



# Anti-Bribery and Corruption Policy

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## Revision History

Version	Date Change Made	Section	Change Made By	Description of Change
<b>Initial v1.0</b>	December 2012	All	Law Department	Initial document creation
<b>v2.0</b>	August 2014	All	Law Department, ER&C	Update regulatory language throughout document
<b>v3.0</b>	November 2016	All	Law Department, ER&C, Outside Counsel	Complete revision of document (all sections)
<b>v4.0</b>	November 2019	5.0 8.10	Law Department, ER&C	Update to definitions and Political Contributions
<b>v5.0</b>	September 2021	8.6 8.11 Appendix 1 Appendix 6 Appendix 8	Global Compliance and Privacy Services	Update to new platform URL and hotline telephone numbers
<b>v6.0</b>	November 2024	All	Corporate Compliance Governance and Compliance Oversight & Monitoring	Update Gifts and Hospitality section and department name references throughout

# Anti-Bribery and Corruption Policy

## 1. Background

The global nature of the business of Verisk Analytics, Inc., and its Business Units (Verisk) often requires that Verisk interact with vendors, customers, their employees, and officials of various governments around the world. Verisk's policy and applicable United States and foreign laws establish certain limits on those interactions. Verisk is committed to carrying out business fairly, honestly, and openly with zero tolerance toward bribery and corruption by those employed by and associated with the Company. Verisk believes that bribery and corruption are significant barriers to open and fair competition for goods and services.

## 2. Policy Statement

It is Verisk's policy that directors, officers, employees, and all persons and organizations acting on its behalf (Associated Persons) 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, acceptance of any Bribe in connection with Verisk's business or activities is prohibited. This Anti-Bribery and Corruption Policy (Policy) applies across all jurisdictions in which Verisk operates and to all Verisk employees and Associated Persons regardless of local customs or practices.

This Policy does not preclude reasonable and appropriate hospitality designed to encourage constructive relationships with Verisk customers, prospects, and others rather than influence a particular decision.

Verisk maintains books, records, and accounts that accurately and fairly reflect all of Verisk's financial transactions and provide assurance that all such transactions are properly authorized and executed. All individuals to whom this Policy applies have a responsibility to comply with this Policy and a duty to report any suspected violations of this Policy through established reporting procedures. Anyone found to have violated this Policy is subject to disciplinary action up to and including dismissal in accordance with local law as well as any and all appropriate civil and criminal sanctions.

Verisk's Chief Legal Officer is the officer responsible for this Policy.

*This Policy is provided to all employees and Associated Persons of Verisk. This Policy may be shared only in accordance with the Data Classification and Handling Policy available on the Enterprise Risk & Compliance intranet site or by contacting Verisk's Chief Privacy Officer and Lead, Corporate Compliance Governance.*

## 3. Purpose

It is the policy of Verisk to comply with the laws of the countries in which it operates, including laws designed to combat bribery and corruption. These laws have wide scope and hidden complexities that necessitate formal policies and procedures be in place to ensure that all Verisk personnel conduct themselves consistent with these laws. This Policy sets forth the framework for assuring compliance with all applicable anti-bribery and corruption laws.

## 4. Audience

The audience includes all Verisk directors, officers, employees, and Associated Persons acting on behalf of Verisk across all Business and Operating Units and in all physical locations.

## 5. Definitions

### 5.1 Associated Person

An Associated Person is any third-party vendor, agent, contractor, or person who works for said entity and has a business relationship with it, or temporary employee engaged by Verisk.

### 5.2 Bribe

A Bribe is any offer, promise, or authorization to give money, goods, gratuities, meals, entertainment, services, jobs, or job offers, travel, gifts, benefit, or other thing of value with the intent to obtain or retain business, gain any improper advantage, or induce or reward Improper Performance, where the recipient is expected to:

- act in bad faith
- act in a prejudicial or unfair manner
- violate a position of trust
- violate the law or his or her lawful duty
- provide an improper advantage

It is an offense to offer, promise, authorize, or accept a Bribe either directly or through an Associated Person.

It is not necessary for the Bribe to be accepted for a violation to occur—an offer or promise of a Bribe is sufficient. It is also not necessary for the individual making the Bribe to know the identity of the recipient, nor does a Foreign Public Official need to fulfil a promise to act for a violation to occur.

### 5.3 Business Unit

A Business Unit refers to a subsidiary organization that is part of Verisk Analytics, Inc., including all offices of the subsidiary, regardless of geographic location.

### 5.4 Business Unit Head

Business Unit Head means the most senior person in the Business Unit or the most senior person in the division or local office to whom the Business Unit Head has delegated these duties.

### 5.5 Facilitation Payment

A Facilitation Payment is a small payment to expedite or facilitate a routine, ordinary, nondiscretionary, commonly performed governmental action by a public official that Verisk is entitled to receive (granting licenses, turning on utilities, processing visas and other government papers, providing police or other local services, etc.). Verisk does not permit payment of facilitation payments in any jurisdiction for any reason unless an individual's life, health, safety, or security is in danger.

### 5.6 Foreign Public Official

A Foreign Public Official is an individual who:

- holds a legislative, executive, administrative, or judicial position of any kind, whether appointed, elected, or ceremonial, of a country or territory outside of the United States or, under the Bribery Act, outside of the United Kingdom
- exercises a public function for or on behalf of a country or territory or for any public agency, ministry, department, commission, or enterprise of that country or territory, including state-owned companies
- any officer, director, or employee of a state-owned company
- serves as an official agent of a public international organization

- works for any foreign political party or official
- is a candidate for foreign political office
- is an associated person of any of the above

Further examples of Foreign Public Officials are included in Appendix 7.

## **5.7 Hospitality and Gifts Register**

A Hospitality and Gifts Register is a document that records information about gifts and hospitality given or received by employees and Associated Persons of Verisk.

## **5.8 Improper Performance**

Improper Performance means performance that amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust.

## **5.9 Local Risk Management**

Local Risk Management is the individual or team of individuals at each Business Unit or office location designated to be responsible for compliance matters on behalf of the Business Unit. Local Risk Management works closely with Law, Corporate Compliance Governance, Compliance Oversight & Monitoring, and Internal Audit staff on all anti-bribery and corruption matters and is responsible for implementing and maintaining compliance with this Policy at the Business Unit.

## **5.10 Political Association**

An association, committee, or other organization, other than a political party, which accepts contributions or makes expenditures to promote the nomination of an individual for an elective public office, including governors associations, active Political Action Committees (PACs) as recognized by applicable governmental registration requirements, super PACs and other similar political organizations as that term is defined in U.S. Internal Revenue Code section 527(e)(1) (i.e., "527 groups").

## **5.11 Political Candidate**

Candidate means an individual who is currently registered, with the appropriate governmental authority, as a candidate for election to any international or U.S. federal, state, or local public office.

## **5.12 Political Contributions**

A payment of money or other thing of value directly made on behalf of Verisk to any political candidate, any political party, or any political association with the intent to influence any election to any international or U.S. federal, state, or local public office.

## **5.13 Political Party**

An association, committee, or organization which nominates or selects a candidate for election to any international or U.S. federal, state, or local public office, whose name appears on an election ballot as the candidate of the association, committee, or organization for such office.

## **5.14 Trade Association**

A membership organization of persons engaging in a similar or related line of commerce, organized to promote and improve business conditions in that line of commerce, and which holds itself out as a trade association, and not to engage in a regular business of a kind ordinarily carried on for profit, and no part of the net earnings of which

inures to the benefit of any member.

## 6. Anti-Bribery Laws and Requirements

### 6.1 Foreign Corrupt Practices Act

As a U.S. publicly traded company, Verisk is subject to the Foreign Corrupt Practices Act (FCPA), which prohibits payments or gifts to foreign government officials, foreign political parties (or officials thereof), and foreign political candidates intended to influence the official's decision, provide an unfair advantage, or reward Improper Performance. The FCPA also prohibits making payments indirectly through third parties (such as agents, consultants, contractors, and joint venture partners) if the organization knows or should have known that the payment will be used for unlawful purposes. The FCPA requires companies to keep accurate books and records and to maintain an adequate system of internal accounting controls.

