

Code of Conduct

We are powered
by integrity

NIQ

A message from our CEO, Jim Peck

**NIQ**

Our ability to act with integrity is essential to maintaining our reputation as a trusted global industry leader. Integrity is one of our four Principles – Client Obsessed, Driven to Win, Accountable for Results, and Committed to Integrity. These Principles reflect NIQ’s and GfK’s proud legacies, common virtues and aspirations, and formed the foundation of our culture as we move forward, together as one NIQ.

Integrity underpins everything we do, and it should serve as a touchstone for every action, every decision we make.

Our Code of Conduct provides guidance on business conduct committed to acting with integrity in our daily work. Each one of us, as part of NIQ, needs to read and understand our Code of Conduct. Though the Code can’t anticipate every situation you may face, it will help you make decisions that are consistent with our Policies and suggest guidance on when to reach out for advice.

If you have questions about the right thing to do – your manager, your Human Resources representative and our entire leadership team, myself included – are all ready to help. 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 Principles or our Code of Conduct, please speak up so that we can properly address it.

Thank you for helping ensure we have a successful company that can sustain and thrive many years into the future.

Sincerely,

A handwritten signature in black ink that reads "Jim Peck".

Jim Peck

Executive Chairman and Chief Executive Officer

Table of contents

01

We are powered by integrity

- 2 A message from our CEO, Jim Peck
- 3 Table of contents
- 5 Our Principles
- 6 About our Code
- 7 Our responsibility
- 8 Speaking up

02

Integrity in our workplace

- 12 We promote a safe and healthy workplace
- 13 We treat each other with respect
- 15 We protect each other's privacy
- 16 We safeguard Company assets
- 18 We communicate with care

03

Integrity in the marketplace

- 20 We ensure the integrity of our data
- 21 We compete fairly
- 22 We protect the private and confidential information of our partners
- 23 We do not engage in corruption or bribery
- 26 We give and receive business gifts and entertainment responsibly

Table of contents

27	We avoid conflicts of interest
30	We keep accurate records and manage them properly
31	We comply with global trade requirements
32	We do not trade on inside information
32	We are responsible in our communications about the Company
33	We do business with partners who share our values

04 Integrity in the global community

35	We support human rights
36	We are committed to environmental responsibility
37	We engage with our communities

38	Key contacts and resources
38	Administration Enforcement and Waivers
39	Index

Our Principles

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

Client Obsessed

Put clients' success at the center of strategy and decision-making.
Be empathetic – put yourself in your clients' shoes. Use market expertise to anticipate, innovate, and differentiate solutions. Act with urgency. Exceed client expectations.

Driven to Win

Be passionate about being the best at what we do.
Be bold and take great pride in our capabilities. Overcome obstacles with tenacity, resilience, and optimism. Dare to be your best and help others do the same.

Accountable for Results

Own, solve, & deliver as one team.
Collaborate earnestly and break down silos. Do what you say you are going to do. Turn ideas into plans and get results.

Committed to Integrity

Create a culture that makes you proud.
Treat all people with dignity. Communicate courageously and honestly and stand up for what is right – say what needs to be said.



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 NIQ (NIQ Global Intelligence plc and any subsidiary that is wholly or partially owned whether directly or indirectly but excluding joint ventures where NIQ Global Intelligence plc does not hold a controlling interest; collectively, the “Company”) means our decisions and actions must always be grounded in our shared Principles, and in compliance with the law.

The Board of Directors (the “Board”) of the Company has adopted this Code of Conduct (“Code”) in order to deter wrongdoing, and along with our Company Policies, promote and provide guidance on:

- Acting with integrity in our daily work
- Ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- Understanding and complying with the laws, regulations, and standards that govern our business
- Protecting ourselves and our Company’s reputation and assets, including corporate opportunities and confidential information
- Full, fair, accurate, and timely disclosure in reports and documents that the Company files with, or

submits to, regulatory agencies and in other public communications made by the Company

- 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
- Accountability for adherence to this Code.

