

Whistleblower Protection Policy

The Dun & Bradstreet (UK) Pension Plan requires directors and officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the D&B Pension Plan we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable trustees and others to raise serious concerns internally so that D&B Pension Plan can address and correct inappropriate conduct and actions. It is the responsibility of all board members and officers to report concerns about violations of the pension plan rules or suspected violations of law or regulations that govern the D&B Pension Plan's operations.

No Retaliation

It is contrary to the values of the Dun & Bradstreet (UK) Pension Plan for anyone to retaliate against any board member or officer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the D&B Pension Plan. Any trustee or officer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of trusteeship or contracted services.

Reporting Procedure

The Dun & Bradstreet (UK) Pension Plan has an open door policy and suggests that trustees share their questions, concerns, suggestions or complaints with either the Plan Chairman or Plan Secretary. The Chairman and Secretary are required to raise concerns about suspected ethical and legal violations in writing to the trustee board who have the responsibility to investigate all reported complaints.].

Plan Secretary

The Plan Secretary is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Plan Secretary will advise the Trustee Board of all complaints and their resolution and will report at least annually to the Governance Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The {Dun & Bradstreet (UK) Pension Plan's Secretary shall immediately notify the Governance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The {Dun & Bradstreet (UK) Pension Plan's Secretary will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Gary Kent
Secretary Dun & Bradstreet (UK) Pension Plan
Policy approved by the Board of Directors on 18-7-17.