### 6.2 U.K. Bribery Act

The U.K. Bribery Act goes beyond the scope of the FCPA. The Bribery Act applies to all operations of organizations with a close connection to the United Kingdom and covers both the public and private sectors. Actions under the Bribery Act are judged by whether they are intended to induce or reward Improper Performance. The Bribery Act makes it a criminal offense (for both the organization and individuals) to receive as well as give a Bribe. The law does not contain an exemption for Facilitation Payments. The Bribery Act requires organizations to put in place adequate procedures to prevent bribery. The Bribery Act holds directors of companies personally liable for lack of adequate procedures.

### 6.3 Canadian Corruption of Foreign Public Officials ACT and the Criminal Code

The Canadian Corruption of Foreign Public Officials Act (CFPOA) and the Criminal Code are the two main pieces of legislation in Canada that govern bribery. The CFPOA criminalizes the corruption of foreign public officials, while the Criminal Code criminalizes the corruption of domestic public officials. The CFPOA applies to Canadian citizens, permanent residents, companies, and other organizations incorporated in Canada. It also applies to anyone whose actions have a "real and substantial connection" to Canada, regardless of their location.

### 6.4 The German Criminal Code

The German Criminal Code (GCC) criminalizes bribery and corruption in both the public and private sectors. The GCC distinguishes between bribery in commercial practice and bribery involving public officials. The GCC also makes it clear that criminal offenses can only be committed by individuals, but corporations may also be liable if an individual commits an offense on their behalf.

### 6.5 Other Anti-Bribery and Corruption Laws

Many countries where Verisk is located or conducts business have their own anti-bribery and corruption laws or have ratified one of the major international treaties against corruption with which Verisk employees are required to comply. When traveling internationally on Verisk business, employees must comply with the local laws of those countries they are visiting, even if those local laws are not rigorously enforced. A violation of a local anti-bribery or corruption law can trigger violations of multiple regulations including the FCPA, the U.K. Bribery Act, CFPOA, GCC, and subject the employee to harsh treatment by local law enforcement or expose the employee to potential blackmail or extortion.

While the specific language or scope of the laws applicable to Verisk's operations in various countries may differ, Verisk employees should seek to conduct themselves with honesty and integrity at all times, avoiding even the appearance of impropriety.



## 7. Scope

### 7.1 Who

This Policy applies to Verisk, its Business Units and affiliates, and their respective officers, directors, employees, and Associated Persons regardless of physical location of the office or territories in which the office is operating.

### 7.2 Where

This Policy covers all Business Units and offices regardless of their physical location, residence, or the territories in which they operate.

### 7.3 Responsibility

Verisk's Chief Legal Officer is responsible for:

- serving as the officer responsible for this Policy

Verisk's Chief Privacy Officer and Lead, Corporate Compliance Governance or his or her designee is responsible for:

- ensuring this Policy is reviewed and updated as appropriate, at least annually
- assisting the Law Department, Compliance Oversight & Monitoring, and Internal Audit in investigating any concerns raised regarding compliance with this Policy

Verisk's Compliance Oversight & Monitoring is responsible for:

- developing, implementing, and administering the completion of annual anti-bribery and corruption training
- reviewing compliance risk assessments and associated regulatory risk registers completed by the Business Units
- oversight and monitoring of compliance with this Policy
- assisting the Law Department, Corporate Compliance Governance, and Internal Audit in investigating any concerns raised regarding compliance with this Policy

Verisk's Law Department is responsible for:

- assisting in updating and revising this Policy, as required, at least annually
- conducting any investigations required resulting from concerns raised regarding compliance with this Policy

Business and Operating Unit Heads are responsible for:

- implementation of this Policy and enacting the necessary processes to ensure that the Business Unit adheres to this Policy (The Law, Corporate Compliance Governance, Compliance Oversight & Monitoring and/or Local Risk Management can assist in achieving Policy compliance.)
- knowing the risk level of each location where they conduct business (The risk level for each country, known as the Corruption Perceptions Index, is described by Transparency International at <https://www.transparency.org/en/cpi>)
- completing an annual compliance risk assessment and any associated regulatory risk registers
- ensuring all employees acknowledge receipt and understanding of this Policy
- ensuring all Associated Persons follow this Policy or have an equivalent anti-bribery and corruption policy
- ensuring all employees and Associated Persons complete required anti-bribery and corruption training
- monitoring and reviewing compliance with this Policy and associated procedures within the Business or Operating Unit
- maintaining detailed financial books and records, receipts, and internal controls to ensure that all expenses and payments are properly documented and transparent (See Appendix 2: Record-Keeping Guidance.)
- conducting third-party due diligence before engaging an Associated Person to perform services or act on Verisk's behalf, annual monitoring of third-party vendors, and audits on any Associated Person where payments

exceed \$5,000 per year and the Business Unit/office is located in a country with a Corruption Perceptions Index of less than 50, as determined by Transparency International at <https://www.transparency.org/en/cpi>

- ensuring all staff complete the Gifts and Hospitality Register whenever a gift or hospitality is given or received by a Verisk workforce member in accordance with the monetary thresholds outlined in Section 8.6.2 of this Policy – Gifts and Hospitality
- cooperating with and assisting Verisk’s Law, Corporate Compliance Governance, Compliance Oversight & Monitoring and Internal Audit Departments with any investigations of suspicious activities
- immediately informing Verisk’s Law, Compliance Oversight & Monitoring, and Internal Audit Departments of any requests for Facilitation Payments, suspicious activities, and any other high-risk occurrences

Local Risk Management is responsible for:

- assisting the Business/Operating Unit in implementing this Policy and any associated policies and procedures at the Business/Operating Unit required to maintain compliance with this Policy
- assisting with any investigation of suspicious activities or concerns raised under the direction of Verisk’s Law, Corporate Compliance Governance, Compliance Oversight & Monitoring, and Internal Audit Departments

Employees and Associated Persons are responsible for:

- ensuring that they do not offer or accept any financial or other inducement that could be interpreted as a Bribe
- notifying their Business or Operating Unit Head and Verisk’s Law, Corporate Compliance Governance, Compliance Oversight & Monitoring Departments as soon as possible if they believe or suspect that this Policy was breached or may be breached in the future
- annually reading and completing an acknowledgment of receipt and understanding of this Policy
- completing all required anti-bribery and corruption training at time of hire, at least annually, and as required

## **8 Verisk Anti-Bribery Procedures**

### **8.1 Risk Assessment**

Each Business Unit Head must assess the nature and extent of the Business Unit’s potential external and internal risks of bribery by persons employed or associated with it. This assessment requires that the Business Unit Head complete an annual compliance risk assessment questionnaire and any associated regulatory risk registers. Additional risk assessments may be required if there are changes in operations, geographic locations, laws and regulations, or other underlying facts and circumstances. The completed compliance risk assessment will be provided to the Law, Corporate Compliance Governance, Compliance Oversight & Monitoring Departments for review. The completed assessments will be subject to audit by Verisk’s Internal Audit Department.

### **8.2 Employee and Associated Person Acknowledgment and Training**

This Policy, as well as all associated procedures, must be understood throughout the organization. Each employee and Associated Person will acknowledge reading this Policy and understanding its requirements. All employees are required to complete anti-bribery and corruption training at time of hire, at least annually, and as required.

### **8.3 Monitoring and Reviewing Compliance with This Policy**

The Compliance Oversight & Monitoring and Internal Audit Departments will review ongoing compliance with this Policy across all Business and Operating Units. Each Business/Operating Unit Head is responsible for monitoring and reviewing their Unit’s compliance with this Policy and required procedures.

## 8.4 Reporting Facilitation Payments, Suspicious Activity, and Other High-Risk Activities

The Business/Operating Unit Head is responsible for immediately informing the Law, Compliance Oversight & Monitoring, Internal Audit, and Local Risk Management of any requests for Facilitation Payments, suspicious activity reports, or any other high-risk occurrences. The Business/Operating Unit Head can send all reports to [ABC@verisk.com](mailto:ABC@verisk.com) or call the appropriate hotline telephone number listed in Appendix 6 and on the Compass intranet web page.

