



BitSight Code of Conduct and Ethics

1. Compliance with Laws, Rules and Regulations

BitSight employees must follow applicable laws, rules and regulations at all times. Employees with questions about the applicability or interpretation of any law, rule or regulation, should contact any member of the Legal Department or the Human Resources department.

2. Respect for Fellow Employees

Employees are expected to work as a team with respect and trust for each other. Employees should strive to uphold honest communication and to protect employees from discrimination, harassment, or unsafe practices. BitSight encourages personal responsibility in all aspects of work.

3. Conflicts of Interest

Employees are expected to use their judgment to act, at all times and in all ways, in the best interests of BitSight. A "conflict of interest" exists when an employee's personal interest interferes with the best interests of BitSight. Employees should attempt to avoid conflicts of interest and employees who believe a conflict of interest may exist should promptly notify any member of the Legal Department or the Human Resources department.

4. Insider Trading Policy

Laws in different countries where BitSight carries on business prohibit trading or dealing in securities by persons who have information that is not generally known or available to the public and which would affect the price of the securities if it were made public ("Inside Information").

Employees of BitSight may not (a) trade in stock or other securities while in possession of Inside Information or (b) pass on Inside Information to others without express authorization by the Company or recommend to others that they trade in stock or other securities based on Inside Information.

5. Equal Employment Opportunities, Discrimination and Harassment

BitSight provides equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. We value diversity in our workforce, as well as in our customers, suppliers, and others. We do not discriminate on the basis of race, color, religion, belief, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital or civil partnership status, pregnancy or maternity, gender, gender expression, gender identity, gender reassignment, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance. We also make reasonable accommodations adjustments for disabled employees and applicants, as required by law. We aim to follow these principles in all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational

programs.

Please see the BitSight Discrimination and Harassment Policy and the BitSight EEO/Affirmative Action Policy for further guidance.

6. Health and Safety

BitSight provides a clean, safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe conditions, procedures, or behaviors. Violence and threatening behavior are not permitted. Employees must report to work in a condition to perform their duties, free from the influence of illegal drugs or alcohol.

For employees based in the U.K., please see the BitSight U.K. Health and Safety Policy for further guidance.

7. Price Fixing

Employees may not discuss prices or make any formal or informal agreement with any competitor regarding prices, discounts, business terms, or the market segments and channels in which BitSight competes, where the purpose or result of such discussion or agreement would be inconsistent with applicable antitrust or competition laws. If you have any questions about this section or the applicable antitrust or competition laws, please contact any member of the Legal Department or the Human Resources department.

8. Bribery; Payments to Government Personnel or the Private Sector

Employees may not bribe anyone for any reason, whether in dealings with governments or the private sector. Bribery laws in different countries where BitSight carries on business prohibit offering a financial or other advantage to another person with the intention of obtaining or retaining business or a business advantage for the organization.

Please see the BitSight Anti-Bribery Policy for further guidance.

9. Recordkeeping, Reporting, and Financial Integrity

BitSight's books, records, accounts and financial statements must be maintained in appropriate detail, must properly reflect BitSight's transactions and must conform both to applicable law and to BitSight's system of internal controls. BitSight's financial, accounting and legal groups are responsible for procedures designed to assure proper internal and disclosure controls, and all employees should cooperate with these procedures.

BitSight is a privately held company and as such, prohibits employees from divulging any BitSight financial information to which they are privy without express permission from the Chief Financial Officer.

10. Internet Usage and Social Media

BitSight expects employees to comply with applicable laws and government guidelines governing social media. Further, when using social media (for example, any form of online publishing and discussion, including blogs, wikis, file-sharing, user-generated video and audio, and social network), employees must comply with this Code of Conduct and Ethics and BitSight's internet and social media policies. Employees must take care not to disclose, directly or indirectly, BitSight's confidential information.

