

## Code of Business Conduct

Putting our business principles  
into action and delivering  
**Information for Good<sup>®</sup>**

2025  
VERSION 3.5





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## Code of Business Conduct

Putting our business principles  
into action and delivering

**Information for Good®**



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# Message from Chris



**Chris Cartwright**

*President and Chief Executive Officer  
TransUnion*



# Message from Chris

Our Code of Business Conduct ensures all associates, officers and board members have the guidance to act in a manner consistent with our values. We are committed to ethical and law-abiding decision-making and behaviors, and steadfast in our efforts to embody **Information for Good**<sup>®</sup>. The Code is our standard for operating with each other, our consumers, customers, vendors and business partners; it also underpins our brand promise.

Everyone at TransUnion is required to affirm the Code annually. This act of compliance is necessary to create awareness, but embodying the Code requires going beyond compliance to conviction. Our actions should reflect the behaviors and expectations captured in the Code. It's vital that we're well-informed, review the Code on a frequent basis and regularly rededicate ourselves to acting in accordance with our values and beliefs. These practices result in a team that is committed to ethical conduct and shows integrity in every aspect of our business. I encourage anyone who has a good faith concern to report it to TransUnion's Global Ethics Helpline. You may report an issue confidentially or anonymously – we take your concerns seriously.

**Thank you for your personal commitment** to keep TransUnion and our stakeholders at the forefront of your decisions to ensure our continued success.

Sincerely,

A handwritten signature in black ink that reads "Chris Cartwright". The signature is written in a cursive, flowing style.

Chris Cartwright  
President and Chief Executive Officer  
TransUnion

# Our values and beliefs



# Our values and beliefs

The Code of Business Conduct is the cornerstone of how we work. The Code reflects our belief in doing business the right way – the affirmation of Information for Good®. We believe in operating with the highest ethical standards in everything we do. We treat information responsibly. This is the foundation of every decision we make, and the way we interact with each other, consumers, our customers, vendors and business partners.

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## At TransUnion, we value:



### Integrity

We act with honesty, trust and respect in all our interactions and everything we do.



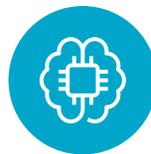
### People

We recognize each of us is essential to our success.



### Customers

We earn trust and build lasting relationships by delivering what we promise.



### Innovation

We aspire to deliver tomorrow's solutions today.

# The beliefs that help us win

## I own it

We hold ourselves and others accountable. We own our successes and learn from our failures.

## I act decisively & get things done

We make timely, informed and clear decisions. We move with speed and agility to get things done and deliver results.

## I think like a customer

We put ourselves in our customer's shoes so we can anticipate their needs and be ready with solutions. Their goals are our goals.

## I innovate and inspire

We bring new ideas to our work and inspire others to do the same. We're a catalyst for change and willing to act on our ideas to move the company forward and upward.

## I make a difference and so do you

We recognize the value and contribution of each individual. We're part of a team and understand how our own work contributes to our wins and losses.

## I say what I need to say

We engage in and embrace candid, direct communication, as well as honest and healthy debate.

# We're all responsible

TransUnion's Code of Business Conduct applies to all associates, officers and board members of TransUnion and its subsidiaries (noting that compliance with this Code is subject to other governing documents and agreements of TransUnion). We expect consultants, contractors, vendors and others temporarily working for TransUnion to follow the principles outlined in this document during the time they perform work for us.

## Being a TransUnion associate means that you:

- Uphold the highest standards of ethical conduct. This means being professional and respectful when performing your TransUnion responsibilities. You should be honest in every business communication. You shouldn't endorse or participate in activities that may embarrass TransUnion or lead to negative publicity about us or our customers.
- Read, understand and follow TransUnion policies, which include not only this Code of Business Conduct but policies, procedures and standards that apply to your TransUnion responsibilities. As a condition of employment, each year you're required to formally attest to your compliance with this Code.
- Conduct business in compliance with the letter and spirit of laws, rules, regulatory orders and court orders that apply to TransUnion.

Our legal standards require you to conduct business in compliance with the letter and spirit of laws, rules, regulations and court orders that apply to TransUnion.

