



WHISTLEBLOWER POLICY 2019

Version 1.0
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Approved by Creditinfo Group CEO

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BLOWING THE WHISTLE

Concerned About Misconduct?

- I am worried this gift is too expensive.
- Is this fraud?
- I suspect misuse of company assets.
- I feel discriminated or harassed.
- I suspect bribes are being paid.

Who Can I Talk To?

- If possible, talk to the person involved; OR,
- Talk to your Manager/Supervisor, Group Compliance Officer, or the Group Legal Department.

You Can Also Use One of the Following Options:

- To file a report OR to get more information, send an email to compliance@creditinfo.com

WE UNDERSTAND IT IS NOT ALWAYS EASY TO RAISE CONCERNS ABOUT POSSIBLE MISCONDUCT BUT WE DO **ENCOURAGE YOU TO COME FORWARD** WITH ANY CONCERNS AND SPEAK UP!

ANY CONCERN WILL BE DEALT WITH **APPROPRIATELY** AND **CONFIDENTIALLY**.

II. Introduction

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. Why is Speaking Up Important?

Creditinfo is committed to conducting business on a daily basis with fairness, integrity and respect for the law and our values. In spite of this commitment, you may one day observe conduct that seems to violate the law, our Creditinfo Code of Conduct, and/or our Compliance Policies. If you observe or suspect such misconduct, you are encouraged to speak up and blow the whistle. By doing so, you give the Group the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust.

The Group truly values the help of employees who identify and speak up about potential concerns that need to be addressed. Speaking up is

encouraged and employees who speak up are protected. You will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for speaking up. After all: whistleblowing is essential for us to sustain our reputation, success and ability to operate – both now and in the future.

C. What is the Purpose of the Whistleblower Policy?

The purpose of this Policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of retaliation. It also describes what you can expect from the Group if you blow the whistle.

D. Who Can Speak Up?

This Whistleblower Policy is available to everyone working for or on behalf of Creditinfo. It is also open to any party with whom the Group has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives, and customers) who wish to raise a concern about possible misconduct within Creditinfo.

E. What Concerns Does the Whistleblower Policy Cover?

This Whistleblower policy can be used to raise concerns about suspected misconduct within Creditinfo, that is: any violation of the law, the Group's Code of Conduct, and/or the Compliance Policies under which the Group operates. Employees are expected to report any fraud or good faith suspicion thereof.

Do use this policy to raise concerns about:

- Fraud
- Discrimination or harassment
- Violations of competition laws and rules
- Inadequate financial or non-financial recordkeeping
- Conflicts of interest
- Bribery
- Environmental, health and safety issues
- Improper use of company resources

- Insider trading
- Disclosure of confidential information
- Violations of our policies on gifts, entertainment and hospitality

Do not use this policy:

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or call your country emergency phone number.
- For any grievances you may have in relation to your terms of employment.
- To settle personal disputes.
- To make accusations that you know are false. Doing so may lead to disciplinary measures.

III. Guidance on How & When to Blow the Whistle

Regardless of which Whistleblower channel you pursue, any potential concern about fraud or good faith suspicion about misconduct must immediately be reported.

A. How to Speak Up

Our Whistleblower Policy allows you to raise concerns about suspected misconduct through a variety of channels. Should you suspect any misconduct, you are encouraged to address this directly with the person involved. If this would not be appropriate, please feel free to raise questions and concerns through any of the following whistleblowing channels.

i. Your Manager/Supervisor

Employees are expected to report any concerns about suspected misconduct within the Group. As a general guideline, the first person to approach when raising a concern is your Manager/Supervisor.

ii. Whistleblowing via Email

In case you suspect misconduct and genuinely believe that the matter



cannot be dealt with through the personnel channel listed above, you may send your concerns to the Group's Compliance Department at compliance@creditinfo.com.

After you send your e-concerns to the Group's compliance inbox, you will receive periodic updates about the progress of your report; you will also be contacted if the person dealing with your report has feedback for you or further questions. Should it arise, you are also encouraged to provide additional information.

