

# Reuters Insight

## Compliance Policy

<b>Date:</b>	22 September, 2008
<b>Version:</b>	V.1.4

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### **1 Introduction**

The Reuters Insight Compliance Policy is the central document outlining the rules and regulations by which we conduct our business, as well as the standards to which we hold both our experts and our clients. In addition to the principles set forth in this policy, we abide by all applicable laws and regulations. Our policies exist to protect our experts, our clients and Reuters Insight. Key measures include:

- Expert Community Agreement
- Restrictions Management
- Verification and Qualification
- Training
- Reporting and Documentation

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### **2 Expert Community Agreement**

Reuters Insight has created and will maintain a document (the Community Agreement) which sets forth the terms and conditions pursuant to which experts may be called on to provide services to Reuters Insight and its clients.

#### *2.1.1 Mandatory Acceptance*

In order to be approved as a member of the Reuters Insight Community of Experts, all prospective experts must accept the Reuters Insight Community Agreement. The applicable version of the Community Agreement is provided to the expert during the registration process. Experts are not permitted to engage in a consultation without executing the Community Agreement prior to the consultation.

#### *2.1.2 Re-Affirmation*

All experts must proactively reaffirm their acceptance of the current version of the Reuters Insight Community Agreement prior to participating in any consultation.

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### 2.1.3 Review

Reuters Insight will review its Community Agreement on a quarterly basis, but reserves the right to amend the Agreement more frequently, if necessary.

### 2.1.4 Key Concepts within the Agreement

Key concepts include:

- Expert's information must be kept up-to-date
- Experts must disclose any potential conflicts of interest
- Experts cannot disclose any Confidential Information learned in course of consultation
- Experts cannot breach any non disclosure agreement held with another other party
- Experts are prohibited from providing Reuters clients with investment, financial, medical or legal advice
- Expert must not solicit or accept consulting projects from clients first introduced to them by Reuters Insight without written permission
- Experts cannot disclose any material non-public information

## 3 **Expert Consultations**

The term "Expert Consultation" refers to any form of interaction with a Reuters Insight expert on behalf of a client, including, but not limited to: one-on-one telephone calls, surveys, in-person meetings and panel discussions.

### 3.1 Training Module

All experts are required to complete the Reuters Insight Consultation Certification module prior to participation in a consultation. Experts are only required to complete the module once, but are required to review the module material on a yearly basis in order to maintain a valid certification.

### 3.2 Consultation Restrictions

Reuters Insight compiles and maintains a list of all applicable consultation restrictions for each expert that is a member of the Reuters Insight Community of Experts. These restrictions come from four groups of stakeholders: clients, Reuters Insight personnel, employee companies, and the experts themselves. Consultation restrictions from all four stakeholder groups apply concurrently, with the strictest effective restriction(s) taking precedence. If there are any questions as to whether particular restrictions are applicable when qualifying an expert for a consultation, the Reuters Insight Compliance Officer reviews and makes a final applicability determination.



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### *3.2.1 Reuters Insight Restrictions*

Reuters Insight has outlined internal restrictions on expert consultations. Clients, companies and experts can narrow the scope of Reuters Insight restrictions, but in no instance will the scope of Reuters Insight restrictions ever be broadened by other stakeholder restrictions. No Reuters Insight restriction will supersede any agreement between an expert and their current and/or former employer(s). The following restrictions will apply to all Reuters Insight consultations:

3.2.1.1 No expert may discuss their current employer's business during the course of a consultation.

3.2.1.2 No expert may discuss their former employer's business during the course of a consultation until a "cooling-off" period of six months has elapsed (six months after departure from their former employer).

3.2.1.3 No expert may consult with known competitors of their current employer.

3.2.1.4 No expert employed by a public company can participate in more than three (3) Reuters Insight consultations in one (1) calendar year, unless that company has provided written consent to Reuters Insight.

### *3.2.2 Client Restrictions*

Clients can define restrictions that they would like to have implemented for consultations between their employees and Reuters Insight experts.

### *3.2.3 Company Restrictions*

Expert employers have the ability to define restrictions on their current employees' ability to consult with Reuters Insight.

### *3.2.4 Expert Restrictions*

Experts can define their restrictions in both the expert profile as well as during the consultation qualification process.

## 3.3 Verification

Reuters Insight makes reasonable efforts to verify the accuracy of expert profile information prior to scheduling an expert for a consultation.