These legal standards may be reflected in TransUnion policies, information described to you by your manager, or information discussed with you by Legal, Risk and Compliance.

TransUnion policies include this **Code of Business Conduct**, as well as various policies, procedures and standards adopted at the enterprise and business unit levels.

## In addition, if you're a manager, that means you're expected to:

- Know the Code and TransUnion policies and promote a culture of ethical business conduct.
- Support your staff in locating TransUnion policies and confirm they read and understand them.
- Answer associates' questions about TransUnion policies and, when in doubt about the right course of action, seek advice and guidance from your manager.
- Never condone any conduct or activity that may raise questions about TransUnion's honesty, integrity or compliance with legal standards.
- Encourage everyone in our organization to voice concerns when they come up.
- Report Code violations you're aware of to your manager, your Human Resources Business Partner, Legal, Risk and Compliance or [TransUnion's Global Ethics Helpline](#). If you have knowledge of misconduct, it is your responsibility to report it.
- Implement appropriate disciplinary procedures after a confirmed Code violation occurs with oversight from Human Resources.

## Did you know?

*The Board of Directors of TransUnion periodically reviews our Code of Business Conduct. This includes confirming our managers are providing the appropriate "tone at the top" to encourage compliance with this Code, TransUnion policies and legal standards.*

You can find all Compliance policies on the Policies and SOPs web [page](#) of TransUnion's intranet.

**You can also ask your manager or your Human Resources Business Partner for copies of applicable policies.**

If you have questions about this Code, TransUnion policies and legal standards discuss them with your manager.

If you feel uncomfortable talking with your manager, you should utilize TransUnion's [Global Ethics Helpline](#).

*Remember, you'll receive annual training on the Code as well as other policies. You're required to acknowledge you read, understand and will comply with the Code.*



## Waivers

If you are a Member of TransUnion's Board of Directors or an executive officer of TransUnion, only the Board of Directors or the Audit Committee of the Board of Directors may provide a waiver of this Code. All such waivers must be promptly disclosed publicly as required by law or applicable stock exchange regulation. For all others, only TransUnion's Chief Legal Officer may approve a waiver.

## Compliance with our Code of Business Conduct

You're expected to use good judgment and abide by this Code of Business Conduct and company policies and procedures, cooperate with investigations and answer questions truthfully, accurately and completely (subject to applicable law).

If you violate this Code or company policies and procedures by, among other things, failing to report a known or suspected violation, by withholding information relating to a violation, or authorizing or knowingly allowing a subordinate to be in violation:

- You may expose yourself and TransUnion to civil, criminal or financial liability.
- You could harm TransUnion's reputation and competitive position.
- You may be subject to disciplinary action, up to and including possible termination and/or criminal prosecution.

## Reporting known or suspected violations

If you see or suspect a violation of this Code, report it using the [Global Ethics Helpline](#); including:

- Unusual or questionable accounting, internal controls or auditing matters.
- Potential violations of laws and regulatory requirements.
- Alleged retaliation against anyone who reports a concern in good faith.

For additional guidance, you can read TransUnion's [LRC 246- Whistleblower Policy](#).

## Tips and guidelines

When faced with a situation where you have a concern to potentially report:

- 1. Make sure you have the facts.** To the best of your knowledge, you should provide as much detail and information as possible.
- 2. Understand what you're being asked to do.** Does it seem right? Or does it seem unethical or improper? Use your judgment and common sense.
- 3. Discuss the problem with your manager and other TransUnion resources.** It's your manager's responsibility to help solve problems. If you feel you cannot discuss the matter with your manager, discuss it with your Human Resources Business Partner or someone from Legal, Risk and Compliance. They'll make sure you obtain the guidance you need.

If none of these options have resolved the issue, you should contact the [TransUnion Global Ethics Helpline](#). The Helpline provides the ability to submit reports anonymously in multiple languages 24 hours a day, seven days a week. You can access the Helpline online or by telephone. The dial-in numbers are listed in the Global Ethics Helpline section of this Code.