11. Combating Trafficking in Persons

BitSight and the United States Government, as well as other international governments, have adopted policies prohibiting trafficking in persons, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery and sex trafficking. Any violation of these policies, or any international laws or regulations including, but not limited to, the UK Modern Slavery Act of 2015, could result in disciplinary action, including termination of employment.

12. Reporting Violations; Whistleblowing Policy

This section of the Code of Conduct and Ethics covers all employees, officers, consultants, contractors, casual workers and agency workers.

Definition

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to BitSight's activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

Reporting

BitSight hopes that in many cases employees will be able to raise any concerns with their line manager and that non-employees will be able to raise concerns with their primary business contact at BitSight (who will in turn follow this policy). However, where employees or non-employees prefer not to raise it with their line manager or primary business contact for any reason, they should contact any member of the Legal Department or the Human Resources department. BitSight will arrange a meeting with the individual who raised a concern as soon as possible to discuss that concern. Employees may bring a colleague or union representative to any meetings under this whistleblowing policy. Any companion brought to a meeting must respect the confidentiality of the disclosure and any subsequent investigation.

BitSight hopes that individuals will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If individuals want to raise their concern confidentially, BitSight will make every effort to keep his or her identity secret and only reveal it where necessary to those involved in investigating the concern. BitSight also offers a process via a third-party service whereby individuals with concerns have the ability to remain anonymous if they choose. Please see Exhibit A for instructions on how to use this option.

External Notification

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases individuals should not find it

necessary to alert anyone externally. That being said, the law recognizes that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. BitSight strongly encourages individuals to seek advice before reporting a concern to anyone external.

If you are a UK-based employee, Public Concern at Work operates a confidential helpline. Their contact are: Helpline: (020) 7404 6609; e-mail: whistle@pcaw.co.uk; and website: www.pcaw.co.uk.

For the avoidance of doubt, nothing in any employee agreement shall prohibit an employee from lawfully reporting waste, fraud or abuse related to the performance of a government contract to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information (e.g. the agency Office of the Inspector General).

Cooperation

Employees must cooperate in internal investigations of potential or alleged misconduct.

No Retaliation

BitSight aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken. BitSight will not allow retaliation against an employee (or anyone) for reporting misconduct by others in good faith.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If employees believe that they have suffered any such treatment, they should inform any member of the Legal Department or the Human Resources Department immediately. If the matter is not remedied employees should raise it formally to a member of the BitSight executive team.

No one should threaten or retaliate against whistleblowers in any way. If employees are involved in such conduct they may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue individuals personally for compensation in an employment tribunal. However, if BitSight conclude that an employee whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

13. Violations

Employees who violate this Code of Conduct and Ethics will be subject to disciplinary action up to and including termination of employment.

14. Questions

Employees should speak with anyone in their management chain or any member of the Legal Department or Human Resources Department when they have a question about the application of this Code of Conduct and Ethics or when in doubt about how to properly act in a particular situation.

15. About this Policy

This policy does not form part of any employee's contract of employment and BitSight may amend it at any time.

Last updated November 2019

Exhibit A

Anonymous Reporting Hotline

Website: www.lighthouse-services.com/bitsight

Toll-Free Telephone Instructions:

1. Make sure you have an outside line.
2. Enter the **access code** from <https://www.business.att.com/collateral/access.html> for the country and/or the telephone system you are calling from. You will then hear a 'bong'.
3. An English-language voice prompt will ask for the number you are calling.
4. Enter the toll-free number: **800-603-2869**. There is no need to dial "1" before the toll-free number.
5. You are now connected to the hotline.
6. A Lighthouse greeting will be played in multiple languages. Make a choice from the pre-recorded language prompts or press 000 and tell the English operator the language you speak (preferably in English). An interpreter will then join the call in 2-3 minutes. The Lighthouse operator will interview you, aided by the interpreter.
7. A report in English is then sent to the designated recipient(s) of your company.
8. Access codes from <https://www.business.att.com/collateral/access.html> are subject to change.

E-mail: reports@lighthouse-services.com (must include company name with report)

Fax: (215) 689-3885 (must include company name with report)