Code of Business Conduct

Putting our business principles into action and delivering **Information for Good®**



TransUnion

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Message From Chris



Our Code of Business Conduct helps ensure 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 we are steadfast in our efforts to embody **Information for Good®**. The Code is our standard for operating with each other and 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 important that we're well informed, review the Code on a regular basis and dedicate 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 help ensure our continued success.

Chris Cartwright

Chris Cartwright
President and Chief Executive Officer
TransUnion

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What We Value

Our values guide how we work, how we make decisions and how we treat one another. They shape our culture and help us do the right thing, even when situations are complex or when there is pressure to move quickly.

At TransUnion, we value:



Integrity

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



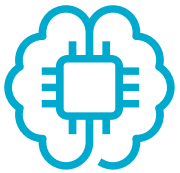
People

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.

This section explains what we expect of ourselves and each other.
It describes our beliefs, our shared responsibility and what it means to comply with the Code.
It also explains when and how to speak up.
Together, these principles set the foundation for everything that follows in this Code.

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Our beliefs

Our beliefs describe how we work and how we make decisions every day. They guide how we treat each other, how we serve customers and consumers and how we live our values in practice. Our values and beliefs reinforce that integrity, accountability and respect are essential to our success.

Our beliefs are:

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 customers' 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.

Together, these beliefs shape our culture and set the foundation for how we act with integrity every day.

We're all responsible

The Code of Business Conduct applies to everyone at TransUnion. This includes all associates, officers and members of TransUnion's Board of Directors. We also expect contractors, consultants, vendors and others working on our behalf to follow the principles in this Code.

Being part of TransUnion means acting with integrity and using good judgment every day. Each of us must understand the Code, follow it in our work and ask questions when we are unsure.

Managers have a special responsibility. In addition to following the Code themselves, managers are expected to:

- Promote a culture of ethical conduct
- Help their teams understand the Code and related policies
- Encourage open discussion and questions
- Address concerns promptly and appropriately

We expect everyone to speak up when something does not seem right. Ignoring issues or allowing misconduct to continue can harm people, the company and the trust we build with others.

Each year, associates and members of TransUnion's Board of Directors must confirm that they have read, understand and will comply with the Code. This helps ensure awareness, but living our values requires more than acknowledgment. It requires daily actions that reflect our commitment to doing business the right way.



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Complying with our Code

Our Code of Business Conduct sets the standards for how we do business and how we treat one another. We expect you to follow the Code, along with the policies, procedures and laws that apply to your role.

Compliance means using good judgment and acting in line with both the letter and the spirit of the Code. When rules are clear, we follow them. When situations are less clear, we ask questions and seek guidance before acting.

Failure to comply with the Code or related policies can have serious consequences for individuals and for TransUnion. These may include disciplinary action, up to and including termination of employment, as well as legal or regulatory consequences. Consequences depend on the facts and circumstances of each situation.

Waivers

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



Reporting concerns

Speaking up is part of doing business the right way. If you see or learn about conduct that may conflict with this Code, TransUnion policies or the law, we expect you to raise the concern.

Concerns may involve many types of situations, including unethical behavior, possible legal or regulatory violations, misuse of information or systems, conflicts of interest or retaliation. You do not need proof that a violation has occurred. If something does not seem right, you should speak up.

Raising concerns in good faith helps TransUnion address issues early and helps prevent harm. It also helps protect people, the company and the trust we build with consumers, customers, shareholders, governments and business partners.

TransUnion does not tolerate retaliation against anyone who raises a concern or asks a question in good faith. Retaliation itself is a serious violation of the Code.

Reporting resources

We provide several ways to report concerns, including:

- Your manager
- Your Human Resources Business Partner
- Legal, Risk and Compliance
- TransUnion's Global Ethics Helpline



Learn more

Refer to LRC 246 – Whistleblower Policy for additional guidance.

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Speak up guidelines

Sometimes the right choice is clear. Other times, a situation can feel uncomfortable, confusing or hard to explain. Our guidelines can help you think through concerns and decide when to speak up.

If you don't know what to do, pause and ask yourself a few simple questions:

- Does this feel honest and fair?
- Would I be comfortable explaining this decision to others?
- Could this harm someone, the company or our reputation?
- Would I want this decision to be shared publicly?

We do not expect you to have all the answers. Asking questions is part of acting with integrity. If something feels wrong, raise the concern; don't stay silent.

In many cases, you should start with your manager. We expect managers to listen, help address concerns and seek guidance when needed. If you are not comfortable speaking with your manager, or if your concern is not resolved, you should use other available reporting options.

Ignoring a concern is not the right choice. Speaking up helps prevent small issues from becoming larger and supports a culture of trust and accountability.



Learn more
Refer to LRC 246 – Whistleblower Policy for additional guidance.

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Our Customers and Consumers

Trust is at the center of our relationships with customers and consumers. People rely on TransUnion to handle information responsibly and to act fairly in every interaction. How we build and manage those relationships matters.

This section focuses on how we work with customers, business partners, suppliers and government entities. It also explains how we protect information and privacy.

