## Table of Contents

Revision History ............................................................................................................. 3

1. Background .................................................................................................................. 4

2. Policy Statement ......................................................................................................... 4

3. Purpose ........................................................................................................................ 5

4. Audience .................................................................................................................... 5

5. Definitions ................................................................................................................... 5

   Associated Person ......................................................................................................... 5

   Bribe .............................................................................................................................. 5

   Business Unit Head ..................................................................................................... 6

   Facilitation Payment .................................................................................................... 6

   Foreign Public Official ................................................................................................. 6

   Hospitality and Gifts Register ....................................................................................... 6

   Improper Performance .................................................................................................. 7

   Local Risk Management ............................................................................................... 7

6. Anti-Bribery Laws and Requirements ......................................................................... 7

   6.1 Foreign Corrupt Practices Act ................................................................................ 7

   6.2 U.K. Bribery Act .................................................................................................... 7

7. Scope ............................................................................................................................ 8

   7.1 Who ......................................................................................................................... 8

   7.2 Where ..................................................................................................................... 8

   7.3 Responsibility .......................................................................................................... 8

      The Executive Vice President, General Counsel and Corporate Secretary is responsible for: 8

      The Sr. V.P. Enterprise Risk & Compliance is responsible for: .................................................. 8

      The Verisk Law Department is responsible for: ................................................................ 9

      The Business Unit Head is responsible for: ..................................................................... 9

      Local Risk Management is responsible for: ................................................................... 9

      Employees and Associated Persons are responsible for: ................................................. 10

8. Verisk Anti-Bribery Procedures ..................................................................................... 10

   8.1 Risk Assessment ...................................................................................................... 10

   8.2 Employee and Associated Person Acknowledgement and Training ...................... 10
8.3 Monitoring and Reviewing Compliance with this Policy ................................................................. 10
8.4 Reporting Facilitation Payments, Suspicious Activity, and Other High Risk Activities .... 10
8.5 Third Party Due Diligence ........................................................................................................... 11
   8.5.1 On-boarding/Engaging Third Parties ................................................................................. 11
   8.5.2 Ongoing Third Party Monitoring ....................................................................................... 11
   8.5.3 New business, change in business and contracts with external parties ................... 11
8.6 Hospitality and Gifts .................................................................................................................... 12
   Certain Hospitality and Business Gifts Expressly Prohibited ................................................ 12
   Government Official Travel Expenses .......................................................................................... 13
8.7 Facilitation Payments .................................................................................................................. 14
8.8 Books and Records and Internal Controls .............................................................................. 15
8.9 Donations ...................................................................................................................................... 16
8.10 Political Contributions .............................................................................................................. 16
8.11 Reporting Concerns and Escalation Procedures .................................................................... 17
8.12 Training and Communication .................................................................................................. 17

9. Responsible Officer ....................................................................................................................... 17

10. Disciplinary Action ...................................................................................................................... 18

Appendix 1 – Anti-Bribery and Corruption Policy Q&A ................................................................. 19
Appendix 2 – Record Keeping Guidance .......................................................................................... 23
Appendix 3 – Associateed Persons Due Diligence Checklist ......................................................... 24
Appendix 4 – Anti-Bribery and Corruption Annual Attestation .................................................... 27
Appendix 5 – Hospitality & Gifts Register ...................................................................................... 30
Appendix 6 – Hotline Telephone Numbers .................................................................................... 31
Appendix 7 – Examples of Foreign Public Officials ....................................................................... 33
Appendix 8 - Red Flags ................................................................................................................... 34
Appendix 9 - Sample Language for Use in Vendor Contracts ........................................................ 35
Appendix 10 - Pre-Acquisition Due Diligence Checklist ................................................................. 37
<table>
<thead>
<tr>
<th>Version</th>
<th>Date Change Made</th>
<th>Section</th>
<th>Change Made By</th>
<th>Description of Change</th>
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<td>Complete revision of document (all sections)</td>
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Verisk Analytics, Inc.
Anti-Bribery and Corruption Policy

1. Background

The global nature of Verisk Analytics, Inc. and its Business Units (“Verisk”) business often requires that we interact with officials of various governments around the world. Verisk’s policy and applicable United States and foreign law 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, as well as any and all appropriate civil and criminal sanctions.

The Executive Vice President, General Counsel and Corporate Secretary is the Officer responsible for this Policy.

*This Policy is provided to all employees and Associated Persons of Verisk. This Policy may only be shared in accordance with the Data Classification and Handling Policy available on the Enterprise Risk & Compliance intranet site or by contacting the Verisk Analytics Vice President of Global IT Security Services or the Vice President Compliance.*
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 Units and all physical locations.

5. Definitions

Associated Person

An Associated Person is any third-party vendor, agent, contractor, or temporary employee engaged by Verisk.

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 their lawful duty, or
- 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 the Foreign Public Official need to fulfil a promise to act for a violation to occur.

Business Unit

A Business Unit refers to each of the subsidiary organizations that is part of Verisk Analytics, Inc. including all offices of any subsidiaries, regardless of their geographic location.
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 who has been delegated these duties by the Business Unit Head.

Facilitation Payment

Facilitation Payments are small amounts of cash that are 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 U.S. Foreign Corrupt Practices Act (FCPA) permits a company or individual to make a facilitating or expediting payment if such payment is related to a routine, ordinary, non-discretionary, commonly performed governmental action by a Foreign Public Official and which Verisk is entitled to receive. However, the U.K. Bribery Act (Bribery Act) does not permit facilitation payments and many times facilitation payments may be illegal under local law.

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.

Hospitality and Gifts Register

A Hospitality and Gifts Register (Register) is a document maintained by Business Units that provides information about all gifts or hospitality given or received by employees and Associated Persons of Verisk operating in non-U.S. countries. A sample Register is included in Appendix 5.
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.

