that all employees, contractors or other personnel working on the Supplier's behalf are trained as required by all applicable laws and regulations, including, but not limited to, anti-bribery and corruption, anti-fraud, modern slavery and human trafficking, privacy and security, and employee health and safety.

## Whistleblower Process

Verisk provides a whistleblower hotline, operated and maintained by a leading company independent of Verisk. The whistleblower hotline provides Verisk's stakeholders, including Suppliers, a way to safely report alleged financial misconduct, bribery and corruption, modern slavery, or other concerns relating to Verisk, as well as other potential improprieties, including those that fall under the provisions of this Supplier Code of Conduct. Suppliers agree that anyone making a whistleblower report shall not be retaliated against.

Whistleblower reports can be made online or by phone. Online reports can be submitted at <http://verisk.ethicspoint.com/>. Reports by phone can be made using one of the [global hotline phone numbers](#). Both methods are available 24/7/365 in local languages across the globe.