



CODE OF CONDUCT



Contents

Chief Executive Officer Message	2
Introduction	3
Proper Use Of Assets	4
Confidentiality, Intellectual Property, Data Privacy And Artificial Intelligence	5
Media And Public Inquiries	7
Health And Safety, Security And Environment	8
Insider Trading, Fair Competition, Antitrust And Competitive Intelligence	10
Giving Or Receiving Payments, Benefits Or Gifts	11
Contracting For Clarivate	12
Political And Charitable Conduct And Contributions	13
Conflicts Of Interest	14
Accounting, Auditing Or Disclosure Concerns And Fraud Reporting	16
Equal Employment Opportunities And Harassment	18
Records Management	19
Embargoes, Sanctions And Export Controls	20

CHIEF EXECUTIVE OFFICER MESSAGE

Dear Colleague,

At Clarivate, trust is the foundation upon which we build everything. As members of the Clarivate team, the trust that we place in each other to conduct ourselves honestly, ethically and with respect for others is in line with our company values: We aim for greatness, We value every voice, We own our actions. These values guide our actions from the day-to-day decisions we make to how we interact with each other to how we prioritize building trusted partnerships with our customers and partners worldwide.

Our Code of Conduct is our global how-to guide for doing business at Clarivate and helps ensure we all have a common understanding of how we should behave. It is also foundational for establishing global leadership as a sustainable company and is the cornerstone of our compliance program. Please take time to read and understand it. If you are ever unsure or feel that the Code is being violated, we ask you to speak up, talk with your manager or contact our **Compliance team**.

Our success and growth depend upon our vigilant adherence to ethics and compliance and ensuring we hold ourselves to the highest standards. Thank you for following the Code, upholding our values and working hard every day to help us build a sustainable and responsible business for long-term, shared success.

Matti Shem Tov

Chief Executive Officer

INTRODUCTION

Who this applies to The Code applies to all officers, directors and Colleagues (full-time, part-time or temporary) of Clarivate. Outside consultants, and contractors are also required to abide by the policies, principles and values set out in this Code.

What you need to do You should read this Code and any supplemental policies posted on The Lens and complete any related online training courses. Colleagues engaging third parties acting on behalf of Clarivate should also ensure that such third parties are aware of their obligations under this Code.

Questions If you have any questions about this Code, please contact compliance@clarivate.com.

Hotline If you believe there has been a violation of this Code, you should report it immediately via the [Ethics Hotline](#) using the toll-free number for your country or through the online reporting system accessible through The Lens. Please refer to The Lens for further details on reporting any possible Code violations, including how to do so anonymously where permissible and for further details on our policy of non-retaliation and how investigations will be handled. You can also report violations of this Code at any time directly to your manager, HR, the Compliance team or a member of the Legal team.

Acknowledgement You are required to acknowledge on an annual basis that you have read the then-current version of this Code, and to take mandatory training courses associated with the Code. Please note that you will be expected to comply with this Code regardless of whether you acknowledge receipt, and that Clarivate reserves the right to interpret this Code and related policies at its sole discretion. This Code is not exhaustive. No statement of principles and procedures can offer a complete guide to cover all possible situations. Clarivate Colleagues are expected to observe both the spirit and the letter of this Code, and to consult this Code or an appropriate representative of Clarivate when faced with an ethical issue. This Code is not intended to alter your terms of employment.

Contact details

For general questions regarding the Code, please visit the Compliance page on The Lens or contact our Compliance team at compliance@clarivate.com.

The Code also references other Clarivate teams that should be consulted for various matters. For your convenience, here are their contact details:

HR: [Email your HR contact listed on your profile on the Lens or follow the link to the HR WorkDay site](#) [HR Help](#)

Legal: legal@clarivate.com

Sourcing: clarivate.sourcing@clarivate.com

Contract Management: contract.admin@clarivate.com

[Waiver](#)

Before a Colleague, or an immediate family member of any such Colleague, engages in any activity that would otherwise be prohibited by this Code the Colleague is strongly encouraged to obtain a written waiver from the General Counsel or Chief Compliance Officer. Before a director or executive officer, or an immediate family member of such director or executive officer, engages in any activity that would otherwise be prohibited by this Code, the director or executive officer must obtain a written waiver from the disinterested directors of the Board or a committee of the Board. Such waiver must be disclosed to the Clarivate shareholders, along with the reasons for granting the waiver

PROPER USE OF ASSETS

Clarivate assets are to be used for your job

Use of company assets You should use Clarivate assets only for authorized business purposes, and you should only access systems and information that you are authorized to access. Clarivate assets should be secured. Clarivate assets must never be used for illegal activities.

