

GLOBAL BUSINESS CONDUCT AND ETHICS POLICY

Accurate Background, LLC together with its subsidiaries, including Vero Screening (collectively, “Accurate Background” or the “Company”), is committed to operating with the highest standards of business ethics. Every organization’s image and reputation are determined by and dependent upon the example set by its employees, and we require our employees to always conduct themselves with honesty and integrity inside and outside of the Company. Our objective is to create a work environment that allows and encourages all directors, officers, and employees of the Company (collectively, the “Covered Persons”) to perform their duties in an ethical, efficient, and effective manner. Accurate Background has adopted this Global Business Conduct and Ethics Policy (the “Code”) and it applies to all Covered Persons. Adherence to the Code is a basic condition of directorship or employment at Accurate Background. All directors, officers and employees of Accurate Background are expected to adhere to the Code without exception. If a Covered Person violates any part of the Code, he or she may be subject to corrective action, up to and including termination of employment. The Code applies to all Covered Persons and should be read in conjunction with the policies set forth in the Employee Handbook.

If any Covered Person becomes aware of a violation of the Code, he or she should promptly report it via the following methods:

- The Ethics Hotline is available 24/7 by either dialing toll-free within the United States 844-942-2781 or
- By visiting <http://accurate.ethicspoint.com> to make a report in writing or
- By contacting Human Resources at humanresources@accurate.com or the Legal Department at legal@accurate.com.

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

COMPANY VISION

To make every hire the start of a success story.

Mission

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

Values

- I. Take Ownership. Be accountable for your actions, your team, and the Company. Accept responsibility willingly, especially when it’s what’s best for our customers. Give others every reason to trust you, believe in you, and count on you. Rise to every occasion with your personal best.

- II. Be Open. Be open to new ideas. Be inclusive of people and ways of doing things. Make yourself accessible and approachable, and communicate with genuineness, transparency, honesty, and respect. Embrace differences.
- III. Stay Curious. Stay curious even as you move forward. Tirelessly ask questions and challenge the status quo in your pursuit of new ideas, ways to solve problems, and to continually grow and improve.
- IV. Work As One. Work together to create the best customer and workplace experience. Put our customers and employees first – before individual or departmental agendas. Make sure they get the help they need to succeed.

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

POLICIES AND PROCEDURES

The following specific policies and procedures are intended to work with and in conjunction with all other policies and procedures that the Company implements. Every Covered Person has an obligation to make sure they understand and adhere to all policies and procedures implemented by the Company, including all of those contained in the Code.

Business Code of Ethics

All Covered Persons are expected to act ethically and to refrain from any activity that creates an actual or potential conflict of interest with respect to their loyalty to the Company, its employees and or its customers. Each Covered Person, in carrying out his or her duties and responsibilities, should endeavor to deal fairly with each other and the Company's customers, suppliers and competitors. The Company abides by all laws and regulations that promote fair and open competition among companies, including the U.S. anti-trust laws, the European Union competition laws, and similar national laws in countries in which we operate. To the extent a Covered Person has questions whether an activity creates an actual or potential conflict of interest, please contact Human Resources.

During employment with the Company, Covered Persons are forbidden from offering, promising, or giving assistance to any person or entity that competes with or is preparing or expected to compete with any aspect of the business of Accurate Background (such person or entity, a "Competitor"). For this purpose, giving assistance includes, but is not limited to, rendering service, sharing information, having an ownership interest, loaning money, or providing

anything of value to a Competitor. Covered Persons are also forbidden from making any preparations to form a competing business or otherwise engage in such competitive activities while employed by Accurate Background, unless otherwise required by applicable law.

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

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

Covered Persons who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism. Covered Persons must avoid all actions that may adversely affect Accurate Background's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a vendor or supplier when Accurate Background is involved in choosing or reconfirming a vendor or supplier or under circumstances that would create an impression that offering courtesies is the way to obtain our business.

Customer Relations

Covered Persons are expected to be polite, courteous, prompt, and attentive to every customer or prospective customer of the Company. When a Covered Person encounters an uncomfortable situation that he or she does not feel capable of handling, the persons should contact their supervisor or Human Resources to discuss. Ours is a service business and all of us must remember that the customer always comes first. Our customers ultimately pay all of our wages. Remember, while the customer is not always right, the customer is never wrong. Customers are to be treated courteously and always given proper attention. Never regard a customer's question or concern as an interruption or an annoyance. You must respond to inquiries from customers, whether in person or by telephone, promptly and professionally. Through your conduct, show your desire to assist the customer in obtaining the help he or she needs. If you are unable to help a customer, find someone who can. All correspondence and documents, whether to customers or others, must be neatly prepared and error-free. Attention to accuracy and detail in all paperwork demonstrates our commitment to those with whom we do business. Never argue with a customer. If a problem develops with a customer or if a customer remains dissatisfied, bring the matter to the attention of your supervisor.