While this document illustrates how the Code comes to life in daily operations, 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 Principles.

Nothing in this Code is intended to require any action contrary to law. The standards in our Code apply to all employees, on-site and remote, including officers of the Company, and members of the Board, and all are required to be familiar with this Code, comply with its provisions and report any suspected violations as described in the Code. In addition, we expect everyone working on the Company’s behalf, including members of the Board, interns, trainees, 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
- Periodically read, understand, and acknowledge our commitment to the Code
- Comply with this Code and any laws or Company Policies that apply to our work
- Know our business and complete any training required for our roles 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, the law, or our Policies

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. Reward integrity and encourage ethical decision-making
- 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. Seek help in resolving and escalating issues when they arise.



Boost Your Code 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, Legal, Ethics and Compliance, or other Company resources. 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 [Ethics and Compliance](#).

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, the law, or Company Policies. 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:

- any member of management
- your Human Resources representative
- Legal Department
- Ethics and Compliance at NielsenIQ.integrity@smb.nielseniq.com
- the [NIQ Ethics Hotline](#)

The [NIQ Ethics Hotline](#) 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 Hotline 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 Hotline will be the only way for the investigators to communicate with you. Details for using the Hotline can be found in the [Key Contacts and Resources](#) section of this Code.



Speaking up

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 [NIQ Ethics Hotline](#) or NielsenIQ.integrity@smb.nielseniq.com. Refer to the [Speak Up and Non-Retaliation Policy](#) for additional information.

“*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: We take reports of misconduct very seriously. Any reported violations of laws, regulations or our Code of Conduct will be promptly reviewed. If necessary, we will conduct a confidential, objective investigation of the matter. The investigators will:

- Objectively determine the facts by conducting interviews and reviewing documents
- Contact employees who may have knowledge about the alleged incidents
- Protect the identity of the accused employees as well as the identity of the reporting source as far as possible
- Recommend corrective actions and/or disciplinary measures where appropriate.

Speaking up

Recognize when you might be tempted to rationalize behavior that isn't consistent with our commitment to integrity. If you hear yourself or others make the following statements, stop and ask yourself if it is the right thing to do:

- 'It was just one time and it won't happen again'
- 'Nobody's perfect'
- 'I had no choice'
- 'It's not hurting anyone'
- 'It's not a practical rule anyway'
- 'We have to trust our employees' judgment'
- 'It's not illegal, so no problem'
- 'Everybody does it - it's the nature of our industry'
- 'If I don't do it, we'll miss out'
- 'My manager made me do it'



02

Integrity in our workplace

NIQ



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. We work hard to prevent work-related injury and ill-health which includes maintaining a workplace that is free from threats, intimidation, acts of violence, weapons, and substances which could affect the safety of ourselves or others.

Working under the influence of substances such as alcohol, cannabis, illegal drugs, or misused prescription drugs, can impair our judgment and 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.

We are all safer when we work together, take reasonable steps to look after ourselves, and those affected by our work. Complete your safety training and follow local safety rules; report unsafe conditions and unsafe acts as you see them to prevent injury. If something goes wrong, report it promptly so that we can investigate and prevent it happening again. 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.

We engage with others about health and safety, such as qualified occupational safety and health professionals, doctors, Works Councils, vendors, and clients so that we can plan our work safely and promote our team's wellbeing. We strive to ensure our safety measures reflect the diverse workforce that we are. However, if you or your colleagues are in immediate danger, you should stop work, make the area safe if you can, and go to seek help.



- 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 are 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 harassment, bullying, and discrimination based on characteristics protected by law. Such conduct creates an unproductive, unpleasant, and possibly hostile work environment. We are all responsible for maintaining a productive work environment free of unlawful harassment and discrimination. We treat each other with respect and do not tolerate harassment, or discrimination against an employee, client, vendor, affiliated agent, or other third party. If you witness or experience harassment, bullying, or discrimination of any kind in the workplace, you must report it to your manager, Human Resources Representative, Legal, or Ethics and Compliance.