We are realistic about our work/life habits and permit limited and occasional personal use of our e-mail, messaging, internet and phones provided that such use is not excessive, does not interfere with your work responsibilities and does not violate this Code. You should not assume or expect privacy when using communications and technology infrastructure owned or supplied by Clarivate. Where permitted by applicable law, we reserve the right to monitor and record your use of communications and technology infrastructure owned or supplied by Clarivate.

Use of computer systems Computers and communication devices are provided to help us work more productively, but keep in mind the following:

- **Use Good Judgment:** If Clarivate becomes involved in litigation or an investigation, your communications may have to be turned over to third parties including regulators and the court. Avoid careless, exaggerated or inaccurate statements that could be misunderstood or used against you or us in a legal proceeding. **Before you hit "send," think and re-read.**
- **Inappropriate Content:** Don't access, send or download inappropriate content that could be offensive, insulting, derogatory or harassing to another person, such as sexually-explicit messages, jokes or ethnic or racial slurs.
- **Confidential Information:** Don't forward internal communications or send confidential materials outside of Clarivate unless you are explicitly authorized to do so.
- **Collaboration Tools:** Use of collaboration tools on your work computer, such as instant messaging, is only permitted if you're using an approved tool provided by Clarivate.
- **Passwords:** Manage and keep confidential your computer user IDs, passwords and authentication devices;
- **IT Security:** Follow guidance from our Information Security team regarding security (e.g., exercise caution when opening files attached to e-mail, be careful of people outside of Clarivate asking for financial, customer or corporate information through e-mail or phone scams). **Please report any suspected computer security exposures or incidents to our Information Security Team immediately.**
- **Personal Devices:** In some instances, you may be allowed to use personal smartphones or other devices for business purposes. If you have approval from your manager to use a personally-owned device for business, your phone will be subject to the same security and data management practices as a company-owned device.

Returning assets When you leave the company or are requested to do so, you must stop using and return any and all Clarivate assets in your possession.

If you become aware of loss, theft, misuse, damage or waste of our assets, or you have any questions about your proper use of them, you should contact our Compliance team or report it through the Hotline.

CONFIDENTIALITY, INTELLECTUAL PROPERTY, DATA PRIVACY AND ARTIFICIAL INTELLIGENCE

You must protect our confidential information, and not misuse any personal data or intellectual property belonging to third parties

Safeguarding confidential information You should not share confidential information belonging to Clarivate, or our customers, vendors or partners with anyone, including colleagues, unless there is a legitimate “need-to-know” and you are authorized to do so. Confidential information includes all non-public information relating to Clarivate, or other companies, that would be harmful to the relevant company, or useful or helpful to competitors if disclosed. Improper disclosure of confidential information could put us at a competitive disadvantage or could hurt or embarrass us or other stakeholders.

Your obligation to safeguard our confidential information applies to you even after you leave Clarivate for as long as the information remains confidential.

Data privacy Many countries have data protection and privacy laws that govern the collection, use, retention and transfer of personal information. You should consult with our Privacy Team before making any new or different uses of information about individuals, especially if it involves sensitive information, such as personally identifiable information (names and addresses), credit card numbers or medical or healthcare related information. Questions can be directed to the Privacy Team at data.privacy@clarivate.com.

Intellectual property As a global leader in the provision of IP solutions, it is essential that we both protect our own intellectual property and respect the intellectual property rights of others. You should get written permission before making use of a third party’s copyright-protected materials, patents, brands or other intellectual property. If you want to use intellectual property that belongs to someone else, we may need to obtain a license or purchase outright ownership of the property. If we already have a license from the third party owner, you should check that your intended use is permitted before making such use or consult with our Legal team.

Downloading, duplicating or redistributing copyrighted material, including music, movies, images or software, may violate the law in many countries and can result in disciplinary or legal action. Do not engage in these activities unless you are legally permitted to do so.

Any intellectual property generated in the course of your employment or using Clarivate assets belongs to Clarivate.