## 8.5 Associated Persons Due Diligence

Business and Operating Unit Heads must conduct, complete, and document appropriate due diligence procedures before engaging an Associated Person (third-party vendor, agent, contractor, etc.) in a foreign country. The Business/Operating Unit Head must also conduct an annual review and attestation of all engaged Associated Persons.

### 8.5.1 Onboarding/Engaging Associated Persons

The Business/Operating Unit is required to:

- conduct due diligence using the Associated Persons Due Diligence Checklist (Appendix 3) and any other appropriate due diligence to document a thorough review of all Associated Persons before entering into a contract
- ensure all appropriate language is included in all contracts with Associated Persons, including (1) the requirement for the Associated Person to create and maintain a Gifts and Hospitality Register and Verisk's right to conduct audits, (2) the requirement to complete an annual attestation regarding anti-bribery and corruption compliance, and (3) an agreement to abide by this Policy and complete Verisk training or attest that the Associated Person has an anti-bribery and corruption policy, program, and training in place that is equivalent to Verisk's and is subject to audit (See Appendix 9 for sample vendor contract language.)
- engage an outside investigation firm to conduct an in-depth review of an Associated Person in high-value transactions, contracts, or activities, if required, after discussion with Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments

### 8.5.2 Ongoing Associated Person Monitoring

The Business/Operating Unit must:

- require Associated Persons to complete an Anti-Bribery and Corruption Annual Attestation (Appendix 4) at least annually
- conduct—in conjunction with the Internal Audit Department—audits of Associated Persons based on assessed risk level determined as part of the Associated Person's onboarding and/or responses to the required annual attestation

### 8.5.3 New Business, Change in Business, and Contracts with External Parties

Where Verisk personnel or Associated Persons seek to develop new avenues for business or where the nature of the business changes, they should inform their Business Unit Head so that the Business Unit can undertake a compliance risk assessment (and due diligence where appropriate) of the circumstances. Where a business relationship with an external party is sought or newly established or the nature of the relationship has changed, the Business Unit must exercise and document appropriate due diligence to ensure there are no circumstances giving rise to a concern. Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments can provide advice on this process.

## 8.6 Hospitality and Gifts

Verisk does not seek to prohibit reasonable and good-faith hospitality, advertising, sponsorship, and promotional or

other similar business expenditures, as it is recognized that this constitutes an established and important part of building constructive relationships. Some hallmarks of appropriate hospitality and business gifts are that they are of reasonable value and are given openly and transparently, properly recorded in Verisk's books and records, provided only to reflect esteem or gratitude, and permitted under local law.

However, hospitality, promotional, and similar business expenditures can be used as Bribes. Verisk prohibits the giving and receiving of hospitality or business gifts and related expenses when the intention is to gain an improper advantage or to induce or reward Improper Performance. Verisk also prohibits the giving and receiving of hospitality or business gifts when the act of doing so places the recipient under any obligation, either currently or in the future.

#### 8.6.1 Certain Hospitality and Business Gifts Expressly Prohibited

The following hospitality and business gift items are expressly prohibited under this Policy:

- quid pro quo arrangements
- cash gifts (other than customary gratuities authorized in advance by management),
- Visa and Mastercard gift cards
- provision or acceptance of entertainment of a sexual nature

All concerns must be reported immediately to Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments by email to [ABC@verisk.com](mailto:ABC@verisk.com), online at <http://verisk.ethicspoint.com/>, or by phone using the hotline telephone numbers listed in Appendix 6 and on the Enterprise Risk & Compliance intranet web page.

Under this Policy, all hospitality and business gifts:

- must be within the applicable law
- should comply with the rules and policies of the recipient's organization
- must be properly documented
- should be an infrequent occurrence between giver and recipient
- may include modest meals with people with whom Verisk does business (such as providing a modest lunch after a meeting)
- may include the occasional provision of attendance at sporting or cultural events, if intended to build constructive business relationships rather than to receive or confer an advantage
- may include the provision of small promotional gifts, such as diaries, pens, and calendars

Each Business and Operating Unit Head is responsible for ensuring that any gift or hospitality is reasonable and proportionate in each individual circumstance. They can seek guidance from the Law and Compliance Oversight & Monitoring departments by sending an e-mail to [ABC@verisk.com](mailto:ABC@verisk.com).

Staff responsible for reviewing expense claims should be alert to any hospitality or gifts that may be construed as a Bribe.

#### 8.6.2 Providing or Receiving Business Gifts and Hospitality Items

All employees in all regions must record Gifts and Hospitality items in the ServiceNow Gifts and Hospitality registration system ([Verisk Gifts & Hospitality Register](#)) whether provided or received when the value of the item meets the lesser of the thresholds below.

Direct Line Managers must authorize all hospitality and gift items in accordance with established thresholds (Appendix 5) before the gift or hospitality items are provided to the recipient.



All gifts and/or hospitality items requiring pre-approval should only be provided after receiving Business or Operating Unit Head authorization.

Gifts refer to expenditures for tangible merchandise such as gift baskets, gift cards, floral arrangements, etc.

Hospitality refers to expenditures for entertainment and recreation such as tickets, admission, and booking fees to entertainment or sports venues, theaters, etc.

Providing a Gift or Hospitality item - complete the G&H Register before providing a gift or hospitality Item to a:

- Potential or current client or employee equal to or greater than \$75 US.
- Government Officials valued at the threshold established by local laws and regulations applicable to your geographic region, or equal to or greater than \$25 if a US government official.

Receiving a Gift or Hospitality item – complete the G&H Register to report the receipt of a gift or hospitality item from a:

- Potential or current client, vendor, or employee equal to or greater than \$200 US.
- Government official valued at the threshold established by local laws and regulations applicable to your geographic region, or equal to or greater than \$25 if received from a US government official.

Each employee or Associated Person giving or receiving gift or hospitality items is required to update the Register including:

- Type of gift or hospitality item and value in U.S. dollars.
- Date when the gift or hospitality was provided or received.
- Recipient of the gift or hospitality, including name, title or position, company name, and company address, or
- Provider of the gift, including name, title, company name, company address, and type of gift or hospitality.

All hospitality and gifts must be made openly and documented appropriately.

Receipts must be provided on employee expense reports where reimbursement is requested.

All Hospitality and Gift Registers are subject to audit by Verisk's Internal Audit and Compliance Oversight & Monitoring Departments.

### 8.6.3 Government Official Travel Expenses

Verisk allows reimbursement of reasonable travel expenses for public officials in connection with a Verisk sponsored event. Any payments to public officials can create an appearance of impropriety, so special care should be taken to ensure that the payments are open and transparent. The Business Unit Head must approve any payment for a public official in advance, and such approval and those transactions must be carefully documented. Whenever possible, payment for travel expenses of public officials should be paid to the governmental entity rather than the public official directly. The Business Unit Head shall obtain complete documentation related to all travel arrangements for their records. All concerns regarding public official travel expenses should be reported to Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments:

- through e-mail at [ABC@verisk.com](mailto:ABC@verisk.com)
- online at <http://verisk.ethicspoint.com/>
- by phone using the hotline telephone numbers listed in Appendix 6 and on the Compass intranet web page

The following procedures related to travel and lodging expenses for public officials shall be adhered to:

- Any expense to Verisk-approved preferred service providers should be paid directly by Verisk.
- No cash payment should ever go directly to a public official.
- Always follow Verisk's travel and expense policy when paying for travel and lodging expenses.
- Avoid extravagant travel expenses (e.g., flying first class, staying at five-star hotels).
- Paying for a public official's family members to participate in travel is not permitted.
- Scheduling or planning any unrelated side trips for the public official (e.g., private trips to Las Vegas or Disney World) is not permitted.

## 8.7 Facilitation Payments

Facilitation Payments are small amounts of cash paid to speed up or facilitate routine government action (granting licenses, turning on utilities, processing visas and other government papers, providing police or other local services, etc.). The Foreign Corrupt Practices Act (FCPA) permits a company or individual to make a Facilitation Payment if such payment is related to a routine, ordinary, nondiscretionary, commonly performed governmental action by a Foreign Public Official and which Verisk is entitled to receive. Routine government action does not include a decision to award new business or continue business with a particular party. The Bribery Act, however, does not permit Facilitation Payments, and many times Facilitation Payments may be illegal under local laws. Additionally, whether facilitating or expediting payments are permissible depends heavily on the circumstances of each case. Verisk does not want to make a Facilitation Payment and then discover that it is perceived by authorities as an improper payment.