*You may report or inquire about suspected violations without fear of retaliation. Your anonymity will be protected to the fullest extent possible if you contact the TransUnion Global Ethics Helpline.*

*TransUnion will not permit retaliation of any kind against you for asking questions or reporting, in good faith, possible violations of this Code of Business Conduct.*



# Our customers and consumers



# Our customers and consumers

Our values and beliefs are at the core of how we work together, and honoring them is critical in maintaining our business commitments and are an important part of TransUnion's success. We do what we say we'll do. We provide services that we believe meet – or exceed – the expectations of our customers and consumers.

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## Business relationships and customers

It's important to preserve our values and beliefs when selecting where and with whom we do business. This includes our customers and all third parties who help us meet the needs of those customers, as well as consumers. We want to work with individuals and companies that share our commitment to ethical business conduct.

We comply with the terms and conditions of our agreements with our customers, vendors, suppliers, agents and other third parties. We expect them to do the same.

If you become aware there's been or is about to be a violation of any agreement entered into by or with TransUnion, you should immediately notify your manager. In turn, managers must then advise TransUnion Legal, Risk and Compliance.

## Government business

Special rules and obligations apply to business arrangements with government entities.

Government entities may include government agencies, state-owned banks, telecommunication providers or other types of state-owned service providers.

You shouldn't make an offer or respond to a proposal to do business with a government entity unless your manager has authorized and received prior approval of the transaction from Legal, Risk and Compliance.

## Confidential information, assets, data breach and use of systems

Protecting information is our top priority, and everyone at TransUnion has a responsibility to protect the privacy and security of our assets. Information is a key asset to our business and competitive position.

You're not authorized to access TransUnion's confidential information, sensitive company information or personal information relating to associates, customers or consumers if it doesn't relate to your employment duties. You should never share proprietary information about TransUnion, our customers, consumers or any other third parties with anyone outside or within TransUnion who is not authorized to receive that information, including spouses, friends, business associates, customers and vendors.

Access to and use of TransUnion Technology is permitted for legitimate assigned work duties and for limited personal use such as checking emails and browsing. You're required to keep all passwords associated with TransUnion equipment and our computer systems confidential at all times and in accordance with our Information Security program.

Your use must also comply with applicable TransUnion policies and legal standards. You may not use, remove, transfer or borrow assets, including data in the possession of TransUnion, unless your manager, Information Security and Legal, Risk and Compliance have approved it, and it is compliant with TransUnion policies.

Your use of TransUnion's computer systems is at the sole discretion of TransUnion. You should secure and protect all computers and telecommunications equipment like cell phones, wireless email devices and laptops assigned to you.

You must follow TransUnion policies, security measures and internal controls for computer and communication systems, including portable electronic devices, laptops, telephones, and other storage devices provided by TransUnion or used in connection with its business.

**Can I?** Send myself company files to my personal email account so I can review them later?

**No.** TransUnion prohibits the use of personal email accounts for sending and receiving TransUnion business. See the Global Information Security Department's [TransUnion Security Policy](#) and their intranet page to learn more.

## Information privacy

TransUnion is committed to complying with applicable privacy and data protection laws because protecting the privacy of personal information is core to everything we do.

Failure to properly protect the privacy and security of personal information may affect TransUnion's performance, value and reputation. It may also damage our consumer and business relationships and result in legal liability.

You must comply with TransUnion policies, procedures and legal standards when handling consumer personal information. Contact Legal, Risk and Compliance if you're not sure how to handle data protection and privacy matters.

### You're strictly prohibited from:

- Providing personal information about another individual to a person without a legitimate purpose and proper authorization to receive it.
- Obtaining or modifying a consumer report or information from that report in violation of applicable laws or TransUnion policy.
- Aiding any person to obtain or modify consumer information, products or services offered by TransUnion unless in compliance with applicable laws and TransUnion policies and procedures.

## Did you know?

TransUnion often monitors computer systems, including instant messages, email and voicemail, to ensure compliance with TransUnion policies.

**What if I** learn about a potential data issue, like improper use or access of consumer data. What should I do?

You must report the issue immediately via the [Issue Management Submission Form](#) available on TransUnion's intranet. To learn more about reporting issues, read [LRC 245-Enterprise Issue Management Policy](#).

Protecting TransUnion is everyone's job.

If your concern is related to an Operational, Data or Physical Security issue, report it immediately using the [Issue Management Submission Form](#) located on TransUnion's intranet.