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 Enterprise Risk & Compliance staff on all anti-bribery and corruption matters and is responsible for implementing and maintaining compliance with this Policy at the Business Unit.

6. Anti-Bribery Laws and Requirements

6.1 Foreign Corrupt Practices Act

As a U.S. publicly traded company, Verisk is subject to the 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 indirectly making payments 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 Bribery Act goes beyond the scope of the FCPA. The Bribery Act applies to all operations of organizations with a close connection to the U.K. 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.

Both the FCPA and Bribery Act are strict liability laws, which means both intentional and unintentional behavior violating the laws will be penalized. Each law carries stiff penalties for violations by Verisk and individual employees and/or Associated Persons acting on behalf of Verisk.
6.3 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 you are required to comply. When traveling overseas on Verisk business, you must comply with the local laws of those countries that you 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 the FCPA and the Bribery Act, can subject you to harsh treatment by local law enforcement that does not meet Western standards, or expose you to potential blackmail or extortion.

While the specific language or scope of the laws applicable to Verisk’s operations in various countries may differ, you should seek to conduct yourself 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

The Executive Vice President, General Counsel and Corporate Secretary is responsible for:
• serving as the Officer responsible for this Policy

The Senior Vice President Enterprise Risk & Compliance or his or her designee is responsible for:
• oversight and monitoring of compliance with this Policy by each Business Unit
• updating and revising this Policy, as required, at least annually
• reviewing each Anti-Bribery and Corruption Risk Assessment and associated regulatory risk registers completed by Business Units
• developing, implementing, and administering the completion of annual anti-bribery and corruption training
• assisting the Law Department in investigating any concerns raised regarding compliance with this Policy
• ensuring that all potential mergers and acquisitions of new organizations by Verisk have been assessed in accordance with the Due Diligence Checklist outlined in Appendix 10
The Verisk 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

The Business Unit Head is responsible for:

- implementation of this Policy and enacting the necessary processes to ensure that the Business Unit adheres to this Policy (The Verisk Enterprise Risk & Compliance Department, the Verisk Law Department, and/or Local Risk Management can assist Business Unit Heads in achieving Policy compliance.)
- knowing the risk level of each location where they conduct business (The risk level for each country, known as the Corruptions Perceptions Index, is described by Transparency International at [http://transparency.org.uk](http://transparency.org.uk).)
- completing an annual 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 their Business 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 a third-party vendor to perform services or act on Verisk’s behalf, conducting annual monitoring of third-party vendors, and conducting third-party vendor audits on any vendor where payments exceed $5,000 per year and the Business Unit/office is located in a country with a Corruptions Perceptions Index of less than 50, as determined by Transparency International
- maintaining a Register if the corruption risk level of the Business Unit is medium or high as determined by the annual risk assessment
- cooperating with and assisting the Verisk Law and Enterprise Risk & Compliance Departments with any investigations of suspicious activities
- immediately informing the Verisk Law and Enterprise Risk & Compliance Departments of any requests for facilitation payments, suspicious activities, and any other high-risk occurrences

Local Risk Management is responsible for:

- assisting the Business Unit in implementing this Policy and any associated policies and procedures at the Business Unit, required to maintain compliance with this Policy
- assisting with any investigation of suspicious activities or concerns raised, under the direction of the Verisk Law Department and/or the Enterprise Risk & Compliance Department,
Employees and Associated Persons are responsible for:

- ensuring that you do not offer or accept any financial or other inducement that could be interpreted as a bribe
- notifying your Business Unit Head and Verisk Enterprise Risk & Compliance and Law Departments as soon as possible if you believe or suspect that this Policy was breached or may be breached in the future
- annually reading and completing an acknowledgement 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 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 risk assessment will be provided to the Enterprise Risk & Compliance Department for review. The completed assessments will be subject to audit by the Verisk Internal Audit Department.

8.2 Employee and Associated Person Acknowledgement 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 Enterprise Risk & Compliance Department will review ongoing compliance with this Policy across all Business Units. Each Business Unit Head is responsible for monitoring and reviewing their compliance with this Policy and required procedures.

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

The Business Unit Head is responsible for immediately informing the Verisk Enterprise Risk & Compliance and Verisk Law Departments and Local Risk Management of any requests for facilitation payments, suspicious activity reports, or any other high-risk occurrences. All reports can be sent to ABC@verisk.com or by calling the appropriate Hotline telephone number listed in Appendix 6 and on the Verisk Enterprise Risk & Compliance intranet web page.
8.5 Third-Party Due Diligence

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

8.5.1 On-boarding/Engaging Third Parties

The Business 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 with a third-party vendor
- ensure all appropriate language is included in all contracts with third-party vendors, agents, and contractors, including the right to require vendor creation and maintenance of a Register and to conduct vendor audits, the requirement to complete an annual attestation regarding anti-bribery and corruption compliance, and an agreement to abide by the 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 a third-party vendor in high-value transactions, contracts, or activities, if required, after discussion with the Enterprise Risk & Compliance and Law Departments

8.5.2 Ongoing Third-Party Monitoring

- At least annually, require Associated Persons to complete an Anti-Bribery and Corruption Annual Attestation (Appendix 4).
- In conjunction with the Enterprise Risk & Compliance Department, conduct audits of Associated Persons based on assessed risk level determined as part of the vendor on boarding and/or responses to the vendor-required annual attestation

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

Where 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 a risk assessment (and due diligence where appropriate) of the circumstances can be undertaken. Where a business relationship with an external party is sought or newly established or the nature of the relationship has changed, appropriate due diligence must be exercised and documented to ensure there are no circumstances giving rise to a concern. The Verisk Enterprise Risk & Compliance and Law 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 expenditure, 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 given openly and transparently, are of reasonable value, 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.

