



CODE OF CONDUCT

We are powered
by integrity

NIQ

A message from our CEO, Jim Peck

Integrity is such a vital part of NielsenIQ's success that we made it one of our core values.

It's our guidepost when safeguarding our data and interacting with our customers, investors, the communities we serve, and each other. Our ability to act with integrity, responsibility, and passion is essential to maintaining our reputation as a trusted global leader in our industry.

While the Code of Conduct cannot address every situation you may face, it will help you make decisions that are consistent with the law, our policies, and our values and behaviors. It is critical that you take the time to review the entire Code of Conduct carefully and thoroughly.

We are all here to help if you're unsure about the right thing to do—your manager, your Human Resources representative and the entire leadership team, myself included. It takes courage to stand up for what is right. If you see something that seems unethical, or does not seem to fit with our values, behaviors or our Code of Conduct, say something so that we can properly address it.

We have an exciting future ahead—one that is committed to cultivating a winning culture powered by integrity.



A handwritten signature in black ink that reads "Jim M. Peck". The signature is fluid and cursive.

Jim Peck

Executive Chairman and Chief Executive Officer

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Our values and our behaviors

Our values are core to who we are. They catalyze our business strategy; we know that demonstrating these values will lead to success.

Our 8 behaviors are our values put into action. They make our improvements sustainable and measurably shape a winning culture.



Integrity

Integrity powers our organization. It means we are honest, trusted – by our customers and each other – and uncompromising in our pursuit of excellence.



Responsibility

We take the initiative to achieve great things for our customers, our communities, and each other. We value diversity and ensure everyone has a voice. We are accountable and do what we say we'll do – as individuals, as teams, and as a company.



Passion

Passion drives us to reach for something bigger than ourselves. It's the spark that ignites innovation and customer focus, inspiring each of us to bring our unique contribution to everything we do.

1. Think like our customers – Be essential to the success of our customers. Treat their goals as your own. Deliver exceptional value at every step.
2. Know our business – Understand what we do and why it matters. Be curious and learn the business levers that grow our top and bottom line. Align your goals to drive results.
3. Be inclusive and help others – Welcome diverse perspectives as a competitive advantage. Practice empathy. Create an environment where everyone can be themselves and do their best work.
4. Be honest and transparent – Be authentic in your thoughts and actions. Engage in healthy debate to get to the best answer. Be a good listener and assume positive intent.
5. Keep your word – Do what you say you are going to do. Turn ideas into plans and get them done. Strive for excellence and give your best effort.
6. Take ownership – Lead the way, take initiative and be accountable. Ask for help when needed. Learn from mistakes and keep moving.
7. Make things better – Relentlessly search for new ways to solve problems and improve business processes. Leave things better than you found them.
8. Be courageous and aim high – Take pride in pursuing your ambitions and dreams and support others in their own pursuits.

About our code

We work together around the world to empower our customers to make bold decisions and transform their business with trusted data, solutions, and insights. Being part of NielsenIQ (“Company”) means our decisions and actions must always be grounded in our shared values of Integrity, Responsibility and Passion, and compliance with the law everywhere we do business.

Our Code of Conduct (“Code”), along with our Company policies, provides guidance on:

- Acting with integrity in our daily work
- Understanding and complying with the laws, regulations and standards that govern our business
- Protecting ourselves and our Company’s reputation
- Getting advice and guidance if we have questions
- Speaking up if we see something that doesn’t seem to fit within the spirit or intent of our values and the Code itself

While this document illustrates how the Code comes to life day-to-day, the Code cannot cover every possible situation in our fast-paced and ever-changing world. It serves as a guide for daily decisions and actions to ensure they align with the law and our core values.

The principles in our Code apply to all employees, on-site and remote, officers of the Company, and members of the Board of Directors of NielsenIQ, its subsidiaries and affiliates worldwide. In addition, we expect everyone working on the Company’s behalf, including suppliers, agents, contractors, and business partners to adhere to these standards and our Supplier Code of Conduct.



Our responsibility

Building a winning culture, powered by integrity, requires the collective commitment of every employee. It is our responsibility to:

- Be honest and transparent, keep our word and always use common sense and good judgment
- Read, understand and certify our commitment to the Code annually
- Comply with this Code and any laws or Company policies that apply to our work
- Know our business and complete any required training so we fully understand what is expected of us
- Make things better by seeking advice from a manager or the appropriate Company resource if we have a question
- Take ownership by holding ourselves and each other accountable and speaking up if we see something that doesn't seem right
- Cooperate fully in the investigation of any possible violation of our Code, our policies or the law

Managers have additional responsibilities to demonstrate what it means to be powered by integrity. We expect managers to:

- Lead by example and model our values and behaviors for their teams
- Be courageous and aim high—clearly communicate compliance and ethics expectations and the importance of acting with integrity and achieving results in the right way
- Be inclusive and help others by promoting a positive, inclusive workplace where all employees feel valued and can perform at their very best
- Foster an environment of openness and trust that allows employees to speak up and ask questions or raise concerns without fear of retaliation

Boost your IQ

Making decisions that are powered by integrity is essential to building and maintaining a winning culture. The right action to take may not always be clear. If we are faced with a difficult situation, take these steps:

1. Gather the facts. Do you have all the relevant information?
2. Be clear on what you are being asked to do. Is it your decision to make or should others be involved?
3. Seek advice from your manager, other Company resources or Compliance & Integrity. Is it the right thing to do? Does it comply with the law, our Code and Company policies? Will it reflect positively on the Company if made public?

Remember, ask before you act. If you are still unsure about the right thing to do, contact [Compliance and Integrity](#).

