

GLOBAL BUSINESS CODE OF CONDUCT AND ETHICS POLICY

“At Accurate, Integrity Matters. It is the foundation for building trust and the cornerstone of business success. Our clients and their candidates trust us to be ethical, honest, and transparent, and we ALL play a role in living up to their expectations guided by our shared vision and values.”

Thank you for upholding our values and ensuring a safe and ethical workplace for all.”

Tim Dowd, CEO

INTRODUCTION

Accurate Background, LLC together with its subsidiaries, (collectively, “Accurate” or the “Company”), is committed to operating with the highest standards of professionalism and business ethics. Every organization’s image and reputation are determined by and dependent upon the example set by its employees, and Accurate is no exception. To achieve this commitment, Accurate expects our employees, officers, directors, suppliers and others acting on behalf of Accurate (“Accurate Person”) to conduct themselves with honesty and integrity inside and outside of the Company.

Accurate has adopted this Global Business Code of Conduct and Ethics Policy (“Policy”) and it applies to all Accurate Persons. This policy is intended to increase awareness regarding ethical standards and conduct and to reflect Accurate’s core values. In addition, this Policy will establish a mechanism for reporting any unethical behavior, conflicts, misconduct or other circumstances that is contrary to Accurate’s values. While not all Accurate Persons will be considered Accurate employees, this Policy is intended cover all Accurate Persons to the extent they act on behalf of Accurate and is intended to work in conjunction with Accurate’s other policies and procedures, including but not limited to the Supplier Code of Conduct, the [Employee Handbook](#) and Accurate’s organizational documents. Cooperation with this Policy is essential to maintaining Accurate’s reputation and principles, and no Accurate Person regardless of their department, title, position, rank, tenure, or other status with Accurate permits a violation of this Policy or our core values.

If you become aware of a violation of this Policy, you are encouraged to promptly report such to your direct supervisor, as applicable or if you feel comfortable, or via one of the below methods. Nothing in this Policy is intended to prohibit you from reporting potential violations of laws or regulations to the appropriate government agencies or to make other disclosures that are protected under your jurisdiction’s laws and regulations.

Reporting Options

- The Ethics and Compliance Hotline (available 24/7): www.accurate.ethicspoint.com
- Via a toll-free number for your region:
 - Australia: 1800 921 435
 - India: 0008000503525
 - UK: 0800 066 8323
 - US: 844 942 2781
- By contacting Human Resources at:
 - Australia: humanresources@accurate.com
 - India: HRIndia@accurate.com
 - UK: UKhumanresources@accurate.com
 - US: humanresources@accurate.com
- By contacting the Legal and Compliance Department at legal@accurate.com.

All information will be treated as confidential, to the extent permitted by applicable law, and no adverse action will be taken against any person that reports a violation of this Policy in good faith.

ACCURATE'S CORE DNA

Company Vision

To make every hire the start of a success story.

Mission

To advance the screening experience through visibility and insights, empowering organizations to make smarter, unbiased decisions.

Principles

- Focus on customer experience to better serve our customers and create differentiation
- Quality and consistency are essential
- Embrace entrepreneurial spirit

Values

- **Take Ownership.** Be accountable for your actions, your team, and the Company. Accept responsibility willingly, especially when it's what's best for our customers. Give others every reason to trust you, believe in you, and count on you. Rise to every occasion with your personal best.
- **Be Open.** Be open to new ideas. Be inclusive of people and ways of doing things. Make yourself accessible and approachable, and communicate with genuineness, transparency, honesty, and respect. Embrace differences.

- **Stay Curious.** Stay curious even as you move forward. Tirelessly ask questions and challenge the status quo in your pursuit of new ideas, ways to solve problems, and to continually grow and improve.
- **Work As One.** Work together to create the best customer and workplace experience. Put our customers and employees first – before individual or departmental agendas. Make sure they get the help they need to succeed.

Our Vision is the idea that drives our business forward, with the Mission being how we will realize our Vision. Accurate's Values represent what we believe and how we will behave with each other and our customers. The Policy supports the Values that we believe in and adherence to the Policy will help to build and maintain the trust, confidence and loyalty of our customers and our employees alike. When considering taking any action or even whether to not take an action, each of us must ask ourselves whether the action or inaction is consistent with and in support of our Mission, Values and Vision. No Accurate Person, regardless of stature or position, may authorize actions that are illegal or that jeopardize or violate the Company's standards, Values or applicable law.