Facilitation Payments to Foreign Public Officials are permitted only in the following circumstances:

- The payment is permitted by local laws.
- The payment is permitted by governmental policies or code of conduct. (Note: Many state-owned enterprises have strict policies that prohibit Facilitation Payments.)
- The Business Unit is not located in, conducting a transaction in, or not otherwise connected to the United Kingdom.
- The Business Unit policies do not prohibit the payment.
- The Business Unit has completed a risk assessment.
- The payment is for a routine government action and is not a discretionary act.
- The payment is not for obtaining or retaining business with the foreign government.
- The payment is only intended to reflect the timing of the action and not the decision to act itself.
- The payment is a small amount.
- The person making or authorizing the payment is not a citizen of the United Kingdom.
- The payment is directed to a low-level government employee and not to an official with decision-making authority.
- The Business Unit reports the payment to Verisk's Law Departments and Compliance Oversight & Monitoring within ten (10) business days by sending an e-mail to [ABC@verisk.com](mailto:ABC@verisk.com).
- The payment is properly and accurately recorded in Verisk's books and records.

No Business Unit or Associated Person may make a Facilitation Payment unless a Verisk employee's life or liberty or Verisk assets are in danger. All requests for Facilitation Payments must be reported to Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments as soon as reasonably possible by sending an e-mail to [ABC@verisk.com](mailto:ABC@verisk.com).

Certain expediting fees may not be Facilitation Payments and may be legitimate payments for faster service. In this case, if a Foreign Public Official is offering an expediting fee and the fee is:

- (1) posted or advertised to the general public,
- (2) payable by check or credit card or other traceable transaction, and

(3) documented by a receipt or invoice, then the fee is most likely not a Facilitation Payment and is permissible. If any of these elements are missing, there is a greater chance that this fee is improper, and the Verisk employee should not pay it.

## 8.8 Books and Records and Internal Controls

Bribes are often concealed under the guise of legitimate payments, such as commissions or consulting fees. Under the FCPA, Verisk is obligated to maintain books and records and accounts, in reasonable detail, that accurately and fairly reflect transactions and the disposition of its assets. There is no minimum or materiality threshold under the FCPA's books and records provisions.

Both the FCPA and the Bribery Act require internal controls designed to prevent and detect Bribes. Internal controls over financial reporting are the processes that Verisk uses to provide reasonable assurances regarding the reliability of financial reporting and the preparation of financial statements.

When Verisk personnel are dealing with a transaction subject to the FCPA or the Bribery Act, they should document all expenses and ensure that:

- the expenses are properly labeled and described
- management has provided written approval for expenses in accordance with Verisk policy
- invoices, receipts, or other documents are correctly itemized and provide sufficient descriptions to ensure that the expenses can be properly identified and accounted for

Even if an employee does not intend to make a Bribe, an expense, no matter how small, that is not accurately explained or described can be viewed as an improper payment. Guidance on proper record keeping is available in Appendix 2.

## 8.9 Donations

Verisk prohibits making charitable donations on behalf of Verisk where the purpose of the donation is to conceal payments made to influence vendors, customers, or Public Officials corruptly or to secure an advantage. Any charitable donations must be made without expectation of reward. Authorized donations must be made in Verisk's name and not in the name of any Public Official. *This Policy does not prevent individual employees, officers, or directors from making charitable donations on their own behalf. Verisk will not reimburse anyone, directly or indirectly, for personal charitable donations.*

## 8.10 Political Contributions and Payments to Trade Associations

### 8.10.1 Political Contributions

Political contributions made on behalf of Verisk are prohibited. This Policy does not prevent individual employees, officers, or directors from making political contributions or engaging in political activities on their own behalf. Verisk may not reimburse anyone, directly or indirectly, for personal political contributions.

### 8.10.2 Payments to Trade Associations

Except as otherwise provided by this Policy, payments to any trade association may be made only where permitted by law and, where the total payments to any individual trade association exceed ten thousand dollars (\$10,000) during any one calendar year, with the prior approval of the Chief Legal Officer or designee of the Chief Legal Officer for such purpose. All permissible payments to any trade association made on behalf of Verisk should be properly authorized, executed, and recorded.



## **8.11 Reporting Concerns and Escalation Procedures**

Verisk personnel have a responsibility to prevent, detect, and report all instances of possible bribery and corruption. All personnel should be alert to the possibility of bribery and corruption. Anyone who has concerns regarding acts or potential acts of bribery or corruption should first speak with his or her direct manager. If for any reason an employee is unable to speak with his or her direct manager, the employee should contact the Business Unit Head or Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments. Employees can report concerns anonymously 24 hours a day, 7 days a week, 365 days a year using the telephone numbers attached in Appendix 6 and listed on the Compass intranet web page. They can also report concerns online at <http://verisk.ethicspoint.com/> or send an e-mail to [ABC@verisk.com](mailto:ABC@verisk.com).

Verisk will treat all reports with the utmost confidentiality and protect from retaliation all personnel making such a report in good faith. The Business Unit Head is responsible for immediately informing Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments of all suspicious activity.

## **8.12 Training and Communication**

All Verisk personnel and Associated Persons shall receive a copy of this Policy and are required at time of hire or retention, and annually thereafter, to acknowledge receipt of the Policy and to confirm that they have read and understood it.

All personnel are required to complete training on anti-bribery and corruption, the Verisk Anti-Bribery and Corruption Policy, and Verisk's required procedures. The Corporate Compliance Governance Department has developed a training deployment plan to ensure that all employees complete the training at time of hire and annually thereafter.

Verisk publishes a copy of this Policy on all company intranet sites and in personnel handbooks where applicable. The Corporate Compliance Governance Department will communicate any changes to this Policy to all personnel.

## **9 Responsible Officer; Policy Owner**

The Chief Legal Officer is the Verisk Anti-Bribery and Corruption Policy Officer and owner of this Policy.

## **10 Disciplinary Action**

Verisk will investigate any potential breach in accordance with internal policies and procedures as well as corporate disciplinary procedures. Disciplinary action will be commensurate with the violation and consistent with local requirements, which may include immediate dismissal. Retaliation against an employee for complying with this Policy or making a whistleblower complaint is strictly prohibited.



## Appendix 1: Anti-Bribery and Corruption Policy Q&A

The following Anti-Bribery and Corruption Policy Q&A provides additional guidance to personnel and Associated Persons.

### **Who is covered by this Policy?**

This policy applies to Verisk, its Business Units, and all officers, directors, and employees of such organizations, regardless of where Verisk conducts business operations. It also applies to any Associated Person (third-party vendor, agent, associate, contractor, or temporary employee) engaged by and acting on behalf of Verisk who may interact with a Foreign Public Official, customer, prospect, or any other person on Verisk's behalf. If you are associated in any way with Verisk, formally or informally, this Policy applies to you.

### **Why do employees outside of the United Kingdom need to get training on the U.K. Bribery Act? Doesn't it apply only to U.K. companies and their employees?**

The U.K. Bribery Act applies to all employees of Verisk who are citizens of the United Kingdom, wherever they are located, and to employees located in or conducting business in the United Kingdom or on behalf of a U.K. registered company, regardless of location. The mere fact that Verisk has U.K. affiliates could make it liable for any offenses committed under the Bribery Act by persons performing services for Verisk, no matter where those offenses were committed. Verisk could be liable for an offense even where there is no actual knowledge of the actions being taken by its employees or Associated Persons unless Verisk can show that it has adequate procedures in place to prevent bribery and corruption. Ensuring that all personnel are aware of all of the laws and regulations that apply to Verisk is critically important. In addition, many Verisk personnel conduct business in or with the United Kingdom, directly subjecting them to the Bribery Act.

### **What is a Bribe?**

A Bribe is any money, goods, gratuities, meals, entertainment, services, benefit, or other thing of value offered, promised, authorized, or given with the intent to influence, induce, or secure any improper advantage or reward. A Bribe can take the form of gifts, loans, fees, rewards, proffered employment, excessive entertainment, employment or offer of employment to relatives, trips, job offers, or other advantages, such as paying taxes, providing services, and making donations. Any employee in doubt as to whether something is an offer or request for a Bribe should contact Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments.