Speaking up

Being powered by integrity means we speak up when we have questions or when we believe something may be a violation of the Code, Company policies, or the law. This includes possible violations by our fellow employees, business partners, or anyone else acting on behalf of the Company. No concern is too small to report, and you don't need to have all the facts as long as you are acting in good faith. Raising a concern in "good faith" means that, to your knowledge, the information you have provided is truthful and accurate.

Every single one of us—regardless of our position within the Company—has a personal responsibility to speak up if we have questions or concerns about possible misconduct. It is often best to speak directly to your manager, but you may also ask questions or raise concerns to:

- the Integrity Helpline
- Compliance & Integrity at integrity@nielseniq.com
- your Human Resources representative
- any member of management

The [Integrity Helpline](#) is hosted by a third-party provider to allow for confidential and anonymous (where local law permits) communication online or through the telephone in your preferred language. When using the Helpline to make a report, follow up often, and respond to any requests for additional information needed to help with our investigation into the concerns raised. This follow-up is especially important when making anonymous reports, as the Helpline will be the only way for the Compliance and Integrity team to communicate with you. Details for using the Helpline can be found in the [Key Contacts and Resources](#) section of this Code.



The sooner the Company learns of a problem or concern, the sooner we can work to resolve it. We take all reports seriously, we review each one and we follow up as appropriate. We are committed to keeping your information confidential to the extent possible under local law and disclose reported information only to those who need to know to carry out the investigation or make decisions based on the outcome. Confirmed violations of our Code, our policies, or the law will result in disciplinary action up to, and including, termination of employment.

We will not tolerate retaliation against anyone who speaks up in good faith. This means that no one can take disciplinary action or otherwise mistreat you because you raised a concern or participated in an investigation of possible misconduct. Retaliation is against the law and against Company policy. If you feel that you or someone else has been retaliated against for raising a concern or participating in an investigation, you should report it using the [Integrity Helpline](#) or integrity@nielseniq.com.

“ *Speaking up may not always be the easy thing, but it is always the right thing.* ”

Q: What happens when someone reports a concern?

A: When a concern is raised, we will look into it and, if necessary, we will conduct a confidential, objective investigation of the matter. The reporter will probably be asked follow-up questions. The more information provided, the easier it will be for the Company to investigate the matter and take appropriate steps, if misconduct is found. To protect the privacy and confidentiality of those involved, the Company may not be able to share results of investigations. The Company prohibits retaliation against anyone who reports a concern in good faith or participates in an investigation.

02

INTEGRITY IN OUR WORKPLACE



We promote a safe and healthy workplace

We are committed to providing a safe, secure, and healthy workplace so that we are free to do the good, innovative work our customers expect of us, and we expect of each other. This includes maintaining a workplace that is free from threats, intimidation or acts of violence and weapons of any kind.

Another part of having a safe and healthy workplace is having a workplace free from the influence of any substance, including alcohol, cannabis, illegal drugs, or misused prescription drugs, that could impair our judgment or risk the safety of others. There are occasions when responsible alcohol consumption may be acceptable such as at a Company-related event or when entertaining customers. In those instances, always maintain good judgment, moderation, and professionalism.

Take ownership and be accountable by knowing and following the laws, regulations, and Company policies designed to protect our health, safety, and security in the workplace.

- Q:** I am worried that a close co-worker of mine may be struggling with mental health issues. They seem down and are not engaging in group activities as they have in the past. I would like to help, what should I do?
- A:** We need to look out for one another and that includes our mental health. Sometimes just asking a co-worker if they are okay and listening to them may be enough to support them. Other times, they may need more support. If you feel comfortable suggesting it, you could remind them of the resources available under the Employee Assistance Program. You could also mention this to your manager or Human Resources representative and ask for their help in ensuring your co-worker has the support they need.



We treat each other with respect

We strive for an inclusive culture where everyone is treated with respect and diversity of backgrounds, thoughts, and opinions is valued, encouraged, and nurtured so that we can all be ourselves and feel empowered to contribute our very best. We are committed to maintaining a workplace that is free of all forms of harassment, including bullying, and discrimination.

Treating each other with respect means we:

- Are inclusive and help others to ensure everyone has a voice
- Are free from bias and value diversity as a strength and competitive advantage
- Provide equal opportunity for all employees—making employment-related decisions only on an individual's skills and abilities to perform the role
- Never discriminate on the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, genetic information, marital status, or any other characteristic protected by law
- Do not engage in or tolerate harassing or bullying behavior
- Maintain professionalism in our interactions and communications

If you believe you have seen or experienced behavior that is discriminatory or harassing, you must report it to:

- the [Integrity Helpline](#)
- Compliance and Integrity at integrity@nielseniq.com
- your Human Resources representative
- any member of management

Harassment is any unwelcome conduct that might reasonably be expected or perceived to cause offense or humiliation to another person or interfere with their ability to do their work. It can take the form of words, gestures, or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment.

Be alert for behavior that would have a negative impact on our workplace such as:

- Being close-minded, not listening, and not being open to other opinions or views
- Making slurs, inappropriate jokes, negative remarks, or stereotyping anyone
- Targeting or singling someone out for ridicule, exclusion, or other harmful treatment
- Displaying or sharing material that could be offensive to others
- Making unwanted romantic or sexual advances
- Inappropriate touching of others

We will not tolerate this type of behavior at our Company. If you ever experience, see or suspect behavior that violates our commitment to inclusion and a workplace free from discrimination and harassment, speak up.