POLICIES AND PROCEDURES

The following specific policies and procedures are intended to work with and in conjunction with all other policies and procedures that the Company implements. This Policy is intended to be applied globally to all of our business activities and corporate operations in accordance with the cultural, social and economic differences in the various countries where the Company operates. Where local laws and regulations contain mandatory requirements that differ from the provisions of this Code, such requirements will prevail. Every Accurate Person has an obligation to make sure they understand and adhere to all policies and procedures implemented by the Company, including all of those contained in the Policy.

Business Conduct

Integrity

All Accurate Persons are expected to act ethically with integrity, trust, curtesy, respect, fair dealing and professionalism at all times. Compliance is all Accurate Persons responsibility and Accurate is committed to comply with all applicable laws and regulations. Violations of any applicable laws and regulations may cause harm to the company in terms of business reputation, loss of customers, litigation, loss of revenue and loss of confidence from our customers, employees, consumers and other third parties.

Conflict of Interest

Accurate Persons are required to refrain from any activity, behavior, relationship or situation that creates an actual or potential conflict of interest with respect to their loyalty to the Company, its employees and or its customers.

A "conflict of interest" occurs when an individual's private interest interferes in any way – or even appears to interfere – with the interests of the Company as a whole. This can exist with

both paid and unpaid activities. It is almost always a conflict of interest for an Accurate Person to work simultaneously for a competitor or vendor of the Company. Best Practice is to refrain from any direct or indirect business connection with Company's vendors or competitors, except when acting on Company's behalf.

During employment with the Company, Accurate Persons are forbidden from offering, promising, or giving assistance to any person or entity that competes with or is preparing or expected to compete with any aspect of the business of Accurate. For this purpose, giving assistance includes, but is not limited to, rendering service, sharing information, having an ownership interest, loaning money, or providing anything of value to a competitor. Accurate Persons are also forbidden from making any preparations to form a competing business or otherwise engage in such competitive activities while employed by Accurate, unless otherwise required by applicable law.

An actual or perceived conflict of interest may not be obvious, therefore, if you have any questions whether actions could be construed as a conflict, you should consult with your immediate supervisor, team lead, Human Resources, or the compliance and legal department.

Gifts, Gratuities and Entertainment

Covered Employees are prohibited from soliciting, offering, promising, giving, or accepting any gratuities, kickbacks, bribes, gifts, favors, or anything else of value from any current or prospective competitor, customer, vendor, consultant, supplier, public official, or other person or entity doing or seeking to do business with Accurate.

Many business courtesies offered to Accurate Persons are offered because of the individual's position at Accurate. Accurate Persons should not feel any entitlement to accept and keep a business courtesy. Accurate Persons may not use their position at Accurate to request business courtesies. Accurate permits an Accurate Person to accept unsolicited business courtesies that are customary business practices or promote successful working relationships. However, an Accurate Person must never accept a business courtesy that creates a conflict of interest.

Accurate Persons who can influence the allocation of business, who participate in negotiation of contracts, or otherwise have the ability to make decisions regarding the selection of vendors and suppliers must use an extra level of diligence to ensure they avoid any business courtesies, gifts or benefits that would create the appearance of impartiality and unfair dealings. Accurate Persons should refuse a courtesy from a vendor or supplier when Accurate is currently and actively involved in the selection or negotiation of a contract with any vendor or supplier.

In addition to receiving gifts, gratuities and entertainment, Accurate is committed to winning our customers and clients solely on the quality and value of our services, and Accurate does not tolerate or authorize any gifts, entertainment, contributions or other benefits to be given to any customer, potential customer or company to influence their decision or to gain an

unfair business advantage. Accurate may approve providing certain business courtesies and nonmonetary gifts (promotional items or company log items) to employees, customers, clients and vendors provided such does not violate any laws or regulations, is consistent with industry practice and does not violate any customer or vendor's standards of conduct or their contract with Accurate.

Customer Relations

Accurate Persons are expected to be polite, courteous, prompt, and attentive to every customer or prospective customer of the Company. What sets Accurate apart from our other competitors is our unwavering focus on our customers and the caliber of talent and innovation flowing throughout our business.

