



**Verisk Analytics, Inc. (the “Company”)**

## **Policy for Reporting Concerns Related to Accounting, Auditing, and Ethical Violations (Whistleblower Policy)**

**(June 2014)**

### Introduction

The Audit Committee of the Verisk Analytics Board of Directors has adopted the Policy for Reporting Concerns Related to Accounting, Auditing, and Ethical Violations to establish procedures for the receipt and handling of complaints, including those submitted by employees, as to accounting or auditing matters. This Policy also includes means for employees to raise concerns with respect to violations of the Company’s Code of Business Conduct and Ethics.

### Scope

The Policy provides procedures for interested parties, including employees, to raise concerns. While the list below provides examples of the types of subjects covered by this Policy, this list is not intended to be exhaustive, and any person with related concerns should raise those issues in accordance with this Policy.

- The Company’s accounting, auditing, or internal controls, such as:
  - Fraud or intentional error in the preparation or review of the Company’s financial statements
  - Fraud or intentional error in the audit of the Company’s financial statements
  - Fraud or intentional error in the recording and maintenance of the Company’s financial books and records
  - Deficiencies or noncompliance with the Company’s internal controls
  - Any attempts to mislead or improperly influence the Company’s independent auditor in the course of the performance of its audit
  
- Public disclosures of the Company’s financial position, such as:

- Material misrepresentations or omissions regarding the reporting of the Company's business and financial condition, results of operations, or cash flows, including prospective reports
- Violations of the Company's Code of Business Conduct and Ethics, such as improper usage of Company property or funds, including disclosure of proprietary information.

Any employee of the Company who raises a good faith concern through these procedures should do so without fear of dismissal or retaliation of any kind. Employee submissions will be maintained anonymously and confidentially, in particular the identity of the employee raising the concern, unless otherwise consented to by the employee, as may be necessary to conduct a thorough investigation or as required to be disclosed by law.

## Raising a Concern

Concerns related to these matters can be raised to:

- The General Counsel of the Company and the Head of Internal Audit to the extent the matter relates to accounting, auditing, or internal controls. Concerns raised to other management in connection with this Policy will be forwarded to the General Counsel; or
- The Whistleblower Hotline, 24/7/365, by:
  - Submitting a web-based report on <https://www.reportlineweb.com/verisk>
  - Submitting a telephone report using one of the hotline phone numbers available by country location on <https://www.reportlineweb.com/verisk>

The concerns raised through these channels should include sufficient information and detail to enable the conduct of a thorough investigation. When requested, confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and legal requirements.

## Handling of Concerns

- Any concerns received by the Head of Internal Audit shall be communicated to the General Counsel.
- The General Counsel will acknowledge receipt of the matter to the individual who raised the concern, whenever possible.
- All concerns related to accounting, auditing, or internal control matters will be reviewed under the direction and oversight of the General Counsel or such other persons as the General Counsel determines to be appropriate. All concerns related to the violations of the Policy, or any other matters raised through these channels, will be reviewed initially by the General Counsel or an appropriate designee in the Law Department.
- After initial review, the General Counsel will determine whether the matter warrants an investigation and will oversee any such investigation. If the matter appears to be significant, the General Counsel will discuss at any time the concerns raised with the Audit Committee or the Chair of the Audit Committee. The person(s) authorized to conduct the investigation will report to the General Counsel in a timely manner all findings of fact, conclusions, and proposed recommendations for remedial actions, if any.
- Prompt and appropriate corrective action will be taken when and to the extent warranted in the judgment of the General Counsel in consultation with the Audit Committee.

- The General Counsel will maintain a log of all complaints, tracking their receipt as well as any investigation and resolution, and shall prepare a periodic summary report semiannually for the Audit Committee. Copies of complaints and such log will be maintained in accordance with the Company's policy regarding document retention.

The Company will not retaliate or discriminate against any employee with respect to the good faith reporting of concerns raised.

The Audit Committee may revise or amend this Policy as necessary or appropriate.