### **Who are considered Foreign Public Officials?**

Foreign Public Officials include government employees, employees of state-owned enterprises (including, but not limited to, employees of national banks, national transportation systems, hospitals, utilities, and schools), political parties and their officials and candidates for political office, elected and appointed officials, agents or associates acting on behalf of government employees or officials, and officers and employees of a public international organization. A person does not cease to be a Foreign Public Official by purporting to act in a private capacity or by the fact that he or she serves without compensation. More examples of Foreign Public Officials appear in Appendix 7.

### **What is a Facilitation Payment?**

A Facilitation Payment is a payment related to a routine, ordinary, nondiscretionary, commonly performed

governmental action by a public official that Verisk is entitled to receive. Facilitation Payments to public officials are expressly prohibited when they relate to the award of new business, an unfair advantage over competitors, or the continuation of business with a particular party. Likewise, Facilitation Payments may not be made to a public official involved in the decision-making process to encourage a decision to award new business or to continue business with a particular party. The U.K. Bribery Act prohibits Facilitation Payments, and any Business Unit or personnel falling under the jurisdiction of the Bribery Act should not make a payment unless the life or liberty of Verisk personnel or Verisk assets are in danger. The Business Unit Head or appropriate personnel must report all requests for Facilitation Payments to Verisk's Enterprise Risk & Compliance and Law Departments by e-mail to [ABC@verisk.com](mailto:ABC@verisk.com).

### **Is it permissible to reimburse travel and hotel expenses for a Public Official or other person?**

Payment of "reasonable and bona fide" hospitality expenditures, such as travel, lodging, and food that are directly related to the promotion, demonstration, or explanation of Verisk products, is permitted if proportionate and reasonable to Verisk business. Reimbursement of reasonable travel expenses to Public Officials who are speakers at Verisk events is generally allowable, but such transactions are subject to additional scrutiny. The Business Unit Head should approve any payment to a Public Official in advance and carefully document the transaction. Payments should be made to the governmental entity rather than to the government official directly whenever possible. The Business Unit Head can contact Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments for further guidance. Under no circumstances will Verisk pay for side trips or for family members of public officials.

### **Where should Verisk personnel register hospitality and gifts?**

All employees across all Business and Operating Units in all geographic areas are required to record Gifts and Hospitality items in the ServiceNow Gifts and Hospitality registration system ([Verisk Gifts & Hospitality Register](#)) per the lessor of the thresholds presented in Appendix 5 or the thresholds imposed by local laws and regulations applicable to their geographic area.

- Gifts are defined as tangible merchandise, e.g., gift baskets, gift cards, flowers, donuts, sweets, and the like.
- Hospitality (Entertainment, Amusement, Recreation) is defined as tickets/admission to entertainment or sports venues, theaters, golf outings, nail salons, and the like.

All gifts and/or hospitality items requiring pre-approval should only be provided after receiving Business or Operating Unit Head authorization.

All records are subject to review by Verisk's Compliance Oversight & Monitoring and Internal Audit Departments.

### **Does this mean that all hospitality has to be authorized in advance?**

All employees across all Business and Operating Units in all geographic areas are required to record Hospitality items defined as tickets/admission to entertainment or sports venues, theaters, golf outings, nail salons, and the like (Entertainment, Amusement, Recreation) in the ServiceNow Gifts and Hospitality registration system ([Verisk Gifts & Hospitality Register](#)) per the lessor of the thresholds presented in Appendix 5 or the thresholds imposed by local laws and regulations applicable to their geographic area.

All gifts and/or hospitality items requiring pre-approval should only be provided after receiving Business or Operating Unit Head authorization.

All records are subject to review by Verisk's Compliance Oversight & Monitoring and Internal Audit Departments.

**Do all gifts given away at conferences need to be registered?**

In general, the answer is no. Usually, gifts given away at conferences consist of Verisk branded merchandise which are considered promotional gifts that do not require registration.

**Is there a monetary limit over which hospitality or gifts need to be registered?**

Yes. All employees across all Business and Operating Units in all geographic areas are required to record Gifts and Hospitality items in the ServiceNow Gifts and Hospitality registration system ([Verisk Gifts & Hospitality Register](#)) per the lesser of the thresholds presented in Appendix 5 or the thresholds imposed by local laws and regulations applicable to their geographic area.

**When can Verisk be responsible for the actions of Associated Persons?**

Verisk may be held responsible for the unlawful practices of Associated Persons under a variety of circumstances. When in doubt, consult with Verisk's Law, Compliance Oversight & Monitoring, and Internal Audit Departments before taking any action to engage an Associated Person to act on Verisk's behalf.

**What should personnel do if unsure whether a payment, gift, or other benefit would be appropriate?**

Personnel should consult the Business Unit Head. The Business Unit Head can contact Verisk's Law, Compliance Oversight & Monitoring and Internal Audit Departments for guidance before making any payment, reimbursing any expense, or providing a gift or other benefit to a Public Official or any other person. Questions should be sent to [ABC@verisk.com](mailto:ABC@verisk.com).

**What should personnel do if they see behavior that is inconsistent with the Policy?**

They should contact their direct manager, Business Unit Head, or Verisk's Law, Compliance Oversight & Monitoring and Internal Audit Departments for advice. Personnel who are unable to contact their manager or Business Unit Head or wish to remain anonymous may make a report by calling the telephone numbers provided in Appendix 6 and listed on the Compass intranet web page or they can report it online at <http://verisk.ethicspoint.com> or send an e-mail to [ABC@verisk.com](mailto:ABC@verisk.com).

## Appendix 2: Record-Keeping Guidance

The following provides examples and guidance to be implemented by each Business Unit to ensure that all books and records are maintained in reasonable detail and that they accurately and fairly reflect all Business Unit transactions and dispositions of Business Unit assets.

- All transactions must be executed in writing in accordance with management authorization.
- All transactions must be recorded in a manner that permits the preparation of financial statements in accordance with Generally Accepted Accounting Principles (GAAP).
- All assets must be maintained with full accountability.
- All transactions must be recorded in accounts that are reconciled to underlying detail at reasonable intervals.
- All cash, bank accounts, investments, and other assets of the Business Unit must always be recorded accurately on the official books of the Business Unit.
- Copies of Associated Person invoices must be maintained in sufficient detail, including the name of the Associated Person, a specific description of the services and/or products provided (including quantities), true purpose of the services, and the prices charged to the Business Unit.
- Details of all payments to both internal and external parties must be maintained such that the recipient of the payment and the nature of the transaction are easily identifiable and supportable.
- Employee expense reimbursement requests must be detailed and supported by receipts.
- Monies received by the Business Unit must be properly supported by an invoice, contract, or other written documentation detailing who the payment was from and the reason for the payment.
- All transactions must be properly signed off by the appropriate Business Unit designee in compliance with Business Unit signatory authority.
- Records should never be falsified or disguised to hide the nature of the transaction, regardless of the purpose of the transaction.
- Check requests must be in writing and contain a complete explanation of the purpose and authority for the payment.
- All documentation, including receipts, expense reports, check requests, petty cash requests, and invoices, must be maintained for at least six (6) years.

## Appendix 3: Associated Person Due Diligence Checklist

Before engaging an Associated Person (any third-party vendor, agent, contractor, or temporary employee engaged by Verisk), the Business Unit must collect and document the items listed on pages 21 and 22. For as long as the Associated Person is providing services to or on behalf of the Business Unit, the Business Unit must review and confirm these items annually.