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 characteristics protected by law such as race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, or political affiliation
- Do not engage in or tolerate harassing or bullying behavior
- Maintain professionalism in our interactions and communication

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

- your manager or any member of management
- your Human Resource Representative
- Ethics and Compliance at NielsenIQ.integrity@smb.nielseniq.com, or
- the [NIQ Ethics Hotline](#)



We treat each other with respect

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

Discrimination refers to unequal or unfair treatment of an individual or a group, based on certain characteristics protected by law (including but not limited to sex, gender, gender identity, sexual orientation, race, age, creed, color, national origin, ancestry, religion, pregnancy, disability, medical condition, veteran status, marital status, family status, parental status, any other protected characteristic, or any other consideration made unlawful by applicable law). It can include physical, verbal, or nonverbal conduct.

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.



NIQ

Speak Up | Code of Conduct | Conflicts of Interest Disclosure | Compliance & Integrity | FAQ

Speak Up!

NIQ is committed to upholding high standards for legal, ethical and fair conduct, which is foundational to our business and workplace. NIQ recognizes that encouraging workforce members to report any issues of legal or ethical non-compliance is the best way to protect NIQ, its stakeholders and the workforce members.

We encourage workforce members to report any actual or suspected incident or misconduct, including a breach or suspected breach of any law, regulation, the NIQ Code of Conduct, or other NIQ policies. Please note, in some countries, the scope of reporting via the hotline is limited by applicable law to certain issues. NIQ employees are encouraged to review additional details about the [SIS SpeakUp](#) program on the NIQ Intranet.

Retaliation is against the law and against company policy. NIQ does not tolerate retaliation against anyone who speaks up in good faith. This means that no one can take disciplinary action or otherwise mistreat a workplace member for raising a concern or for participating in an investigation of possible misconduct. If you feel that you or someone else has been retaliated for raising a concern or for participating in an investigation, you should report it.

When you make a report, you can choose to provide your name or remain anonymous where permitted by data privacy laws. To the extent possible, all reports will be handled in a confidential manner.

Report

Call Us

Ask

Follow 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.

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, which includes all non-public information that might be of use to the Company's competitors, or harmful to the Company or its customers, suppliers or partners if disclosed. All Company assets should be used only for legitimate business purposes. Any suspected incident of fraud or theft should be reported for investigation immediately.

Our confidential and proprietary information is what makes us unique and is one of our most important assets. This information includes our intellectual property (trade secrets, copyrights, trademarks, and patents), business, product or marketing plans, information regarding negotiations, technical specifications, methodologies, designs, databases, customer reports, analyses and deliverables, and other information and materials not publicly available, including non-public financial data or reports. 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. Unauthorized use or distribution of confidential information is prohibited and could also be illegal and result in civil or criminal penalties. 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 Code 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 NIQ-approved end-user technology solutions (e.g., Microsoft Outlook, Microsoft Teams, and 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 our 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.

Communications Policy

03

Integrity in the marketplace

NIQ



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, 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 Ethics and Compliance on how best to handle the situation.

We compete fairly

We win because we put our clients' success at the center of strategy and decision-making, we are driven to win, and we are accountable for our results. 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. No Board member, officer, or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair dealing practice.

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, 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 policies 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](#)
- Obtaining 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, we do 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 Ethics and Compliance at NielsenIQ.integrity@smb.nielseniq.com or via the [NIQ Ethics Hotline](#).