As a services business, Accurate's focus is on customer experiences, and we should be ready to serve every single day. Customers are to be treated courteously and always given proper attention. Never regard a customer's question or concern as an interruption or an annoyance. You must respond to inquiries from customers, whether in person or by telephone, promptly and professionally. Through your conduct, show your desire to assist the customer in obtaining the help he or she needs. If you are unable to help a customer, find someone who can. All correspondence and documents, whether to customers or others, must be neatly prepared and error-free. Attention to accuracy and detail in all paperwork demonstrates our commitment to those with whom we do business. Never argue with a customer. If a problem develops with a customer or if a customer remains dissatisfied, bring the matter to the attention of your supervisor. When an Accurate Person encounters an uncomfortable situation that he or she does not feel capable of handling, the person should contact their supervisor or Human Resources to discuss.

Conducting Personal Business

Accurate Persons may not conduct personal business or business for another employer during their scheduled working hours, unless otherwise required by applicable law.

Media Inquiries

From time to time, Accurate Persons and other individuals associated with the Company may be approached by reporters or other members of the media. In order to ensure that representatives of Accurate speak with one voice and provide accurate information about the Company, all media inquiries must be directed to marketing@accurate.com. No one may issue a statement on behalf of Accurate without first receiving permission from the Chief Executive Officer. Any Accurate Person found in violation of this policy may be subject to discipline, up to and including termination.

Fair Dealings and Competition

Each Accurate Person, in carrying out his or her duties and responsibilities, should endeavor to deal fairly with each other and the Company's customers, suppliers and competitors. The Company abides by all laws and regulations that promote fair and open competition among

companies, including the U.S. anti-trust laws, Foreign Corrupt Practices Act (FCPA), the European Union competition laws, the U.K. Bribery Act, Australia's Part IV of the Competition and Consumer Act 2010 and similar national laws in countries in which we operate. Accurate Persons should only use proper and legal means of gathering marketing and business information concerning competitors. The Company does tolerate and does endorse anyone to induce or solicit confidential information from a competitor's past or present employees.

Bribery and Corruption

The Company is committed to winning business based solely on the quality and value of our products and services. Regardless of local custom or practices by others, we do not offer, make, or authorize, request, agree to receive or receive payment of money or anything of value including, but not limited to, cash, gift cards, gifts, travel expenses, entertainment, charitable or political contributions, per diem payments, sponsorships, honoraria, loans or employment offers to:

- Influence the judgment, conduct or action of any individual to ensure a desired outcome;
- Win or retain business or influence any act or decision of any governmental official, political party, candidate for political office, business partner or other decision maker; or
- Gain an improper business advantage or retain business.

Third parties who act on Accurate's behalf (such as suppliers) are subject to the same restrictions. Accurate will never make, offer to make, or authorize payment to a third-party if we know or have reason to believe that all or part of the payment will be offered or given by the third-party to someone to secure an improper advantage or to obtain or retain business.

US Foreign Corrupt Practices Act

Under the FCPA, it is illegal for US persons, including US companies or any companies traded on US exchanges, and their subsidiaries, directors, officers, employees, and agents, to bribe non-US government officials. The concept of prohibiting bribery is simple. However, understanding the full scope of the FCPA is essential as this law directly affects everyday business interactions between the Company and non-US governments and government-owned or government-controlled entities.

UK Bribery Act

Under the provisions of the Act, you may not directly or indirectly offer or promise any financial or other advantage to a UK or non-UK official or a private person for the purpose of influencing such official or private person in order to obtain or retain business, or an advantage in the conduct of business. This applies to acts or omissions that occur within the United Kingdom or elsewhere.

Anti-Money Laundering Laws

Anti-money laundering laws prohibit us from engaging in financial transactions where the funds involved were derived from illegal activities. We only conduct business with individuals and entities involved in legitimate business activities with funds that come from legitimate sources. If you believe that any individual or entity associated with Accurate may be engaging in any illegal activity, consult the Legal Department before entering into the transaction.

The Company may use outside individuals or organizations such as agents, representatives, consultants, independent contractors, distributors, and suppliers to help conduct business. We select our business partners carefully and choose those who share our values and high standards for ethical business practices. We have a responsibility to consider their business practices, behaviors, reputation, experience, and any past violations of law when we make decisions about partnering with them.

Transactions with third parties operating in high-risk markets carry a higher risk of corruption, so it is important to exercise due diligence during the selection process and to monitor third parties throughout the term of our relationship with them.