Artificial Intelligence With the increased availability and interest in generative Artificial Intelligence (AI) applications, it is critical that all Clarivate colleagues properly assess the appropriate use of these tools, and consider the limitations and risks to Clarivate assets, business and reputation, when using AI during the performance of their responsibilities at Clarivate. The misuse of this technology can lead to the loss or infringement of not only our company data, but also the data of our customers, partners and suppliers, thereby exposing us to increased privacy, security, intellectual property and reputational risks. All Clarivate colleagues are responsible and accountable for their use of Clarivate data, including inputs and outputs of generative AI, in accordance with all applicable laws, existing Clarivate policies, and

Clarivate's Acceptable Use Standard. Non-compliance with applicable laws, any Clarivate AI Policy or Acceptable Use Standard may result in corrective action up to, and including, termination of employment.

Colleagues may not use generative AI applications hosted in environments managed by third parties for product development, coding aid, etc. and must seek prior written clearance by emailing GenerativeAI@clarivate.com before using generative AI with any of our products and services or allowing any third party (including customers, suppliers and partners) to use our content and products within their use of generative AI.

Copies of Clarivate's AI Policy, Generative AI Guidelines and Acceptable Use Standard, can be found on The Lens.

MEDIA AND PUBLIC INQUIRIES

Don't speak on behalf of Clarivate unless you are authorised to do so

External requests for information Only an authorized spokesperson may engage in discussions about Clarivate with third parties. No other individual is authorized to speak on behalf of the company. Anyone contacted by a third party must refer the third party to a member of the Communications Team.

Public Speaking, Industry Events and Publications No individual should speak with the media concerning Clarivate or, where a discussion includes or could include any information which is "material" with respect to Clarivate, except (i) as authorized by a member of the Communications Team, (ii) in response to media calls relating to a press release that has been issued and that mentions such individual as a contact person, or (iii) as otherwise authorized by this Policy or other Clarivate guidelines or policies. If you have questions regarding what constitutes "material" information, please refer to the **Public Disclosure Policy** and **Guidelines for Public Disclosure** on The Lens.

No individual should speak with analysts or Clarivate shareholders regarding Clarivate except members of Clarivate's senior management team, who are authorized in accordance with Clarivate's guidelines and/or policies.

Before publishing, making a speech, participating as a panellist at an industry event, or giving an interview in your capacity as a Clarivate Colleague - or if a publication, speech or interview might in any way be connected to your position at Clarivate - you must obtain approval from our Communications Team.

Questions can be directed to the Communications Team at **newsroom@clarivate.com**.

Social media Exercise good judgment when posting or sharing information relating to Clarivate. Do not disclose any confidential or sensitive information. Avoid using statements, photos, video or audio that could be construed as malicious, obscene or threatening, or that disparages our business, co-workers, customers or business partners. Be transparent about your relationship to Clarivate if you are writing about our industry, or Clarivate products or services. Always consult the **Clarivate Social Media Policy** on The Lens prior to posting anything on social media regarding the company.

HEALTH AND SAFETY, SECURITY AND ENVIRONMENT

We are committed to ensuring the health and safety of our Colleagues

We endeavour to provide a healthy and safe work environment for our Colleagues as well as be a good corporate citizen in the communities where we do business. In this regard, you must:

- Conduct our operations in a manner that complies with applicable occupational health and safety laws, environmental laws, and the public policies that they represent.
- Follow policies and guidelines, and take training to ensure safety, pollution prevention, resource efficiency and responsible sourcing.

Drugs and alcohol We are expected to conduct business at Clarivate free from the influence of substances that could impair our job performance. This includes alcohol, illegal drugs, controlled substances and, in certain instances, prescription medication. Clarivate Colleagues are prohibited from using, selling, possessing, manufacturing or distributing illegal drugs in our workplace. These rules apply to all Colleagues, at all times, whether on or off Clarivate's premises. If you are taking prescribed medication that you believe may interfere with your ability to exercise good judgment in the performance of your job, please report this to your manager or to HR. Colleagues who violate this policy may be subject to corrective action. And, as involvement with certain drugs is illegal, violations of this policy could also subject you to arrest and prosecution by law enforcement agencies.

Where permitted by law, Clarivate may require that a Colleague who is suspected of violating this policy submit to a screening test. Refusal to submit to a drug or alcohol screening test at the company's request may result in discharge.