We protect each other's privacy

Our employees and prospective employees trust us with their personal information (also referred to as personal data or individual-level data). It is our responsibility to protect their privacy and this information by complying with applicable privacy and data protection laws wherever we do business. These laws are complex and vary by country, so if you work with this type of information as part of your job responsibilities, you must be sure you understand what is required.

We protect the privacy of this data by:

- Collecting, holding, using, or processing only the personal data we need for legitimate business purposes
- Maintaining appropriate safeguards to prevent loss, misuse, or unauthorized disclosure while it is in our custody
- Promptly reporting any possible misuse or compromise of personal data to the Legal team

Personal or individual-level data means data about or relating to a unique identified or identifiable individual, including information that can be used on its own or with other information to identify, contact, or locate an individual. Some examples include telephone numbers, email addresses, banking or financial information, and government identification numbers among other things. Remember, what constitutes this type of information is constantly changing and varies by country, so if you are unsure, please seek guidance from the Legal team.

Q: What personal data can the Company collect about me as a current or future employee?

A: The Company may collect personal data only for legitimate business purposes such as assessing an applicant for hire or an employee's qualifications for a promotion or reassignment, administering payroll or benefits, establishing a contact in the case of an emergency, and complying with any reporting requirements under the law. We are responsible for protecting this personal data by following all applicable privacy and data protection regulations.

Global Privacy and Data Use Policy

We safeguard company assets

We each have a responsibility to use Company assets in a way that supports business goals rather than for our personal benefit. We take ownership and are accountable to protect those assets from loss, damage, theft, waste or misuse. This includes our physical and financial assets such as equipment, supplies, facilities and funds, and our intangible assets such as our confidential and proprietary information.

Our confidential and proprietary information is what makes us unique and is one of our most important assets. This information includes our intellectual property (copyrights, trademarks, patents), business, product or marketing plans, information regarding negotiations, technical specifications, methodologies, customer reports, analyses and deliverables, and other information and materials not publicly available. Protecting information contained on our computer systems, portable electronic devices, laptops, phones, and other technology requires us to take special measures to safeguard these systems and devices from unauthorized access.

Sharing confidential information with people outside the company can hurt us competitively, damage our reputation, or impact our financial results. Our obligation to protect confidential and proprietary information continues throughout our employment and after we leave the Company.



We safeguard Company assets by:

- Treating them with care, guarding against theft, waste, damage, or misuse
- Using them thoughtfully and efficiently, never using them for something offensive, illegal or that would violate Company policy
- Keeping all confidential information in a safe and secure place, marking it confidential, and only sharing it with those who have a business “need to know”
- Physically securing laptops, using multi-factor authentication (MFA) anytime it’s offered, using different passwords on different systems and accounts, using strong confidential passwords, taking appropriate caution when accessing the internet, installing only Company-authorized software, being alert for phishing, and promptly reporting any unusual or suspicious activities

Boost your IQ

Do

- ✓ Ensure all expenditures are reasonable, for business purpose and properly approved
- ✓ Properly secure all equipment and physical assets
- ✓ Use strong confidential passwords that include a combination of numbers, letters, and special characters
- ✓ Think before you click on suspicious emails or attachments
- ✓ Only share confidential information with those who have a business need-to-know

Don't

- ✗ Use Company funds, equipment or supplies for personal gain
- ✗ Leave your laptop or other company device unsecured
- ✗ Share your password
- ✗ Send company information using unapproved systems or applications
- ✗ Discuss confidential information in public places
- ✗ Be afraid to report inadvertent sharing of confidential information

Q: My co-worker needs access to certain systems to get work done while I am on vacation and won't be there to provide it. Is it okay if I share my username and password with them so they can access the information they need?

A: No. Your manager should ensure an appropriate way for your co-worker to have access to the information they need while you are on vacation. You should never share your username and password, even with a trusted co-worker. Remember, you are responsible for anything that happens in the system under your username and password.

We communicate with care

We collaborate with each other to deliver excellence and contribute to the success of our customers. To do this effectively, we communicate with each other and our customers and business partners using NielsenIQ-approved end-user technology solutions (e.g., Microsoft Outlook, Microsoft Teams, Slack, company-issued mobile phones) to send emails, instant messages, and text messages. We must think carefully about the words we use in these communications, be respectful, factual, and write each message as if it could become public.

Social media is another way to communicate with people inside and outside the Company. It can be used effectively by people authorized in the Company to build our brand and reputation, and attract new team members. However, if we choose to use personal social media accounts to express our thoughts and opinions online, we must make it clear that we are speaking for ourselves and not on behalf of the Company whether our conversations are intended to be public or private. Remember you are responsible for what you publish, so be sure to think before you post.

In whichever manner we choose to communicate, always remember:

- Be courteous and respectful
- Never disclose confidential information about our employees, our Company, or its customers or business partners
- Do not communicate in a way that may be offensive or violate our Code or other Company policy
- All communications made using Company devices or systems are not private and are subject to monitoring by the Company
- Electronic communications create records that are permanent and retrievable, even if deleted, and could affect the reputation of our Company or our people

Q: My team works together closely and many of us have become friends and connect with each other outside of work and on our personal social media accounts. Recently, one of the team members I follow posted something offensive about one of our customers. It made me uncomfortable, but since it was on their personal account, I didn't think it violated our Company policy. Is that right?

A: No. Even when using your personal social media accounts, we must always be respectful of our employees, customers or business partners and never post anything about them that could be considered offensive or otherwise violate our Code or Company policy. You should speak with the team member that posted the content to help them understand the implications of what we say online and how our communications can affect our business, our reputation and even our legal obligations.