All agreements between the Company and third parties should be in writing and include confirmation that the third-party will comply with all applicable laws, including anti-corruption laws such as the Foreign Corrupt Practices Act, the U.K. Bribery Act, and Australia's Part IV of the Competition and Consumer Act 2010 as well as local labor and employment laws for third party suppliers. All suppliers and vendors are required to agree to follow our Supplier Code of Conduct and any violation of such should immediately be reported to the Legal Department.

If you have any questions about the business practices of the third-party, consult with the Legal Department or Procurement Department.

Fraud

Preventing and detecting fraud is key to maintaining our reputation and to avoid losing the confidence of our customers, suppliers, and employees. Fraud generally involves some form of deception such as theft or making a false statement in order to obtain a financial benefit or other advantage. Accurate insists on integrity in all our work and the work of our partners, including vendors, suppliers, contractors or the like. Fraud by any Accurate Person in any form is strictly prohibited, even if it is meant to benefit the Company in some way. Every Accurate Person should be aware of these potential fraud red flags:

- Dishonesty and embezzlement;
- Misuse or theft from the Company, a customer, a supplier, or partner assets, including cash, supplies, equipment, or any other assets;
- Misuse of credit card accounts;
- False reimbursement submissions;

- Exploitation of one's position with the Company for personal advantage;
- Taking personal advantage of corporate opportunities, such as personally pursuing a financial opportunity from which Accurate may benefit without first offering the opportunity to the Company;
- Theft, misuse or unauthorized disclosure of the Company's intellectual property, trade secrets or confidential information (including client lists, internal processes or other non-public information concerning the Company or its business);
- Unauthorized handling or reporting of business transactions;
- Falsification of any business documents, inspection reports, expense records or financial statements;
- Misrepresentations about products or services;
- Failure to disclose complete and accurate information when required by law or Company policy; and
- Bribery, kickbacks, and illegal gratuities.

Each Accurate Person, in carrying out his or her duties and responsibilities, should endeavor to deal fairly with each other and the Company's customers, suppliers and competitors. The Company abides by all laws and regulations that promote fair and open competition among companies, including the U.S. anti-trust laws, the European Union competition laws, and similar national laws in countries in which we operate.

Protection of Accurate Information

Confidential Information

All Accurate Persons must treat any information relating to the business of Company and any of its activities, projects, clients, customers, vendors and suppliers as confidential, both during employment and after service with the Company may cease. Accurate Persons may not divulge any of this information to outside parties, including family and friends, without the prior written consent of the Executive Leadership Team. The following examples are intended to serve as a guide to the types of such information and material, and this list is not exhaustive:

- Matters of a business nature such as information about bidding practices, financial information, reference names, projects or proposals, Company products, costs, pricing, profits, markets, customer lists, all data regarding customers and vendors, and plans for future expansion or business development.
- Matters of a non-public, technical nature such as civil engineering plans and processes, customer lists, catalogs, pricing information, Company reports, computer programs, software and supporting documentation, procedure manuals and related methods or technologies.
- Information pertaining to any services or products and the results of all such services or products provided to the Company's clients.
- Information pertaining to Company finances, research and development, marketing, business plans or strategies, suppliers, business partners, or customers.

Except as required in the performance of one's duties, Accurate Persons must not at any time during or after their employment use, disclose, possess or disseminate any confidential information or any other information of a secret, proprietary, or generally undisclosed nature relating to the Company, or its services, activities, projects, clients, customers, vendors and suppliers, plans, or procedures. Upon termination of the employment relationship or at any time upon the Company's request, Accurate Persons must deliver to the Company all copies of confidential information or other Company property in the person's possession. Additionally, upon separation from employment from the Company, Accurate Persons must immediately return any and all Company issued laptops, phones, keycards, external storage devices and any other Company-issued devices as well as any documents or other items containing Company confidential information.

Employees are prohibited from using cloud services, such as Dropbox and others, to store Company files, including any documents containing or referencing the Company's trade secret, proprietary and confidential information. Accurate Persons are prohibited from copying, moving, transferring and/or exporting any Company trade secret, proprietary and/or confidential information to their personal devices and/or accounts.

Nothing contained herein encompasses (or places any restriction upon any Accurate Person's discussions regarding) employee wages, employee benefits, payroll information and other terms and conditions of employment, nor does anything in this Policy interfere with in any way, restrict or impede any right any employee may have to engage in activity protected by Section 7 of the National Labor Relations Act without fear of retaliation, and/or any state or local laws protecting, for example, an employee's right to discuss wages, terms and conditions of employment, etc.