Workplace violence and hostility Clarivate has zero tolerance for acts or threats of violence, intimidation and hostility towards another Colleague, a customer or a member of the public. If you feel that you or another person is being threatened or subjected to violence, or if you encounter suspicious activity, you must make this known immediately to the Compliance team or HR.

No person may possess a weapon of any kind, or other dangerous or hazardous device or substance on Clarivate premises, at Clarivate-sponsored functions or otherwise on company business.

In the event of a life-threatening emergency, immediately call local police or an ambulance and then line-management. Domestic and personal issues that may apply to or affect the workplace (i.e., orders of protection, restraining orders) should be reported to the Compliance team or HR.

Workplace bullying Clarivate does not tolerate bullying behavior. Unless contrary to applicable law, individuals who engage in workplace bullying may be subject to corrective action, up to and including termination of employment.

Workplace bullying is the use of force, threats or coercion to abuse, intimidate, or humiliate another Colleague. Workplace bullying includes, but certainly is not limited to, the following:

- Verbal abuse, such as the use of patently offensive, demeaning and harmful derogatory remarks, insults and epithets;
- Verbal or physical conduct that is threatening, intimidating or obscene;

- Pushing, shoving, kicking, poking, tripping, assaulting, or threatening physical assault, or intentionally damaging a person's work area or property; or
- Sabotage, or deliberately subverting, obstructing or disrupting another person's work performance.

Cyberbullying refers to bullying, as defined above that occurs through the use of a computer, cell phone, smartphone, tablet, pager or other device that transmits electronic information, regardless of whether the device is owned by or located at the company or connected to the company network. Cyberbullying is also prohibited.

Convictions during employment Colleagues who are convicted of a criminal offense while working for Clarivate, even if the conviction occurs outside the workplace or outside working hours, must disclose the conviction to the company. While Clarivate reserves the right to suspend or terminate the employment of an individual based on the outcome of its independent investigation into the conviction, not all convictions will result in suspension or termination. During its investigation, Clarivate will take into consideration all the facts and circumstances surrounding the conviction and the underlying offense.

Modern Slavery Act Compliance Clarivate is, and has always been, committed to preventing acts of modern slavery and human trafficking from occurring both within our business and our supply chain by ensuring we only work with suppliers of the highest standard and by running rigorous employment checks. Our company strives to provide a safe, diverse and equal opportunity workplace. Any practices of modern slavery either within our company or within our partner organizations will not be tolerated. If you have any concerns, please contact the Chief Compliance Officer.

INSIDER TRADING, FAIR COMPETITION, ANTITRUST AND COMPETITIVE INTELLIGENCE

We comply with applicable laws and compete fairly

[Non-Disclosure Policy and Insider Trading](#) During the course of your employment at Clarivate, you may become aware of non-public information relating to the company. Material non-public information (also known as “inside information”) is information about a company that is not known to the general public, and that could influence an investor’s decision to buy, sell or hold that company’s securities. Buying or selling securities of a company while you possess material non-public information (otherwise known as “insider trading”) is a criminal offense in many countries and is prohibited. In addition, if you share material non-public information with anyone, including family or household members, and that person then buys or sells securities (or passes the information on to someone else who buys or sells securities), you may be liable for “tipping,” which is also illegal. This applies to stock, shares, options, debt securities or any other securities of Clarivate. If you have any doubt whether information you possess is material non-public information, you should not trade on or pass along that information. Instead, immediately seek guidance from the Chief Compliance Officer.

Additional information regarding Colleague non-disclosure obligations and insider trading can be found in **Clarivate’s Public Disclosure Policy, Guidelines for Public Disclosure** and **Insider Trading Policy** on The Lens.

[Interacting with competitors](#) We believe in fair and open competition. You should always comply with applicable antitrust and competition laws wherever we do business. It is against our policy to:

- fix prices (formally or informally) with competitors or non-related parties, whether directly or indirectly
- share pricing or other commercially sensitive information with competitors
- allocate customers, territories or product markets between Clarivate and our competitors
- unfairly disparage or misrepresent competitors or their products
- induce another party to breach a contract in order to enter into a transaction with Clarivate
- deal unfairly with customers or suppliers

If you are involved in marketing, sales or sourcing, or regularly in contact with our competitors, make sure you understand the applicable antitrust laws and internal policies.