Social Media Policy

03

INTEGRITY IN THE MARKETPLACE



We ensure the integrity of our data

In a data-driven business like ours, data integrity is critical to our ongoing success. Our customers rely on our integrity, the integrity of our data, our analysis, products and services to make significant marketing, product, and other impactful business decisions. Our independence is a competitive advantage, and we always conduct our research and analysis honestly. We never engage in conduct that might interfere, or have the appearance of interfering, with the outcome of any specific report or analysis. A lapse in data integrity can result in reputational and financial harm and can have legal consequences. It is critical that we each do our part to ensure our data is powered by integrity.

Do

- ✓ Adhere to all protocols for panel and household engagement and recruiting
- ✓ Approach all measurement and analysis without bias
- ✓ Be diligent about protecting Company data and information
- ✓ Immediately report any threat to data integrity, the theft, loss or inadvertent sharing of confidential information, survey, or field materials

Don't

- ✗ Serve on a Company panel or participate in a Company survey yourself or let someone from your household do so
- ✗ Falsify data in any way or manipulate data to produce a certain outcome
- ✗ Share a customer's confidential analysis or trade secrets with another customer or anyone outside of our Company

- Q:** My team is working on a field survey about a customer's new product line. The customer provided very specific recruitment criteria for survey participants that has made it challenging to gather enough participants. With the customer's deadline to complete the survey approaching, we decided to relax the criteria so we could include enough participants and meet the deadline. Is that okay?
- A:** No. We must always think like our customers and be honest and transparent with them about the challenges we are facing so they can make an informed decision rather than risk the integrity of the survey data.
- Q:** A major customer has asked our team to provide data that will help them with a sales presentation. The problem is - our data does not support the message they want to sell. My team feels pressured by the customer to find a way to show that the data supports their success story. We don't want to upset the customer. What should we do?
- A:** Our Company's reputation is built on the integrity of our data, and we cannot compromise that for any customer. Before responding to the customer, seek advice from your manager or reach out to Compliance and Integrity on how best to handle the situation.

We compete fairly

We win because we know our business, think like our customers, keep our word, and make things better. We compete honestly and fairly and follow the laws that promote free and fair competition in the countries where we operate. We will outperform our competition because of our reputation for transparency, data integrity, and the quality of our products and services rather than engaging in unfair or unethical practices.

Competition or antitrust laws are complex and vary by country, but they generally prohibit activities that negatively affect competition in the market such as:

- Discussions which could imply agreements with competitors to set prices or allocate customers or markets
- Dictating pricing to resellers, requiring exclusivity, or conditioning sales on other purchases
- Abusing a dominant market position such as offering rebates or discounts to force out competitors
- Making any other agreement that may unlawfully restrict competition

We must always be careful when we interact with our competitors so that there can be no perception that we are engaged in any improper discussions or agreements.

Violating these laws can result in criminal prosecution, as well as significant financial penalties for both the Company and the individuals involved. If you have questions, please contact the Legal team for guidance.

- Q:** At a trade association meeting I ran into an old college friend who works for one of our competitors. They asked me how business was going. I know we have to be careful about any conversations with competitors, so I just told them things were going well and changed the subject to talk about our families. Did I do the right thing?
- A:** Yes. It is fine to respond in a general, non-specific way to say that all is well, but keep your conversation high-level and be aware that simply having a conversation with a competitor can give the appearance to others of something improper.

Trade associations and other industry bodies can be useful groups to help businesses grow, develop best practices, and foster their mutual interests, but they also present competition law risks. Remember, if a participant in such a meeting raises an improper topic such as prices, pricing policies, costs, discounts, credit terms, restrictions on buying or selling, or suggests any form of collusion, explicitly state that you will not discuss the matter, leave the meeting and have both your objection and exit noted and report the incident to the Legal team as soon as possible.

We protect the private and confidential information of our partners

Our customers, panelists, survey respondents, and other business partners trust us with their personal, confidential, and/or proprietary information for business purposes. This information includes (but is not limited to) personal data, strategic business plans, methodologies, intellectual property, pricing and marketing data, and other information or materials not publicly available. We comply with Company policy and all applicable privacy and data protection laws in the countries where we do business.

Many of us work with this information daily and it is our responsibility to protect it by:

- Marking it confidential
- Storing and handling it securely
- Using multi-factor authentication (MFA) anytime it's offered, strong confidential passwords and complying with security measures for information stored on our devices
- Never discussing it in shared public spaces
- Providing access only to those who have an approved business need to know
- Promptly reporting any unauthorized access or data incident through [ServiceNow](#)

Be sure to get approval from the Legal team before using the Intellectual Property Rights of any third party and only use trademarked and copyrighted material with permission from the owner.

Q: I was running late to my next meeting but needed to get an email out to a customer. The email included an attachment with confidential research results for the customer that they had been expecting. In my rush, I typed the wrong email address and accidentally sent the email to a different customer. What should I do?

A: You should immediately report your mistake to your manager and the [Cybersecurity team](#) so the appropriate steps can be taken regarding the data incident. In the future, you should always use the encryption option within the email system to secure documents that contain confidential information. To prevent accidents like this from happening, it is best to take the time to double check the email addresses of the recipients to ensure only authorized people receive the information. Better to be a few minutes late to a meeting than have a data incident.

Q: How will I know if the information I am working with is confidential and needs to be protected?

A: Ask yourself:

- Is it marked Confidential?
- Does it belong to one of our panelists, customers, suppliers, or other business partners?
- Could the owner of the information be harmed if this became public?

If the answer to any of these questions is yes, you should treat the information as confidential and protect it accordingly. When in doubt, refer to the [Data Classification Guide](#) or check with the Legal department.