You can email questions about the Issue Management Program to [IssueMgt@transunion.com](mailto:IssueMgt@transunion.com).

If your concern is related to Ethics, Employment Practices, Books and Records, including externally published financial data or Fraud, report it immediately using the [Global Ethics Helpline](#); you have the option to submit a concern anonymously, subject to local laws. Please refer to the list of helpline phone numbers on the last page of this Code.



You can report ethics concerns anonymously via [www.TUGlobalEthicsHelpline.com](http://www.TUGlobalEthicsHelpline.com).

# Our company and stakeholders



# Our company and stakeholders

Our values and beliefs not only guide our actions with customers and consumers, but they are core to how we manage our company and deliver value to our stakeholders. As a successful business, we all have an interest in protecting the company. We strive for financial success by growing our business and making a reasonable profit. We implement controls to manage our risks and create reliable records. And we maintain open communication with our investors and keep them apprised of all material developments.

## Antitrust, competition laws, fair dealing and fair lending

TransUnion seeks to outperform our competition fairly and honestly. It's our responsibility to understand our customers' requirements and satisfy them by offering quality services at competitive terms and prices.

Competition and antitrust laws regulate dealings with competitors, customers, distributors and other third parties. TransUnion associates must understand how competition and antitrust laws affect their daily work. You must fully and consistently comply with applicable competition and antitrust laws.

These laws prohibit agreements with a competitor to set any terms of sale (such as prices, discounts and credit terms) and limit the information TransUnion can share with competitors. Because of these risks, you're prohibited from discussing competitive matters with any competitors without prior authorization from Legal, Risk and Compliance.

In addition, we are committed to ensuring our financial institution customers are confident in their ability to make lending decisions based on the information provided by TransUnion. TransUnion's products and services are used by creditors subject to anti-discrimination laws. These laws protect individuals from discrimination in the lending process.

### You must not:

- Discuss or enter into any understanding with competitors concerning prices, production limits, products, services, customers or territories.
- Discuss or enter into any understanding with competitors regarding the boycotting of certain customers, industries, competitors or suppliers.
- Use trade secret or proprietary information of another company to win customers.
- Induce past or present employees of other companies to share proprietary information with you.
- Make disparaging comments about the products, services or actions of any of TransUnion's competitors.

## Did you know?

You can find additional information about antitrust laws in [LRC 38 Antitrust Policy](#) on TransUnion's intranet.

### What is Antitrust?

Antitrust generally refers to laws established to protect trade and commerce from unlawful restraint and monopolies or unfair business practices.

Such laws exist to preserve a fair and competitive economy. Violations of these laws can carry stiff criminal penalties as well as civil fines.

## Did you know?

If you wish to enter into an activity with any competitor, you must obtain your manager's approval and the approval of Legal, Risk and Compliance in advance.

It's our policy to treat consumers fairly based on legitimate business factors necessary to evaluate creditworthiness, without regard to protected characteristics. In the United States, anti-discrimination laws define these protected characteristics as including race or color, religion, national origin, sex, marital status, age, disability, genetic information, income derived from any public assistance program, or exercise of a consumer's rights under law.

It's illegal for creditors, using any information obtained, to discriminate against an applicant based on protected characteristics in all aspects of a credit transaction.

## What are Anti-discrimination Laws?

*Anti-discrimination laws are federal laws protecting consumers from unfair, discriminatory and predatory lending practices.*

*Anti-discrimination laws prohibit discrimination against an individual or group of people based upon one or more protected characteristics.*

## What is bribery?

*Bribery is the offering, promising, giving, demanding or receiving of any thing of value in an attempt to improperly influence the outcome or decisions of others.*



## Bribes, inducements, kickbacks and payoffs

All associates, board members, third parties, vendors, representatives or agents of TransUnion must conduct business on its behalf honestly and without the use of bribery, inducement or corrupt practices. TransUnion is committed to only the highest levels of openness, integrity and accountability.