Nothing in this Policy prevents Accurate Persons from making truthful reports of unlawful conduct to federal, state, and local agencies, or as otherwise required by applicable law.

Corporate Recordkeeping

Accurate requires honest and accurate recording and reporting of information related to business decisions. Accurate's creation, retention and disposal of company records and information will be in accordance with Accurate's data retention and disposal policies and other applicable accounting principles.

All corporate records of Accurate must be promptly and accurately entered into the appropriate record book(s) and shall be true, accurate and complete. No Accurate Person may improperly record, manipulate, or otherwise document information to be misleading. Specifically, no information should be maintained in any manner to interfere with an auditor engaged to perform an internal independent audit of our books, records, processes or internal controls.

In the event of litigation, investigation or other issues arise regarding any Accurate records, all Accurate Persons should contact the Legal and Compliance Department prior to sharing any corporate records. Additionally, the Legal and Compliance Department may advise

Accurate Persons to retain certain corporate records beyond Accurate's standard data retention policy ("Legal Hold") and any Accurate Person who has been advised of such Legal Hold shall not destroy or dispose of any corporate documents without the prior approval of the Legal Department.

Use of Company Resources

Company resources, including time, email, intranet, internet, phones, computers and other equipment, are considered Accurate assets and are provided to be used for business purposes only. Accurate Persons should not use Accurate resources for personal purposes. Additionally, Accurate Persons should endeavor to protect Accurate's assets and ensure any Company property or equipment is protected from improper use, theft or other damage.

Accurate reserves the right to monitor or review information contained on an Accurate Person's company-issued computer or electronic device, the Accurate intranet, and cloud-based, Company-provided applications and services. Accurate resources shall not be used to create, access, store, print, solicit or send any materials that is, or may be considered, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate. No Accurate Person should solicit contributions nor distribute non-work-related materials during work hours.

The foregoing policy is in addition to the policies set forth in the Company [Employee Handbook](#) and should be read together with the policies set forth therein. Questions about the proper use of company resources should be directed to your direct supervisor or Human Resources.

Employment Policies and Relationships

Relationships

All Accurate Persons must avoid situations involving actual conflicts of interest with respect to the interests of the Company. Personal or romantic involvement with a subordinate employee of Accurate may lead to supervisory problems, possible claims of harassment, morale problems, and liability for the Company and the supervisor personally. Any Accurate Person with any supervisory authority must refrain from engaging in a romantic, sexual, or other close personal relationship with any subordinate. For this purpose, subordinate means any person who is supervised directly or indirectly by, or whose work assignments, performance evaluations, pay, or benefits may be controlled or influenced by such Accurate Person. Any Accurate Person involved in the type of relationship described in this policy should immediately and fully disclose such relationships to Human Resources.

Equal Opportunity Employer

Accurate is an equal opportunity employer and is committed to maintaining high ethical standards, protecting human rights and acting with honesty and integrity in everything we do. Accurate does not tolerate any form of discrimination, harassment, slavery, forced labor or human trafficking in any part of our business.

Everyone deserves to work in an environment where they are treated with dignity and respect. Accurate is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

Accurate will not discriminate against any individual on the basis of an individual's actual or perceived race, hair texture or hairstyle, creed, color, ethnicity, religion, gender, sexual orientation, marital status, national origin, age, physical or mental disability, handicap, pregnancy (including childbirth, lactation and related medical conditions), gender identity, partnership status, domestic violence victim status, ancestry, alienage or citizenship status, genetic information (including testing and characteristics), sickle-cell trait, HIV-status, association with HIV-positive individuals, military status, veteran or disabled veteran status, unfavorable discharge from military status, order of protection status, medical condition, use or non-use of lawful products off the employer's premises during non-working hours, or any other characteristic prohibited by applicable law. This policy applies to all aspects of employment, including hiring, promotion, demotion, compensation, training, working conditions, transfer, job assignment, benefits, layoff, and termination.

Any Accurate Person who feels harassed or discriminated against should immediately report the incident to his or her manager or to Human Resources. Similarly, any Accurate Person that witnesses any discrimination against another employee should immediately report the incident to his or her manager or to Human Resources.