We do not engage in corruption or bribery

We are powered by integrity and do not engage in corruption or bribery. As a global company, we must follow the anti-corruption laws of any country where we do business. Though laws in some countries make a distinction between bribing a government or public official and bribing someone in the private sector, NielsenIQ does not. We are committed to do our part to reduce corruption and increase transparency around the world.

We never offer, give, or receive anything of value to or from anyone in an attempt to gain an unfair business advantage or to improperly influence a business decision. To ensure integrity and transparency in our books and records, we must never conceal the true nature of an expense. All payments and transactions must be clearly and accurately described and properly recorded.

In some situations, government officials may seek facilitating payments, or “grease payments”, to complete or speed up routine government actions, or ensure favorable outcomes. We do not promise nor provide such payments.

These rules also apply to anyone acting or doing business on our behalf; we must be diligent in selecting business partners that comply with our standards for doing business ethically and in compliance with the law.

If you are ever asked by a customer, supplier, government official, or other party to make or to accept a bribe, kickback, or other prohibited payment, gift or benefit, refuse the request and immediately inform your manager, and Compliance and Integrity at integrity@nielseniq.com or via the [Integrity Helpline](#).

A **“bribe”** is anything of value offered, promised, or given to improperly influence the actions of another to obtain or retain business or an unfair business advantage. Bribes can come in many forms such as:

- cash or cash equivalents (such as gift cards)
- gifts, entertainment, hospitality, travel expenses
- business or employment opportunities
- political or charitable contributions
- favors or anything of value to the recipient

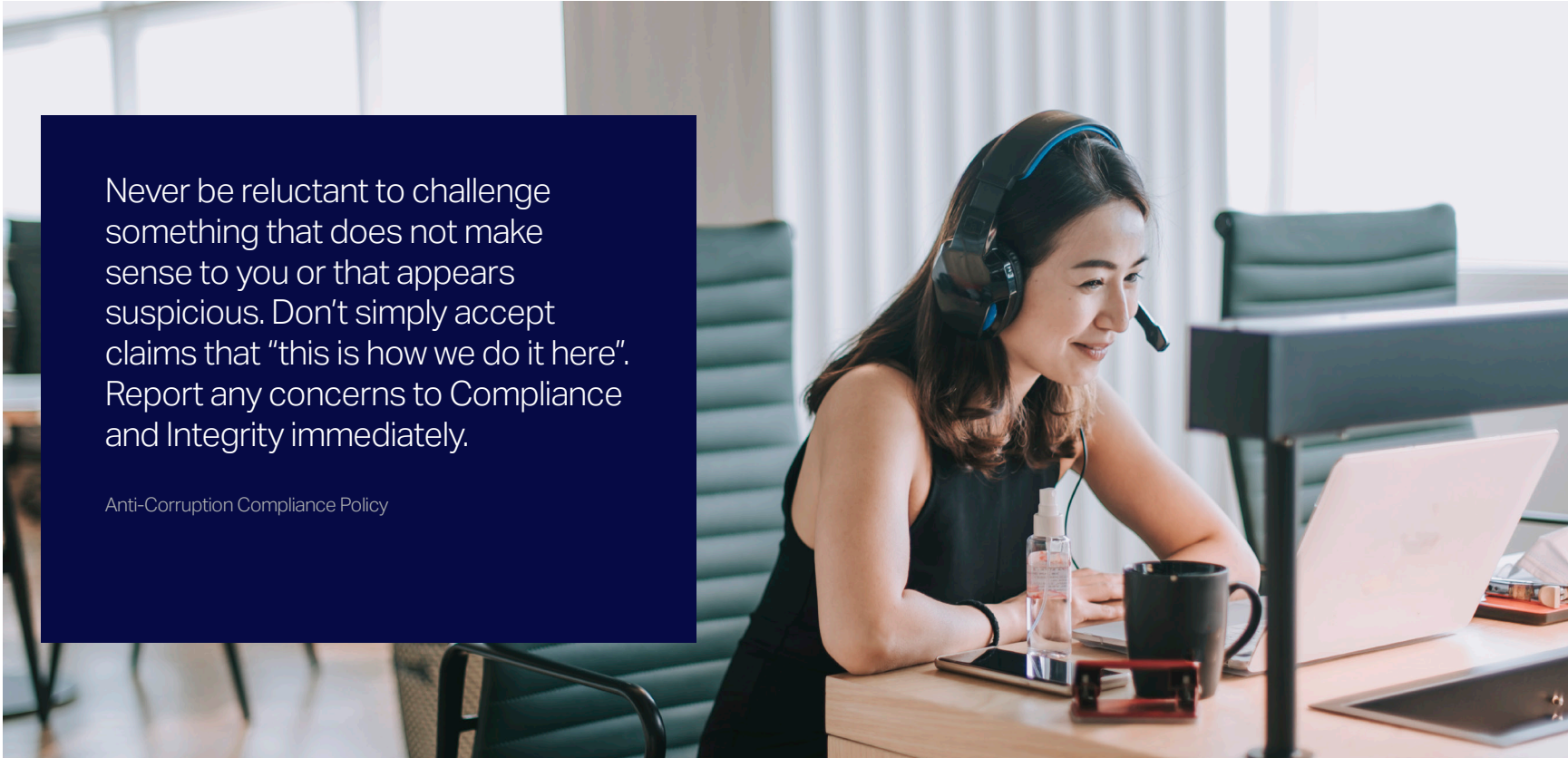
Keep in mind, a payment, gift, donation, or favor may be considered a bribe even if it is of very small value and even if it does not result in the intended advantage actually being received. It is the intent of the person directing, offering, or paying the bribe that matters.