## Anti-bribery and anti-corruption laws

TransUnion must comply with anti-bribery and anti-corruption laws of the countries and nations in which we operate. When acting for or on behalf of TransUnion, you must not:

- Make, promise, offer or deliver any donation, gift, favor, payment, contribution or other gratuity to an official or employee, or close family member of an official or employee of any government or governmental agency or any person seeking public office.
- Make any indirect payment(s) to organizations associated with such employee, official or person. For example, you cannot make indirect payments through attorney fees, sales commissions, political committees or parties, charitable contributions or consultant fees.

TransUnion permits you to make legally required payments, such as fees for licenses, permits or other official expenses required by law or regulation to do business.

All payments must be made in accordance with the [Delegation of Authority for Expenditures Policy](#) which requires approval in advance of commitment by the appropriate business approver and finance approver.

You should contact Legal, Risk and Compliance for guidance if you're unsure whether you might be dealing with a government official or have any other questions on complying with anti-bribery and anti-corruption laws. Always report any suspected bribery activity. See [LRC 292-Anti-Bribery & Anti-Corruption Policy](#) for more information.

## Gifts, meals, hospitality and entertainment

Exchanging gifts, meals, hospitality and entertainment are customary ways to strengthen business relationships, and with some restrictions, are lawful business practices.

Such gifts, meals, hospitality and entertainment must be consistent with [LRC 226 – Gifts & Entertainment Policy](#) and:

- Must not violate any legal standards or generally accepted ethical standards, including the standards of the recipient's organization.
- Must not create a sense of obligation or appearance of an obligation for the associate or third party.
- Must be infrequent, modest, customary and appropriate in the circumstances.
- Must be within the approved dollar thresholds in the country guidelines listed in LRC 226 – Gifts & Entertainment Policy.
- Must not involve activities, products, services, or venues that TransUnion considers in bad taste, may damage TransUnion's reputation or violate this Code.

## Anti-money laundering, terrorist and proliferation laws

TransUnion is committed to complying with anti-money laundering, terrorist and proliferation financing laws and regulations of the countries in which TransUnion operates. Money laundering, terrorist and proliferation financing involve hiding the origin, movement, destination or illegal use of money obtained through illegal activities in attempts to make these illicit funds appear legitimate. TransUnion conducts business only with reputable customers, suppliers and others involved in legitimate business activities, with funds derived from legitimate sources. Steps for compliance include:

- Knowing your business partners: All TransUnion

You may support your selected political parties or candidates for public office with your own funds, as long as you don't imply your action is on behalf of TransUnion.

You may not make a political contribution with TransUnion's funds or request reimbursement from TransUnion for a political contribution unless your manager has approved the contribution and received prior approval from Legal, Risk and Compliance.

Refer to [LRC 231-Political and Lobbying Activity Policy](#) for additional information.

associates must use an approved TU Procure system or process for third party sourcing, selection and contract negotiations. Until you have completed the TU Procure process, you may not enter into an agreement with a third party. See the [TransUnion Global Procurement Policy](#) for further detail.

- Monitoring financial activity: Relationship Owners of third parties must monitor third party transactions and activities consistent with the established TransUnion Procurement Standard Operating Procedures and the [Third Party Risk Management Policy](#).
- Keeping complete records: Keep current, complete and accurate records of all business transactions.
- Reporting any suspicious activity: Immediately alert Legal, Risk and Compliance or utilize the Global Ethics Helpline to report any suspicious activity.
- Cooperating fully with legal and regulatory authorities charged with enforcing anti-money laundering, terrorist and proliferation financing laws of the countries in which TransUnion operates.

Please see [LRC 262-Anti-Money Laundering and Terrorist Financing Policy](#) for further detail.

## Conflicts of interest

A conflict of interest can happen when your personal interests affect or create an appearance that they may affect how you make decisions as a TransUnion associate. Conflicts of interest can impair your ability to make objective judgments and you should avoid them. If you cannot avoid a conflict, or the appearance of a conflict, you must disclose it and have it reviewed and approved by your manager and Legal, Risk and Compliance.

In particular, you should not:

- Use TransUnion's property, information, or your position for personal gain. An example is entering into any investment or business opportunity for yourself, family, friends, or any business controlled by you, your family or friends, which you know about through your job at TransUnion.
- Compete with TransUnion directly or indirectly for business opportunities.