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)
- provision or acceptance of entertainment of a sexual nature

All concerns must be reported immediately to the Verisk Enterprise Risk & Compliance and Law Departments through the ABC@verisk.com or http://www.reportlineweb.com/verisk e-mail addresses or the Hotline telephone numbers listed in Appendix 6 and on the Enterprise Risk & Compliance intranet web page.

The following procedures apply to ALL hospitality and business gifts allowed under this Policy:

- must be within the applicable law
- should comply with the rules and policies of the recipient’s organization
- must be properly documented
- should be infrequent, not a regular occurrence between giver and recipient
- small-value gift items may be acceptable as promotional gifts, with Business Unit Head approval
- may include modest meals with people with whom Verisk does business (such as providing a modest lunch after a meeting)
- occasional provision of or attendance at sporting or cultural events if intended to build constructive business relationships rather than to receive or confer an advantage
- provision of small promotional gifts, such as diaries, pens, calendars, etc., will generally be acceptable

Staff responsible for reviewing expense claims should be alert to any hospitality or gifts that may be construed as a Bribe.
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 that 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 the Enterprise Risk & Compliance and Law Departments through the ABC@verisk.com or https://reportlineweb.com/verisk e-mail addresses or the Hotline telephone numbers listed in Appendix 6 and on the Enterprise Risk & Compliance intranet web page.

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

- Any expense should be paid directly by Verisk to Verisk-approved preferred service providers.
- No cash payment should ever go directly to a public official.
- In paying for travel and lodging expenses, always follow Verisk's travel and expense policy.
- Avoid extravagant travel expenses (e.g., first class v. business class, five-star v. four-star hotels).
- Verisk will not pay for a public official’s family members to participate in the travel.
- You are not permitted to schedule or plan any unrelated side trips for the public official (e.g., private trips to Las Vegas or Disney World).

If the Business Unit assessed risk level is other than LOW, the Business Unit shall be required to maintain a Register as outlined in Appendix 5.

The following Hospitality and Business Gifts documentation applies to all Business Units categorized as a MEDIUM or HIGH risk level for all or part of their operations, based upon the completed risk assessment:

Each Business Unit will establish and maintain a Register to record all business gifts and hospitality given and/or received and the reason for the gift or hospitality. Each employee or Associated Person giving or receiving gifts or hospitality is required to update the Register either in advance or immediately after any gifts or hospitality have been given or received. The Register must include the signature of the Business Unit Head who has authorized the gift or hospitality. At a minimum, the Register must include:
- date gift or hospitality given or received
- to whom the gift or hospitality was given or received by, including name, title or position, company name, company address, type of gift (e.g., lunch, tickets to a sporting event, leather backpack, etc.)
- value of gift or hospitality in U.S. dollars
- given by whom, including name, title, and company name (if given by an Associated Person)
- received from whom, including name, title, company name, company address and type of gift or hospitality (if received by a Verisk employee or Associated Person)
- signature of Business Unit Head approving the gift, including date approved

- Receipts must be provided.
- Each Business Unit must implement a hospitality and gifts policy and procedure specific to their Business Unit.
- All offers of business gifts to Verisk employees and Associated Persons should be referred to the Business Unit Head and should be accepted only if approval has been received from the Business Unit Head or is consistent with the policy established by the Business Unit and recorded in the Register.
- All business gifts should be made only as authorized by the Business Unit Head.
- All hospitality, whether given or received, must be authorized by the Business Unit Head
- Each Business Unit Head is responsible for ensuring that any gifts and/or hospitality are reasonable and proportionate in each individual circumstance. Guidance can be sought from the Verisk Enterprise Risk & Compliance and Law Departments as to whether the planned hospitality is proportionate and reasonable by contacting the ABC@verisk.com email address.
- All hospitality and gifts must be made openly and documented appropriately.
- Staff processing expense claims should check expenses against the Hospitality and Gifts Register to ensure recording and appropriate authorization have taken place

All concerns should be reported to the Verisk Enterprise Risk & Compliance and Law Departments. All Registers are subject to audit by the Verisk Internal Audit and Enterprise Risk & Compliance Departments.

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 FCPA permits a company or individual to make a facilitating or expediting 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. However, the Bribery Act 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. You do not want to make a facilitating payment and then discover that it is perceived as an improper payment by authorities. Facilitating or expediting 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 facilitating payments)
- Your Business Unit is not located in, conducting a transaction in, or is not otherwise connected to the United Kingdom.
- Your Business Unit policies do not prohibit the payment.
- Your 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.
- You report the payment to the Verisk Law and Enterprise Risk & Compliance Departments within ten (10) business days at ABC@verisk.com.
- The payment is properly and accurately recorded in Verisk’s books and records.

Any Business Unit or Associated Person who fall under the jurisdiction of the Bribery Act may not make a facilitating payment unless your life, liberty, or Verisk assets are in danger. All requests for facilitating or expediting payments must be reported to the Verisk Law and Enterprise Risk & Compliance Departments, as soon as reasonably possible, using the ABC@verisk.com e-mail address.

Certain expediting fees may not be facilitating 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 (1) is posted or advertised to the general public, (2) is payable by check or credit card or other traceable transaction, and (3) can be documented by a receipt or invoice, then the fee is most likely not a facilitating payment and is permissible. If any of these elements are missing, there is a greater chance that this fee is improper, and you 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, 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 you are dealing with a transaction subject to the FCPA or the Bribery Act, you 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 you do 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. Record-Keeping Guidance is available in Appendix 2.