### Corporate Information

- Full legal name, address, and telephone number of Associated Person
- DBA (doing business as) name(s) if any
- Type of firm (e.g., partnership, corporation)
- E-mail and website address (if available)
- Number of years in business
- Date and place of incorporation
- Parent company if any
- Subsidiaries, if any
- Jointly owned companies if any
- Relationship to Verisk:
  - Supplier
  - Agent
  - Distributor
  - Other (describe)
- Describe the business focus and/or function to be performed for Verisk
- Name and address of each owner of the organization, the percentage of ownership, and length of ownership term
- Name and address of all members of the organization's Board of Directors and length of term (if applicable)
- Names of key employees (officers, managers, and employees working on Verisk business) and the length of tenure with the organization
- Any employees, owners, or directors who are currently employed by the government (including the military and/or state-owned companies)
- Any employee, owner, or director who has ever held a government job or been in the military
- Other businesses where the entity's owners and/or officers are engaged
- Any directors, officers, or employees who are related by blood or marriage to a government employee or official (including the military and/or state-owned companies)
- Any directors, officers, or employees who owe their position with the organization to their acquaintance with a government official (including the military and/or state-owned companies) or are friends of government officials, former lobbyists, or individuals who have specialized knowledge of government officials

### Business Activities

- Countries in which the Associated Person has business operations
- Copies of all required registrations, licenses, permits, and certificates of incorporation (if a corporation) held to do business in each country (Any documents in a foreign language must be translated.)
- Records of annual sales to government entities (including the military and/or state-owned companies), including a list of all government entities to which the company sells or supplies goods and services
- Two (2) or three (3) customer references (preferably from the United States or Western Europe)
- A bank reference (preferably from an established institution)
- Copies of audited (or if not available, unaudited) financial statements

## **Anti-Bribery and Corruption Compliance Policies and Procedures**

- Current anti-bribery and corruption policies
- Anti-bribery and corruption training materials (e.g., PowerPoint presentations, handouts, attendance lists, acknowledgment forms)
- Internal accounting control procedures

## **Investigations and Enforcement Actions**

- A list and relevant documentation of any of the Associated Person's owners, directors, officers, or employees who have ever been involved in, accused of, or adjudicated for violating any anti-bribery and corruption law
- A list and relevant documentation of any of the Associated Person's owners, directors, officers, or employees who, within the past ten (10) years, have been found guilty of violating any criminal laws or regulations in their home country
- A list and relevant documentation of any of the Associated Person's owners, directors, officers, or employees who have received disciplinary actions relating to bribery and corruption and/or complaints relating to bribery and corruption from customers or any other individual
- A list of any employees of the Associated Person who have been granted amnesty or immunity from prosecution for cooperation with a government entity

## **Dealings with Public Officials**

- Records of any payments or gifts to any Public Official within the past twelve (12) months in connection with or in any way related to Verisk's business
- Records of any hospitality (gifts, travel, meals, lodging) provided to any Public Official within the past twelve (12) months in connection with or in any way related to Verisk's business
- Records of any Facilitation Payments within the past twelve (12) months in connection with or in any way related to Verisk's business
- Accounting records reflecting each gift, hospitality, or Facilitation Payment

## **Contributions and Donations**

- Records of contributions to political parties or candidates for political office
- Records of donations to government entities (including the military and/or state-owned companies) or charitable organizations
- Accounting records reflecting each contribution and donation

## **Books and Records and Internal Controls**

- Confirmation that the Associated Person maintains accurate and complete books and records for at least twelve (12) months related to work for the Business Unit

## Appendix 4: Anti-Bribery and Corruption Annual Attestation

The Business Unit should use the following template—filling in the Business Unit or other information where indicated in italics—to create an Anti-Bribery and Corruption Annual Attestation for Associated Persons conducting business on the Business Unit’s behalf.

As part of its anti-bribery and corruption third-party due diligence, *Business Unit Name* (part of the Verisk Analytics, Inc., family of companies) requires its current and potential vendors to complete this Anti-Bribery and Corruption Attestation.

An officer of the vendor’s organization must sign the attestation and return it to *Business Unit* within thirty (30) days of issuance. The completed attestation and any supporting documentation must be sent securely to: *insert email address or mailing address*.

### 1. Code of Conduct (COC) and/or Compliance Policies (select one)

\_\_\_\_\_ My organization has adopted COC and/or compliance policies that are comparable to *Business Unit’s* COC and/or compliance policies. We distribute these COC and/or compliance policies to all employees who conduct business on *Business Unit’s* behalf. This occurs initially within sixty (60) days of hire or contracting, upon revision, and annually thereafter.

OR

\_\_\_\_\_ My organization does not have COC and/or compliance policies comparable to *Business Unit’s* COC and/or compliance policies. We distribute *Business Unit’s* COC and/or compliance policies and procedures to all employees who conduct work on behalf of *Business Unit*. This occurs initially within sixty (60) days of hire or contracting, upon notice of revision, and annually thereafter.

### 2. Anti-Bribery and Corruption (ABC) Policy (select one)

\_\_\_\_\_ My organization has an anti-bribery and corruption (ABC) policy and procedure that is applicable to all employees and vendors and is comparable to *Business Unit’s* ABC policy. We distribute our organization’s ABC policy to all employees and vendors that conduct business on *Business Unit’s* behalf. This occurs initially within sixty (60) days of hire or contracting, upon revision, and annually thereafter.

OR

\_\_\_\_\_ My organization does not have an anti-bribery and corruption (ABC) policy and procedure comparable to *Business Unit’s* ABC policy. We distribute *Business Unit’s* ABC policy to all employees and vendors that conduct work on behalf of *Business Unit*. This occurs initially within sixty (60) days of hire or contracting, upon notice of revision, and annually thereafter.

### 3. Anti-Bribery and Corruption (ABC) Training (select one)

\_\_\_\_\_ My organization has anti-bribery and corruption (ABC) training that must be completed by all employees and vendors and is comparable to *Business Unit’s* ABC training. We require this ABC training to be completed by all employees and vendors that conduct business on *Business Unit’s* behalf. This training must be completed initially



within sixty (60) days of hire or contracting, upon revision, and annually thereafter. We maintain comprehensive records of completion status of all training.

OR

\_\_\_\_\_My organization does not have anti-bribery and corruption (ABC) training that is comparable to *Business Unit's* ABC Training. We distribute *Business Unit's* ABC training to all employees and vendors that conduct work on behalf of *Business Unit*. This training must be completed initially within sixty (60) days of hire or contracting, upon notice of revision, and annually thereafter. We maintain comprehensive records of completion status of all training.

#### 4. Accounting Books and Records, Internal Controls, and Hospitality and Gifts Register

\_\_\_\_\_My organization has a detailed set of accounting books and records and internal controls to record properly any and all transactions made on behalf of *Business Unit*. Our accounting books and records and internal controls meet the following minimum standards:

- The expenses are properly labeled and described.
- Management has provided written approval for expenses.
- Records are kept for no less than ten (10) years.
- Invoices, receipts, or other documents are correctly itemized and provide sufficient descriptions to ensure that they can be properly accounted.

\_\_\_\_\_My organization maintains a Hospitality and Gifts Register. Each employee or vendor giving or receiving gifts or hospitality related to *Business Unit* business is required to update the Register either in advance or immediately after any gift or hospitality has been given or received. The Register must show who has authorized the gift or hospitality. I certify that, at a minimum, the Hospitality and Gifts Register includes:

- date the gift or hospitality was given or received
- recipient of the gift or hospitality, including name, title or position, company name, company address, and type of gift (e.g., lunch, tickets to a sporting event, leather backpack, etc.).
- value of the gift or hospitality in U.S. dollars
- giver of the gift or hospitality, including name and title or position
- signature of authorized person approving the gift, including date approved • receipts attached

#### 5. Downstream Vendors (select one)

\_\_\_\_\_My organization uses the services of downstream/subcontracted vendors to assist in delivering services to or on behalf of *Business Unit*. I certify that all downstream/subcontracted vendors adhere to all requirements outlined in this attestation and that my organization provides oversight to those downstream/subcontracted vendors to ensure that they comply with these requirements. I certify that each downstream/subcontracted vendor completes an attestation before time of contracting and annually thereafter.

*Provide a list of each downstream/subcontracted vendor providing services to or on behalf of Business Unit:*

Legal Entity Name

Address

Services Provided





## Certification

I certify, as an authorized representative of my organization, that the statements made above are true and correct to the best of my knowledge. In addition, my organization agrees to maintain documentation supporting the statements made above for no less than ten (10) years and to produce evidence of the above to *Business Unit* upon request. My organization understands that the inability to produce this evidence may result in a request by *Business Unit* for a corrective action plan or other contractual remedies such as contract termination.

