



Whistleblower and Reporting Policy

I. OVERVIEW

Definitive Healthcare Corp., together with its subsidiaries and entities controlled by it (the “Company”) is committed to honest, ethical and lawful conduct, full, fair, accurate, timely and transparent disclosure, and compliance with applicable laws, rules and regulations. To assist the Company in fulfilling these commitments, you are strongly encouraged to disclose to, and seek guidance from, an appropriate supervisor or manager if you believe any person associated or doing business with the Company has engaged, is engaging, or may engage in any illegal or unethical behavior or has violated, or may violate any law, rule, regulation, the Company’s Code of Business Conduct and Ethics (the “Code”) or any of the Company’s other compliance policies or procedures.

This Whistleblower and Reporting Policy (this “Policy”) establishes guidelines and procedures for the reporting and review of concerns relating to accounting, internal accounting controls or auditing matters (an “Accounting Concern”), compliance with any legal or regulatory requirements, the Code or any of the Company’s other compliance policies or procedures, or any other matter that could cause serious damage to the Company’s reputation (together with any Accounting Concerns, “Concerns”). Accounting Concerns include, without limitation, the following types of conduct: (i) fraud, deliberate error or **gross negligence or recklessness** in the preparation, evaluation, review or audit of any financial statement of the Company; (ii) fraud, deliberate error or **gross negligence or recklessness** in the recording and maintaining of financial records of the Company; (iii) deficiencies in, or noncompliance with, the Company’s internal accounting controls; (iv) misrepresentation or false statement to management, regulators, the outside auditors or others or by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of the Company; and (v) deviation from full and fair reporting of the Company’s results or financial condition. By appropriately responding to Concerns, we can better support an environment where compliance is valued and ensure that the Company is meeting its ethical and legal obligations.

This Policy applies to all employees, officers, directors, agents, representatives and other third parties when they act on behalf of the Company.

Any person receiving a report of a Concern through any of the channels listed below should contact the Chief Legal Officer promptly so that appropriate steps can be taken in accordance with this Policy.

II. MANAGER RESPONSIBILITIES

If you are a manager, you are responsible for continually emphasizing integrity as a standard of performance for all employees. If you receive a report of a Concern, please contact the Chief Legal Officer promptly so that appropriate steps can be taken in accordance with this Policy. The Chief Legal Officer will ensure that the Concern is appropriately directed.

III. NO RETALIATION AGAINST WHISTLEBLOWERS

Retaliation against anyone who raises a Concern in good faith, or who assists the Company, the Board of Directors or the Audit Committee or any governmental, regulatory or law enforcement body in reviewing or otherwise helping to resolve a Concern, is prohibited and is a violation of this Policy and our Code. If you believe you have been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company or its agents for reporting complaints regarding Accounting Concerns in accordance with this Policy, you should immediately file a complaint to your manager, Human Resources, the Legal Department or any of the other resources listed in the Code. You may also report retaliation through the Company's toll-free ethics hotline provided in this Policy and our Code. See Section IV below, *How to Raise a Concern*. Any person who retaliates against another individual for making any report pursuant to this Policy and our Code will be subject to disciplinary action up to and including termination.

While we encourage you to seek to address Concerns through the methods provided in this Policy or in any other agreement or policy of the Company, nothing in this Policy prohibits or interferes with your ability, without notice to or authorization of the Company, to communicate in good faith with any governmental agency for the purpose of reporting a possible violation of law, or to participate in any investigation or proceeding that may be conducted by any governmental agency, including providing documents or other information.

Employees who file reports or provide information in bad faith are not protected by this policy and are subject to disciplinary action.

IV. HOW TO RAISE A CONCERN

You may submit a Concern either in writing or orally. No form is required to submit a Concern, but you are encouraged to provide as much information and detail as possible so that the Concern can be properly reviewed. In addition, Concerns may be submitted anonymously as described below. While Concerns may be submitted at any time, we encourage you to raise a Concern as soon as reasonably possible after becoming aware of the matter. You should make every effort to report your Concerns using one or more of the methods specified below. The complaint procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he or she believes is engaged in prohibited conduct under this Policy. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Chief Legal Officer and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

The most direct way to raise any Concern is to discuss it with your manager. However, if you are not comfortable speaking with your manager, you are encouraged to contact Human Resources, the Hotline, the Legal Department or any other resource listed in the Code. They, in turn, will forward the Concern if appropriate.