8.9 Donations

Verisk prohibits the making of charitable donations on behalf of Verisk where the purpose of the donation is to conceal payments made to influence Foreign Public Officials corruptly or to secure an advantage. Any charitable donations must be made without expectation of reward. Charitable donations made on behalf of Verisk should be properly authorized by the Senior Vice President of Corporate Social Responsibility, executed, and recorded. Any donation approved by Verisk must be made in Verisk’s name and not the name of any Foreign Public Official. This Policy does not prevent individual employees, officers, or directors from making charitable donations on their own behalf. Verisk may not reimburse anyone, directly or indirectly, for personal charitable donations.

8.10 Political Contributions

Political contributions may be made only where permitted by law and with the prior approval of the Executive Vice President, General Counsel and Corporate Secretary. Any political contributions made by or on behalf of Verisk and any solicitations for political contributions of any kind cannot be made to induce or reward Improper Performance. Political contributions made on behalf of Verisk should be properly authorized, executed and recorded. 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.
8.11 Reporting Concerns and Escalation Procedures

You have a responsibility to prevent, detect, and report all instances of possible bribery and corruption. You 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 to his or her direct manager. If for any reason you are not able to speak to your direct manager, you should contact the Business Unit Head or the Enterprise Risk & Compliance and Verisk Law Departments. Concerns can be reported 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 Enterprise Risk & Compliance intranet web page or by e-mail to https://www/reportlineweb.com/verisk or ABC@verisk.com.

All reports will be treated with the utmost confidentiality and personnel making such a report in good faith will be protected from retaliation. The Business Unit Head is responsible for immediately informing the Enterprise Risk & Compliance and Verisk Law Departments of all suspicious activity.

8.12 Training and Communication

All Verisk personnel and Associated Persons shall receive a copy of this Policy and shall be 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 and this Policy and required procedures. The Enterprise Risk & Compliance Department will develop a training deployment plan to ensure that all employees complete the training at time of hire and annually thereafter.

A copy of this Policy will be published by the Enterprise Risk & Compliance Department and each Business Unit on all Verisk company intranet sites and in personnel handbooks where applicable. Enterprise Risk & Compliance will communicate any changes to this Policy to all personnel.

9. Responsible Officer

The Executive Vice President, General Counsel, and Corporate Secretary is the Verisk Anti-Bribery and Corruption Policy Officer and is responsible for monitoring, updating, and maintaining the Anti-Bribery and Corruption Policy and related procedures. The Senior Vice President of Enterprise Risk & Compliance and the Assistant General Counsel of the Law Department will support and assist the Business Unit Heads in implementing and managing 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 compliant 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.

Q1. Who is covered by this Policy?

A: This policy applies to Verisk, its Business Units, and all officers, directors, and employees of such organizations, even those Business Units whose operations are conducted entirely within the United States. It also applies to any 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 reading this, and you are associated in any way with Verisk, formally or informally, this Policy applies to you.

Q2: 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?

A: 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 these offenses were committed. Verisk could be liable for an offense even where there is no actual knowledge of the actions being taken by their 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.

Q3: What is a Bribe?

A: A Bribe is any money, goods, gratuities, meals, entertainment, services, or other thing of value offered, promised, authorized, or given with the intent to influence, induce, or secure any improper advantage or reward. This is referred to as Improper Performance. A bribe can take the form of gifts, loans, fees, rewards, proffered employment, excessive entertainment, employing of relatives, trips, job offers, or other advantages such as paying taxes, providing services, and making donations. If you are in any doubt as to whether something is an offer or request for a bribe you should contact the Enterprise Risk & Compliance and Verisk Law Departments.
Q4: Who is a Foreign Public Official?

A: A Foreign Public Official includes 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. Further examples of Foreign Public Officials appear in Appendix 7.

Q5. What is a facilitation payment?

A facilitating or expediting payment is a payment related to a routine, ordinary, non-discretionary, commonly performed governmental action by a public official that the company is entitled to receive. Facilitating or expediting 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, facilitating or expediting 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 Bribery Act prohibits facilitating payments, and any Business Unit or personnel who fall under the jurisdiction of the Bribery Act should not make a payment unless your life, liberty, or Verisk assets are in danger. All requests for facilitating or expediting payments must be reported to the Verisk Enterprise Risk & Compliance and Law Departments via the ABC@verisk.com e-mail address.

Q6: Is it permissible to reimburse travel and hotel expenses for a government or Foreign Public Official or other person?

A: Payment of “reasonable and bona fide” hospitality expenditures, such as reasonable travel, lodging, and food that are directly related to the promotion, demonstration, or explanation of our products is permitted if proportionate and reasonable to our business. Reimbursement of reasonable travel expenses to Foreign 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 Foreign Public Official in advance and such transactions should be carefully documented. Payments should be made to the governmental entity rather than to the government official directly, whenever possible. The Business Unit Head may contact the Verisk Enterprise Risk & Compliance and Law Departments for further guidance. Under no circumstances may payment be made for side trips or for family members of public officials.
Q7: Where do I register hospitality and gifts?

A: Business Units determined by risk assessment to be at MEDIUM or HIGH risk shall establish for all or part of their operations, a Register of all hospitality and gifts given and received. You must complete the Register (see Appendix 5) so that appropriate authorization by the Business Unit Head can occur. Your Business Unit Head will tell you where the Register is located and how you may access it. All records will be maintained locally and subject to review by the Verisk Internal Audit and Enterprise Risk & Compliance Departments.

Q8: Does this mean that all hospitality has to be authorized in advance?

A: Ideally, all expenditures on behalf of a Business Unit that maintains a Register will be authorized and the Register completed in advance. On some occasions, this will be impractical, such as when a decision is made to go to lunch when you are with the customer, not before. All hospitality and business gifts should be entered into the Register as soon as possible after the event, in accordance with the policy and procedures developed by your Business Unit.

Q9: Do I have to register all gifts given away at conferences?