- Maintaining business relationships
- Conducting government business
- Safeguarding information and systems
- Protecting information privacy



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Maintaining business relationships

Our stance:
TransUnion builds business relationships based on trust, fairness and transparency. We apply this standard to how we work with our customers, business partners, suppliers and government entities. We expect honest dealing, respect for agreements and fair treatment in all commercial relationships.

Why it is important:
Strong business relationships help us serve customers, protect consumers and maintain trust in our brand. Unfair, misleading or discriminatory practices can harm consumers, damage relationships and expose TransUnion to legal and reputational risk.

How to act:
- Act honestly and fairly when working with customers, partners and suppliers
- Honor contracts, commitments and agreed-upon terms
- Use TransUnion information responsibly and only for authorized business activity
- Treat consumers fairly based on legitimate business factors and never based on protected characteristics
- Raise concerns when a customer's, a business partner's or a supplier's conduct seems unethical, misleading or inconsistent with our values



Applying Information for Good:

Scenario: A customer asks whether TransUnion data can be used to screen out certain groups of applicants to "reduce risk." The request is framed as a business decision, but it may disproportionately exclude protected classes.

What to do: Pause and contact Legal before responding. TransUnion information must be used in a fair and lawful way. Raise the concern so it can be reviewed and addressed appropriately.

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Conducting government business

Our stance:
TransUnion conducts business with government entities with care and integrity. Government business is different from commercial business and requires additional oversight and approvals.

Why it is important:
Dealings with government and state-owned entities carry higher legal and regulatory risk. Failing to follow required processes can lead to serious legal consequences and harm TransUnion's reputation.

How to act:
- Recognize that government and state-owned entities are subject to special rules
- Do not offer or respond to proposals involving government entities without obtaining required approvals
- Follow all review and approval requirements before engaging in government business
- Be alert to heightened risks, including improper influence or pressure
- Ask for guidance if you are unsure whether an entity is government-related or whether special rules apply

Learn more
Refer to OPS 234 – Third-Party Risk Management Policy and
OPS 273 – Global Procurement Policy and
LRC 292 – Anti-Bribery & Anti-Corruption Policy for detailed guidance.



Applying Information for Good:

Scenario: A potential customer appears to be a commercial company, but you learn it is owned or controlled by a government. The sales process is already moving forward.

What to do: Pause and use the Global Ethics Helpline or email TUEthics@transunion.com. We treat government entities differently, even when they look like private businesses. Do not proceed until Legal, Risk and Compliance has reviewed and approved the relationship.

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Safeguarding information and systems

Our stance:
TransUnion protects its information, systems and technology, especially information classified as “Confidential” or “Restricted”. This protection is critical to how we operate and to the trust others place in us. Everyone has a role in keeping company systems, devices and information safe.

Why it is important:
Our systems and information support our daily work. Poor security practices or improper access can disrupt operations and put information at risk. This can harm customers, consumers and TransUnion.

Trusted terms:

- **Information classification:** TransUnion classifies all information into four levels based on sensitivity: Public, Internal, Confidential and Restricted
- **System access:** Permission to use TransUnion systems, applications or devices as part of your role
- **Security incident:** Any event that could put TransUnion systems or information at risk, such as phishing attempts, lost devices or unusual access activity



Common security warning signs

Some security risks are subtle. Be alert to unexpected login requests, messages that create urgency, requests to bypass normal steps or links or attachments that feel unusual.
To escalate security incidents, contact the Cyber Defense Operations Center by emailing CDOC@transunion.com.

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Safeguarding information and systems

How to act:

- Use TransUnion systems, networks and devices only for authorized business activity and within your system access.
- Protect Restricted and Confidential information from improper access or sharing based on our information classification system; encrypt Restricted information.
- Keep passwords, credentials and devices secure and do not share them.
- Do not download software or applications without permission. Use artificial intelligence (AI) and other technology responsibly, and do not upload confidential information to external AI or other sites where it could become available outside of TransUnion.
- Watch for unusual activity, system issues or security warnings that could signal a security incident.
- Communicate through TransUnion-approved applications only.
- Report security incidents and security concerns via the Cyber Defense Operations Center by emailing CDOC@transunion.com.
- Apply the correct information classification — Public, Internal, Confidential or Restricted — to documents and emails.

Learn more

Refer to the TransUnion Security Policy for additional guidance.



Applying Information for Good:

Scenario: I receive an email that looks internal and asks me to sign in using a link. The message seems real, but the timing or wording feels unusual.

What to do: Do not click the link or enter your credentials. Report the message via the "Report Phish" button in your TransUnion email application so that the Information Security Department can review it before any system access is compromised.

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Protecting information privacy

Our stance:
TransUnion respects the privacy of individuals. This includes consumers, customers and associates. We protect personal information and use it only for authorized TransUnion business activity.

Why it is important:
People trust us with their personal information. Improper access, use or sharing of data can cause harm and damage trust. It can also create legal and reputational risk for TransUnion or TransUnion associates.

