

## **BBB Business Partner Code of Conduct**

As a leader in advancing marketplace trust, BBB sets high ethical standards for business conduct. We also apply these standards to ourselves and our Business Partners. The BBB Business Partner Code of Conduct (the “Code”) helps ensure that BBB Business Partners share our commitment to an ethical marketplace.

For the purposes of this Code, “BBB” refers to any Better Business Bureau, the Council of Better Business Bureaus, BBB Institute for Marketplace Trust, BBB Wise Giving Alliance, and any other BBB-affiliated entity. “Business Partners” refers to suppliers that contract to provide BBB with any product or service and other organizations that contract with BBB to accomplish its mission, and includes the employees, agents and contractors of Business Partners. “Business Partners” does not include BBB Accredited Businesses or CBBB National Partners unless they form a contractual relationship with BBB beyond their accreditation by BBB or membership in CBBB.

BBB expects that Business Partners will conduct their business with or on behalf of BBB in compliance with the Code. As appropriate, preference will be given to Business Partners that demonstrate greater commitment to this Code and ethical standards generally.

### **1. Start With Trust**

Although Business Partners are independent individuals or business entities, their actions may impact and reflect upon BBB. Business Partners should understand and comply with the Business Partner Code and monitor their compliance through their own administrative processes.

### **2. Maintain Legal and Regulatory Compliance**

In their work on behalf of BBB, Business Partners will conduct their business activities in full compliance with applicable laws and regulations in all jurisdictions in which they operate, including laws and regulations on bribery, corruption and prohibited business practices in the countries in which they conduct business. Business Partners will not make any offer, payment, consideration or benefit of any kind which constitutes an illegal or corrupt practice, either directly or indirectly on behalf of BBB, as an inducement or reward for entering into a contract or in connection with the provision of any goods or services under a contract.

### **3. Advertise Honestly**

3.1 Business Partners that advertise or solicit accreditation, sponsorship or any other financial support on behalf of BBB should ensure that all BBB-related advertising or solicitations comply in all respects with BBB policies related to accreditation, the BBB Code of Advertising, and all laws, regulations and guides relating to advertising, solicitations, sponsorships and disclosure of nondeductibility of contributions.

3.2 Business Partners may use BBB trademarks only (1) to create products, materials or websites for direct use by BBB, or (2) as specifically permitted by BBB policies or by the Council of Better Business Bureaus in writing. Unless CBBB has granted permission, Business Partners should not use the BBB name or other BBB marks on Business Partners' materials, including websites and URLs. Business Partners should not use the BBB name or other BBB marks in a manner that represents or infers Business Partners to be BBB or Business Partners' employees to be employees of BBB.

3.3 BBB does not endorse specific products or services unless specifically provided by BBB policies. Business Partners should not publicize their business relationships with BBB or identify BBB as a customer without specific permission from BBB in writing, and then only in the manner, context and language approved by BBB. This provision does not prohibit BBB from participating in affinity programs consistent with BBB policies.

#### **4. Safeguard Data and Privacy**

4.1 Business Partners should ensure the security and confidentiality of BBB proprietary information; business, charity, consumer and donor information entrusted to BBB; and data about visitors to BBB domains (collectively, "Confidential Information"). Business Partners should have policies and procedures in place to prevent disclosure of Confidential Information to unauthorized parties. In their work on behalf of BBB, Business Partners should maintain physical, technical and procedural safeguards in compliance with applicable laws, technology and information security requirements applicable to BBBs, and any specifications established by CBBB for access to BBB information technology systems and BBB domains.

4.2 Business Partners that, in their work on behalf of BBB, interact with visitors to their own websites should disclose in a Privacy Statement/Policy or elsewhere on their websites the following: what information they collect, with whom it is shared, how it can be corrected, how it is secured, how policy changes will be communicated, and how to address concerns over misuse of personal data.

4.3 Business Partners that, in their work on behalf of BBB, collect identifying information of businesses or individuals should respect contact preferences regarding contact by telephone, fax and e-mail, and communicate changes in preferences to BBB.

4.4 Business Partners that, in their work on behalf of BBB, handle payment card information will certify annually their compliance with the Payment Card Industry Data Security Standard (PCI DSS).

4.5 Business Partners that administer BBB email systems will adopt Domain-based Message Authentication, Reporting & Conformance (DMARC) specifications.

4.6 Business Partners whose product or service collects information about or track visitors to any BBB domain will certify that their product or service supports BBB's

compliance with the Digital Alliance Self-Regulatory Principles, including the Self-Regulatory Principles for Online Behavioral Advertising (OBA Principles), the Multisite Data Principles (MSD Principles) and the Mobile Guidance (MG) (collectively, the Principles). Business Partners that subcontract or otherwise engage other companies to fulfill any obligations under BBB contracts should ensure that such companies' products or services are also compliant with the Principles. The Principles can be accessed at <http://www.aboutads.info/principles/>. Further, Business Partners will not transfer any information collected from any BBB domain for any purpose beyond the scope of activities necessary to fulfil their responsibilities under contracts with BBB without providing to CBBB's Chief Information Officer an explanation of the proposed data transfer and use and receiving express permission for such transfer and use.

## **5. Embody Integrity**

5.1 Business Partners should demonstrate commitment to ethical practices in their business conduct and performance of services and production of products on behalf of BBB. Business Partners will comply with BBB policies affecting their relationship with BBB.

5.2 Business Partners should share BBB's commitment to maintaining a work place where people are treated with dignity and respect. In their work on behalf of BBB, Business Partners will follow all applicable wage, benefit, child labor, workplace safety, discrimination and labor laws. While we recognize and respect cultural differences, in their work on behalf of BBB, Business Partners will not engage in discrimination based on age, race, color, religion, sex, gender identity, pregnancy, national origin, citizenship status, disability, sexual orientation, marital status, domestic partner status or veteran status.

5.3 BBB depends on the trust and confidence of businesses, charities, consumers and donors. It is important that we avoid activities that create actual or perceived conflicts of interest. BBB employees are not permitted to give or receive anything of value intended to influence a decision. Business Partners will not offer gifts that could be perceived to influence sound business judgment. BBB makes purchasing decisions based on the merit of Business Partners' products and services, not on gifts, entertainment or other business courtesies.

## **6. Report Violations of the Code**

Business Partners should report a possible violation of the Code that directly affects BBB or the transaction with BBB. Business Partners are encouraged to work with their primary contact at BBB (or his or her supervisor) to resolve the situation. If this is not possible or appropriate, reports may be made to an officer of the contracting BBB entity or the CBBB General Counsel.