---

Print Name and Title

---

Signature and Date

---

Legal Entity Name

---

Legal Entity Address

## Appendix 5: Hospitality and Gifts Register

The Gifts and Hospitality Register can be accessed at [Verisk Gifts & Hospitality Register](#).

- Gifts are defined as tangible merchandise, e.g., gift baskets, gift cards, flowers, donuts, sweets, and the like.
- Hospitality (Entertainment, Amusement, Recreation) is defined as tickets/admission to entertainment or sports venues, theaters, golf outings, nail salons, and the like.

### Providing a Gift or Hospitality Item Reporting and Approval:

Recipient	Report Only	Pre- Approval Required	Approval Required
Potential Client	=> \$75 USD equivalent	=> \$200 USD equivalent	Direct Line Manager
Current Client	=> \$75 USD equivalent	=> \$200 USD equivalent	Direct Line Manager
Employee	=> \$75 USD equivalent	=> \$200 USD equivalent	Direct Line Manager
Government Official	=> \$25 or Greater	=> \$25 USD equivalent	Direct Line Manager

### Receipt of a Gift or Hospitality Item Reporting:

Category	Received From	Value of Item Received	Notification
Gift	Potential Client	=> \$200 USD equivalent	Direct Line Manager
Gift	Current Client	=> \$200 USD equivalent	Direct Line Manager
Gift	Employee	=> \$200 USD equivalent	Direct Line Manager
Gift	Vendor	=> \$200 USD equivalent	Direct Line Manager
Gift	Government Official	=> \$25 USD equivalent	Direct Line Manager
Hospitality	Potential Client	=> \$200 USD equivalent	Direct Line Manager
Hospitality	Current Client	=> \$200 USD equivalent	Direct Line Manager
Hospitality	Employee	=> \$200 USD equivalent	Direct Line Manager
Hospitality	Vendor	=> \$200 USD equivalent	Direct Line Manager
Hospitality	Government Official	=> \$25 USD equivalent	Direct Line Manager

## Appendix 6: Hotline Telephone Numbers

Country	Dial Instructions	Languages	Comments
<b>Australia (Optus)</b>	Step 1 - Dial: 1-800-551-155 Step 2 - Dial: 855-224-3293	English	Available from cellular phones
<b>Australia (Telstra)</b>	Step 1 - Dial: 1-800-881-011 Step 2 - Dial: 855-224-3293	English	Available from cellular phones
<b>Canada</b>	Dial: 855-224-3293	English French Canadian	No Restrictions
<b>China</b>	Send an email to: <a href="mailto:Reportaconcern@verisk.com">Reportaconcern@verisk.com</a>	Chinese English	Description of your concern Dates on Which or During which the incident occurred Contact details for the individuals involved and contact information for follow up questions or concerns Where the incident happened How you became of the aware of the incident Whether management is aware or involved
<b>Costa Rica</b>	<a href="https://verisk.ethicspoint.com">https://verisk.ethicspoint.com</a>	Spanish English	No hotline reporting option Available at this time. Use online reporting option
<b>France (Hotels 1)</b>	Step 1 - Dial: 0-800-99-1011 Step 2 - Dial: 855-224-3293	French (EU) English	Select hotels
<b>France (Hotels 2)</b>	Step 1 - Dial: 0-800-99-1111 Step 2 - Dial: 855-224-3293	French (EU) English	Select hotels
<b>France (Hotels 3)</b>	Step 1 - Dial: 0-800-99-1211 Step 2 - Dial: 855-224-3293	French (EU) English	Select hotels
<b>France (Hotels-Paris Only)</b>	Step 1 - Dial: 0-800-99-0111 Step 2 - Dial: 855-224-3293	French (EU) English	Select hotels
<b>France (Orange)</b>	Step 1 - Dial: 0-800-99-0011 Step 2 - Dial: 855-224-3293	French (EU) English	Available from cellular phones
<b>France (Telecom)</b>	Step 1 - Dial: 0-800-99-0011 Step 2 - Dial: 855-224-3293	French (EU) English	No Restrictions
<b>Germany</b>	Step 1 - Dial: 0-800-225-5288 Step 2 - Dial: 855-224-3293	German English	Available from cellular phones
<b>India</b>	Step 1 – 000-117 Step 2 – 855-224-3293	Hindi English	Only available from phones allowing international access and most public calling centers; may not be available from all locations; not available from public phones
<b>Ireland</b>	Step 1 - Dial: 1-800-550-000 Step 2 - Dial: 855-224-3293	English	From Northern Ireland use UK access code Available from cellular phones
<b>Ireland</b>	Step 1 - Dial: 00-800-222-55288	English	No Restrictions

Country	Dial Instructions	Languages	Comments
<b>(UIFN Airtel, Meteor, 02)</b>	Step 2 - Dial: 855-224-3293		
<b>Israel (Barak)</b>	Step 1 - Dial: 1-80-933-3333 Step 2 - Dial: 855-224-3293	Hebrew Arabic English	No Restrictions
<b>Israel (Bezeq)</b>	Step 1 - Dial: 1-80-949-4949 Step 2 - Dial: 855-224-3293	Hebrew Arabic English	No Restrictions
<b>Israel (Golden Lines)</b>	Step 1 - Dial: 1-80-922-2222 Step 2 - Dial: 855-224-3293	Hebrew Arabic English	No Restrictions
<b>Japan (Soft bank Telecom)</b>	Step 1 - Dial: 00-663-5111 Step 2 - Dial: 855-224-3293	Japanese English	May not be available from every phone/public phone Public phones require coin or card deposit
<b>Mexico</b>	Step 1 - Dial: 01-800-288-2872 Step 2 - Dial: 855-224-3293	Spanish (LA) English	Public phones may require local coin payment during call duration
<b>Mexico (Por Cobrar - Spanish)</b>	Step 1 - Dial: 01-800-112-2020 Step 2 - Dial: 855-224-3293	Spanish (LA) English	Public phones may require local coin payment during call duration
<b>Nepal (Nepal Telecom Only)</b>	Dial: 18000010142	Nepali English	No Restrictions
<b>Poland</b>	Step 1 - Dial: 0-0-800-111-1111 Step 2 - Dial: 855-224-3293	Polish	Public phones require coin or card deposit
<b>Singapore</b>	Dial: 1 800-723-1243	Mandarin Malay English	
<b>Spain</b>	Step 1 - Dial: 900-99-0011 Step 2 - Dial: 855-224-3293	Spanish (Castilian) English	Available from cellular phones
<b>Sweden</b>	Step 1 - Dial: 020-799-111 Step 2 - Dial: 855-224-3293	Swedish English	No Restrictions
<b>United Kingdom &amp; Northern Ireland</b>	Dial: 0800-028-0966	English	No Restrictions

## Appendix 7: Examples of Public Officials

- Presidents, prime ministers, or other heads of government
- Monarchs and other heads of state (kings, queens, sultans, sheiks, and royal family members)
- Secretaries, chancellors, ministers (Minister of Energy, Secretary of Housing, etc.)
- Commissioners, chiefs, and directors of government commissions, agencies, departments, and bureaus
- Members of military, quasi-military, or police forces
- Civil servants (assistant or undersecretaries, deputies, vice ministers, clerks, assistants, etc.)
- Foreign servants (ambassadors, consuls general, etc.)
- Senators, representatives, Members of Parliament, council members (whether appointed or elected)
- Judges at any level of court (including administrative judges)
- Mayors, governors, local/provincial/state/county legislators, or parliamentarians
- Employees and volunteers for political parties
- Candidates for political office
- Officials of political parties
- Employees of intergovernmental and non-governmental organizations (United Nations, Red Cross, North Atlantic Treaty Organization, Organization for Security and Co-operation in Europe, International Olympic Committee, World Health Organization, etc.)
- Employees of state-owned companies (including officers, directors, managers, and lower-level employees):
  - airlines
  - energy companies (Pemex, Petrobras, Total, Rosneft, etc.)
  - construction companies –
  - hospitals
  - schools and universities
- Agents or associates of the above (including law firms, accounting firms, lobbyists, consultants, etc.)