[Gathering competitive intelligence](#) Legitimate intelligence gathering is an important part of doing business and understanding our market. However, you should not obtain information about our competitors through illegal practices. For instance, you should not misrepresent your identity or relationship with our business to gain access to a competitor’s product. If you have been given access to a competitor’s product, you must comply with any relevant terms and conditions when making use of such product. In addition, if you have been given access to confidential competitor information, RFPs or proposals, you should refrain from using or sharing that information, and immediately contact the Compliance team. More details about appropriate competitive intelligence gathering can be found on the Compliance page on The Lens.

Any questions about antitrust or competitive intelligence should be directed to the Compliance team.

GIVING OR RECEIVING PAYMENTS, BENEFITS OR GIFTS

Use your best judgment in giving and receiving gifts; don't directly or indirectly make unauthorised payments to company or government representatives

Although giving and receiving gifts, meals, services or entertainment could be considered a customary business practice, they can also potentially affect objectivity and judgment, and may breach anti-bribery and anti-corruption laws and regulations in extreme cases.

Acceptable gifts, meals, services and entertainment Gifts, meals, services and entertainment are acceptable and comply with this Code if they:

- are relatively infrequent and not excessive in value
- comply with applicable laws and regulations, and are consistent with customary business practices or courtesies
- will not place the recipient under any obligation to the person who gave the gift
- do not include cash or cash equivalents
- would not embarrass Clarivate, the person receiving the gift, or the person giving the gift, if publicly disclosed
- comply with any additional guidelines posted on the Compliance page on The Lens, including the monetary limits placed on gifts, meals and entertainment

Because it's not possible to define "not excessive" in a way that covers all possible cases, we rely on your good faith judgment in these situations. If you have any doubts, you should consult with the Compliance team.

Please remember that we have special guidelines in the **Anti-Bribery and Anti-Corruption Policy** regarding interactions with government officials, which you should familiarize yourself with.

In all cases, you should keep in mind that our customers and business partners often have their own policies and guidelines, and you should not offer gifts, meals, services or entertainment which you know or suspect would violate those policies or guidelines.

For questions regarding Clarivate's gifts, meals, entertainment or travel policies and procedures in general, please contact the Compliance team or review our **Anti-Bribery and Anti-Corruption Policy** and our **Global Travel and Entertainment Policy** on The Lens.

Bribes, improper payments and gifts Our policies, as well as the laws and regulations of most countries where we do business, forbid you from making payments designed to improperly influence the decisions of an individual, company or governmental official. Similarly, you cannot solicit, encourage or receive any payment, gift or favour that could influence your decision or cloud your independent judgment. While what's viewed as a bribe in one country may be acceptable in another, you're expected to comply with this Code.

Facilitation payments "Facilitation payments" (small payments made to government officials or affiliated persons to secure routine actions such as processing visas or other government papers, obtaining non-discretionary permits, providing phone or power service, and similar activities) are prohibited under Clarivate policy even if local laws permit it. If you are faced with a request for such a payment, you should refuse.

CONTRACTING FOR CLARIVATE

Do not sign a contract on behalf of Clarivate unless you are authorised

Commercial contracting Clarivate enters into many contracts that govern our business relationships, so we have policies and procedures in place to ensure that any contract entered into on behalf of Clarivate has the appropriate level of review and approval.

Before you enter into any contracts on behalf of Clarivate, you should have proper authorization. All third party vendor and supplier agreements should be negotiated by our Sourcing team. All customer agreements, partner agreements and other non-vendor commercial agreements should be negotiated by our Contract Management team or Legal team. **Do not sign a contract unless it has gone through the appropriate channels.**

No Side Letters You may not enter into "side letters" with customers, vendors or suppliers. Side letters are undisclosed and unapproved documents, emails or verbal assurances that allow customers, vendors or suppliers to deviate from our standard contract terms. All terms relevant to our dealings with these parties should be contained in the formal contract.

Government contracting In addition to the rules and procedures outlined above, if you engage with governments, it is vitally important that you follow the rules which govern public procurement, comply with applicable laws, policies and standards, and consult with our Legal team whenever there is a question about any of the above.

POLITICAL AND CHARITABLE CONDUCT AND CONTRIBUTIONS

Political contributions made on behalf of Clarivate are not permitted. Charitable contributions made on behalf of Clarivate always require approval

Political conduct and contributions Clarivate does not give support - directly or indirectly - to any political party, candidate, group or religion, nor does it take, absent exceptional circumstances, sides in national or international conflicts or disputes. In keeping with this policy, you should make it clear that you are acting or speaking on your own behalf, and not on behalf of Clarivate, when you are involved in political activities or expressing your opinion on political or public issues, You must not identify the name of Clarivate (or any of our brands) with any political party or group or any one side in such conflicts or disputes.