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:

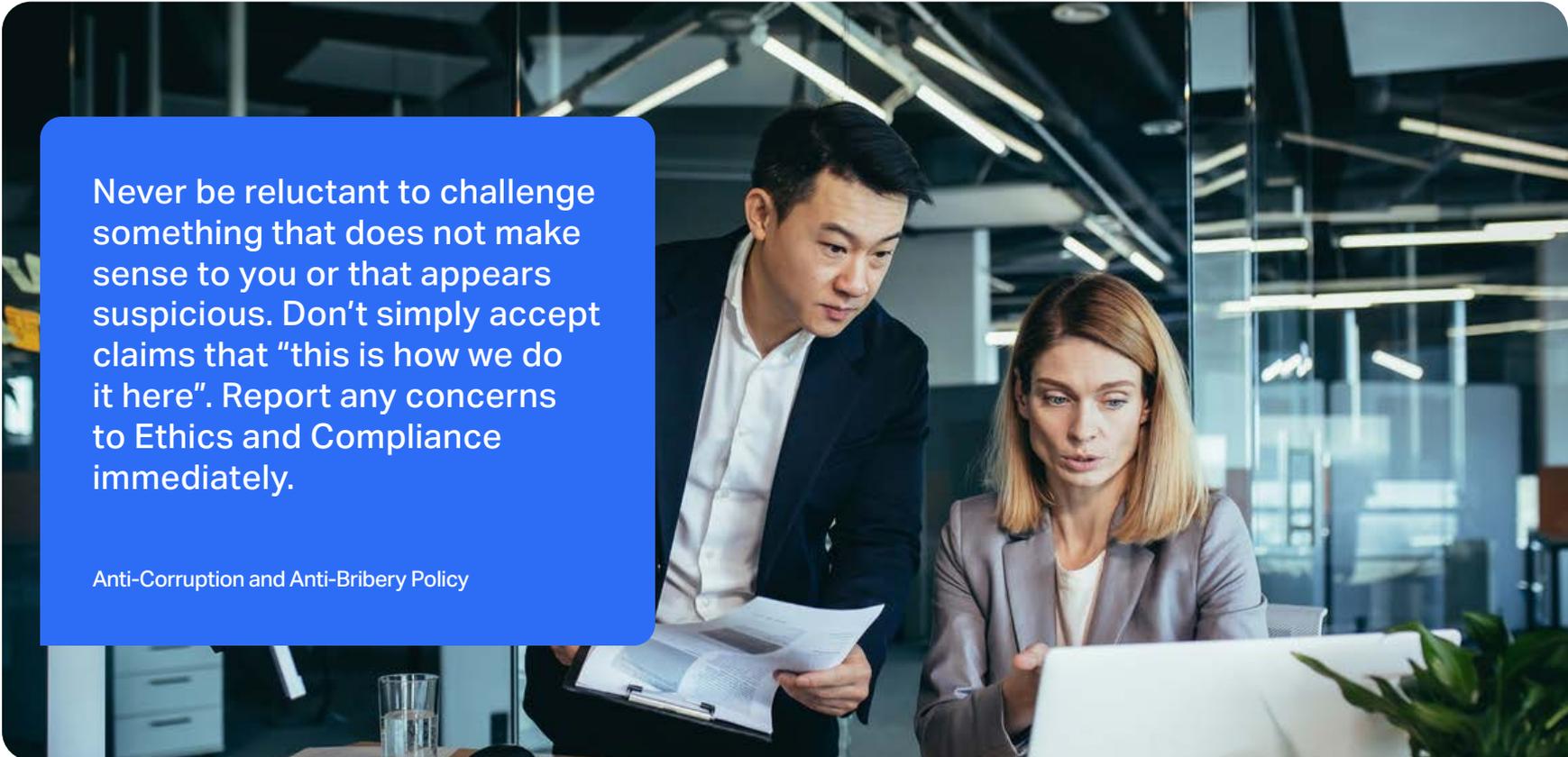
- cash or cash equivalents (such as gift cards)
- gifts, entertainment, hospitality, and travel expenses
- business or employment opportunities
- political or charitable contributions
- favors or anything of value to the recipient.

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 Ethics and Compliance immediately.

Anti-Corruption and Anti-Bribery 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 Ethics and Compliance.

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 [Ethics and Compliance](#).

Travel and Expense Policy
Conflict of Interest Policy

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
- 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
- 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



An actual or apparent 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. Consult the Conflict of Interest Policy for more details and instructions on how to disclose actual or potential conflicts of interest. Most conflicts of interest can be managed or mitigated, 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.”