Fraud

Preventing and detecting fraud is key to maintaining our reputation and avoiding losing the

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

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

If you suspect fraudulent activity, you should immediately report your suspicion to your manager or to the Company's Ethics Hotline. The Ethics Hotline is available 24/7 by either dialing toll-free within the United States 844-942-2781 or by visiting <http://accurate.ethicspoint.com> to make a report in writing.

Bribery and Corruption

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

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

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

Anti-Money Laundering Laws

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

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

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

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

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

Conducting Personal Business

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

Confidential Information

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

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

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

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

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

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

Employee is advised that pursuant to the Defend Trade Secrets Act, an individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of

a trade secret that (a) is made (i) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (b) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

Relationships

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

Equal Opportunity Employer

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

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

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

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

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

Freedom of Association

We respect the legal rights of all Covered Persons to join or not join worker organizations, including collectively bargained trade unions, or similar external representative organizations. We as an organization strive for effective communication with our employees as a means of promoting positive employee relations. Accurate Background abides by all laws under the National Labor Relations Act.

Supply Chain Standards

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

Environmental Responsibility

We recognize the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. Accurate Background complies with all applicable environmental laws and regulations. We must strive to always follow best practices when disposing garbage and using chemical substances.

Corporate Recordkeeping

We create, retain, and dispose of our company records as part of our normal course of business in compliance with all Accurate Background policies and guidelines, as well as all applicable regulatory and legal requirements.

All corporate records of Accurate Background must be true, accurate and complete, and the Company's business data must be promptly and accurately entered in its books in accordance with Accurate Background's and other applicable accounting principles.

No Covered Person may improperly influence, manipulate, or mislead any authorized audit, nor interfere with any auditor engaged to perform an internal independent audit of our books, records, processes or internal controls.

Use of Company Resources

Company resources, including time, material, equipment, and information, are provided for Company use only and not for personal use by any Covered Person.

Covered Persons are trusted to behave responsibly and use good judgment to conserve company resources and to use them as they are intended. Supervisors and managers are responsible for the resources assigned to their departments and have the authority to resolve issues concerning the proper use of Company resources when questions arise.

No Covered Person should solicit contributions nor distribute non-work-related materials during work hours.

In order to protect the interests of Accurate Background, the Company reserves the right to monitor or review all data and information contained on a Covered Person's company-issued computer or electronic device, the use of Company-provided Internet or our intranet, and on cloud-based, Company-provided applications and services. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate.

The foregoing policy is in addition to the policies set forth in the Company Handbook and should be read together with the policies set forth therein. Questions about the proper use of company resources should be directed to your manager or Human Resources.

Whistleblowing

The Company is committed to achieving the highest possible business and ethical standards. To help achieve these standards, Accurate Background has an "open door" policy, to allow individuals to come forward with any ideas or concerns regarding the Company, its employees, its suppliers, or its business generally. Any individual who raises such concerns will not be retaliated against by the Company. Accurate Background will not tolerate retaliation, and any individual found to have retaliated against an individual raising concerns will be subject to discipline, up to and including termination.

Whistleblowing is viewed by the Company as a positive act that can make a valuable contribution to our business and its long-term success. Employees are often the first to realize that there is something wrong in the business and this policy aims to:

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

This policy applies to all Covered Persons, regardless of a Covered Persons position, job responsibilities, status, or seniority. "Whistleblowing" means reporting by a Covered Person of suspected violations of the Code, violations of other policies of the Company (including the

Supplier Code of Conduct), illegal acts, or failure to act by any employee, officer, director, supplier, or other third-party doing business with or on behalf of the Company.

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

The Whistleblowing Policy is not intended to replace existing procedures for raising concerns but is intended to provide another channel for Covered Persons to raise concerns in good faith. The Accurate Background Ethics Hotline may be used to report possible illegal, unethical or improper conduct by any person doing business with or on behalf of the Company. While you can also express concerns to your supervisor, Human Resources or the Legal Department, the value of the Ethics Hotline is that anyone wishing to raise a concern can do so anonymously, without any fear of retaliation.

Media Inquiries

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

Administration of the Code

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