



Our vendor code of conduct

At Definitive Healthcare, we know our business decisions can have important economic, environmental, and social impacts in the communities we serve and beyond. To ensure that we, and our vendors, conduct business responsibly and ethically, we've developed this Vendor Code of Conduct ("Code").

The principles, guidelines, and standards we outline below are drawn from and built upon our Code of Business Conduct and Ethics. These policies reflect our company values and beliefs, and we expect our vendors (any person or entity that provides goods or services to Definitive Healthcare and its subsidiaries, sometimes referred to herein as "you" or "your") to respect and live up to these ethical standards.

For more information, read our [Definitive Healthcare Code of Business Conduct and Ethics](#).

We follow the laws and regulations relevant to our work in all locations where we operate, and we expect the same from our vendors (any person or entity that provides goods or services to Definitive Healthcare and its subsidiaries). It is their responsibility, and the responsibility of their employees, contractors, subcontractors, and agents to read, understand, and comply with this Code and all applicable laws, regulations, and standards.

Should our vendors become aware of any violation or potential violation of this Code, laws, or regulations, it should be reported to us immediately. Violations may result in the termination or nonrenewal of their Vendor relationship with us.

We encourage our vendors to reach out to us if they have any questions or believe a violation or potential violation has occurred. Please contact our Chief Legal Officer (1-508-720-4224) or any member of the Legal Department. The Definitive Healthcare toll-free ethics hotline is also available:

- In the U.S. by calling 1-866-454-2135, or
- By submitting a report at <https://www.whistleblowerservices.com/DH>

Equal opportunity and nondiscrimination

We believe our employees play a vital role in helping us realize our vision. Therefore, we are committed to fostering a diverse and inclusive work environment where everyone is afforded the same opportunities to achieve their personal and professional goals. Our vendors are expected to uphold similar values.

Our vendors will not discriminate against others based on race, color, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, pregnancy, physical or mental disability, or veteran status. Instead, employment-related decisions should be based on merit alone.

Harassment

We do not tolerate harassment in any form and expect our vendors to follow suit. The legal definition of harassment may vary from place to place, but such behavior always has the purpose or effect of creating an intimidating, offensive, or demeaning environment for another person. This is a form of discrimination, and any such behavior or actions are not permissible.

Upholding human rights

At Definitive Healthcare, we are committed to respecting and protecting fundamental human rights. We have a zero-tolerance policy in regard to modern slavery in all forms, including child or forced labor and human trafficking practices. By extension, we expect our vendors to uphold individual human rights in all operations and oppose modern slavery in all its forms.

This means, in part, that our vendors must provide reasonable working hours and fair wages for those who work on their behalf. In addition, our vendors will not knowingly do business with subcontractors, business partners, or other vendors who violate these practices.

We also support the Ten Principles of the UN Global Compact on human rights, labor, environment, and anti-corruption, as well as the UN Sustainable Development Goals. We are also a Participant of the UN Global Compact. Through these principles, we uphold the freedom of association and the effective recognition of the right to collective bargaining. We expect our vendors to implement and abide by the same, or similar, standards. More information is available in [The Ten Principles of the UN Global Compact](#).

Creating a safe and healthy working environment

To ensure our employees can effectively do what they need to do each day, we are committed to providing a safe, healthy, and efficient work environment. Our vendors should also provide a safe and healthy working environment for their employees and must comply with all applicable health and safety laws, regulations, and industry requirements related to their business. While conducting business on our behalf, our vendors should also prohibit:

- Possession, use, sale, purchase, or distribution of any illegal drugs or controlled substances by any employee or representative
- Acts of violence or threats of violence
- Possession, distribution, or viewing of pornographic or sexually explicit material, or use of our equipment to obtain or view such materials

UN Global Compact

Definitive Healthcare adopts and adheres to The Ten Principles of the UN Global Compact. Through these principles, we uphold the freedom of association and the effective recognition of the right to collective bargaining. We expect our vendors to implement and abide by the same, or similar, standards. More information is available in [The Ten Principles of the UN Global Compact](#).

Business practices

We believe integrity, honesty, and sound judgment are fundamental to our success. By extension, our vendors must operate fairly and ethically and remain honest in all business pursuits.

Our vendors should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or any other intentional unfair practices. They must make only factual and truthful statements about their company and Definitive Healthcare, and the services offered.

Confidential information and communications practices

Complying with privacy and data protection laws

Our vendors should process all personal data in compliance with applicable privacy and protections laws. View our policies [here](#).

Preserving third-party information

Our vendors should be committed to vigilantly protecting the privacy of third-party information. This means they must use the same standards to collect, use, and safeguard client information as they would their own confidential information. Our vendors must also take steps to prevent compromising or accidentally disclosing client data or information. If such disclosure or incident occurs, you should notify us immediately.

Protecting Definitive Healthcare's confidential information

Our vendors are responsible for protecting proprietary and confidential information, even after their work is complete or their vendor relationship has come to an end.

Should a vendor relationship end, all proprietary and confidential information must be returned to us, and such information must never be disclosed to other parties, including new or existing clients, employers, colleagues, contractors, subcontractors, or agents, no matter how much time has passed since their work or relationship with us has ended.

