



IRi

Growth delivered.

**IRI VENDOR
CODE OF CONDUCT
AND SUSTAINABILITY
POLICY**

VENDOR CODE OF CONDUCT

Updated: November 2020

It is essential that the employees of Information Resources, Inc. (the “Company” or “IRI”) and its other subsidiaries, (IRI or the Company) conduct themselves at all times with integrity and in full compliance with the laws and regulations that govern our global business activities. To that end, the Company has established a set of company standards of business practices and regulatory compliance that are set out in the IRI Code of Conduct which applies to all IRI employees, directors and officers. The Code of Conduct is an extension of our values and reflects our commitment to ethical business practices and regulatory compliance. We encourage vendors to review this policy located on our website.

IRI expects that its vendors will share and embrace the letter and spirit of our commitment to integrity. By “vendor” we mean any firm or individual that provides a product or service to IRI or indirectly to any of its clients. We understand that vendors are independent entities, but the business practices and actions of a vendor may significantly impact and/or reflect upon us, our reputation and our brand, which is one of our most important assets. Because of this, IRI expects all vendors and their employees, agents and subcontractors (their representatives) to adhere to the Company’s Code of Conduct while they are conducting business with and/or on behalf of IRI. All vendors should educate their representatives to ensure they understand and comply with the Code.

The Code of Conduct is maintained on our public website at www.iriworldwide.com and, to the extent reasonably appropriate to the circumstances under which a vendor and their representatives are engaged, is incorporated into this Vendor Code of Conduct.

Additionally, all IRI vendors and their representatives shall:

1. Conduct their business activities in full compliance with applicable laws and regulations.

2. Comply with the anti-corruption laws of the countries in which it does business, including the United States Foreign Corrupt Practices Act and UK Anti-Bribery Act.
3. Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
4. Comply with all applicable environmental laws and regulations.
5. Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion, accuracy, retention and disposal.
6. Comply with the intellectual property ownership rights of IRI and others, including but not limited to copyrights, patents, trademarks and trade secrets.
7. Use good judgment, discretion and moderation when offering gifts or entertainment to IRI employees.
8. Avoid the appearance of or actual improprieties or conflicts of interests. To that end, Vendors and/or their representatives shall not deal directly with any IRI employee whose spouse, domestic partner or other family member or relative has a financial interest in the vendor (other than ownership of less than one percent (1%) of the Vendor's publicly traded outstanding shares).
9. Avoid insider trading by buying or selling IRI or another company's stock when in possession of information about IRI or another company that is not available to the investing public and that could influence an investor's decision to buy or sell stock.
10. Conduct their employment practices in full compliance with all applicable laws and regulations.
11. Cooperate with IRI's commitment to a workforce free of harassment and unlawful discrimination.

12. Provide a safe and healthy work environment and fully comply with all applicable safety and health laws, regulations and practices.

13. Prohibit the use, possession, distribution and sale of illegal drugs while on IRI or vendor owned, leased or managed property.

14. Use only voluntary labor. The use of forced labor whether in the form of indentured labor, bonded labor, or prison labor by a Company vendor or its subcontractors is prohibited.

15. Comply with all local minimum working age laws and requirements and not utilize child labor.

16. Do not engage or threaten to engage in physical discipline or abuse.

17. Pay living wages under humane conditions and in accordance with applicable laws.

18. Do not require workers to work more than the maximum hours of daily labor set by applicable laws; ensure that overtime is voluntary and paid in accordance with applicable laws and regulations.

19. Keep employee records in accordance with local and national regulations.

REPORTING OF QUESTIONABLE BEHAVIOR OR POSSIBLE VIOLATIONS

If you or your representative wish to report any questionable behavior or possible violation of this Vendor Code of Conduct, the Company has a variety of resources available to assist you. You are encouraged to work with your primary Company contact in resolving a business practice or compliance concern. However, IRI recognizes that there may be times when this is not possible or appropriate. In such instances, please contact any of the following:

A. The IRI Global Ethics Hotline at +1-888-205-7834. The Hotline is maintained by an independent service provider, is available at all hours of the day and night and has representatives who speak all major languages. You may also file a report online at www.ethicspoint.com.

The telephone number for parties outside the U.S. can be found on the website above. Reports processed over the phone or online can be done confidentially depending on the country you are calling from. Reports made to the Hotline are sent to the Company for further investigation.

B. You may also contact the IRI Legal Department at:

General Counsel 203 North LaSalle Street Suite 1500, Chicago, Illinois 60601

Telephone: +1 (312) 474-3004

Email address: General.Counsel@iriworldwide.com

IRI will not tolerate any retribution or retaliation taken against any individual who has in good faith sought out advice or has reported questionable behavior or a possible violation. We thank you for your compliance with this important Policy and look forward to a mutually beneficial relationship with all of our vendors based on the highest levels of ethical behavior.

