

## SUPPLIER CODE OF CONDUCT

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 in all aspects of its business. We require our employees to always conduct themselves with honesty and integrity inside and outside of the Company and similarly we expect all third parties doing business with the Company to conduct themselves with the same level of honesty and integrity. The trust of our clients is dependent upon both our employees and suppliers operating within the framework of principles, guidelines, and policies aligned with our ethical, social, and environmental responsibilities described in our Global Business Conduct and Ethics Policy and this Supplier Code of Conduct (the “Code”). We believe that operating within the principles, guidelines, and policies set forth in the Code is critical for protecting, managing, and enhancing our business reputation and image within the industry. We also believe that adherence to the Code will drive long-term and sustainable growth for the Company as well as our clients, business partners, and suppliers alike.

We strive to conduct business with suppliers who share our commitment to operating with the highest standards of business ethics. In addition to the responsibilities outlined in the Code, all suppliers doing business with the Company are expected to and must comply with all applicable laws, regulations, orders, directives, and guidelines applicable to them or our business generally together with all obligations set forth in any contract a supplier may have with the Company. Compliance with the Code is in addition to any obligations set forth in any other written agreement with the Company. Supplier will respond to all questions from the Company in a complete and accurate manner, including with respect to any security questionnaire, data transfer agreement, information security agreement or other similar document.

Furthermore, each supplier doing business with the Company is expected to, and must ensure that, any third party that is indirectly providing services or products to the Company through such supplier also complies with all applicable laws, regulations, orders, directives, and guidelines applicable to either such third party or to our business and to the Code. Any failure of such third party to adhere to the Code or to conduct its business in compliance with all applicable laws, regulations, orders, directives, and guidelines will be deemed a violation of such by the applicable supplier for failure to ensure such compliance.

### **Ethics**

Suppliers will conduct their business in an ethical manner and act with integrity. Expectations include:

- Fair Competition – Suppliers shall conduct their business using fair business practices, consistent with fair competition, truth in marketing, anti-trust laws and in compliance with all applicable laws, rules, and regulations that prohibit restriction of competition.
- Reporting Unethical Behavior – Suppliers shall have a means for their employees to report grievances anonymously and shall encourage their workers to report concerns or illegal activities within their workplace without threat of retaliation, intimidation, or harassment.

Suppliers shall monitor, investigate, and take corrective action where needed. Suppliers will document and maintain records of reported cases.

- Privacy – Suppliers will protect the personal information of everyone they do business with, including customers, suppliers, consumers, and employees.
- Preventing Conflicts of Interest – Suppliers will avoid even the appearance of conflicts of interest in working with the Company and shall not allow personal or family interests to influence them in any business dealings with the Company. Suppliers will have policies and financial controls in place to prevent conflicts of interest affecting procurement and financial decision-making.
- Antibribery and Anticorruption – Suppliers will not offer any form of bribe, kick back or other payment, directly or indirectly, to (1) influence the judgement, conduct or action of any individual to influence a desired outcome, (2) 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 (3) gain an improper business advantage, and Suppliers will have policies, monitoring and enforcement in place to ensure compliance with all applicable anti-corruption laws.

## **Labor**

The Company is committed to creating and maintaining a work environment where everyone can work, learn, and recommend ideas in a climate of mutual respect that is free of harassment and discrimination. Suppliers are expected to do the same and this includes at least the following:

- Forced Labor – Suppliers shall not use any form of forced, bonded or involuntary labor and must comply with applicable laws combating modern slavery
- Child Labor – Suppliers shall not use child labor below the age of 16 or the applicable minimum legal age, whichever is higher.
- Fair Treatment – Inhumane treatment and/or physical punishment of workers is prohibited. Suppliers shall not permit harassment or abuse of any kind.
- Nondiscrimination, Diversity and Inclusion – Suppliers will not permit discrimination in screening, hiring, training, promotion, compensation, or any other employment practice based on race, color, age, sex, gender identity, gender expression, sexual orientation, ethnicity, national origin, genetic information, medical condition, pregnancy, disability, caste, religion, political affiliation, union membership, marital status, covered veteran status or any additional illegally discriminatory characteristic.
- Wages and Fringe Benefits – Work hours, minimum wages and overtime hours paid to employees as well as any fringe benefits, must be compliant with applicable laws and

regulations. Wages should be paid at regular intervals with reasonable frequency. Deductions from wages for disciplinary reasons are prohibited.