We are responsible for the actions of our third parties and must be diligent in ensuring they do not engage in bribery or corruption on our behalf. Watch for warning signs such as:

- close relationships with the government
- undisclosed subagents or subcontractors
- undue secrecy, being told “not to ask”
- inflated invoices or unusual rebates
- unexplained expense reports
- unusual payments (to third parties or in third countries)
- off-books accounts or “slush funds”
- anything that makes you doubt your third party’s credibility or intention to comply with the anti-bribery laws

Never be reluctant to challenge something that does not make sense to you or that appears suspicious. Don't simply accept claims that "this is how we do it here". Report any concerns to Compliance and Integrity immediately.

Anti-Corruption Compliance Policy



We give and receive business gifts and entertainment responsibly

Gifts and entertainment can be used responsibly to build relationships and goodwill with our customers and other business partners, but gifts and entertainment that are excessive or inappropriate can harm the reputation of our Company and ourselves.

We must be careful to remain independent and objective in our dealings and we must never use gifts and entertainment in exchange for a favor or to improperly influence a business decision. These rules around gifts and entertainment apply to our families too. Gifts and entertainment given or received by your family or the family of someone we do business with raise the same issues as something provided directly.

Extra care must be taken when interacting with government officials. Because of this, we never offer gifts, meals, or entertainment to any government official without proper advance approval from the Legal team.

Before offering or accepting any gift or entertainment, make sure it:

- ✔ Is not cash, a gift card or other cash equivalent
- ✔ Is modest in value and within local policy limits
- ✔ Is infrequent and consistent with good business practices
- ✔ Is given and received openly and transparently
- ✔ Does not give the appearance of influencing or attempting to influence a business decision
- ✔ Is not offered or accepted during active negotiations including the periods leading up to and immediately following negotiations
- ✔ Does not violate the law or company policy for either party
- ✔ Does not create a conflict of interest

If you are offered a gift that does not align with these criteria, return it as tactfully as possible. If it is not possible to decline the gift without damaging a relationship, the gift should be shared with your co-workers or turned over to the Company. If you are unsure, contact [Compliance and Integrity](#).

We avoid conflicts of interest

To be successful, we must all work together in the Company's best interests. A conflict of interest can arise from any situation that may cause our personal interests (or those of someone we have a close personal relationship with) to influence our business decisions, or cause us to act, or appear to act, in a way that is not in the Company's best interest. It isn't possible to list every situation that may cause a potential conflict of interest, but some examples include:

- You, someone from your household or someone you have a close personal relationship with serving on a Company panel or participating in a Company survey
- Being an active participant in the data or markets that our Company measures such as creating or promoting content that the Company measures
- Working for, or having an ownership interest in, a competitor, supplier, or customer of the Company
- Having a second job (including a board membership) that interferes with your work at the Company or using Company assets for personal gain
- Taking personal advantage of an opportunity that belongs to the Company or competing with the Company
- Having a close personal relationship with someone who directly or indirectly reports to you
- Being involved in the selection process of a new employee, supplier, or other business partner when the applicant is someone with whom you have a close personal relationship



A real or perceived conflict of interest can erode trust and harm our reputation for doing business with integrity, so it is best to avoid even the appearance of such a conflict. It can be hard to sort out what is and is not a potential conflict of interest and how best to handle it. If we believe a potential conflict of interest exists, we must be honest and transparent and promptly disclose it to Compliance and Integrity by completing a [Conflict of Interest Disclosure form](#) so they can help to resolve it. Most conflicts of interest can be managed so that they do not violate the Code—but failing to disclose a conflict is always a violation.

If you hear things like...

“My cousin has a company that could do this work for us.”

“Now that I am working remotely, I have time to start a home-based business on the side.”

“Since we have such a good relationship, we can help each other out.”

Stop and think – these could indicate a conflict of interest and you should seek guidance from [Compliance and Integrity](#).

A **close personal relationship** includes family relationships, domestic partners, and relationships of a romantic, intimate or sexual nature, or close, special personal friendships that may influence your decision-making and cause you to act other than in the best interests of the Company or cause the appearance of such a conflict of interest.

Conflict of Interest Guidance
Conflict of Interest Disclosure form



We keep accurate records and manage them properly

We are honest and transparent. We maintain accurate books and records to ensure the integrity of our financial reporting and comply with the law. We must always exercise sound judgment and strictly follow Company policies when recognizing revenue, documenting transactions, and recording expenses. In addition to our financial statements, a record can be anything that documents a business activity, decision, or transaction such as timecards, expense reports, or survey results.

We are each responsible for:

- Maintaining complete, accurate, and timely books and records related to our areas of responsibility
- Securely storing records that comply with the Records and Data Retention Policy
- Following all internal controls and applicable accounting policies
- Cooperating with internal or external auditors, investigators, or regulators
- Reporting any actual or suspected error or irregularity in the records or violation of internal controls to the Corporate Audit team or by using the Integrity Helpline

Anyone who intentionally misrepresents or falsifies information in our books and records, or who assists others in doing so, has engaged in fraud. Fraudulent activity compromises the integrity of our financial reporting and creates serious consequences for our Company and the individuals involved.

Being powered by integrity means:

- We never use Company credit cards or other Company accounts for personal purchases
- We never seek reimbursement for personal expenses
- We never circumvent internal controls
- We never falsify or misrepresent information in a Company record
- We review expense reports closely, watching for any unusual transactions or exceptions before approving them
- We do not ignore irregularities because they are small in size since something small may be a sign of a larger issue that should be reported
- We are always honest and transparent

Records and Data Retention Policy

We comply with global trade requirements

As a global company, we move information, technology, people, products and services across national borders, and must comply with all applicable laws and regulations that govern international trade. These requirements include:

- Controls over imports and exports
- Political and economic sanctions that restrict trade with certain countries, entities, or persons
- Anti-boycott laws that prohibit us from participating in a boycott not sanctioned by the United States

If you are involved in the movement of information, technology, people, products and services across borders, you are expected to understand, and comply with all the trade laws and regulations of the markets where you work. These requirements are complex and can be confusing, so if you have questions, contact the Legal team for guidance.