## 3.4 Qualification

All experts are qualified for each individual consultation prior to participating in that consultation. Qualification for a prior consultation does not serve as qualification for any future consultation. Each consultation is unique; even though the topic may



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be similar, that does not auto-qualify any expert for any additional consultation(s). Only experts that pass all of the Reuters Insight qualification checks are qualified for consultation participation.

### 3.5 Post-Consultation Follow-Up

After a consultation has concluded, experts participating in the consultation are given the opportunity to provide feedback on the consultation and inform Reuters Insight if any issues occurred during the consultation that need to be addressed. Any issues identified in post-consultation follow-up are handled according to the Reuters Insight escalation procedures.

## **4 Training**

Reuters Insight requires parties participating in consultations to engage in tailored training to ensure knowledge of and compliance with all applicable policies, rules, regulations and guidelines.

### 4.1 Internal

All Reuters Insight employees are required to complete an internal training session on our compliance policies and procedures, tailored by business area. All new employees are expected to undertake the training within one month of their start date.

### 4.2 Expert

All experts are required to complete the Reuters Insight Consultation Certification module prior to participation in any consultation. Experts are only required to complete the module once, but are required to review the module material on a yearly basis in order to maintain a valid certification.

## **5 Employee Code of Conduct**

All Reuters Insight employees have read, signed and are expected to abide by the Thomson Reuters Code of Business Conduct and Ethics. This Code includes the Thomson Reuters Trust Principles. Main concepts include:

### 5.1 Conflicts of Interest

All employees must avoid actual and potential conflicts of interest when performing their duties and may not advance personal interests at the expense of Thomson Reuters. It is each member of Reuters Insight's responsibility to identify potential conflicts of interest when they arise and escalate them to their manager.

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### 5.2 Confidential Information

As part of an employee's job or position, they may learn or have access to non-public or outside information relating to Thomson Reuters businesses, operations or technology. If confidential information is not in the public domain, employees must treat it as confidential.

### 5.3 Securities Laws and Insider Trading

A number of Thomson Reuters officers, directors and employees have access to material non-public information about Thomson Reuters or other companies that is not known by people outside of the company. No Thomson Reuters officer, director or employee of Thomson Reuters or any of its businesses may trade in, or encourage another person to trade in, Thomson Reuters securities while in possession of material non-public information. Material non-public information is akin to inside information.

## **6 Reuters Insight Research**

The Reuters Insight Research group undertakes client-led research, which may involve interacting with experts on behalf of a client. The applicable compliance procedures are driven by the party for which research is being conducted and the distribution of research material and communications.

## **7 Escalation and Management of Policy Violations**

### 7.1 Reuters Insight personnel

Any violations of this policy by Reuters Insight personnel will be escalated directly to the Reuters Insight Compliance Officer. Breach of any provision may result in disciplinary action, up to and including termination.

### 7.2 Consultation-related conflicts

Reuters Insight encourages open communication with its Community of Experts and clients to ensure that all consultation-related conflicts are reported and handled appropriately. If a consultation-related conflict is brought to the attention of Reuters Insight, the Reuters Insight compliance department will conduct a thorough investigation of the alleged conflict or complaint. Violation of stated consultation restrictions by experts may result in removal from the Reuters Insight Community of Experts. Violation of stated consultation restrictions by clients may result in the loss of the ability to consult with the expert Community.

**8 Reporting/Documentation**

Reuters Insight is committed to maintaining complete and accurate records of all consultation-related activity to ensure adherence to all applicable compliance policies and restrictions. Reuters Insight has the capability to produce reports on consultation-related activity for the purpose of demonstrating adherence to such policies and restrictions.

**9 Data Protection**

Reuters Insight respects the integrity of our expert, client and company relationships, and Reuters Insight personnel are subject to a code of conduct which requires them to adhere to privacy and data protection principles. Reuters Insight stores and maintains data in accordance with all applicable laws and regulations.

**10 Review**

Reuters Insight subjects its compliance policy and procedures to an annual review by legal counsel to ensure the incorporation of industry best practices. Additionally, the Reuters Insight compliance department consistently monitors industry developments and may choose to alter its compliance policy, as appropriate, as necessitated by industry changes.

**11 Other**

11.1 Staffing

Reuters Insight employs a Compliance Officer whose primary responsibility is to ensure adherence to Reuters Insight's compliance policies and procedures.

11.2 Product/Project Specifications

All Reuters Insight product/project specifications are subject to a compliance check to ensure that new products and projects adhere to the Reuters Insight compliance policy.