A: Each Business Unit Head is expected to determine what gifts need to be registered. In general, the answer will be no, provided that the gifts are reasonable and customary. These will generally be considered promotional gifts that do not require registration.

Q10: Is there a financial value over which all hospitality or gifts need to be registered?

A: No. Each Business Unit’s policy and procedures will provide guidance to what is reasonable and appropriate under the circumstances. If you are in any doubt about proportionality or acceptability, you can consult your Business Unit Head or the Verisk Enterprise Risk & Compliance and Law Departments.

Q11: When can Verisk be responsible for the actions of third parties?

A: Verisk may be held responsible for the unlawful practices of third parties under a variety of circumstances. When in doubt, you may consult with the Verisk Law and Enterprise Risk & Compliance Departments before taking any action to engage a third party to act on Verisk’s behalf.

Q12: What should I do if I am unsure whether a payment, gift, or other benefit would be appropriate?

A. Contact your Business Unit Head. The Business Unit Head may contact the Verisk Enterprise Risk & Compliance and Law Departments for guidance before making any payment, reimbursing any expense, or providing a gift or other benefit to a Foreign Public Official or any other person. Questions may be sent to ABC@verisk.com.
Q13: What should I do if I see behavior that may be inconsistent with the Policy?

A. You should contact your direct manager, your Business Unit Head, or the Verisk Enterprise Risk & Compliance and Law Departments for advice. If you are unable to contact your manager or Business Unit Head or you wish to remain anonymous, you may make an anonymous report by calling the telephone numbers provided in Appendix 6 and listed on the Enterprise Risk & Compliance intranet web page, or by sending an e-mail to https://www.reportlineweb.com/verisk or 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).
• Maintain full accountability of all assets.
• 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 vendor invoices must be maintained in sufficient detail including the name of the vendor, 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 who was paid and the nature of the transaction is 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.
• Bank accounts should be opened or closed only upon prior written approval of the Business Unit Head.
• Check requests must be in writing and contain a complete explanation of the purpose and authority for the payment.
• All accounts shall be designated with descriptions that are not vague (e.g., internal third-party account).
• All documentation, including receipts, expense reports, check requests, petty cash requests, invoices, etc., will be maintained for at least six (6) years.
Appendix 3
Associated Persons Due Diligence Checklist

The following items must be documented for all Associated Persons engaged by Business Units. This information must be collected and documented before engaging an Associated Person and reviewed and confirmed for the Associated Person annually basis for as long as the Associated Person is providing services to or on behalf of the Business Unit.

Corporate Information

- Full legal name, address and telephone number of organization
- Any firm DBA’s (doing business as)
- Type of firm (partnership, corporation, etc.)
- 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 our organization:
  - Supplier
  - Agent
  - Distributor
  - Other (describe)
- Describe the business focus/function to be performed for our organization
- Name and address of each owner of the company, the percentage of ownership, and length of ownership term
- Name and address of all members of Board of Directors (if applicable) and length of term
- 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/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

• Provide the following documentation:
  • 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. (If these are in a foreign language, they 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 or three 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

• Provide the following documentation:
  • Current Anti-Bribery and Corruption Policies
  • Anti-bribery and corruption training materials (e.g., PowerPoint presentations, handouts, attendance lists, acknowledgement forms)
  • Internal accounting controls procedures

Investigations and Enforcement Actions

• If any of the Associated Person’s owners, directors, officers or employees have ever been involved in, accused of, or adjudicated for violating any anti-bribery and corruption law, provide a list of those individuals and any relevant documents
• If any of the Associated Person’s owners, directors, officers or employees have ever been, within the last ten (10) years, found guilty of violating any criminal laws or regulations in their home country, provide a list of those individuals and any relevant documents.
• Provide the following documentation regarding any of the Associated Person’s owners, directors, officers, or employees: (a) disciplinary actions relating to bribery and corruption, and (b) complaints from customers or any other individual relating to bribery and corruption
• If any employees of Associated Persons have been granted amnesty or immunity from prosecution for cooperation with a government entity, provide a list of those individuals
Dealings with Foreign Public Officials

• Provide the following documentation (annually if the Associated Person continues to provide services to or on behalf of the Business Unit):
  • records of any payments or gifts to any Foreign 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 Foreign Public Official within the past twelve (12) months in connection with, or in any way related to Verisk’s business
  • records of any Facilitating 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 Facilitating Payment

Contributions and Donations

• Provide the following documentation (annually if the Associated Person continues to provide services to or on behalf of the Business Unit):
  • 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

• Confirm whether 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

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

Attestations should be signed, attested to by an officer of the vendor’s organization, and returned to Business Unit within thirty (30) days of issuance. Completed attestations and any supporting documentation are to 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 Compliance Policies that are comparable to Business Unit’s COC and Compliance Policies. We distribute these COC/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 Code of Conduct 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 Policy and Procedure that is applicable to all employees and vendors and is comparable to Business Unit’s Anti-Bribery and Corruption Policy. We distribute the 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 Policy 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 training that must be completed by all employees and vendors and is comparable to Business Unit’s anti-bribery and corruption 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 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 and meet the following minimum standards:

- The expenses are properly labelled and described.
- Management has provided written approval for expenses.
- Records are kept for at least five (5) 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 gifts 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
- to whom the gift or hospitality was given or received, 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
- by whom the gift or hospitality was given or received, including name and title or position
- signature of authorized person approving the gift, including date approved
- receipts must be provided
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 of the requirements outlined in this attestation and that my organization provides oversight to those downstream, subcontracted vendors to ensure that they are in compliance 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, will maintain this documentation no less than ten (10) years, and will 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 & Gifts Register