Get to know your business partners and if you ever have doubts on whether we can engage in business with them, contact the Legal team for guidance. Know our business, be vigilant and exercise good judgment, and promptly report any unusual or suspicious activities.

Q: I understand that we cannot do business with a country, company, or person on a sanctions list. How will I know if the company I am considering working with is on a sanctions list?

A: As part of our due diligence process, prospective customers and business partners must be properly screened to ensure they are not subject to sanctions that would prevent NielsenIQ from doing business with them. If you are unsure, contact the Legal team for guidance before proceeding.

Global Trade Sanctions Policy



We do not trade on inside information

During our work, we may come across information about business partners or any other company that is material and not yet known to the public. We cannot buy or sell stock in any company if we have such inside information. We also cannot provide inside information or a “tip” to a family member, friend, or any other person who then buys or sells stock based on such information. Trading on inside information is against the law and Company policy. Please contact the Legal team if you have any questions about the laws and regulations that govern securities trading.

“Inside information” is information that is not available to the public, is material to the business and would likely be taken into consideration by an investor when deciding whether to buy or sell stock in a company. Some examples include information about new products, merger or acquisition activity, undisclosed financial results, or changes in executive leadership.

We are responsible in our communications about the company



We are committed to communicating accurately and honestly about our Company. To be sure we are speaking clearly and consistently, in one voice, only those who have been designated by the CEO or the Global Communications team are authorized to speak on the Company’s behalf with members of the media or the general public. If you receive a request for information about the Company from anyone outside the Company, please forward it to a Communications team member so that they may respond appropriately.

We do business with partners who share our values

Our values of Integrity, Responsibility, and Passion guide how we conduct business every day. We expect our business partners and anyone working on behalf of our Company to comply with our Supplier Code of Conduct to ensure they:

- Conduct business ethically, responsibly, and in compliance with all applicable laws and regulations
- Uphold the human rights of workers, treating them with dignity and respect
- Integrate sound environmental, health and safety practices into all aspects of their business

We are each responsible for knowing our business partners and to notify [Compliance and Integrity](#) if we believe a business partner is not meeting these expectations.

Boost your IQ

Q: I suspect one of our suppliers of requiring their employees to work extra hours without compensation. What should I do?

A: You should raise your concern to your manager, Compliance and Integrity or through the Helpline so it can be properly investigated, and corrective action taken if needed. If true, the supplier is in violation of our Supplier Code of Conduct and our commitment to support human rights around the world. We expect our business partners to live up to the same standards we have for ourselves.

Supplier Code of Conduct



04

INTEGRITY IN THE GLOBAL COMMUNITY



We support human rights

Our value of passion drives us to reach for and care about something bigger than ourselves. We believe that human rights are basic, universal rights that form the foundation for freedom and peace in the world and we support that for all countries. We work to protect these rights by:

- Complying with all local laws and regulations concerning freedom of association and collective bargaining
- Prohibiting human rights abuses, including discrimination and harassment, excessive or forced labor, child labor, compensation below minimum living wages, unsafe working conditions, slavery and human trafficking

We expect our business partners to share our passion and commitment to socially responsible business practices.

“ *Through responsible, sustainable business practices and our commitment to giving back, we care for the communities and markets where we live and operate our business.* ”

Human Rights Guidelines

We respect the environment

We are committed to protecting and restoring our natural environment. In addition to complying with applicable laws and regulations, we strive to reduce our Company's impact on the environment by better managing our resources and driving efficiencies in the areas of waste, energy use, and business travel. We encourage our employees to make things better by participating in environmental projects that are unique to our business and footprint.

Q: I am really interested in environmental issues; how can I make a difference at work?

A: We can each make a difference every day by:

- minimizing waste and recycling
- using energy efficiently
- using technology rather than business travel to connect with others
- participating in NielsenIQ Green projects

Environmental Policy and Guidelines

We engage with our communities

We believe the vitality of our business is closely linked to the health of the markets and communities where we operate. When they are vibrant and growing, so is our business. As a Company, we strive to make things better in our communities through charitable contributions, partnerships with nonprofits and global employee volunteering programs organized by NielsenIQ Cares or our Employee Resource Groups. We also engage with government officials, industry associations and experts on public policy issues important to our business and to our customers' businesses.

In addition to Company-sponsored activities, employees may choose to engage with their communities in ways that are meaningful to them. If we choose to personally participate in charitable or political activities, we must do it on our own time, with our own funds and be clear that we are acting as individuals and do not represent the Company. We may not use Company resources, including funds, time, property, equipment, or personnel for these personal activities. We may not pressure or attempt to influence other employees to support any candidate or cause, or to make a personal contribution.

- Q:** A friend of mine is on the board of a local charity and asked me if the Company could help sponsor its upcoming gala. I think it would be good for the Company's reputation in the community. If I have the money in my budget, can I do it?
- A:** You must first get approval before donating to a charitable cause on the Company's behalf. If you think the sponsorship is something that would be good for the Company to do, contact the Legal team and your Finance representative for guidance.