- Freedom of Association – Suppliers should encourage their employees to communicate with their superiors concerning working conditions, compensation, etc. without fear of intimidation, harassment, or retaliation. Employees should be permitted to associate freely, bargain collectively, and seek representation in accordance with local laws.

## **Health & Safety**

Suppliers must provide a safe and healthy working environment. Suppliers should have resources responsible for defining, implementing, and monitoring policies and management systems that include compliance with applicable laws and regulations. The health and safety elements should, at minimum, include:

- Workers' Health and Protection – Suppliers shall protect workers from unsafe working conditions such as exposure to physical or environmental hazards in the workplace.
- Maintenance, Emergency Preparedness, and Response – Suppliers shall have programs in place to operate and maintain all operations in the safest manner possible. Suppliers shall identify, assess, and track possible emergency situations in the workplace and minimize their impact by implementing emergency response plans and procedures.
- On-site Work – Any suppliers using the Company's facilities will comply with all applicable policies and procedures applicable to such facilities.

## **Conflict Minerals**

Although we are not a manufacturer, we are concerned about the use of conflict minerals. We do not sell products and services containing conflict minerals, directly or indirectly financing, or benefitting armed groups. All of our suppliers are expected to share this objective and take action to conform. Accurate Background reserves the right to suspend or terminate any supplier who fails to demonstrate this commitment.

## **Protection of the Company Information**

At Accurate Background, protecting confidential and sensitive information is of utmost importance. Inappropriate use or disclosure of information can cause serious harm to the Company as well as to our business partners, clients, and suppliers.

- Protect Confidential Information – Suppliers must keep confidential all proprietary and sensitive information of the Company and its clients. Suppliers must take precautions to safeguard this information, including that Supplier's personnel are adequately trained.
- Data Privacy & Security – Suppliers must comply with all applicable data privacy and security laws and regulations. Suppliers must maintain appropriate procedures, safeguards,

and controls to secure and protect the confidentiality, integrity, and availability of confidential information, including personal information, received from, processed on behalf of, or disclosed by the Company.

### **Internal Management Systems**

Suppliers are expected to implement internal management systems with executive level commitment and accountability to ensure adherence to, and continual improvement and compliance with, these principles set forth in the Code. This includes maintaining adequate documentation and records to demonstrate compliance with the Code, as well as all applicable laws and regulations. Records prepared for the Company or maintained on behalf of the Company must be accurate, complete, and retained in accordance with applicable legal and regulatory recordkeeping requirements, or as otherwise specified in a relevant written contract between the applicable supplier and the Company.

### **Demonstrating Compliance**

All suppliers agree to adhere to the Code as a condition to doing business with the Company. To the extent that a supplier enters into a written agreement with the Company, such supplier will also agree to allow the Company and its representatives to audit such supplier's compliance with the Code. Suppliers who have signed an agreement with the Company are expected to promote the principles of the Code in their own supply chains. They should encourage their subsidiaries and subcontractors to adhere to the Code and the ethical, human rights and health and safety standards upon which this Code is based, as a part of fulfilling their contractual obligations. Supplier must promptly respond in writing to any inquiries from the Company related to any alleged violation or non-compliance with the Code, any agreement with the Company or any applicable law.

### **Report Violations to Accurate Background**

Suppliers are expected to report violations or potential violations of the Code or applicable law or regulations to the Company by sending an email to [SupplierEthics@accuratebackground.com]. Each Supplier is expected to also inform its employees of this obligation such that they too should report any such violations to such Supplier.

Failure to comply with the Code, any contract with the Company, or any applicable laws and regulations, may result in the termination of any contract between such supplier and the Company and the Company may pursue all available equitable or legal remedies with respect to any such non-compliance.