All reports received via the Group's compliance inbox are routed back to the Group's Compliance Officer for further handling.

You may also choose to discuss your concern with the Group's Compliance Officer, Carly Souther, at +34.691.043.161, or via email at c.souther@creditinfo.com, or member of the Group Legal Department, who can mediate personally on your behalf.

B. What about 'External Whistleblowing'?

The Group strongly encourages you to raise concerns internally through one of the available channels. Taking a concern to an outside party (e.g., the media) can have serious implications for the Group, for the persons involved, and possibly also for yourself. By speaking up internally, you give the Group the chance to look into the matter and take action if needed. In this way we can truly improve Creditinfo together.

C. What Kind of Information Needs to be Provided?

When you file a report (in person, in writing, or online), please provide as much detailed information as you have to enable the Group to assess and investigate your concern, such as:

- the background, history and reason for the concern
- names, dates, places and other relevant information
- any documents that may support your report

A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

D. What Should You Do If You Don't Have All the Facts?

We encourage you to speak up as soon as possible, ideally before situations get out of hand or damage is done. It is always better to discuss upfront than to report afterwards. If you know about or suspect misconduct, speak up with the facts you have. We do not expect you to have all the answers and you are certainly not expected to prove that your concern is well founded. Let the Group look into the matter to determine if there is a reason for concern.

Never investigate the matter yourself and do not seek evidence to build a strong case. We guarantee that no disciplinary measures or other steps will be taken against you if your genuine concern later turns out to be mistaken or misguided.

IV. Safeguarding Your Position: Confidentiality & Non-Retaliation

A. Do reports remain confidential?

All reporting is done confidentially. This means that information about your concern will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake. In principle, we are obliged to inform the implicated person that a complaint has been filed against him/her, but your identity will not be disclosed. You yourself can help us protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

B. Is it possible to report anonymously?

At the moment, Creditinfo does not have an anonymous reporting system. Nonetheless, any concerns will be dealt with appropriately and confidentially.

Creditinfo is committed to offering an anonymous reporting option in the future. Therefore, a later version of this Policy will enable you to share your

concerns anonymously (where allowed by the laws of your country).

However, even after an anonymous reporting option is established, you will continue to be encouraged to reveal your identity; that's because it is more difficult – and, in some circumstances, even impossible – for us to investigate reports that are made anonymously.

C. Will Your Privacy be Safeguarded?

Creditinfo is committed to protecting the privacy of everyone involved. We will do everything reasonable to safeguard personal data from unauthorized access and processing. Any personal data obtained as part of this Whistleblower Policy will only be used for the purposes explained in this Policy or to comply with the law or an important public interest.

D. Non-retaliation – How Will You be Protected if You Speak Up?

Speaking Up is encouraged and employees who speak up are protected. Please feel confident that you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation will not be tolerated. Retaliation is treated as a disciplinary matter.

If, however, you maliciously raise a concern that you know is false, you will not be protected.

E. What Happens if This Policy is Misused?

It is a violation of the Group's Code of Conduct to knowingly make a false accusation, lie to investigators, interfere with an investigation, or refuse to cooperate in an investigation. Doing so may lead to disciplinary measures.

V. Follow-up: What Happens After You Speak Up?

A. What Can You Expect if You Speak Up?

Creditinfo takes every report of possible misconduct seriously. If you submit a report in person, over the telephone, or in writing, you will receive an e-confirmation of receipt within five (5) to seven (7) Business days, with an estimate of how long it will take to handle and assess your concern.

Your report will undergo an initial review, and if necessary, it will be appropriately investigated. On average, closure of the matter can be expected within one (1) to three (3) months.

You will be informed of the overall findings, i.e. whether or not the Group has established that misconduct has taken place. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy, and the legal rights of all concerned.