“I am working remotely, I have time to start a 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 [Ethics and Compliance](#).

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 Policy



Loans by the Company to, or guarantees by the Company of, obligations of Board members, officers, employees or their family members are of special concern and could constitute improper personal benefit to the recipients of such loans or guarantees, depending on the facts and circumstances. Loans by the Company to or guarantees by the Company of obligations of any Board member or executive officer or their family members are expressly prohibited.

All officers and employees owe a duty to the Company to advance its interests when the opportunity to do so arises. Officers and employees are prohibited from taking for themselves personally opportunities that are discovered through the use of Company property, information, or position. Officers and employees may not use Company property, information or position for personal gain. In addition, no officer or employee may compete with the Company. The foregoing are also applicable to Board members, subject to certain exceptions.

Board members and executive officers must seek determinations and prior authorizations or approvals of potential conflict of interest exclusively from the Board's Audit Committee.



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
- Ensuring full, fair, accurate, timely, and understandable disclosures in reports and documents that are filed with the Securities and Exchange Commission and in other public communications made by the Company
- Securely storing records and complying with the Records and Data Retention Policy and the procedures for handling legal holds
- 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 [NIQ Ethics Hotline](#)

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. Examples of fraud may include:

- Altering numbers to meet goals or targets
- Fabricating or manipulating data to satisfy a client
- Submitting false information to obtain benefits, for example by submitting travel & expenses requests for personal travel
- Intentionally falsely reporting time worked
- Misstating financial information in Company books and records

Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline). However, none of these motivations are a justification for committing fraud.

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, 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 NIQ from doing business with them. If you are unsure, contact the Legal team for guidance before proceeding.

Trade Sanctions Policy



We do not trade on inside information

During our work, we may come across information about the Company, our business partners, or any other company that is material and not yet known to the public. We cannot buy or sell stock in the Company or 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 refer to the Insider Trading Policy for additional information and 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 in accordance with the Regulation Fair Disclosure Policy are authorized to speak on the Company’s behalf with the finance community, 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 Global Communications team member so that they may respond appropriately. Please refer to the Regulation Fair Disclosure Policy for additional information.

We do business with partners who share our values

Our commitment to integrity guides 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 must notify [Ethics and Compliance](#) if we believe a business partner is not meeting these expectations.

Boost Your Code IQ

Q: What are my responsibilities when it comes to selecting a supplier for the Company?

A: When selecting or retaining a supplier, you should:

- Involve Procurement and base your decision on merit, quality of service, and reputation
- Follow the Company's applicable bidding, negotiating, and contracting processes
- Perform appropriate due diligence to determine that the supplier is a legitimate entity, with a reputation for integrity and ethical behavior, and does not engage in unlawful activities
- Disclose and manage any apparent or actual conflicts of interest with suppliers
- Ensure that the supplier can meet or exceed our high levels of quality and service

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, Ethics and Compliance or through the [NIQ Ethics Hotline](#) 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.

04

Integrity in the global community



We support human rights

We are deeply committed to upholding human rights in alignment with key international agreements and conventions. Human rights are basic, universal rights that form the foundation for freedom, justice and peace in the world, and apply equally in all countries.

We work to protect these rights by:

- Complying with all local laws and regulations concerning freedom of association and collective bargaining
- Creating an environment where everyone feels safe, included, respected, and free to be their authentic selves
- Making a positive difference for the communities where we live and work
- Including everyone irrespective of their different backgrounds, experiences, and perspectives
- Providing equal employment opportunities
- Fostering an open and inclusive environment where diverse perspectives and social dialogue are respected and encouraged
- Creating a working environment that is free from harassment and discrimination
- Maintaining a safe working environment
- Providing appropriate pay and benefits aligning with the nature of their work and in compliance with relevant laws and regulations
- Upholding high ethical standards and financial integrity
- Prohibiting all forms of modern slavery, including forced labor, child labor, excessive labor, and human trafficking
- Transparently and progressively reporting on our practices

We expect our business partners to share our passion and dedication to socially responsible business practices. Reporting violations via the reporting channels described in the Speaking Up section is encouraged without fear of retaliation, and all reports are investigated to uphold our zero-tolerance policy for human rights violations.