### What is a conflict of interest?

*This occurs when your private interests interfere with the interests of TransUnion, or otherwise affects your objectivity or effectiveness as a TransUnion associate.*



- You must report the existence or discovery of any circumstances that constitute a conflict of interest or could create a potential conflict of interest, including any financial or other business relationship, transaction, arrangement or other interest or activity with any of TransUnion's suppliers, customers, competitors or other persons.

Working with a relative or someone with whom you have a personal relationship could create a conflict of interest. You must tell your manager if you have any personal relationship with another associate, applicant for employment, contractor or consultant so TransUnion can review the situation.

It is not always clear if something is a conflict of interest, so if you are unsure, talk to your manager or Legal, Risk and Compliance.

### Did you know?

You can find additional information about conflicts of interest in [LRC-250 Conflicts of Interest Policy](#) on TransUnion's intranet.

## Insider trading

You must never trade in securities of TransUnion or of one of its business partners or customers based on material, non-public information.

U.S. securities laws prohibit trading on the basis of material non-public information. If you have access to material non-public information about a company, including TransUnion, regardless of its source, you're not permitted to use or share that information for your personal benefit. All non-public information about TransUnion, its customers, suppliers or joint venture parties should be considered confidential information.

Trading in securities of these entities while in possession of material non-public information, as well as being the source of that information for others who trade, may constitute illegal insider trading. Additional information regarding avoiding insider trading is available in [LRC 247- Insider Trading Policy](#).

## Books, records and financial reporting

We're committed to providing external stakeholders, including investors, with full, fair, accurate, timely and understandable disclosures. Therefore, the records, data and information owned, used and managed by TransUnion must be truthful, accurate and complete. You're responsible for the integrity of the information, reports and records under your control. It's essential that you maintain the integrity, accuracy and reliability of TransUnion's books, records and financial statements to comply with all legal, accounting, tax and other regulatory requirements.

Associates who prepare, maintain or have custody of TransUnion's records and reports must ensure these documents:

- Accurately and fairly reflect, in appropriate detail, the assets and transactions of TransUnion.
- Are protected from loss or destruction.
- Are retained for specified periods of time in accordance with TransUnion's document retention policy.
- Are maintained in confidence.

You are responsible for the integrity of all records and documents you create or maintain as part of your job responsibilities.

### You should not:

- Misrepresent facts in any TransUnion business document.
- Falsify any financial or other records.
- Bypass our system of internal controls.
- Enter into side agreements that have not been properly reviewed and authorized by legal counsel.
- Be complicit in allowing a third party to misrepresent a business transaction.

### Did you know?

Examples of unacceptable practices include:

- Backdating entries or transactions
- Reporting revenue or expenses without supporting documentation
- Entering into unrecorded, special or "off the books" transactions

*The integrity of our business requires we have accurate information in order to make responsible business decisions.*

*For example, our accounting requires supporting documents to be truthful, accurate and complete.*



### Important

If you discover any inaccurate records, reports or documents – even if you didn't create the item – you must immediately inform your manager or contact [TransUnion's Global Ethics Helpline](#).

You must obtain all necessary approvals in accordance with our [Delegation of Authority for Expenditures policy](#) before you or someone under your supervision disburses or transfers any TransUnion funds or property.

You must manage business records according to our record retention guidelines and applicable legal standards. For more information on Records Management see [LRC 239 – Enterprise Records Management Policy](#) or e-mail [RecordsManagement@transunion.com](mailto:RecordsManagement@transunion.com).

In the event you're made aware of litigation or an investigation and you have business records in your possession that may relate to that litigation or investigation, you must advise your manager. Your manager should then consult with Legal, Risk and Compliance to determine the proper handling of those records.

## External communications

Because TransUnion is a global leader, you may be asked to comment as a representative of TransUnion on industry initiatives, consumer matters or other economic concerns. It's critical that our communications with external audiences are managed in a coordinated way to ensure our messages are accurate, consistent and timely. In addition, as a publicly traded company, TransUnion is prohibited from selectively disclosing material non-public information.