B. Who Will Act on Your Concerns and How?

All concerns that are received by the Group are tracked internally. The Group's Compliance Officer (or designated appointee) will prioritize and handle your case according to the nature, urgency, and potential impact of your concern.

i. Review and investigations

The Group follows a two-phased approach when handling concerns:

- **Initial review and inquiries** – The purpose is to assess the concern and decide if it requires further review and investigation (and, if so, by whom and in which form). You may be approached for additional information.
- **Further review and investigation** – If the report requires further review and investigation, the Group's Compliance Officer (or designated appointee) will focus on an objective, factual analysis of the case. If needed, outside experts (i.e., Group Legal, Finance, etc.) can be engaged to assist in the investigation. They will work under strict confidentiality.

Review and investigation will be conducted in an independent, fair, and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including the right to a fair hearing). Details of the case, your identity, and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation, and are only shared on a need-to-know basis.

C. What is Expected of You in Connection with Investigations?

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. Lying to the people performing the investigation as well as delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures. All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in, or learn about an investigation, you must keep the matter confidential.

i. Appropriate measures

If your concern is well-founded (i.e. misconduct has indeed taken place), then appropriate measures will be taken where necessary and in accordance with the law and Group Compliance Policies.

D. What to Do if You Have a Concern About the Follow-up on a Report?

If you believe that your concern, or a concern raised against you, has not been handled appropriately or that an investigation has not been performed correctly, please inform the Group's Legal Counsel, Johannes Eiríksson at johannes@creditinfo.com.

E. More Information?

If you have questions relating to this Whistleblower Policy or if you need assistance, please contact:

- Your Manager/Supervisor; or,
- The Group's Compliance Officer, Carly Souther, at +34.691.043.161, or via email at c.souther@creditinfo.com.

VI. Protection of Personal Data

In any Whistleblower report, personal data may be collected, processed, and transmitted as required by applicable laws for the purposes of identifying and resolving any actual, perceived, or potential misconduct.

Creditinfo Companies are the parties responsible for the processing of personal data in the context of this Whistleblower Policy (the 'Personal Data'). Creditinfo Companies will only process personal data described herein for the purposes of this Whistleblower Policy.

Creditinfo will take the necessary technical and organisational measures to adequately safeguard the personal data against loss or unauthorized access. The Group has instructed its IT operators to do the same. The reports may be collected by any data processing means, whether electronic or not. Such means shall be dedicated to the code, i.e. the personal data shall in all cases be processed separately from other employee information systems or employee files.

Reports that have been found unsubstantiated shall be removed as soon as possible. Personal data relating to reports about substantiated claims will be removed within two (2) months after the verification work of the investigators is completed, unless disciplinary measures are taken; or, court proceedings are filed against the implicated person, or the reporter, if the report was filed in bad faith; in which event, the data will be removed within two (2) months after the disciplinary measures or the court proceedings (in highest instance) have been completed. Recording of any disciplinary measures against an employee of the Group resulted from a report filed under the provisions of this Policy shall be done in compliance with the Group's Compliance Policies.

'Remove' means destruction of the personal data or adaptation of the personal data in such a way that identification of the reporter and the implicated person are no longer possible. After the aforementioned storage periods are lapsed, the personal data may only be kept for archiving and statistical purposes in accordance with applicable national, European, and/or international laws.

Any employee may, at all times, inquire from his/her Manager/Supervisor or the Group's Compliance Officer whether or not a report has been filed

against him/her. If so, s/he will be provided with a written overview of the personal data available about him/her unless this would seriously hinder the investigation. If personal data proves to be incorrect or irrelevant, the implicated person can request correction or removal thereof.

The implicated person has a right to object to the processing of personal data in relation to a report on compelling legitimate grounds relating to his particular situation, if the legitimacy of the processing by Creditinfo Companies is based on applicable section(s) of relevant data protection laws. Replies to a request for access, correction or removal shall be provided as soon as reasonably practicable, but no later than four (4) weeks. Any refusal shall be in writing and shall mention the reasons therefore.

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 'S' followed by a horizontal line and a flourish.