Trusted terms:

- **Personal information:** Any information that identifies or relates to an individual, such as a name, contact details or account information.
- **Restricted information:** The highest classification of TransUnion data. It includes nonpublic personally identifiable information, consumer data, health information and any data that we receive, create, store or process for consumers and our customers, as well as TransUnion information such as intellectual property, board minutes, business plans, sensitive employee information and other similar information.
- **Need-to-know:** All associates must consider information to be governed by the principle of "need-to-know." Unless an associate has reason to access information in the performance of their defined job duties, access should be denied.



Applying Information for Good:

Scenario: A coworker asks me to look up a credit report for a task that is outside my role. They say it will be quick and harmless.

What to do: Do not access the information. Use credit data only for authorized business activity. Use the Global Ethics Helpline or email TUEthics@transunion.com or raise the concern with your manager.

Monitoring

TransUnion may monitor activity on company systems, including email, instant messaging, text messages and voicemail, to help ensure personal information is handled appropriately and in line with our policies.

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Protecting information privacy

How to act:

- Access personal information only when your role requires it
- Use TransUnion data only for authorized business activity
- Do not share personal information with anyone who is not authorized
- Take extra care when handling Restricted information
- Ask for guidance if you are unsure whether access or use is appropriate
- Keep personal information on approved TransUnion systems and never send company data to personal email or accounts

Protecting TransUnion is everyone's responsibility. If you have a concern related to an operational, data or physical security issue, report it to the Issue Management Program immediately using the Issue Submission Form on the company intranet. For questions about the Issue Management Program, email IssueMgt@transunion.com.

If your concern involves ethics, employment practices, a financial reporting matter or fraud, report it right away through TransUnion's Global Ethics Helpline. You may submit a report anonymously, where permitted by local law. Phone numbers are listed on the last page of this Code.

You can also submit ethics concerns via email at TUEthics@transunion.com.



Access does not always justify use

Having access to personal information does not automatically mean you should use it. Curiosity, convenience or helping a coworker are not valid reasons to access data. When in doubt, pause and ask your manager before acting.

Learn more

Refer to the TransUnion Security Policy and LRC 249 – Associate Information Technology Use Policy for additional guidance.

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Our Company and Stakeholders

As a global company, we are responsible to many stakeholders, including consumers, regulators, investors and business partners. Acting with integrity helps protect our company and supports long-term success.

This section addresses how we compete, manage risk and meet our obligations as a business. It covers topics such as fair competition, financial integrity and accurate reporting. These standards help us make sound decisions and maintain confidence in how we operate.

- Competing fairly
- Preventing bribery and corruption
- Handling gifts and entertainment
- Avoiding money laundering
- Managing conflicts of interest
- Guarding against insider trading
- Maintaining accurate records
- Communicating externally
- Supporting investigations



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Competing fairly

Our stance:
TransUnion competes fairly and makes its own business decisions. We follow competition and antitrust laws wherever we operate. We do not work with competitors to gain an unfair advantage.

Why it is important:
Fair competition helps keep markets open and builds trust with customers and business partners. Unfair actions, or actions that appear unfair, can limit choice, break the law and damage TransUnion's reputation or impact TransUnion associates.

How to act:
- Make business decisions internally, never with competitors
- Do not agree with competitors to set prices, split markets or limit competition
- Be careful when interacting with competitors, including at trade associations or industry events
- Do not share or ask for sensitive business information, such as pricing, customers or future plans
- Do not make disparaging or insulting comments about a competitor's products, services or actions
- Contact Legal if you are unsure whether a discussion or activity is allowed

Learn more
Refer to LRC 38 – Antitrust Policy for detailed guidance on competition and antitrust requirements.

Applying Information for Good:

Scenario: At an industry event, a competitor starts talking about pricing trends. What should I do?

What to do: You should stop the conversation and make it clear you cannot discuss pricing or other sensitive business information. If the discussion continues or you are unsure how to respond, leave the situation and contact Legal for guidance.

What are competition and antitrust laws?

Competition and antitrust laws help protect fair competition. They are designed to prevent unfair business practices, to protect trade and commerce from unlawful restraint and monopolies, and to prevent misuse of market power. Breaking these laws can lead to serious penalties, including fines and criminal charges.

Working with competitors requires approval

Some activities with competitors may be allowed but only with advance approval. You must get your manager's approval and approval from Legal, Risk and Compliance before entering into any activity with a competitor. Contact Legal for any questions and for guidance.

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Preventing bribery and corruption

Our stance:
TransUnion does not tolerate bribery, kickbacks or corruption. We do not offer, give or accept anything of value to influence a decision or gain an unfair advantage. This applies to interactions with businesses and public officials.

Why it is important:
Bribery and corruption break the law and undermine trust. They can expose TransUnion and our associates to legal, financial and reputational harm. They can also damage the relationships we rely on to do business the right way.

Trusted terms:
- **Anything of value:** More than cash. This can include gifts, meals, travel, entertainment, favors, services, charitable contributions or offers of employment.
- **Facilitation payments:** Also known as "grease payments," these are small payments made to secure or speed up routine government actions, such as permits or approvals.
- **Kickbacks:** Improper payments, benefits or rewards given in return for favorable treatment, referrals or business decisions.
- **Public official:** Anyone who works for or represents a government or a government-controlled organization.
- **Third parties:** Individuals or organizations, such as agents, consultants or intermediaries, who act on TransUnion's behalf.

