
MOODY'S

Vendor Code of Conduct

About Moody's

Moody's is an essential component of the global capital markets, providing credit ratings, research, tools and analysis that contribute to transparent and integrated financial markets. Moody's Corporation (NYSE: MCO) is the parent company of Moody's Investors Service, which provides credit ratings and research covering debt instruments and securities, and Moody's Analytics, which offers leading-edge software, advisory services and research for credit and economic analysis and financial risk management.

Introduction

At Moody's, we believe acting ethically and responsibly is not only a requirement of its employees, but equally of its vendors providing goods and services to, or on behalf of, Moody's. Moody's will only do business with suppliers, contractors and consultants (collectively herein referenced as "Vendor" or "Vendors") that comply with applicable and controlling laws and regulations and at a minimum, with standards of business conduct consistent with those set forth in this Moody's Vendor Code of Conduct ("Code").

The Code applies globally describing Moody's expectations of its Vendors in the areas of business integrity, labor practices, employee health and safety, diversity and inclusion, and environmental stewardship. If at any time the Code conflicts with the terms and conditions of a Vendors' contract, the contract will govern.

Business Practices & Ethics

Moody's Vendors will conduct their business activities with the highest ethical standards in compliance with all local laws and regulations.

Anti-Bribery

Vendors will be familiar with and comply with all local anti-bribery laws and regulations which include, but not limited to, the United States Foreign Corrupt Practice Act and the UK Bribery Act. These include all local anti-bribery laws and regulations regarding the payment or giving of anything of value, either directly or indirectly, to an official of a foreign government or political party, candidates for office, and state-owned

enterprises for the purpose of influencing an act or decision in their official capacity or inducing the official to use his or his party's influence with that government, to obtain or retain business involving products or services.

Confidentiality

In performing services for Moody's, Vendors may have access to non-public, competitively sensitive and/or private information, data and materials belonging to Moody's or their respective employees, customers, clients, issuers or third-party suppliers or contractors. Moody's expects its Vendors to protect confidential information in which it obtains, accesses or otherwise processes on behalf of Moody's or its customers in accordance with all local laws.

To the extent Vendors are given access to Moody's systems, Vendor will use such systems solely for the purpose of providing services and not for personal or any other purposes.

Human Rights

Moody's expects its Vendors to share its commitment to protect human rights and improve labor standards globally. Our positions are reflected in the [Corporate Social Responsibility](#) and [Diversity and Inclusion](#) sections on Moody's website.

Inclusion / Non-Discrimination

While Moody's recognizes and respects cultural differences, Vendors should treat its employees with the highest level of respect and maintain a workplace free of harassment and discrimination. Vendors will not discriminate based on an individual's age, sexual orientation, gender identity, race, disability, nationality, religious beliefs, political beliefs, veteran

status or marital status. Moody's requires its Vendors to comply with local laws and regulations pertaining to discrimination in hiring and employment practices.

Wages & Benefits

Vendors are expected to provide its employees with wages and benefits that meet or exceed local laws and regulations. Depending on local laws, benefits could include but are not limited to maternity leave, parental leave, health benefits, child care benefits, health insurance, family care leave, and pension. Vendors' employees should be provided with clear written information about their wages and benefits in an agreed upon language.

Child Labor

Vendors will not use or employ child labor, and will take all means necessary to ensure that it does not use or employ anyone under the legal minimum working age. Furthermore, Vendors must comply with all employment laws and regulations which include International Labor Organization (ILO) standards.

Forced Labor & Human Trafficking

Moody's denounces all forms of forced labor which include, but is not limited to, slavery and human trafficking. Vendors are expected to comply with all laws and regulations pertaining to slavery, forced labor and human trafficking such as the UK Modern Slavery Act 2015.

Working Hours & Environment

Vendor personnel working hours must be in compliance with all laws and regulations. Personnel should not be forced to work in excess of legal limits, and overtime should be voluntary in nature agreed upon between Vendor and their personnel.

Moody's expects its Vendors provide a safe and healthy working environment that supports accident prevention and ensures the health and safety of all personnel. This includes but is not limited to adequate fire safety measures, heat and ventilation and toilet facilities.

Vendor Diversity

Moody's is committed to the development of minority and women-owned business enterprises ("MWBES") and increasing the amount of business placed with MWBEs. Moody's proactively provides opportunities for such enterprises to participate in the bidding and contract award process. As part of Moody's commitment, Vendors are expected to use commercially reasonable efforts to purchase from and/or subcontract with MWBEs.

Environmental & Sustainability Stewardship

Moody's believes in activating an environmentally sustainable future, reducing adverse impact on the planet and doing our part to protect and care for the environments in which our employees live and work. Moody's positions, policies and disclosures can be found on our [Corporate Social Responsibility](#) website.

Moody's encourages incumbent and perspective Vendors to adhere to similar environmental and sustainability stewardship efforts.

Code Violations / Integrity Concerns

Moody's offers its employees and the public an integrity hotline if there has been an actual or perceived violation of local laws and regulations, or this Code. Moody's Integrity Hotline phone number can be found [here](#) on Moody's website.