All vendors and suppliers of the Company are also expected to follow all applicable laws. Any Accurate Person that becomes aware of any actual or alleged violation of applicable laws by a supplier or vendor of the Company should report such violation to the Legal Department or via the Ethics Hotline.

Harassment

Accurate does not tolerate any kind of harassment in the workplace and prohibits Accurate Persons from participating in any harassing activities. Harassing activities include but are not limited to, intimidation, sexual harassment, sexual advances, requests for favors, discrimination or bullying with regard to religious beliefs, nationality, ethnicity, sexuality, age, disabilities or other protected statuses. Further discrimination, harassment and retaliation prevention policies and procedures are available in the Accurate [Employee Handbook](#).

Anti-Slavery and Human Trafficking

Accurate is committed to creating and maintaining a work environment of mutual respect and is free of punishment, threats of violence, abuse, or other forms of harassment or intimidation. As a global organization, Accurate is committed to upholding the principles found in the UK Modern Slavery Act of 2015 and the Australian Modern Slavery Act of 2018. While these Acts may not apply to all Company locations, Accurate prohibits the use of involuntary labor, including child labor, human trafficking, slavery, prison labor, debt

bondage, or other indentured or forced labor globally in our business operations and our supply chain.

Labor Practices

- **Wages and Benefits.** Accurate is committed to comply with applicable labor and employment laws, including laws regarding minimum legal age for employment, wage and hour laws and regulations, overtime hours, piece rates and other elements of compensation, and legally mandated benefits.
- **Health and Safety.** Accurate strives to provide a safe and healthy work environment in accordance with international and national standards, laws, rules, and regulations. All Accurate Persons have responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.
- **DEIB.** Accurate is committed to a workplace culture that values and promotes diversity, equality, inclusion, and belonging. Accurate has launched a DEIB initiative “Belonging at Accurate.” Accurate has created opportunities to address diversity and inclusion with formal processes to include minorities, women, disabled persons, and veterans. We are committed to sound business values with diversity in our colleagues, customers, and stakeholders to support economic prosperity within the communities we serve. For more information about employee resource groups and activities please contact Human Resources or visit Accurate’s internal intranet On Background.
- **Freedom of Association.** We respect the legal rights of all Accurate Persons to join or not join worker organizations, including collectively bargained trade unions, or similar external representative organizations. We as an organization strive for effective communication with our employees as a means of promoting positive employee relations. Accurate abides by all laws under the National Labor Relations Act and no employee will suffer any discrimination or other ill-treatment due to the decision to engage or not engage in any organization.
- **Volunteers.** Accurate encourages Accurate Persons to participate in corporate volunteering and other social responsibility initiatives. Accurate offers a volunteer paid time off program for Accurate employees and in certain locations, Accurate has local Corporate Social Responsibility (CSR) initiatives in alignment with local rules and regulations.

Sustainability and Environmental Policies

Supply Chain Standards

Accurate sets a high bar for the Company as well as its vendors and suppliers. Our Supplier Code of Conduct is grounded in principles of inclusivity, continuous improvement, and supply chain accountability. We review our Supplier Code of Conduct regularly to ensure continuous best practices and to include the most current policies developed by industry. All vendors, suppliers or third parties doing business with Accurate are subject to these standards as a condition of doing business with us. We expect that all products and services provided to Accurate to be produced and provided in accordance with these standards.

Environmental Responsibility

Accurate understands and recognizes the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. Accurate complies with all applicable environmental laws and regulations. We apply a continuous improvement approach to enhance economic, social, and environmental conditions by adding value through innovative products and services, elimination of wasteful practices, increased energy efficiency, reduced total cost of ownership, reduced greenhouse gas emissions, reduced water use, and end-of-life recycling alternatives. Accurate is continuing to improve its environmental policies by continuing to implement additional initiatives to reduce the environmental impact of products and services.

COMPLIANCE AND REPORTING

Accurate is committed to achieving the highest possible business and ethical standards. All Accurate Persons are responsible for maintaining a culture of integrity. This may mean asking tough questions, sharing opinions or speaking up. To help achieve this culture and standards, Accurate has an “open door” policy, to allow individuals to come forward with any ideas or concerns regarding the Company, its employees, its suppliers, or its business generally. Any individual who raises such concerns will not be retaliated against by the Company. Accurate will not tolerate retaliation, and any individual found to have retaliated against an individual raising concerns will be subject to discipline, up to and including termination.