<table>
<thead>
<tr>
<th>Date Gift or Hospitality Given or Received</th>
<th>Gift or Hospitality Given or Received (Indicate Given or Received)</th>
<th>Gift Given to Whom (Include Name, Title or Position, Company Name, Company Address, Description of Gift)</th>
<th>Value of Gift</th>
<th>Receipt Attached (Indicate Yes or No. If No provide explain why receipt not available)</th>
<th>Gift Given by Whom (Include Name and Title or Position)</th>
<th>Signature of Business Unit Head</th>
<th>Date Signed by Business Unit Head</th>
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## Appendix 6
### Hotline Telephone Numbers

<table>
<thead>
<tr>
<th>Country</th>
<th>Dial Instructions</th>
<th>Language</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argentina</td>
<td>Dial: 0800-266-5106</td>
<td>Spanish (Latin American)</td>
<td>No restrictions</td>
</tr>
<tr>
<td>Australia</td>
<td>Dial: 1-800-74-3475</td>
<td>English</td>
<td>No restrictions</td>
</tr>
<tr>
<td>Austria</td>
<td>Dial: 0800-070-6279</td>
<td>German</td>
<td>No restrictions</td>
</tr>
</tbody>
</table>
| Bolivia   | Dial: 800-11-0354 | Spanish (Latin American)  | • Public phones require coin or card deposit  
• May not be available from every phone, public phone  
• Available from mobile phones. Airtime charges may apply.  
• Telephone Administration may restrict the use of toll-free numbers for certain applications, such as resale, prepaid cards, calling cards, call-back purposes, or third-country calling |
| Brazil    | Dial: 0800-047-4160 | Brazilian Portuguese      | No restrictions                                                          |
| Canada    | Regular: 855-224-3293  
Collect: 470-219-6718 | Spanish (Latin American) | No restrictions                                                          |
| China     | Dial: 400-992-0444 | Chinese (Mandarin)        | No restrictions                                                          |
| Colombia  | Dial: 01-800-012-3414 | Spanish (Latin American) | No restrictions                                                          |
| Denmark   | Dial: 0-80-252631 | Danish                    | No restrictions                                                          |
| Ecuador   | Step 1: Dial: 1-800-223-528 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Spanish (Latin American) | No restrictions                                                          |
|          | Step 1: Dial: 1-999-119 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Spanish (Latin American) | • May not be available from every phone, public phone  
• Carries: Spanish |
| France    | Dial: 0800-94-8666 | French                    | No restrictions                                                          |
| Germany   | Dial: 0800-724-3722 | German                    | No restrictions                                                          |
| India     | Step 1: Dial: 000-117 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Hindi                      | • Only available from phones allowing international access  
• Most public calling centers  
• Not available from public phones |
| Indonesia | Step 1: Dial: 001-801-10 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Indonesian                 | • Not available from cellular phones  
• Use public phones allowing international access |
| Israel    | Step 1: Dial: 1-80-933-3333 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Hebrew                     | • No restrictions  
• Carries: Barak |
|          | Step 1: Dial: 1-80-949-4949 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Hebrew                     | • No restrictions  
• Carries: Bezeq |
|          | Step 1: Dial: 1-80-922-2222 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Hebrew                     | • No restrictions  
• Carries: Golden Lines |
| Japan     | Dial: 012-09-85514 | Japanese                  | No restrictions                                                          |
| Kazakhstan| Step 1: Dial: 8*800-121-4321 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Kazakh                     | The symbol "*" signifies that you need to pause for a tone before continuing to enter the remaining numbers of the access code. |
| Korea     | Dial: 80-90-80991 | Korean                    | No restrictions                                                          |
| Malaysia  | Dial: 1-800-88-5781 | Malay                     | No restrictions                                                          |
| Mexico    | Step 1: Dial: 001-800-462-4240 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Spanish (Latin American)   | When calling from public phones, use phones marked Ladel/Telmex, AT&T branded, or Telhor phones |
|          | Step 1: Dial: 001-800-658-5454 (access code)  
Step 2: Dial: 855-224-3293 (phone number) | Spanish (Latin American)   | • When calling from public phones, use phones marked Ladel/Telmex, AT&T branded, or Telhor phones  
• Collect calling only  
• Carries: MexTel |
<table>
<thead>
<tr>
<th>Country</th>
<th>Dial Instructions</th>
<th>Language</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mexico</td>
<td>Step 1: Dial: 01-800-288-2872 (access code)</td>
<td>Spanish (Latin American)</td>
<td>• When calling from public phones, use phones marked Ladian/Telmex, AT&amp;T branded, or Telhoro phones.</td>
</tr>
<tr>
<td></td>
<td>Step 2: Dial: 855-224-3293 (phone number)</td>
<td></td>
<td>• Public phones may require local coin payment during call duration.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Carrier: MexTel</td>
</tr>
<tr>
<td>Nepal</td>
<td>Dial: 1-800-044-6108 (English)</td>
<td>English</td>
<td>Not available from pay phones</td>
</tr>
<tr>
<td>Nigeria</td>
<td>Collect: 009-1-470-219-6718</td>
<td>English</td>
<td>No restrictions</td>
</tr>
<tr>
<td>Pakistan</td>
<td>Step 1: Dial 00-800-01-001 (access code)</td>
<td>Urdu</td>
<td>• Not available from cellular phones</td>
</tr>
<tr>
<td></td>
<td>Step 2: Dial 855-224-3293 (phone number)</td>
<td></td>
<td>• May not be available from every phone, public phone.</td>
</tr>
<tr>
<td>Peru</td>
<td>Step 1: Dial: 0-800-70-088 (access code)</td>
<td>Spanish (Latin American)</td>
<td>• May not be available from every phone, public phone.</td>
</tr>
<tr>
<td></td>
<td>Step 2: Dial: 855-224-3293 (phone number)</td>
<td></td>
<td>• Carrier: Americatel</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Carrier: Telefónica (Spanish)</td>
</tr>
<tr>
<td>Russia</td>
<td>Dial: 8-800-555-6996</td>
<td>Russian</td>
<td>• If you dial from a landline in Russia, you need to dial 8 800 xxx xxxx, where first 8 stands for long distance prefix.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• If you dial from a mobile phone in Russia, you can use E.164 format, which is +7 800 xxx xxx.</td>
</tr>
<tr>
<td>Singapore</td>
<td>Dial: 1-800-723-1243</td>
<td>Malay</td>
<td>No restrictions</td>
</tr>
<tr>
<td>South Africa</td>
<td>Dial: 0800-204-282</td>
<td>English</td>
<td>For mobile access, there could be a charge depending on what network the caller is calling from. But if there is a charge, there is an announcement advising that you will be charged.</td>
</tr>
<tr>
<td>Spain</td>
<td>Dial: 900-8-22571</td>
<td>Spanish (Castilian)</td>
<td>No restrictions</td>
</tr>
<tr>
<td>Switzerland</td>
<td>Dial: 0800-00-1274</td>
<td>German</td>
<td>No restrictions</td>
</tr>
<tr>
<td>Taiwan</td>
<td>Dial: 0-800-66-6591</td>
<td>Chinese (Mandarin)</td>
<td>No restrictions</td>
</tr>
<tr>
<td></td>
<td>Dial: 0-800-66-6591</td>
<td></td>
<td>No restrictions</td>
</tr>
<tr>
<td>Turkey</td>
<td>Step 1: Dial: 0811-288-0000 (access code)</td>
<td>Turkish</td>
<td>• Not available from cellular phones</td>
</tr>
<tr>
<td></td>
<td>Step 2: Dial: 855-224-3293 (phone number)</td>
<td></td>
<td>• Requires international access</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Public phones require coin or card deposit</td>
</tr>
<tr>
<td>United Arab Emirates</td>
<td>Dial: 8000-444-7033</td>
<td>English</td>
<td>No restrictions</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>Dial: 0800-028-0666</td>
<td>English</td>
<td>Works for Isle of Man and Jersey</td>
</tr>
<tr>
<td>United States</td>
<td>Regular: 855-224-3293</td>
<td>English</td>
<td>Includes all 50 states and Guam, Puerto Rico, and the Virgin Islands</td>
</tr>
<tr>
<td></td>
<td>Collect: 470-219-6738</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix 7
Examples of Foreign 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 (under or assistant secretaries, deputies, vice-ministers, clerks, assistants, etc.)
- Foreign servants (ambassadors, consul-generals, etc.)
- Senators, representatives, MP’s, councilmen (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 (UN, Red Cross, NATO, OSCE, IOC, WHO, etc.)
- Employees of state-owned companies (including officers, directors, managers, and lower-level employees):
  - Airlines
  - Energy companies (Pemex, Petrobras, Petrofina, 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 nonexhaustive list may be considered “red flags” to be aware of to help identify possible bribery and corruption issues. If any of the following are observed or requested you should report the incident to the Verisk Enterprise Risk & Compliance and Law Departments using the telephone numbers provided in Appendix 6 and listed on the Enterprise Risk & Compliance intranet web page or by sending an e-mail to https://www.reportlineweb.com/verisk or ABC@verisk.com:

- Offshore fund transfers
- Free or discounted services
- Lavish entertainment
- Employment (of the person, or future employment of him or her, employment of 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 Foreign 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/professional relationship to Foreign Public Officials
- Agent/associate is recommended or required by a Foreign Public Official
- Press reports of corruption amongst Foreign 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 third-party vendor
• 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 to undisclosed principals or unusual bonuses
• 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 insiting on use of side letters
• Refusal to certify compliance
Appendix 9
Sample Language for Use in Vendor Contracts*

Audit Rights

1.1 Agreement to Maintain Records. Contractor shall maintain consistently applied, accurate and complete books, records, and other documents (including [computer files and supporting orders and invoices to document the amount and calculations of all charges and expenses] incurred pursuant to and during the term of this Agreement [and for a period of [NUMBER] years following the termination of this Agreement]. Contractor shall maintain the books, records, and other documents in conformance with Generally Accepted Accounting Principles. Such books, records, and other documents shall be kept at or accessible from Contractor’s principal place of business.

1.2 Audit Rights. Without limiting its rights under this Agreement, upon reasonable request during the Term and within [TIME] after expiration or earlier termination of this Agreement, the Verisk Business Unit or its Representatives may audit and copy from Contractor, the Contractor’s books, records, contracts, hospitality and gifts registers, and other documents including computer files and supporting orders and invoices as necessary to verify the audited Party’s adherence to the Agreement’s terms and conditions. Audits shall be conducted at any time during Contractor’s regular business hours on Business Days at Contractor’s principal place of business. Contractor shall reasonably cooperate with the Auditing Party in conducting such audit. The Parties shall coordinate all audit activity through the respective companies’ designated point of contact for this Agreement. The Auditing Party’s failure to notify Contractor of any deficiency or breach that it identified during an audit hereunder is not a waiver of any claim of the Auditing Party against Contractor.

Vendor Requirement to Maintain its own Hospitality and Gifts Register

Hospitality and Gifts Register. At the direction of the Verisk Business Unit, Contractor shall establish and maintain a Hospitality and Gifts Register (“Register”). Such Register may be maintained in the format appearing in Appendix 5 of the Verisk Analytics, Inc., Anti-Bribery and Corruption Policy and shall 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, Contractor shall execute and deliver to the Verisk Business Unit an Attestation substantially similar to Appendix 4 of the Verisk Analytics’, Inc., Anti-Bribery and Corruption Policy regarding Vendor’s compliance with said Policy.