You must notify our Compliance team if you plan to campaign for, or serve in, public office, and avoid conflicts of interest by excusing yourself from any political matters involving Clarivate if you do so. Questions can be directed to the Compliance Team at Compliance@clarivate.com.

Charitable conduct and contributions We encourage you to contribute your personal time and resources to charities and non-profit organizations. However, if you are affiliated with a charity or non-profit organization that seeks to do business with, or receive donations, assets or services from Clarivate, you should disclose this to our Compliance team and obtain appropriate approval.

CONFLICTS OF INTEREST

Regardless of position, you must avoid all actual and potential conflicts of interest in performing your duties for Clarivate and you must not advance personal interests at the expense of Clarivate

We expect that you will act in the best interests of Clarivate and avoid conflicts of interest by exercising sound judgment and making reasoned and impartial decisions. A conflict of interest may arise whenever an outside activity or personal interest interferes with - or even appears to interfere with - the interests of Clarivate. For example, a conflict may arise if you have a personal relationship with a Clarivate vendor, supplier, competitor or business partner, or with another Colleague. A conflict of interest can also arise when you take a position or have an interest that makes it difficult for you to perform your work objectively and effectively.

Identify and pre-clear conflicts It is your responsibility to identify a potential conflict as soon as it arises and to contact our Compliance team if you are unsure whether such relationship or transaction poses a conflict before engaging in the conduct. Full disclosure allows us to effectively resolve unclear situations. Some conflicts are permissible if they are disclosed and approved by the Compliance Team. We rely on you to exercise sound judgment and to seek advice when appropriate. Clarivate reserves the right to address conflicts in the manner that most benefits our company, such as modifying supervision over an account, removing a Colleague from a particular project or transaction, or directing a Colleague to terminate an outside relationship.

Examples of conflicts The following are examples of conflicts of interest that could arise and are prohibited unless they have been pre-cleared or resolved in advance:

- **Improper Benefits:** You or someone in a close relationship with you receives improper personal benefits (such as cash, gifts, entertainment, services, discounts, etc.) as a result of your position at Clarivate.
- **Interference:** Your work as an officer, director, Colleague or consultant to another company interferes with your ability to do your job at Clarivate, or the other company competes with Clarivate.
- **Other opportunities:** You take for yourself a business opportunity which you discovered through your position at Clarivate without first offering it to Clarivate. More specifically, you may not take personal advantage of any corporate opportunities unless our company has had an opportunity to evaluate it and has explicitly indicated it will not be pursuing the opportunity. If you have any questions regarding whether a situation is permissible, you should contact the Compliance team.
- **Personal Gain:** You use Clarivate property or information, or your position at Clarivate for personal gain. Specifically, you may not use information acquired during your employment, especially confidential company or customer data, for personal use, investments, business opportunities or other related gains. If you have any questions, you should immediately contact the Compliance team.
- **Relationship:** Someone in a close relationship with you is directly reporting to you, or you have the ability to supervise, review or influence the job evaluation, hiring, pay or benefits of someone in a close relationship with you who also works at Clarivate.
- **Improper Influence:** You allow any investments held by you or someone in a close relationship with you to influence you in your work for Clarivate. You may not make or hold a significant investment in a private entity that competes with, does business with or is seeking to do business with Clarivate without the approval of the Compliance Team. An interest is considered "significant" if it could

impair, or reasonably appear to impair, your ability to act solely in the best interests of Clarivate. If you hold such an investment, immediately notify the Compliance Team.

In addition, if someone in a close relationship with you works for a competitor, customer supplier or business partner of Clarivate, both of you should take special care to comply with the duties that each of you owe to your employer.

Other positions Working outside of Clarivate or serving as a director of another organization may create a conflict of interest, whether or not the position is compensated.