Whistleblowing

No Accurate Person is ever expected, encouraged, or allowed to violate any law when conducting Accurate business. Employees are encouraged to promptly report any suspected violations of laws or violations of ethical standards, as described below. Whistleblowing is viewed by the Company as a positive act that can make a valuable contribution to our business and its long-term success. Employees are often the first to realize that there is something wrong in the business and this policy aims to:

- Encourage Accurate Persons to feel confident in raising concerns at the earliest opportunity;
- To provide avenues for Accurate Persons to raise concerns and be notified as appropriate of any action taken by the Company in response; and
- To provide reassurance that any Accurate Person will be protected from possible retaliation for making any good-faith disclosures.

This policy applies to all Accurate Persons, regardless of an Accurate Persons position, job responsibilities, status, or seniority. “Whistleblowing” means reporting by an Accurate Person of suspected violations of this Policy, violations of other policies of the Company (including the Supplier Code of Conduct), illegal acts, or failure to act by any employee,

officer, director, supplier, or other third-party doing business with or on behalf of the Company.

Any serious concerns an Accurate Person may have about the conduct of any employee, officer, director, supplier, or other third-party doing business with or on behalf of the Company should be reported. Such concerns may include, but are not limited to, fraud, embezzlement, accepting or offering of bribes, violations of applicable law, violations of the Policy or other policies adopted by the Company, discrimination, harassment, damage to the environment, disregard for the health or safety of others, or other acts or lack of action that is not consistent with the Policy.

The Whistleblowing Policy is not intended to replace existing procedures for raising concerns but is intended to provide another channel for Accurate Persons to raise concerns in good faith.

Ethics Hotline

The Accurate Ethics Hotline may be used to report possible illegal, unethical or improper conduct by any person doing business with or on behalf of the Company. While you can also express concerns to your supervisor, Human Resources or the Legal Department, the value of the Ethics Hotline is that anyone wishing to raise a concern can do so anonymously, without any fear of retaliation.

All Accurate Persons are responsible for maintaining an ethical culture with integrity. This may mean asking tough questions, sharing opinions or speaking up. If you become aware of a violation of this Policy, you are encouraged to promptly report such to your direct supervisor, as applicable or if you feel comfortable, or via one of the below methods. Nothing in this Policy is intended to prohibit you from reporting potential violations of laws or regulations to the appropriate government agencies or to make other disclosures that are protected under your jurisdiction's laws and regulations.

Reporting Options

- The Ethics and Compliance Hotline (available 24/7): www.accurate.ethicspoint.com
- Via a toll-free number for your region:
 - Australia: 1800 921 435
 - India: 0008000503525
 - UK: 0800 066 8323
 - US: 844 942 2781
- By contacting Human Resources at
 - Australia: humanresources@accurate.com
 - India: HRIndia@accurate.com
 - UK: UKhumanresources@accurate.com
 - US: humanresources@accurate.com
- By contacting the Legal and Compliance Department at legal@accurate.com.

All information will be treated as confidential, to the extent permitted by applicable law, and no adverse action will be taken against any person that reports a violation of this Policy in good faith.

GLOBAL VARIATIONS

While customs may vary around the world, there are some principles that are fixed and apply globally to Accurate Persons and to Accurate as a company:

- Never offer or accept a bribe, that is, anything designed to obligate a person to act improperly with regard to Company business;
- Do not offer or accept cash or cash equivalents without approval from your manager;
- Do not participate in any business entertainment activity that would violate the law or embarrass Accurate by its public disclosure; and
- Consult the Legal Department before offering anything of value to government agencies, employees or political party officials (including Accurate clients and customers), as such gifts and entertainment are strictly regulated and often forbidden entirely.

ADMINISTRATION

This Policy does not, nor is it intended to, create an employer-employee relationship or constitute an employment contract. Specifically, any reference to an Accurate Person does not imply that Accurate Persons are considered Accurate employees. This Policy is intended to apply to all individuals acting on behalf of Accurate regardless of their classification as employee, contractor, officer, director, supplier, vendor or other third-party agent.

The Board of Managers of Accurate oversees the Policy, and the Policy is administered and monitored by our Legal Department and Human Resources. Senior management of the Company will periodically assess this Policy and approve any amendments hereto.

Employee Name

Employee Signature

Date Signed