Applying Information for Good:

Scenario: A third party offers to "handle" a government approval for TransUnion in exchange for a fee. Is this allowed?

What to do: No. You must not offer, approve or allow payments meant to influence a decision or gain an unfair advantage. This includes actions taken by third parties on TransUnion's behalf. Stop the activity and use the Global Ethics Helpline or email TUEthics@transunion.com right away.

How to act:
- Never offer, give or accept anything of value to influence a business or government decision
- Do not make facilitation payments, even if they are considered customary or permitted in some locations
- Be especially careful when dealing with public officials — this includes government officials and others who work for or represent a government or government-controlled organization
- Do not use third parties, such as agents or consultants, to do something you or the company is not allowed to do
- Keep accurate records of payments, expenses and business activities
- Contact Legal for guidance if you are unsure how to handle a situation
- Remit legally required payments, such as fees for licenses, permits or other official expenses as required by law or regulation to do business
- Make permitted payments in accordance with the Delegation of Authority for Expenditures Policy

Learn more
Refer to LRC 292 – Anti-Bribery & Anti-Corruption Policy for detailed requirements and guidance.

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Handling gifts and entertainment

Our stance:
Certain gifts, meals and entertainment can help build business relationships, but they must be ordinary, reasonable and of limited value. They must also follow TransUnion policy and the law.

Why it is important:
Gifts that are excessive, inappropriately timed or unsuitable can influence — or appear to influence — business decisions. This can break the law or ethical rules and harm our reputation.

How to act:
- Give or accept gifts or entertainment only when they are infrequent, modest, customary and appropriate
- Follow TransUnion policy, all applicable laws and generally accepted ethical standards, including those of the recipient's organization
- Do not give or accept anything that could affect, or appear to affect, a business decision
- Do not give or accept anything that a reasonable person would consider to be in bad taste or that could damage TransUnion's reputation
- Attend or host meals or events only when there is a clear business purpose and the cost is reasonable

Learn more
Refer to LRC 226 – Gifts and Entertainment Policy for additional information, including gift thresholds.



Applying Information for Good:

Scenario: A business partner invites me to a high-end event shortly before a contract decision. The invitation is framed as relationship building, and similar events have been offered in the past. Can I attend?

What to do: Pause and ask for guidance from your manager before responding. Timing and value matter, especially when a decision is pending. Even if the invitation is well intended, it could create the appearance of influence. Use the Global Ethics Helpline or email TUEthics@transunion.com for guidance.

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Avoiding money laundering

Our stance:
TransUnion follows laws that prohibit money laundering and related financial crimes. We do not take part in activities that hide the source or use of illegal funds. We work only with reputable customers, suppliers and partners and expect funds to come from lawful sources.

Why it is important:
Money laundering and related activities hide the use of funds connected to serious crime. These activities are illegal and can create financial and reputational risk for TransUnion or TransUnion associates and cause real harm.

How to act:
- Know your business partners and complete required due diligence
- Watch and record financial activity as required by TransUnion policy
- Keep business records current, complete and accurate
- Report suspicious activity or suspected money laundering, terrorist financing or proliferation financing right away, using the Global Ethics Helpline
- Cooperate with reviews and authorities involved in enforcing anti–money laundering laws

Learn more
Refer to LRC 262 – Enterprise Anti-Money Laundering, Terrorist and Proliferation Financing Policy and OPS 234 – Third-Party Risk Management Policy and OPS 273 – Global Procurement Policy for detailed guidance.

Applying Information for Good:

Scenario: A longtime customer asks to split a large payment into several smaller payments and wants it processed quickly. The request feels unusual, but the customer says it is just for convenience.

What to do: Pause and do not proceed. Breaking up payments can be a warning sign, even with familiar customers. Follow required review steps and report the situation to the Global Ethics Helpline for assessment before any payment is accepted.

Red flags of money laundering

Be alert to situations that may signal risk, even with familiar customers or partners. Examples include:
- Requests to change payment methods, split payments or move funds quickly
- Transactions that do not match the customer's usual business or profile
- Pressure to bypass normal checks or keep details confidential
- Incomplete, inconsistent or changing information about the source of funds

If you notice any red flags, pause and report the situation to the Global Ethics Helpline for review.

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Managing conflicts of interest

Our stance:
We all have personal interests and relationships. A conflict of interest can arise when those interests affect, or appear to affect, our judgment or decisions at TransUnion.

Why it is important:
Conflicts of interest can make it hard to act objectively and in the best interests of TransUnion. Even when decisions are made in good faith, undisclosed conflicts can damage trust with customers, business partners and each other.

How to act:
- Be alert to situations where personal relationships, outside work or financial interests could affect your judgment
- Disclose any actual, potential or perceived conflict of interest as soon as it arises
- Do not use your role or TransUnion resources or information for personal gain
- Take extra care when a situation involves a supplier, customer, competitor or government official
- Email TransUnion's Ethics & Conduct Department at TUEthics@transunion.com if you are unsure whether a situation could create a conflict



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Managing conflicts of interest



Applying Information for Good:

Scenario: I'm starting outside work that doesn't compete with TransUnion. Do I still need to disclose it?

