

ZOOMINFO TECHNOLOGIES INC.

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

ZoomInfo Technologies Inc. (together with its subsidiaries, the “Company” or “we”) has established the following business standards of conduct and responsibilities to conform to the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and similar anti-bribery and anti-corruption laws worldwide (collectively, “Anti-Corruption Laws”) and to combat global corruption in all its forms, including extortion, and bribery. It reinforces the Company’s commitment to act honestly and ethically in all business dealings anywhere in the world and applies to the Company’s employees, contractors, subcontractors, agents, and other authorized representatives and third parties acting on the Company’s behalf (“Company Representatives”).

A. Scope of Matters Covered by the Policy

1. This policy relates to compliance with Anti-Corruption Laws and is in furtherance of the Company’s Code of Business Conduct and Ethics, which prohibits all bribes, Kickbacks, or other similar payments in any form, either directly or indirectly, to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. The Company and Company Representatives involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this policy.
2. Under this policy, Company Representatives are prohibited from directly or indirectly:
 - (a) offering, paying, requesting, or receiving bribes or Kickbacks;
 - (b) offering or giving anything of value to Government Officials or relatives of Government Officials to influence official action or to secure an improper advantage;
 - (c) authorizing, participating in, or condoning any corrupt activities or behavior by other Company Representatives or any other third party;
 - (d) engaging in or supporting activities that could facilitate corruption, including illegal agreements, fraudulent claims, or creation of false records;
 - (e) offering, making, or approving Facilitation Payments; and
 - (f) concealing any corrupt or potentially corrupt activity.
3. The following terms used in this Policy have the meaning specified below:
 - (a) “Government Official” means any officer or employee of a government or any department, agency, or instrumentality thereof (which includes a government-owned or government- controlled state enterprise) or of a public international organization, any person acting in an official capacity for or on behalf of a government or government entity or of a public international organization, any foreign political party or party official, or any candidate for political office. Thus, Government Officials include not only elected officials but also employees of companies owned by a government, political party officials and others. It should also be noted that employees of state-owned or

state-controlled commercial enterprises generally are Government Officials.

(b) “Bribery” or “bribe” means offering, giving, receiving, or soliciting of anything of value with the intent to influence the actions of a Government Official, or other person, in charge of a public or legal duty. Bribery is an illegal and unethical gift or lobbying effort bestowed to influence the recipient's conduct.

(c) “Corruption” or “corrupt” means to a wide range of dishonest behaviors, ranging from petty payments to facilitate routine transactions to payments to fraudulently secure large public concessions. It may also involve any combination of bribery, kickbacks, extortion, fraud, deception, collusion and money laundering, among other dishonest behaviors.

(d) “Kickback” means a scheme of commercial bribery that arises when Company Representatives offer or provide corrupt payments and other advantages to, or accept the same, from other persons and entities.

(e) “Facilitation Payment” means an unofficial payment to Government Officials to obtain or facilitate non-discretionary, routine services to which the Company is otherwise entitled without making such payment. Examples of Facilitation Payments include payments to Government Officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or business permit, processing government papers such as visas, customs clearance, providing telephone, power or water service, or loading or unloading of cargo. Facilitation Payments do not include official fees, which are standard, published fees available to parties and paid to governmental offices or agencies (rather than directly to Government Officials) in order to obtain non-discretionary governmental actions, such as legitimate filing fees.

B. Procedures for Questions; Reporting Suspected Violations

1. Any questions concerning compliance with this policy should be directed to the General Counsel openly, or confidentially and/or anonymously in the following manner:
 - (a) in writing to ZoomInfo Technologies Inc., Attn: General Counsel, 805 Broadway Street, Suite 900, Vancouver, Washington 98660;
 - (b) by calling (+1) 833-976-2033 at any time; or
 - (c) by submitting a form at <https://www.whistleblowerservices.com/ZI>.
2. Any suspected violations of this policy should be directed to the General Counsel as set forth in Section B.1. above and will be handled in accordance with the procedures set forth in the Company’s Code of Business Conduct and Ethics and Whistleblower Policy.

Effective Date: May 12, 2022