*Language may be modified to meet the requirements of specific vendor agreements.
Appendix 10
Pre-Acquisition Due Diligence Checklist

The following items must be documented in connection with all potential mergers and acquisitions. Pre-acquisition due diligence helps Verisk accurately value target companies and demonstrates our commitment to compliance with all applicable anti-bribery and corruption laws.

Corporate Information

- Full legal name, address and telephone number of target company
- Any firm DBA’s (doing business as)
- Type of firm (partnership, corporation, etc.)
- 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
- Name and address of each owner of the target company, the percentage of ownership, and length of ownership term
- Name and address of all members of Board of Directors (if applicable) and length of term
- Names of key employees (officers, managers, and employees) and the length of tenure with the organization
- Any employees, owners, or directors currently employed by a government entity (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 target company’s owners/officers are engaged
- Any directors, officers, or employees related (by blood or marriage) to an employee or official of a government entity
- Any directors, officers, or employees who owe their position with the organization to their acquaintance with an official of a government entity, or are friends of government officials, former lobbyists, or individuals who have specialized knowledge of government officials
Business Activities

- Provide the following documentation:
  - Countries in which the target company has business operations
  - Countries in which the target company makes sales to government entities
  - Copies of all required registrations, licenses, permits, and certificates of incorporation (if a corporation) held to do business in each Country. If these are in a foreign language, they must be translated.
    - Identification of each government entity responsible for administering registration, licensing, permits, and approvals
    - Copies of all correspondence with these government entities
    - List of all consultants and other third-party intermediaries engaged to perform services in connection with registration, licensing, permits, and approvals from government entities
      - Copies of contracts with those consultants and other third-party intermediaries
      - Records of all compensation paid to consultants and other intermediaries
  - Records of annual sales to government entities
    - List of all Government Entities to which the target company sells or supplies goods and services
    - Percentage of target company’s total business with government entities
    - Copies of contracts, sales records, and invoices regarding the sale or supply of goods or services to government entities
      - Include copies of subcontracts to supply goods or services to government contractors
  - Description of the approval process and policy for the retention of third-party intermediaries (agents, consultants, brokers, joint venture partners, distributors)
    - Include background checks and due diligence materials on each third-party intermediary
    - Records of approval of each third-party intermediary
    - Copies of contracts with each third-party intermediary
    - Records and reports of any investigation or termination of any third-party intermediary based upon anti-bribery or corruption concerns
  - Two or three customer references (preferably from the United States or Western Europe)
  - A bank reference (preferably from an established institution)

Anti-Bribery and Corruption Compliance Policies and Procedures

- Provide the following documentation:
  - Code of Conduct and Corporate Compliance Policy
  - Current Anti-Bribery and Corruption Policies
  - Anti-bribery and corruption training materials (e.g., PowerPoint presentations, handouts, attendance lists, acknowledgement forms)
Compliance Reviews, Investigations and Enforcement Actions

- Provide the following documentation:
  - Internal policies and procedures regarding compliance reviews
    - Reports of compliance audits relating to bribery and corruption issues
    - Follow-up actions in response to compliance audits relating to bribery and corruption issues
  - Records and reports of internal compliance investigations relating to bribery and corruption issues
  - Documents regarding threatened, pending, and completed administrative and judicial enforcement actions and proceedings relating to bribery and corruption issues
  - Voluntary disclosures of suspected violations of anti-bribery and corruption laws to government entities
  - Local legal opinions relating to bribery and corruption issues
  - Any of the targeted company’s owners, directors, officers or employees who have ever been involved in, accused of, or adjudicated for violating any anti-bribery and corruption laws and any relevant documents
  - Any of the targeted company’s owners, directors, officers or employees who have ever been, within the last ten (10) years, found guilty of violating any criminal laws or regulations in their home country and any relevant documents.
  - Documentation regarding any of the target company’s owners, directors, officers or employees: (a) disciplinary actions relating to bribery and corruption, and (b) complaints from customers or any other individual relating to bribery and corruption

Dealings with Foreign Public Officials

- Provide the following documentation:
  - Target company’s policies and procedures regarding payments, gifts, hospitality (travel, meals, lodging, entertainment) and Facilitating Payments to Foreign Public Officials
  - Records of any payments, gifts, or hospitality (travel, meals, lodging, entertainment) provided to any Foreign Public Official
    - Purpose of each payment, gift, or hospitality
    - Approvals for each payment, gift, or hospitality
    - Legal opinions on the legality of each payment, gift, or hospitality
  - Records of any Facilitating Payments
    - Purpose of each Facilitating Payment
    - Approvals for each Facilitating Payment
    - Legal opinions on the legality of each Facilitating Payment
  - Accounting records reflecting each payment, gift, hospitality, or Facilitating Payment
Contributions and Donations

- Provide the following documentation:
  - Target company’s policies and procedures regarding political contributions and charitable donations
  - Records of contributions to political parties or candidates for political office
  - Records of donations to government entities or charitable organizations
  - Approval process for political contributions and charitable donations
    - Purpose of or rationale for each political contribution and charitable donation
    - Approvals for each political contribution and charitable donation
    - Legal opinions on the legality of each political contribution and charitable donation
  - Accounting records reflecting each political contribution and charitable donation

Books and Records and Internal Controls

- Provide the following documentation:
  - Targeted company’s financial and accounting controls procedures
  - Targeted company’s audited (or if not available, unaudited) financial statements and accounting records (including a detailed analysis of third-party expenses such as commissions, travel, entertainment and marketing expenses)
  - Records and reports of internal audits or government inquiries regarding the accuracy of the targeted company’s books and records or the adequacy of the targeted company’s internal controls
  - List of all funds, assets, accounts and transactions not recorded or reflected on the target company’s books and records