CORPORATE SUSTAINABILITY POLICY

The purpose of this policy is to formally communicate to our stakeholders that IRI believes in sustainability... optimizing the balance between environmental stewardship, social responsibility, and economic prosperity... to be an ethical imperative, that IRI appreciates sustainability to be a potential driver of new opportunities to increase growth and decrease risk, and that IRI intends and commits to continue strengthening the foundation it has already established for setting sustainability-related objectives and managing to achieve them.

Policy Details

Our sustainability policy hinges on five guiding principles for how we define, manage, measure, communicate and improve on sustainability:

- **Good Governance:** IRI maintains not just one, but multiple formal roles with responsibilities for collectively ensuring successful centralized and decentralized management of environmental stewardship.
 - o Executive leadership team / CEO
 - o Finance
 - o Human Resource
 - o Legal
 - o Audit and Compliance
 - o Corporate Services
 - o Marketing and Communications
 - o Sales

- **Practical Materiality:** IRI identifies which determinant factors have substantial effects on our sustainability, and which, based on probability, risk, resources, and other factors, are the highest priorities.

- **Manageable Goals:** IRI is committed to setting SMART (Specific, Measurable, Achievable, Realistic and Timely) objectives and corresponding targets, as measuring is essential to managing.
- **Communication:** IRI seeks to promote environmental stewardship, and sustainability at large, with both its internal and external stakeholders, from educating its internal personnel during new hire and other orientations to advocating to its external customers and suppliers.
- **Continuous Improvement:** IRI revisits and determine if and how we can refine our policy at least once a year.

The remainder of the policy hinges on what, through discussion with stakeholders, review of external protocols, and consultation with external subject matter experts, IRI believes are its material priorities:

- **Economic Prosperity:** IRI believes that direct economic value generated and distributed are most material to managing our sustainability, especially as a for-profit corporation.
- **Environmental Stewardship:** IRI believes that energy use is its most material environmental impact to manage to remain contribute to maintaining sustainability, including relative to its physical footprint.
- **Social Responsibility:** IRI cannot achieve and sustain optimal results unless our people are safe and well, so believes that occupational health and safety are most material to manage.
- **Governance:** From profitability, energy, and safety to promoting sustainable procurement, consumption, and community engagement, IRI believes that having sound management practices for identifying the aspects and boundaries most material to its business will help sustain it.

Related Policies, Standards, or Processes

IRI endorses the principles of a range of sustainability standards, protocols, and initiatives, including but not necessarily limited to:

- Global Reporting Initiative (GRI);
- United Nations Global Compact / Sustainable Development Goals (UN GC / SDG);
- Sustainability Accounting Standards Board (SASB);
- International Standards Organization (ISO) 900, 14000, and 27000;
- Carbon Disclosure Project (CDP); and
- ENERGY STAR®, WaterSense®, and other voluntary EPA initiatives;
- European Union (EU) Eco-Management and Audit Scheme (EMAS);
- Occupational Health and Safety Assessment Series (OHSAS) 18001.

To this end, IRI has a range of internal policies that support sustainability.

Compliance Measurement

IRI measures the extent to which it expects all personal and third parties to comply with this policy via a multitude of key performance indicators, from its energy use intensity and incident rate to supplier risk and grievances.

IRI is proactive in finding ways to reduce our energy needs. Past projects have included upgrading to more energy efficient lighting and replacing aging infrastructure such as HVAC and elevator systems. In 2018, IRI established a goal of achieving a minimum of 1% per year reduction in energy intensity through 2025 over our 2018 baseline.

IRI uses key performance indicators to support of its policy of setting SMART objectives for material aspects of its sustainability. Though not all-inclusive, following are examples of KPIs that IRI uses for measuring aspects of its sustainability, plus examples of correlated indicators from the GRI and SASB standards:

- **Corporate Governance**

- Ethics: Issues (e.g., GRI G4 GA57,58; SASB SV0102-01,02)
- Suppliers: Screenings (e.g., GRI G4 EN32, HR4,5,6,10, LA14, SO9,10)

- **Economic Prosperity**

- Value: Profitability (e.g., GRI G4 EC1)
- Presence: Markets (e.g., GRI G4 EC2)

- **Environmental Stewardship**

- Energy: Consumption, Intensity, Reduction (e.g., GRI G4 EN3,5,6)
- Emissions: GHG Emissions, Intensity (e.g., GRI G4 EN15,16,18)
- Water: Withdrawal, Sources (e.g., GRI G4 EN8,9)

- **Social Responsibility**

- Safety: Injuries, Incident Rate (e.g., GRI G4 LA6)
- Training: Investments, Programs, Reviews (e.g., GRI G4 LA9,10,11)
- Diversity: Composition (e.g., GRI G4 LA12; SASB SV0101-06,07,08)
- Retention: Turnover (e.g., GRI G4 LA1, SASB SV0102-07)
- Human Rights: Grievances (e.g., GRI G4 HR12)
- Anti-Corruption: Incidents (e.g., GRI G4 SO3,4,5)
- Privacy: Data Management (e.g., GRI G4 PR8; SASB SV0102-03,04,05)