What to do: Yes. Outside work can still create a real or perceived conflict of interest and can take away time from associates' TransUnion work duties. You should disclose the situation to your manager and email TUEthics@transunion.com so we can review and manage it appropriately. Having a conflict is not a violation, but failing to disclose one can be.

Where conflicts can arise

Conflicts of interest can take many forms. Some of the most common situations include:

- **Personal relationships:** When a family member, friend or romantic partner works for TransUnion, a customer, a supplier, a competitor or a government entity you interact with at work
- **Outside work or activities:** When you have a second job, consulting role, board position or business activity outside of TransUnion that could influence your work or take time or resources away from your role
- **Business opportunities:** When you pursue or support an outside business opportunity that overlaps with TransUnion's business or uses TransUnion resources, information or time
- **Financial interests:** When you or a close family member have a significant financial interest in a customer, supplier or competitor of TransUnion
- **Use of company resources:** When TransUnion systems, information or relationships are used to benefit you or someone close to you outside of your role

Not every situation is a violation. The key is early disclosure. Sharing potential conflicts allows them to be reviewed and managed before they create risk.

Learn more

Refer to LRC 250 – Conflicts of Interest Policy for detailed guidance on disclosure and approval requirements and use the disclosure form as required.

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Guarding against insider trading

Our stance:
Insider trading laws prohibit the trading in securities and sharing of information when an individual has material nonpublic information that could affect a reasonable investor's trading decision. This applies to TransUnion securities and to securities of other companies we work with, such as customers, suppliers or business partners.

Why it is important:
The penalties for insider trading are severe, both for the individuals involved in the unlawful conduct and their employers. Where a violation occurs, a person can be subject to substantial penalties, including criminal liability, civil liability and disciplinary action (up to termination of employment). Sharing material nonpublic information with friends or family is also prohibited and can result in serious legal consequences and damage to TransUnion.

How to act:
- Do not buy or sell securities when you have material nonpublic information that could affect an investor's decision about the trade
- Do not share material nonpublic information with anyone who could trade on it, including friends or family
- Do not use material nonpublic information to place bets or participate in prediction markets or other event-based trading
- Be careful about what you say in public settings, meetings or online, including on social media
- Follow insider trading rules at all times, even when trading through personal accounts
- Remember that these restrictions can continue after you leave TransUnion
- Ask TransUnion's Corporate Secretary for guidance before trading or sharing information if you are unsure

Applying Information for Good:

Scenario: I learned material nonpublic information at work, but I don't plan to trade. Can I still talk about it with friends or family?

What to do: No. You cannot share material nonpublic information with anyone. Even casual conversations can lead to insider trading risks. If you are unsure whether information is public, do not share it and ask TransUnion's Corporate Secretary for guidance.

Learn more
Refer to LRC 247 – Insider Trading Policy and LRC 248 – Public Disclosure and Regulation FD Policy for detailed rules and guidance.

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Maintaining accurate records

Our stance:
TransUnion records must be accurate, complete and truthful. Our records show what we do and how we make decisions. Creating, approving or keeping inaccurate records is a violation of our Code, regardless of financial outcomes.

Why it is important:
Complete and trustworthy records help people trust our work and our decisions. Inaccurate or incomplete records can mislead others, create issues during regulatory exams, audits or investigations and put TransUnion and our associates at legal risk.

How to act:
- Create records that clearly reflect business activities and decisions.
- Follow required approval steps before spending under our policies, including but not limited to our delegation of authority for expenditures and travel and expense policies. Submit expense reports that are timely, complete and supported by accurate information.
- Keep records when required and follow our Enterprise Records Management Policy for a destruction schedule, making required exceptions for legal holds.
- Ask for guidance if you are unsure how to record or approve a transaction.

Applying Information for Good:

Scenario: A record is scheduled for destruction, but I receive notice of a legal hold. What should I do?

What to do: Stop any planned destruction right away. A legal hold means certain records must be maintained, even if they would normally be deleted or destroyed. You must preserve any records covered by the legal hold until you are told in writing that the hold has been lifted.

Unacceptable practices

- Falsifying, changing or hiding information in any record, including financial records
- Backdating entries or transactions
- Reporting revenue or expenses in the wrong time period or without supporting documentation
- Engaging in unrecorded, special or "off the books" transactions
- Bypassing our system of internal controls

Learn more
Refer to LRC 239 – Enterprise Records Management Policy, ACCT 206 – Delegation of Authority for Expenditures Policy, OPS 235 – Global Travel Policy and ACCT 202 – Global Expense Reporting Policy for detailed requirements and guidance.

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Communicating externally

Our stance:
We communicate carefully and responsibly with people outside TransUnion. What we say publicly can affect trust in TransUnion and the markets, and only designated individuals are authorized to speak on behalf of the company.

Why it is important:
External communications can have wide and lasting impact. Even informal or well-intended comments can be misunderstood, shared broadly or create legal, financial or reputational risk for TransUnion or TransUnion associates.