Third-Party Donation Guidelines



Key contacts and resources

We know that asking for help and raising concerns may be difficult at times. It's important for us to hear from you. We urge you to use the Integrity Helpline. You can ask a question or raise a concern online or by phone. This service is run by a third party, is confidential and available 24 hours a day, 7 days a week in 38 languages.

The Integrity Helpline can be accessed online at nielseniqhelpline.ethicspoint.com or by using this QR Code.



For the telephone Integrity Helpline, many countries have direct toll-free access. For countries without direct toll-free numbers, you can reach the Integrity Helpline for free as shown below by either (a) first dialing the local AT&T Access Number, and then the Helpline number shown or (b) placing an international collect call (i.e., a reverse charge call).

Additionally, you can always ask questions or raise concerns with:

- your manager
- your Human Resources representative
- Compliance and Integrity at integrity@nielseniq.com

Should you wish to contact NielsenIQ's Legal, Compliance & Integrity, Information Security or Human Resources departments, regarding a Code of Conduct matter and you do not know who to contact, please email integrity@nielseniq.com or access the [Integrity Helpline](#). Provide your name, contact information, and the department with which you wish to connect. A representative from that department will be in touch with you as soon as possible.

Administration

The NielsenIQ Board of Directors is responsible for overseeing the administration of the Code and supporting the Company's Compliance & Integrity Program. This includes periodic reviews of the Code, and the introduction of any changes or additions that are deemed necessary.

Rarely, in special circumstances, there may be a valid reason to request an exception from some part of our Code. Waiver requests for employees must be submitted in writing to Compliance and Integrity. For the CEO, senior executive officers and members of the Board of Directors, waivers may only be granted by the Audit Committee or the full Board of Directors and are subject to applicable laws and regulations.

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Helpline numbers

^ Indicates second dial tone
At the English prompt dial Helpline Number

Country	AT&T access number	Helpline number
Argentina	N/A	0800-333-1340
Australia	N/A	1-800-99-8449
Austria	N/A	0800-293-800
Belarus	8^800-101	8553735902
Belgium	N/A	0800-7-8609
Brazil	N/A	0800-892-1929
Bulgaria	00-800-0010	8553735902
Canada	Domestic	8553735902
Chile	N/A	1230-020-0595
China	China Unicom: North, Beijing	10-800-711-1230
	China Telecom: South, Shanghai	10-800-110-1154
	N/A	01-800-5-1-82895
Colombia	N/A	0800-011-1291
Costa Rica	N/A	8553735902
Croatia	0800-220-111	8553735902
Cyprus	N/A	8009-1380
Czech Republic	N/A	800-143-991
Denmark	N/A	80252676
Ecuador	1-800-225-528;	8553735902
	1-999-119 (Spanish)	
Egypt	Cairo: 2510-0200;	8553735902
	Outside Cairo: 02-2510-0200	
France	N/A	0800-91-3567
Germany	N/A	0800-183-0961
Ghana	0-2424-26-004	8553735902
Greece	N/A	00-800-11-0027683
Hong Kong	N/A	800-90-0283
Hungary	N/A	06-800-20-487
India	000-117	8553735902

Country	AT&T access number	Helpline number
Indonesia	N/A	001-803-1-0027683
Ireland	N/A	1800-812915
Israel	N/A	180-941-7683
Italy	N/A	800-789474
Japan	N/A	0066-33-830450
	N/A	00531-11-0222
	N/A	0034-800-600067
Jordan	1-880-0000	8553735902
Kazakhstan	8^800-121-4321	8553735902
Kenya	N/A	0800-733-300
Lithuania	N/A	8-800-3-30-93
Malaysia	N/A	1-800-81-6628
Mexico	N/A	001-855-373-5902
Netherlands	0800-022-9111	8553735902
New Zealand	N/A	0-800-44-0453
Norway	N/A	08005-82-06
Pakistan	00-800-01-001	8553735902
Philippines	N/A	1-800-1-111-0758
Poland	N/A	0-0-800-151-0020
Portugal	N/A	800-8-11506
Romania	Telekom Romania: 0808-03-4288	8553735902
Russia	Moscow & St. Petersburg: 363-2400; Outside Moscow: 8^495-363-2400; Outside St. Petersburg: 8^812-363-2400; Russia: 8^10-800-110-1011	8553735902
Serbia	N/A	0800-190-668
Singapore	N/A	800-110-1991
Slovak Republic	N/A	0800-189-761
Slovenia	N/A	0-800-81408
South Africa	N/A	0800-98-7246

Country	AT&T access number	Helpline number
South Korea	N/A	00308-132772
Spain	N/A	900-97-1288
Sri Lanka	Colombo: 2-430-430; Outside Colombo: 112-430-430	8553735902
Sweden	N/A	020-10-92-66
Switzerland	N/A	0800-56-3279
Taiwan	N/A	00-801-10-4427
Thailand	N/A	001-800-11-0027683
Turkey	0811-288-0001	8553735902
Ukraine	0-800-502-886	8553735902
United Arab Emirates	United Arab Emirates 8000-021; United Arab Emirates (du) 8000-555-66; Military-USO & Cellular: 8000-061	8553735902
United Kingdom	N/A	0808-234-0566
Algeria, Bahrain, Cameroon, Dominican Republic, El Salvador, Finland, Guatemala, Honduras, Ivory Coast, Lebanon, Macedonia, Nepal, Nicaragua, Nigeria, Oman, Panama, Peru, Tunisia, Uruguay	International Collect Call to United States	+1-678-248-7252
United States & Puerto Rico	Domestic (DA)	8553735902
Venezuela	English 0-800-225-5288 Spanish 0-800-552-6288	8553735902
Vietnam	1-201-0288; 1-228-0288	8553735902