Before agreeing to work outside of Clarivate, or otherwise providing services to any vendor, business partner or competitor of Clarivate, you must obtain prior written approval from the Compliance Team. In addition, because outside positions and appointments could create potential conflicts of interest, you may not serve as a director, trustee, officer, advisory board member or consultant, or in a similar paid or unpaid position, with another organization unless you have notified the Compliance Team of the potential conflict, filed the appropriate conflicts of interest disclosure, and receive approval from the Compliance Team (Conflicts disclosures must be submitted for review by the Compliance Team in Clarivate's Conflicts database located at **Conflicts Disclosure Form**). Your job with Clarivate must always be your first professional priority, and you should assess whether such action could result in a potential conflict of interest. In addition, you may not serve as a director of a publicly traded company unless you've received approval from the Compliance Team.

If you hold a position with another organization and if you speak publicly for such organization, you should ensure that you are seen as speaking on behalf of that organization, and not on behalf of Clarivate.

If you're permitted to work outside of Clarivate or join another organization's board, you may not divulge any confidential or strategic information about our business, and you must not vote on any board issues that are related to dealings with Clarivate.

Any permitted outside work/positions should not be done on Clarivate time or using Clarivate equipment, property, information or supplies. Your outside work/position should not interfere with or prevent you from devoting the time and effort needed to fulfil your primary duties and obligations to Clarivate.

If you have any questions regarding a potential or actual conflict of interest, please contact the Compliance team at Compliance@clarivate.com.

ACCOUNTING, AUDITING OR DISCLOSURE CONCERNS AND FRAUD REPORTING

Promptly report any accounting, auditing or disclosure concerns that you may have, or any fraud incidents that you may become aware of. Keep accurate and reliable records

We have a responsibility to keep accurate financial records in line with our company's accounting standards and policies and in compliance with applicable laws, and to submit good faith questions and concerns regarding questionable accounting, auditing or disclosure practices.

Examples of accounting and auditing issues to report You should promptly report any concerns relating to accounting, internal controls or auditing matters, which may include actions involving:

- fraud or deliberate errors in the preparation, maintenance, review or audit of any financial statement or financial record of Clarivate
- deficiencies in, or noncompliance with, the Clarivate internal accounting controls
- misrepresentation or false statements to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of Clarivate
- deviations from full and fair reporting of the Clarivate financial condition

Examples of fraud to report You should also report any other types of fraudulent or dishonest activity that you become aware of or have good faith suspicions about. Examples include:

- questionable transactions with customers or business partners not in accordance with Clarivate policies
- forgeries or other alterations of documents
- billings made higher or lower than normal prices for products or services at a customer's or vendor's request
- payments made for any reason other than as described in the relevant contract, or payments made to an individual account rather than the account of a company with which we are doing business
- payments made through intermediaries that deviate from ordinary business transactions
- embezzlement, theft or misappropriation of Clarivate assets or customer assets that we have been entrusted with

Proper financial and accounting recordkeeping Our financial and accounting records are used to produce reports for Clarivate management, directors, governmental and regulatory authorities and others. We have appropriate control systems in place to ensure these records are complete and accurate. You can help us by doing the following:

- All of your books, records and accounts - including time sheets, sales records, invoices, bills and expense reports - must be complete, accurate and reliable.
- Unrecorded, undisclosed or "off-the-books" funds or assets should not be kept for any purpose.
- Never falsify any document or distort the facts relating to a particular transaction.
- Transactions should be recorded in a timely manner and supported by appropriate documentation.
- You should not incur or pay the cost of anything using Clarivate funds if the incurrence or payment is not authorized under company policy.

You should report fraudulent activities by current or former Colleagues, officers, directors, contractors or third parties with whom we do business to the Compliance team.

Disclosures The information in Clarivate's public communications, including all reports and documents filed with or submitted to the Securities and Exchange Commission, must be full, fair, accurate and understandable. To ensure Clarivate meets this standard, to the extent you are involved in Clarivate's disclosure process, you are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to our company commensurate with your duties, including those set forth in our Public Disclosure Policy, available on The Lens. You are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts about Clarivate to others, including Clarivate's independent auditors, government regulators and self-regulatory organizations.

Reporting, Accountability and Enforcement We promote ethical behaviour at all times and encourage you to talk to supervisors, managers and other appropriate personnel, including officers, the General Counsel and Chief Compliance Officer when in doubt about the best course of action in a particular situation.

You should promptly report suspected violations of laws, rules, regulations or this Code, or any other unethical behaviour by any director, officer, Colleague or anyone purporting to be acting on Clarivate's behalf to appropriate personnel, including officers, the General Counsel and the Chief Compliance Officer. Reports may be made anonymously on our Compliance Portal or through our Ethics Hotline.