How to act:
- Share only information that is approved for public release
- Do not speak on behalf of TransUnion unless you are an authorized spokesperson
- Be careful when posting or commenting online, including on personal social media accounts, such as Facebook, LinkedIn or TikTok
- Do not respond to media, investor or analyst questions unless you are authorized to do so; instead, contact the Corporate Affairs & Communications team at Comms@transunion.com
- Avoid speculating about company performance, future plans or business matters
- Pause and ask for guidance from Comms@transunion.com if you are unsure whether something should be shared



Applying Information for Good:

Scenario: What if I'm asked an unexpected question about TransUnion at a conference or online and I am not an authorized spokesperson?

What to do: Do not answer. Politely decline and direct the question to the Corporate Affairs & Communications team at Comms@transunion.com for guidance. It is better to pause than to share information that could be inaccurate, incomplete or not meant for public release.

Learn more
Refer to LRC 248 – Public Disclosure and Regulation FD Policy and MC 185 – Online Activities and Social Media Policy for detailed guidance.

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 Concerns and LRC 246 – Whistleblower Policy.

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Supporting investigations

Our stance:
TransUnion cooperates fully with audits, investigations and reviews. We respond honestly and thoughtfully to requests for information and support efforts to understand issues and address them.

Why it is important:
Investigations help protect TransUnion, our people and those we work with. Accurate information and cooperation help issues get resolved promptly and help prevent similar ones in the future.

How to act:
- Cooperate fully and honestly with audits, external and internal investigations and reviews.
- Provide accurate, complete and factual information.
- Preserve records and information related to an investigation.
- Never destroy, alter, conceal or withhold information that may be relevant.
- Do not attempt to influence, interfere with or obstruct an investigation.
- Keep investigation matters confidential and share information only with those who have a need to know.
- For questions and guidance about internal investigations, use the Global Ethics Helpline or email TUEthics@transunion.com. For external investigations, including customer audits and/or regulatory exams, ask Legal for guidance if you are unsure how to respond to a request.

Learn more
Refer to LRC 246 – Whistleblower Policy.

Applying Information for Good:

Scenario: A record or document is requested as part of an investigation, but I'm not sure whether it is relevant or allowed to be shared. What should I do?

What to do: Do not decide on your own or delay responding. Preserve the record and if it relates to an internal investigation, use the Global Ethics Helpline or email TUEthics@transunion.com for guidance. If the record relates to an external investigation, seek guidance from Legal. Never delete, alter or withhold information that may be relevant to an investigation.

Document preservation

When you are aware of an investigation, audit or legal matter:
- Follow instructions from Legal, Risk and Compliance about preserving information
- Retain emails, messages, files and other documents related to the matter
- Preserve information even if it would normally be deleted under routine practices
- Do not delete, alter or discard any records that may be relevant

Failing to preserve records can interfere with an investigation and may lead to serious consequences.

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Our People

Our people create our success. We foster a workplace where everyone feels safe, respected and supported. This enables us to do our best work, live our values every day and embody our Workforce for Good. This section focuses on how we treat one another at work. The topics that follow help ensure our workplace reflects dignity, fairness and shared responsibility.

- Working safely
- Welcoming workplace



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Working safely

Our stance:
We all share responsibility for a safe work environment. Working safely means protecting physical and mental well-being, whether we work in an office, remotely or while traveling for TransUnion.

Why it is important:
A safe environment helps people focus, speak up and do their work well. Unsafe behavior, including bullying or threats, can harm people and grow worse if ignored.

Trusted terms:
- **Bullying:** Repeated or serious behavior that intimidates or threatens someone and makes the work environment unsafe
- **Psychological safety:** Feeling able to speak up and do your work without fear of threats or retaliation
- **Physical safety:** Protection of individuals from bodily harm, physical violence or injury

How to act:
- Follow safety practices in offices, remote workspaces and during work-related travel
- Watch for unsafe conditions or behavior, including aggressive or intimidating conduct
- Take concerns seriously, even if no one has been hurt
- Escalate safety concerns early to TUConcierge@transunion.com instead of handling them alone
- Support coworkers by speaking up when something does not feel right



Applying Information for Good:

Scenario: An associate comes to work and begins shouting, acting aggressively and making others uncomfortable. No one has been harmed, but several coworkers are concerned.

What to do: Take the situation seriously. Do not try to handle it on your own or assume someone else will act. Move to a safe location if needed and report the concern immediately to TUConcierge@transunion.com so the appropriate team can respond.

Learn more
Refer to the Harassment and Workplace Violence Prevention sections of TransUnion's Associate Handbook.

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Welcoming workplace

Our stance:
TransUnion commits to providing a workplace where everyone is treated with dignity and respect. We value different backgrounds, experiences and points of view and expect everyone to help create a fair and welcoming environment.

Why it is important:
This commitment helps people feel respected and able to do their best work. Harassment or unlawful discrimination can harm trust, teamwork and performance.