## Appendix 8: Red Flags

The following is a non-exhaustive list of “red flags” that Verisk employees should be aware of to help identify possible bribery and corruption issues. If any of the following are observed or requested, employees are to report the incident to Verisk’s Law, Compliance Oversight & Monitoring, and Internal Audit Departments by using the telephone numbers provided in Appendix 6 and listed on the Compass intranet web page or by sending an e-mail to <http://verisk.ethicspoint.com/> or [ABC@verisk.com](mailto:ABC@verisk.com):

- Offshore fund transfers
- Free or discounted services
- Lavish entertainment
- Employment request or expectation (of the person or the person’s family members or close friends)
- Unusually smooth sales process where expertise is limited
- Abnormal cash and check transactions
- Undue urgency for payments
- Poorly documented requests for reimbursement
- Only one person deals with a given supplier
- Family relationship between an agent/consultant and a Public Official
- Unexplained or excessive intercompany charge-backs
- Unexpected or illogical decisions in procurement
- Excessive commissions
- Abnormal expense statements
- Unapproved suspense accounts
- Unapproved credit notes
- Payments to intermediaries
- Payment requested to a numbered bank account
- Invoices for services not rendered
- Excessive or unusual bad-debt write-offs
- History of corruption in the country
- Agent/associate lacks necessary experience
- Agent/associate refuses to sign an annual FCPA attestation as described in Appendix 4 or provide documentation for due diligence
- Agent/associate has close personal or professional relationship with Public Officials
- Agent/associate is recommended or required by a Public Official
- Press reports of corruption among Public Officials
- Reputation for unethical or illegal conduct
- Payments to other entities
- High-risk country as identified by Transparency International at <http://transparency.org.uk>
- Unclear or undisclosed ownership of Associated Person
- Payments inappropriate for the work being done
- Lack of transparency in expenses or accounting records, or evidence that tax or foreign exchange controls are being violated
- Payments or unusual bonuses to undisclosed principals
- Money is needed to get the business
- Payment of commissions or significant portion of a commission before or immediately upon contract
- Refusal to sign a formal commission or fee agreement or to provide an invoice or receipt

- Demands for lavish entertainment or gifts before commencing or continuing contractual negotiations
- Refusal to put terms in writing or insisting on use of side letters
- Refusal to certify compliance

## Appendix 9: Sample Language for Use in Vendor Contracts\*

### **Anti-Bribery:**

- 1.1 Each party, its affiliated persons, third-party agents, and business partners agree to comply with all applicable anti-bribery laws, which may include, without limitation, the US Foreign Corrupt Practices Act, US Federal Bribery Statute, UK Bribery Act, and all similar national laws intended to prevent bribery and corruption. In particular, except for sums properly due and owing to a party in the normal course of performance of its obligations under the Agreement, between the parties, neither party shall give, offer, promise, or authorize any payment, gift, or other item of value (whether financial or otherwise) to any of the other Party's officers, employees, agents or contractors for the purpose of introducing or rewarding any favorable action or influencing any act or decision, and each Party warrants that it has not done so prior to execution of this Agreement.
- 1.2 Each Party shall have in place, maintain, and comply with an anti-bribery and corruption policy that meets the requirements of the US Foreign Corrupt Practices Act, US Federal Bribery Statute, the UK Bribery Act, and all similar national laws intended to prevent bribery and corruption.
- 1.3 Each Party shall notify its affiliated persons, employees, contractors, third-party agents, and business partners of its Anti-Corruption Policy and use reasonable endeavors to ensure compliance with its provisions. Each Party shall (to the extent permissible by Law) notify the other Party in writing if such Party violates or becomes aware that it has violated the anti-bribery laws.
- 1.4 Verisk reserves the right to request evidence to support compliance with the foregoing representations and warranties. Such evidence may include (i) copies of Anti-Bribery Policy, (ii) evidence of employee awareness/training concerning the Anti-Bribery Policy, and/or (iii) certification by an officer of the company through an affidavit attesting to compliance with all applicable anti-bribery laws, which may include, without limitation, the US Foreign Corrupt Practices Act, US Federal Bribery Statute, the UK Bribery Act, and all similar national laws intended to prevent bribery and. Failure to either fulfil this request or to provide evidence to support compliance may result in termination of the Agreement for material breach.

### **Vendor Requirement to Maintain Its Own Hospitality and Gifts Register**

Hospitality and Gifts Register. At the direction of the Verisk Business Unit, the Contractor shall establish and maintain a Hospitality and Gifts Register (Register). Such Register may be subject to audit by the Verisk Business Unit.

### **Vendor Requirement to Execute Annual ABC Attestation**

Annual Attestation. Commencing with the date of this Agreement, the Contractor shall execute and deliver to the Verisk Business Unit an attestation substantially similar to Appendix 4 of Verisk's Anti-Bribery and Corruption Policy regarding the Vendor's compliance with said Policy.

### **Vendor Requirement to Comply with Verisk Governance Policies**

Verisk has a policy of doing business in an ethical and sustainable manner and therefore expects the parties with which it engages to do likewise. Supplier will comply with all Verisk Governance Policies (or Supplier's own similar policies) available on the Verisk Website: <https://investor.verisk.com/governance/governance-documents/default.aspx>

Supplier represents and warrants either (A) that it operates and will at all times while this Agreement is in effect continue to operate in compliance with all aspects of the Verisk Supplier Code of Conduct at <https://www.verisk.com/siteassets/media/corporate-social-responsibility/downloads/supplier-code-of-conduct->



[policies-and-procedures.pdf](#) pr (B) that (i) Supplier has its own code of conduct that covers substantially similar matters as the Verisk Supplier Code of Conduct; (ii) Supplier operates and will at all times while this Agreement is in effect continue to operate in compliance with all aspects of its own code of conduct, and (iii) to the extent the Verisk Supplier Code of Conduct contains requirements that Supplier's code of conduct does not that Supplier operates and will at all times while this Agreement is in effect continue to operate in compliance with all such requirements of the Verisk Supplier Code of Conduct.

Supplier shall indemnify, defend, and hold Verisk harmless for any claims against Verisk arising out of or related to Supplier's breach of the representations and warranties set forth in this section that are applicable to it.

Verisk reserves the right to request evidence to support Supplier's compliance with foregoing representations and warranties. Such evidence may include: (1) copies of Supplier's code of conduct, (2) the completion and return reasonable questionnaires to assess Supplier's compliance with Verisk's Supplier Code of Conduct, (3) evidence of employee awareness/training, and/or (4) a request for an officer of Supplier to sign an affidavit attesting that Supplier is in compliance with the Verisk Supplier Code of Conduct. Notwithstanding the foregoing, if Verisk has a reasonable belief that Supplier is in violation of Verisk's Supplier Code of Conduct, Verisk shall provide written notice to Supplier setting forth in detail the reasons for its belief and a demand for the parties to conduct a Compliance Review solely for the purpose of evaluating whether Supplier has violated Verisk's Supplier Code of Conduct. The Parties shall schedule such Compliance Review at a time and place as mutually agreed during Supplier's regular business hours. The scope of any Compliance Review shall be limited only to those matters that are directly related to Supplier's alleged violation of Verisk's Supplier Code of Conduct. Supplier shall provide Verisk with (I) copies of documents, records, and other information, (II) access to Supplier facilities, operations, and (III) ability to conduct confidential interviews of Supplier personnel with knowledge of the alleged violation, as are reasonably necessary to conduct the review and conclude on the alleged violation. The review will be conducted by Verisk or its authorized representatives and at Verisk's expense (excluding Supplier's operational costs). Failure on the part of the Supplier to either fulfil this request or to provide evidence to support compliance may result in termination of the Agreement for material breach.

Verisk is an equal opportunity employer and federal contractor or subcontractor. Consequently, the parties agree that, as applicable, they will abide by the requirements of 41 CFR 60-1.4(a), 41 CFR 60-300.5(a) and 41 CFR 60-741.5(a) and that these laws are incorporated herein by reference. These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity or national origin. These regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status or disability. The parties also agree that, as applicable, they will abide by the requirements of Executive Order 13496 (29 CFR Part 471, Appendix A to Subpart A), relating to the notice of employee rights under federal labor laws.

*\*Language may be modified to meet the requirements of specific vendor agreements.*