“*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 in all business relationships.*”

We are committed to environmental responsibility

We recognize the critical importance of environmental responsibility. We focus on addressing key material environmental matters arising through our materiality assessments. We encourage less energy use, better waste handling and use of natural resources, and support sustainable consumption. We endorse the Principles of the United Nations Global Compact and the United Nations Sustainable Development Goals, and we do this by:

- Complying with all relevant local and global laws and regulations
- Proactively identifying and addressing potential environmental risks or gaps and striving to minimize our negative impacts and our environmental footprint
- Continuing to encourage sustainable practices across our business operations such as energy reduction initiatives, waste reduction, and recycling initiatives
- Participating in People & Planet Day activities and advancing our contribution towards the United Nations Sustainable Development Goals
- Continuing to create awareness on environmental responsibility
- Promoting sustainable consumption patterns through our data and insights
- Growing our partnerships and collaborations to strengthen our approach to environmental responsibility
- Progressively and transparently reporting on our progress with environmental responsibility

By upholding these principles of environmental responsibility, we demonstrate our dedication to protecting the environment and contributing to a sustainable future for generations to come and we expect our business partners to uphold similar passion and dedication to environmental responsibility.



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 the People & Planet Program 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.



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 NIQ Ethics Hotline. You can ask a question or raise a concern orally or in writing. This service is run by a third party, is confidential, and is available 24 hours a day, 7 days a week in 43 languages. Access the NIQ Ethics Hotline online at nielseniqhelpline.ethicspoint.com or via the QR Code.



For oral reporting to the NIQ Ethics Hotline, click 'Call Us' and select the country you are located in. Available connection options will be displayed. For web-based calling: (i) click the link shown and allow microphone access in your browser; then (ii) click the green call button to connect. For countries with direct toll-free numbers, you can reach the NIQ Ethics Hotline for free via telephone by dialing the listed Hotline number.

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

- your manager
- your Human Resources representative
- Ethics and Compliance at NielsenIQ.integrity@smb.nielseniq.com

Should you wish to contact NIQ's Legal, Ethics and Compliance, Cybersecurity, or Human Resources departments regarding a Code of Conduct matter and you do not know who to contact, please email NielsenIQ.integrity@smb.nielseniq.com or access the [NIQ Ethics Hotline](#). 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 Enforcement and Waivers

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

The Company must ensure prompt and consistent action against violations of this Code.

If, after investigating a report of an alleged prohibited action by a Board member or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board.

If, after the investigation of a report of an alleged prohibited action by any other person, the relevant Company representative determines that a violation of this Code has occurred, the appropriate supervisor will report such determination to Ethics and Compliance.

Upon receipt of a determination that there has been a violation of this Code, the Board or the Ethics and Compliance department along with other appropriate corporate functions will take such preventative or disciplinary action as it deems appropriate, including but not limited to, reassignment, demotion, dismissal and in the event of criminal conduct or other serious violation of the law, notification of appropriate governmental authorities.

This Code may be amended, modified, or waived by the Board or a committee designated by the Board.

Index

- Accounting Records
- Antitrust
- Bribery
- Charitable Donations
- Competition
- Confidential Information
- Conflicts of Interest
- Corruption
- Discrimination
- Environment
- Ethics Hotline
- Gifts and Entertainment
- Harassment
- Health and Safety
- Human Rights
- Import and Export Laws
- Inclusion and Diversity
- Inside Information and Insider Trading
- IT Security
- Political Contributions
- Privacy
- Quality
- Records Management
- Resources
- Suppliers
- Trade Sanctions
- Use of Company Assets
- Volunteering
- Workplace Violence