Prohibition against trading on inside information

While working on behalf of Definitive Healthcare, our vendors may become aware of material, non-public information (also known as "inside information") about our company, our clients, or other companies. Buying or selling securities of a company while in possession of inside information is a criminal offense in many countries, including the U.S., and is prohibited by company policy.

Furthermore, our vendors are prohibited from revealing inside information to anyone, including friends and family members.

Coordinating our corporate communications

Only authorized people can speak on behalf of Definitive Healthcare on matters of company business. Should inquiries or information requests from the news media, government, a regulatory body, or investment community representative regarding us or our clients, including financial results, business strategy, or other company matters, they should not respond. Instead, these inquiries should be forwarded to us immediately.

Social media

Due to the highly sensitive nature of our business and the laws that apply to our work, even seemingly harmless disclosures through social media could prove damaging to Definitive Healthcare or our clients. As a result, use of social media that refer to Definitive Healthcare or any of its employees, clients, and subsidiaries in blogs, podcasts, discussion forums, and social networks. Should a vendor become aware of any inappropriate use of our technologies or electronic communications through social media, they should notify us.

Conflicts of interest

When performing work for Definitive Healthcare, vendors must avoid situations in which their personal interests and loyalties are, or appear to be, incompatible with ours, or are influenced by personal gain or benefit at our expense. This can include transactions that benefit (or give the appearance of benefiting) a vendor's family member or another related third party at the expense of Definitive Healthcare.

Vendors working on our behalf should never offer or accept a gift or entertainment if such activity creates a sense of obligation, puts them in a situation where they may appear biased, or is done with the intent to influence a business decision. To avoid even the appearance of a conflict of interest, good judgment and moderation should always serve as guides in these situations. We encourage our vendors to consult their Definitive Healthcare contact should they have any questions about these guidelines or need to discuss a potential conflict.

Complying with laws

Anti-corruption laws

Our vendors should not promise, offer, or authorize any bribe or kickback to obtain an improper business advantage. They should never use, support, or promote corrupt practices while doing business on our behalf, and must abide by all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and other laws, including laws implementing the OECD Convention Against Corruption, the United Nations Convention Against Corruption, and local jurisdictional laws and regulations.

These laws commonly prohibit bribery of "Government Officials," but may also criminalize bribery of private persons. Anti-corruption laws are complex, and the consequences of violating these laws are severe. For this reason, our vendors should avoid any activity that could be construed as corrupt.

Abiding by U.S. and international competition (anti-trust) laws

Definitive Healthcare's vendors should comply with competition laws wherever they do business.

Abiding by economic sanctions and anti-boycott laws

Our vendors must fully comply with all relevant economic sanctions, laws, and regulations of the United States, United Kingdom, European Union, and United Nations, including those prohibiting or restricting transactions with certain designated foreign governments, entities, persons, or end-users. Definitive Healthcare's vendors must also fully comply with all U.S. anti-boycott laws.

Preventing money laundering and terrorist financing

Definitive Healthcare's vendors must know and comply with all applicable laws and regulations that are aimed at halting money laundering and terrorist financing. Remaining vigilant and exercising good judgment when dealing with unusual or suspicious client transactions is important. This means our vendors should never alert an organization or individual with whom they have a relationship of any impending or ongoing investigation against them. Our vendors should notify us about any situation that seems inappropriate or suspicious.

Abiding by export control laws

It is critical that our vendors comply carefully with all applicable laws and regulations that regulate our international trading activity. As such, they must understand and follow the laws relating to imports and exports to and from the U.S. and other jurisdictions where they do business.

Abiding by environmental laws

Our vendors must comply with all applicable environmental laws and regulations. They should also commit to minimizing any environmental hazards and conserving and protecting natural resources and managing their use of energy and other resources responsibly.

Addressing questions and concerns

Filing a report

If a vendor becomes aware of an actual or potential violation of this Code or any relevant law or regulation, they should report it promptly, where allowed by applicable law.

We encourage our vendors to ask questions, raise concerns, or file a report in several ways:

- Contact your Definitive Healthcare Point of Contact directly
- Write to Definitive Healthcare Corp., Attn: Chief Legal Officer, 492 Old Connecticut Path, Framingham, MA 01701
- Call our toll-free ethics hotline at 866-454-2135 at any time
- Submit a report at <https://www.whistleblowerservices.com/DH>

The helpline is staffed by an outside company and is available 24 hours a day, 7 days a week. Reports to the helpline may be made on a confidential or anonymous basis where local law allows, and the information should be relayed to us for further investigation.

Investigation of reports

Our vendors are expected to cooperate fully in any internal investigation we undertake that may involve them and/or about which the vendor may have relevant information. Should a vendor report concerns about one of our employees or us, we will treat the reported information confidentially to the extent permitted by local laws and consistent with good business practices. We will always uphold our commitment to our non-retaliation policy.

Audit rights

We reserve the right to audit our vendors to verify compliance with our Code of Conduct. We may request reasonable access to vendor policies and procedures relevant to the conditions outlined within this Code and the work being performed on behalf of Definitive Healthcare.

Violations of this code

We are committed to upholding and enforcing the principles of our Code. We will use all reasonable means to prevent and immediately halt the occurrence of conduct that violates our Code. However, any vendor that directly or indirectly performs, facilitates, condones, or approves of any illegal or unethical conduct will be subject to disciplinary measures. If the person is found to be in violation, it could result in the immediate termination or nonrenewal of their vendor relationship with us.