A. Hotline

You may report any Concern through the Hotline and, if you prefer, you may do so anonymously. The Hotline is a web portal and phone line and available 24 hours a day, 7 days a week. The information you provide (anonymously, if you choose) will be documented in detail and provided to the Human Resources team.

- **Call:** Concerns may be reported at 866-454-2135.
- **Web Portal:** You may also report any Concern through the Anonymous Comment Box on the Company's intranet homepage or via the following link <https://www.whistleblowerservices.com/DH>.

B. Human Resources

Concerns may be communicated to Human Resources at hrdefinitivehc.com

C. Legal Department

Concerns may be communicated to the Legal Department at AskLegal@definitivehc.com

D. Accounting Concerns

If you believe your Concern may be an Accounting Concern, you may report your Concern in the following manner:

- **Audit Committee**

Accounting Concerns may be communicated to the Chief Legal Officer (who will work with the Chair of the Audit Committee as discussed in Section V. Below), or via the Hotline as described above.

- **Hotline**

Accounting Concerns may be communicated through the Hotline as described above.

V. PROCEDURES FOR RECEIVING AND REVIEWING CONCERNS

Concerns received through the methods described above that could qualify as an Accounting Concern must be referred to the Chief Legal Officer for evaluation. The Chief Legal Officer will review the Concern to determine if it qualifies as an Accounting Concern. Any Concern that does not qualify as an Accounting Concern shall be referred to the appropriate Company department for review in accordance with the Code and Company policies.

The Chief Legal Officer will promptly notify the Chair of the Audit Committee of any Accounting Concern. The Chair of the Audit Committee, in consultation with the Chief Legal Officer, shall determine whether an adequate basis for commencing an investigation exists, designate the Chief Legal Officer to lead a review of the Accounting Concern, or determine that the Audit Committee will retain the matter for review. If the Accounting Concern is reviewed by the Chief Legal Officer (under the direction and oversight of the Audit Committee), the Chief Legal Officer will then appoint one or more internal and/or external investigators to promptly and fully investigate each viable claim under the direction and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances, and the Chair of the Audit Committee will receive updates as circumstances dictate. The Audit Committee will receive updates of any pending review at each scheduled meeting (or sooner if necessary) and shall be apprised of the parameters of the review.

the Chair of the Audit Committee or the Audit Committee may consider such matters as the identity of any person who is the subject of the Accounting Concern, the severity and scope of any alleged wrongdoing, the credibility of the Accounting Concern raised, and any other factors that are appropriate under the circumstances.

The Chief Legal Officer may authorize the engagement of outside experts to assist in the review of any Concern, other than Accounting Concerns for which the Audit Committee may authorize the use of outside experts to assist in a review by the Audit Committee or the Chief Legal Officer, as applicable, and the Company will pay all fees of such outside experts.

If the Concern involves or implicates the Chief Executive Officer, Chief Financial Officer, Controller, Chief Legal Officer, or the internal audit function, the matter must be directed to the Chair of the Audit Committee, and the Chair of the Audit Committee will determine whether to retain the matter for review or designate an appropriate Company officer to lead the review.

VI. CONFIDENTIALITY

You may raise Concerns anonymously by contacting the Hotline described in this Policy. If you choose to identify yourself (which we encourage), we will keep your identity confidential to the greatest extent possible under the circumstances or as otherwise required by law, consistent with the need to conduct an adequate investigation. Regardless of the method that you use or whether you raise a Concern anonymously, it is important to provide us with as much information as possible so that we can review and seek to address your Concern. See Section III, *No Retaliation Against Whistleblowers*.

VII. RETENTION OF CONCERNS

The Chief Legal Officer will maintain a log of all Concerns, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for the Audit Committee. Each member of the Audit Committee and, at the discretion of the Chief Legal Officer, other personnel involved in the investigation of complaints, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with our then-current document retention policy.

VIII. POLICY OVERSIGHT

The Audit Committee may amend this policy from time to time.