The General Counsel's office or Chief Compliance Officer shall investigate and determine or shall designate an appropriate person to investigate and determine, the legitimacy of such reports. The General Counsel's office or Chief Compliance Officer will then, in consultation with HR, determine the appropriate disciplinary action. Such disciplinary action may include, but not be limited to, reprimand, termination with cause, and possible civil and criminal prosecution.

In accordance with our Whistleblower Policy, we will not tolerate retaliation for reports made in good faith. Retaliation or retribution against anyone for a report made in good faith of any suspected violation of laws, rules, regulations or this Code will result in appropriate corrective action.

EQUAL EMPLOYMENT OPPORTUNITIES AND HARASSMENT

We provide a workplace that offers equal employment opportunities and is free from harassment and inappropriate conduct

We are committed to providing equal employment opportunities for all persons with respect to hiring, compensation, promotion, training and other terms, conditions and privileges of employment. We comply with applicable laws and regulations governing non-discrimination in all locations. All Colleagues should treat each other with courtesy, dignity and respect. We have zero tolerance for harassment or other inappropriate conduct, whether committed by an Colleague, supervisor, customer, vendor or any other person on interacting with our colleagues or conducting business on our behalf.

Any form of discrimination or harassment is a violation of this policy and will be treated as corrective action, which may result in discipline, up to and including termination of employment. If you believe you have been subjected to harassment or other inappropriate conduct in violation of this Code, or are aware of incidents of harassment or inappropriate conduct in violation of this Code, You can report the incident through the Ethics Hotline using the toll-free number for your country or through the online reporting system accessible through The Lens, or by directly contacting your manager, HR, the Compliance team or a member of the Legal team.

RECORDS MANAGEMENT

Comply with records management policies applicable to you and don't destroy or falsify documents or e-mails if you learn of litigation or investigations

Our information and records are valuable corporate assets that must be carefully maintained. We must comply with legal and regulatory requirements that relate to document and record retention and disposal. You should manage our records and information in a manner that ensures:

- consistently organized filing, storage and retrieval of recorded information
- record maintenance in whatever media satisfies legal, fiscal, regulatory and operational requirements
- protection of records (including backups)
- needed documentation in the event of litigation
- proper and timely disposal of records no longer of value, both in paper and electronic format

If you are informed about pending or threatened litigation or a governmental investigation, you may not destroy any records (including e-mails) unless you have been authorized to do so by the Legal team. It may be a criminal offense to destroy or falsify documents or e-mails that are subject to a subpoena or other legal process. Any Colleague who fails to comply with this policy, as well as applicable laws and regulations, is subject to corrective action, up to, and including, termination and may also face criminal or civil prosecution, with possible fines and prison terms.

You should contact the Legal team if you have a question about records retention.

EMBARGOES, SANCTIONS AND EXPORT CONTROLS

Comply with applicable sanctions and export control laws

As a global business, we need to ensure that we do not violate any laws, rules or regulations that apply to trade embargoes, sanctions and export controls.

Sanctions Sanctions restrict our ability to do business with particular countries, entities, or individuals.

There are wide-ranging sanctions or embargoes that apply to different countries or regions. These sanctions are politically motivated and may change over time - you can find a current list of sanctioned markets on the Compliance page on The Lens.

Additionally, governments and inter-governmental bodies (e.g., the United Nations) may issue lists of entities and individuals that are sanctioned. We systematically screen our prospects and customers against these lists.

You must not do business with any person or entity that is a sanctioned party or in a sanctioned market, or owned, controlled or acting on behalf of a sanctioned party or a party in a sanctioned market. One of the key ways that you can support our sanctions compliance efforts is to **know your clients and business partners** - who owns or controls them, what their reputation is, what business they do and where they do it.

To find out more about rules on doing business with sanctioned countries and parties, please visit the Compliance page on The Lens.

Export controls Export control imposes restrictions on what you can export, from where, to where, to whom and for what purpose. You must follow any processes and guidelines implemented by our business for compliance with export controls.

If you have any questions about sanctions or export controls, please contact our Compliance team.

Compliance with other laws, rules and regulations Clarivate is obligated to comply with all applicable laws, rules and regulations. It is your personal responsibility to adhere to the standards and restrictions imposed by these laws, rules and regulations in the performance of your duties for the company.