### You should:

- Refer all media inquiries directly to TransUnion's Public Relations team.
- Have 1) your manager, 2) Communications, Enterprise Marketing & Branding or Global Marketing and 3) Legal, Risk and Compliance pre-approve any articles, speeches or other materials you want to submit to the media or present at an industry or customer conference or governmental hearing.
- Not disclose actions or activities relating to our business operations outside of TransUnion unless that disclosure has been pre-approved by 1) your manager, 2) Communications, Enterprise Marketing & Branding or Global Marketing and 3) Legal, Risk and Compliance. This includes communications made via social media.
- Route all communication regarding business operations, results, plans or prospects in relation to our business, competitors, customers or suppliers through the proper channels. Do not discuss these with any person associated with the media, any investment banking firm, any financial analyst or regulator, unless that discussion has been pre-approved by Legal, Risk and Compliance.
- Review and comply with [LRC 248-Public Disclosure and Regulation FD Policy](#).
- This policy on External Communications does not apply to communications with a regulator or government agency for the purpose of reporting or investigating a suspected violation of law, such as communications made through a government whistleblower program. For additional guidance, please refer to the Code of Business Conduct's section on Reporting Known or Suspected Violations and the Board of Directors' [LRC 246-Whistleblower Policy](#).

## Interacting with auditors and investigators

All interactions with auditors and investigators should be coordinated with Legal, Risk and Compliance or the Controllershship or Tax functions within Finance, as applicable based on the nature of the matter. It's important to provide complete and accurate information when communicating with these entities:

- Any auditors or investigators – internal or external.
- Any governmental agency or official.

There are laws that provide for severe criminal and civil penalties for anyone who tries to improperly influence, obstruct or impede a governmental agency in the performance of its official duties.

On a periodic basis, you may be called upon to provide information for governmental or regulatory filings. This responsibility will include certifying the information you or your associates have provided is complete and accurate.

If called upon to provide this information, you're expected to respond in a timely manner. Required disclosure in the filings must be full, fair, accurate, timely and understandable.

### Did you know?

Business records and communications often become public. You should avoid exaggeration, derogatory remarks, guesswork and "joking" or "surly" characterizations of people, events and companies in any communication. This applies to email, voicemail, instant messaging, internal memos, formal reports and even personal notebooks and calendars. So remember, keep your documents factual.

For information about rules when engaging in online activities and social media, refer to [HRC 185 - Online Activities and Social Media Policy](#).

## **Engaging with social media:**

- *Don't post confidential information about our company.*
- *Don't post confidential information about our consumers, customers, co-workers, business partners or vendors.*
- *Do not present yourself as a spokesperson for TransUnion.*
- *Clearly state any opinions you've expressed are your own.*
- *Be mindful of TransUnion's corporate values and non-discrimination policies. Whether intentional or otherwise, your words reflect on TransUnion.*
- *Only use TransUnion logos, trademarks, or branding elements in posts with proper authorization and in accordance with brand guidelines.*
- *If you see social media activity that could harm the company's reputation, report it to your manager or the social media team.*
- *If you praise or recommend TransUnion, its products or its services, you must disclose that you are an associate either through explicitly stating that you work for TransUnion or use of pronouns like "we" or "our."*
- *Do not input confidential, proprietary, or sensitive company information into AI tools (e.g., ChatGPT, generative AI platforms) when creating or drafting social media content.*



# Our people



# Our people

Our values and beliefs — designed by our people — have a clear application to our workplace and how we treat one another every day. Each represents the way we hope associates address their work product and their work environment, taking ownership and pride in what they do.

## Workplace

At TransUnion, we have a shared responsibility in maintaining a safe, professional, productive and healthy working environment. We believe that our ability to attract and retain talented associates positions us for success. That's why we're an equal opportunity employer, seek a varied employee base and provide appropriate compensation opportunities and performance standards that reflect our best efforts. We value the contributions of all associates and do our part to foster a positive and healthy working environment.

### **TransUnion associates are expected to:**

- Treat everyone with respect and dignity, being sensitive to the varied beliefs and backgrounds of others.
- Express yourself in a professional, positive, polite, collaborative and non-confrontational manner in both words and gestures and maintain appropriate dress and hygiene standards.
- Comply with and support management directives, business unit and department goals in the performance of your job.