Trusted terms:
- **Harassment:** Unwelcome behavior tied to a protected trait that interferes with someone's work or creates a hostile environment
- **Sexual harassment:** Unwelcome sexual comments, behavior or attention that makes someone uncomfortable or affects their work
- **Unlawful discrimination:** Unfair treatment based on a protected trait that affects work opportunities or decisions
- **Protected traits:** Personal characteristics that include race, color, religion, national origin, sex, age, disability, genetic information and any other characteristic protected by applicable law
- **Reasonable accommodations:** Changes or support that help someone work effectively

How to act:
- Treat others with respect and professionalism
- Use respectful language and stay open to different perspectives
- Do not engage in harassment, sexual harassment or unlawful discrimination
- Speak up or ask for guidance if you see or experience unfair treatment
- Support reasonable accommodations that help people do their jobs

Applying Information for Good:

Scenario: An associate asks for a workplace accommodation because of a medical condition. As their manager, you are unsure what support may be appropriate.

What to do: Listen respectfully and refer the request to your Human Resources Business Partner. Do not decide on your own whether the accommodation should be approved or ask for unnecessary medical information. Work with Human Resources to support the associate and help identify a reasonable accommodation.

Learn more
Refer to the Harassment and Workplace Violence Prevention sections of TransUnion's Associate Handbook.

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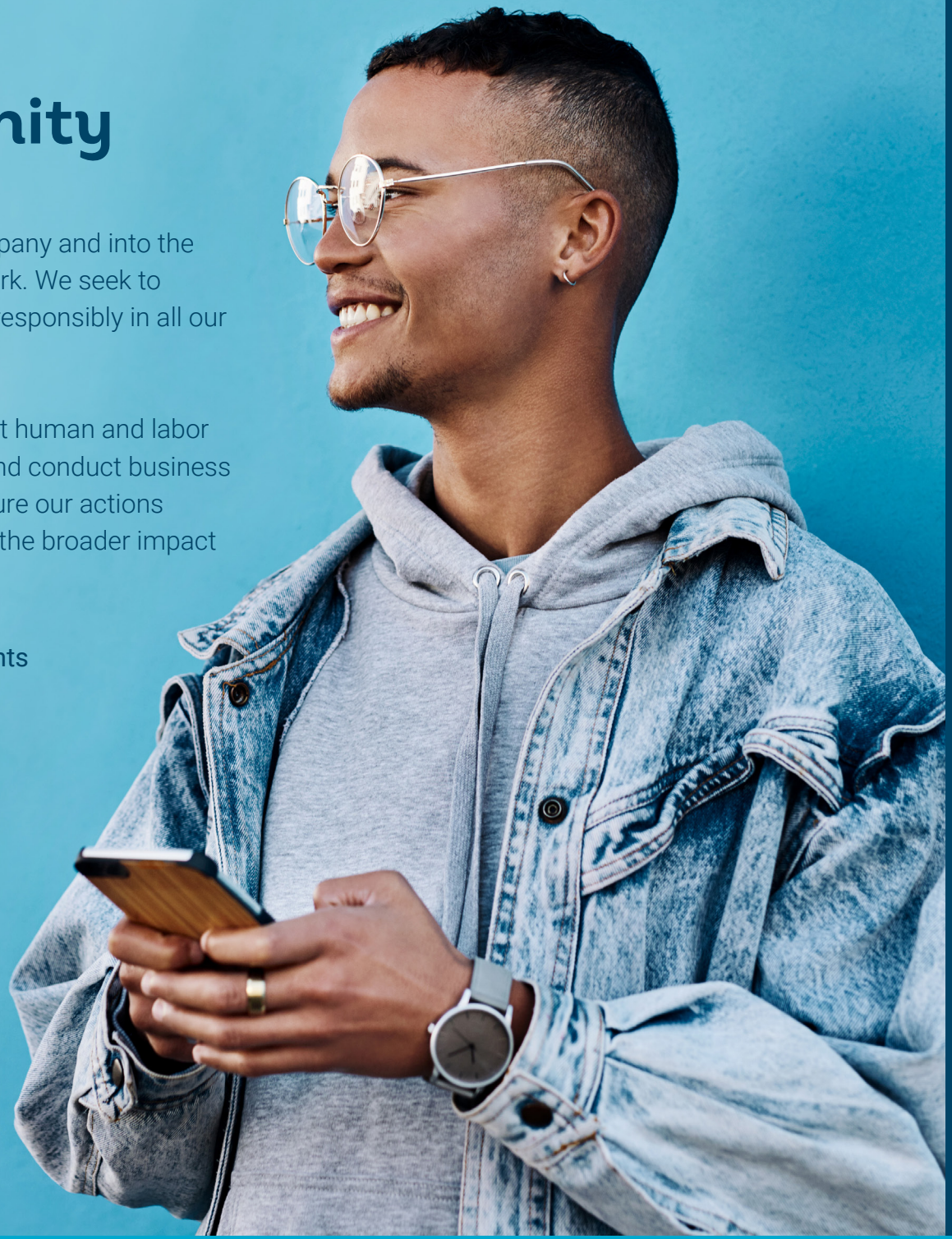
Our Community

Our values extend beyond our company and into the communities where we live and work. We seek to make a positive impact and to act responsibly in all our community interactions.

This section covers how we respect human and labor rights, engage with communities and conduct business responsibly. These topics help ensure our actions reflect care for people, society and the broader impact of our work.