*If you believe in good faith that a directive, goal or objective is in violation of this Code, you should utilize the [Global Ethics Helpline](#) as soon as possible.*

- Not tolerate harassment, bullying, discrimination or violence.
- Not damage or misappropriate the property of TransUnion or our associates, customers or guests.
- Read and adhere to this Code and all TransUnion policies relating to your job duties.
- Promptly report any conduct that is unlawful, abusive, an actual or potential health or safety hazard or in violation of this Code.

## Equal Opportunity Employment

We are an equal opportunity employer and are committed to treating all our employees and job applicants equally.

All supervisors and managers are responsible for ensuring that policies of equal opportunity are applied at all times and that all procedures and practices are free of discrimination and harassment. We hire, train, develop and promote associates on the basis of merit and ability alone.

We are committed to a workplace environment free from acts of discrimination and harassment, and we make all employment decisions based on job-related qualifications and merit without regard to race, color, religion, sex, national origin, age, disability, genetic information and any other characteristic protected by applicable law.

For additional guidance, you can read the [TransUnion Harassment](#) and [Workplace Violence Prevention](#) sections in TransUnion's associate handbook.

***TransUnion is committed to a positive work environment.***

*TransUnion will not tolerate any behavior in conflict with maintaining a safe, healthy, non-discriminatory, non-violent, alcohol-free, drug-free, crime-free environment.*



# Our community



# Our community

Finally, our values and beliefs carry out into our community. We encourage employee involvement in community programs and activities. We are sensitive to the culture and needs of all local communities in which we have a presence. We support efforts that promote education and economic well-being in communities where we work.



## Human and labor rights

We're committed to respecting and preserving human rights, not only for our associates but for the communities in which we operate. In our [Human Rights and Labor Standards Policy](#), we adopt international human, labor and development standards as the baseline for how we operate our business. Furthermore, we underscore this commitment with regular trainings for associates on relevant human and labor rights issue areas.



## Community relations

At TransUnion, being a good corporate citizen means giving back to the communities where we operate. Our Community Program, called **GoodWorks@TU**, focuses on the ways in which we believe we can most meaningfully give back.



## Corporate sustainability

We encourage you to read our annual [Global Impact Report](#) for information on the work TransUnion is doing to support communities all over the world.

TransUnion funds and supports a variety of community-based activities that make a difference in people's lives. One example is its participation in programs that promote financial literacy, empowering people to make smart financial choices.

TransUnion also periodically sponsors regionally focused volunteer opportunities throughout the year. Whatever way you choose to volunteer, either through a company-sponsored event or as

an individual in neighborhood activities, you're encouraged to participate and make a difference.

TransUnion recognizes participating in these types of volunteer programs and activities enriches the lives of associates. TransUnion provides paid time off to eligible associates who participate in a qualifying volunteer program or activity. Charitable matching gift programs are also available in select regions.

# TransUnion's Global Ethics Helpline



# TransUnion's Global Ethics Helpline

Often, the right thing to do is obvious. At other times, a situation may seem complex or unusual and you may be unsure about how to proceed. If you have a concern related to any conduct that may conflict with the Code of Business Conduct, please report it immediately. Not only do we have a duty to do so, but it also allows us to quickly gain clarity and avoid potential problems. If something has gone wrong, it gives us an opportunity to investigate and correct it.

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TransUnion's Global Ethics Helpline allows you to submit reports anonymously (subject to local laws) in multiple languages 24 hours a day, seven days a week through an external company. Access the Helpline through the web at [www.TUGlobalEthicsHelpline.com](http://www.TUGlobalEthicsHelpline.com), or by phone using the dial-in numbers listed below:

- U.S. & Canada: 1-800-245-8341
- Brazil: 0-800-200-3510
- Colombia: 01-800-518-5288
- Costa Rica: 0800-542-5600
- Hong Kong: 800-902-144
- India: 000-800-050-3896
- Luanda, Angola\*: 244-266-434-587
- Philippines: 1-800-1-322-0149
- Singapore\*: 65-3163-1063
- South Africa: 080-098-2229
- U.K.\*: 44 (20) 7099-0385

*If you have questions regarding TransUnion's Global Ethics Helpline, please email **TUEthics@transunion.com***



\*These numbers serve as Regional Hubs for locations that do not have a dedicated toll-free number, allowing reporters to submit concerns outside of these specific locations.