- Respecting human and labor rights
- Engaging with communities
- Doing business responsibly



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Respecting human and labor rights

Our stance:
TransUnion respects human and labor rights wherever we do business. This applies to our own operations and to the suppliers, vendors and other third parties we work with. We expect work to be voluntary, lawful and respectful of human dignity.

Why it is important:
Respecting human and labor rights helps protect people from harm and exploitation. Abusive labor practices, even when they occur outside our direct operations, can cause serious harm and expose TransUnion or TransUnion associates to legal, ethical and reputational risk.

Trusted terms:
- **Forced labor:** Work that a person is compelled to perform against their will through threats, coercion or lack of freedom to leave
- **Human trafficking:** The use of force, fraud or coercion to exploit people for labor or services

How to act:
- Treat all people with dignity and fairness in our operations and business relationships
- Do not engage in or support forced labor, child labor or human trafficking
- Be alert to warning signs of abusive or unsafe labor practices
- Do not ignore concerns simply because they involve a supplier or third party and not TransUnion
- Escalate concerns promptly when something does not seem right



Applying Information for Good:

Scenario: While visiting a third-party vendor, I notice workers appear closely supervised, avoid speaking and do not have control over their schedules or identification documents. The vendor insists everything is compliant with local law.

What to do: Do not ignore the concern. Raise the concern using the Global Ethics Helpline or email TUEthics@transunion.com. Concerns about labor practices should be escalated, even when they involve third parties and even if no violation has been confirmed.

Learn more
Refer to LRC 281 – Human Rights and Labor Standards Policy and OPS 272 – Supplier Code of Conduct for detailed guidance.

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Engaging with communities

Our stance:
TransUnion supports positive community activities where we live and work. This includes volunteering, helping local causes and taking part in civic life. You must be clear, however, when your activities are personal and not connected to TransUnion.

Why it is important:
Community activities build trust and help others. Issues can arise when these activities become political or create the impression that TransUnion supports or is connected to them. This can create legal and ethical risk and damage trust.

How to act:
- Join community or volunteer activities as a private individual unless you are approved to act on behalf of TransUnion
- Make it clear that your personal political views do not represent TransUnion
- Do not use TransUnion time, money, equipment or spaces for personal political activity
- Step away from activities that could appear to involve lobbying or political advocacy for TransUnion, unless otherwise approved to do so
- Ask for guidance via the Global Ethics Helpline or email TUEthics@transunion.com if an activity could cause confusion or create a conflict of interest



Applying Information for Good:

Scenario: I volunteer with a nonprofit organization that TransUnion supports. The group asks volunteers to contact elected officials about a proposed law. People assume TransUnion supports the effort because I work there.

What to do: Pause and clarify that you are acting on your own, not for TransUnion. If the activity continues to focus on political advocacy, step back or ask for guidance via the Global Ethics Helpline or email TUEthics@transunion.com before continuing.

Learn more
Refer to LRC 231 – Political and Lobbying Activity Policy and LRC 226 –Gifts and Entertainment Policy for detailed guidance.

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Doing business responsibly

Our stance:
TransUnion does business responsibly and with integrity. This includes how we select, engage and manage vendors, suppliers and other third parties. Responsible business means following approved procurement processes and managing risk throughout our business relationships.

Why it is important:
Vendors and third parties can affect our data, operations, customers and reputation. When procurement or third-party controls are bypassed, even with good intentions, it can expose TransUnion or TransUnion associates to legal, financial and operational risk.

Trusted terms:
- **Procurement:** The process used to select, contract with and manage vendors and service providers in a fair, transparent and controlled way
- **Third party:** Any external company or individual that provides goods or services to TransUnion or supports our business operations

How to act:
- Use approved procurement processes when selecting or engaging vendors
- Do not commit to work, pricing or services before required reviews and approvals are complete
- Avoid conflicts of interest and disclose them if they arise
- Be mindful that third parties can create risk for TransUnion, including through their own subcontractors
- Raise concerns if a vendor relationship does not follow required standards or creates risk



Applying Information for Good: Q A

Scenario: A business partner suggests quickly onboarding a vendor to meet a tight deadline and asks me to bypass standard procurement steps "just this once." The vendor seems reputable and the work feels urgent.

What to do: Do not bypass the process. Procurement steps exist to manage risk and protect TransUnion. Raise the concern via the Global Ethics Helpline or email TUEthics@transunion.com and follow the approved process, even when timelines are tight.

Learn more
Refer to OPS 234 – Third-Party Risk Management Policy and OPS 273 – Global Procurement Policy for detailed guidance.

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If you have a concern related to conduct that may conflict with this Code, TransUnion policies or the law, you are encouraged to report it through TransUnion's Global Ethics Helpline.

The Global Ethics Helpline is available 24 hours a day, 7 days a week, in multiple languages. Reports can be made confidentially and, where permitted by law, anonymously. TransUnion does not tolerate retaliation against anyone who raises a concern in good faith.

You can report a concern in the following ways:

Online:
www.TUGlobalEthicsHelpline.com

By phone:

- US & 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**
- UK*: **44-(20)-7099-0385**

*These numbers serve as regional hubs for locations without a dedicated toll-free number.

Questions about TransUnion's Global Ethics Helpline? Email TUEthics@transunion.com.

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