

comScore, Inc. Reporting and Non-Retaliation Policy

This Reporting and Non-Retaliation Policy (this “Policy”) is to be read in conjunction with the Code of Business Conduct and Ethics.

PURPOSE

This Policy is intended to reinforce the commitment of comScore, Inc. (the “Company”) to ethical behavior and integrity by helping to foster and maintain an environment where employees and others can report concerns about wrongdoing or suspected wrongdoing without fear of retaliation. The purpose of this Policy is to encourage employees and others to disclose wrongdoing or suspected wrongdoing that may adversely impact the Company, the Company’s reputation, the Company’s stockholders, customers, employees or other stakeholders, and to set forth the procedures by which such reports should be made, investigated and addressed. All employees are responsible for reporting wrongdoing or suspected wrongdoing using the procedures in this Policy. The Policy shall be reviewed by the Board of Directors of the Company on an annual basis and reinforced to employees through annual trainings and Company communications.

REPORTS OF WRONGDOING BY EMPLOYEES

Employees who become aware of any wrongdoing or suspected wrongdoing, either financial or non-financial, are encouraged to report such matters as described below. An act of wrongdoing or suspected wrongdoing may relate to (i) financial matters such as accounting, internal control or auditing matters, or (ii) non-financial matters such as a violation of the Company’s Code of Business Conduct and Ethics, a danger to health or safety, or a violation or suspected violation of any applicable law, rule or regulation in any Company workplace and may be committed by employees, officers, directors, clients, vendors, contractors, and other third parties that conduct business with the Company.

Any act of wrongdoing or suspected wrongdoing should be reported in the following manner:

Employees are strongly encouraged to discuss any concerns first with their supervisors, managers or other appropriate Company management and the Company’s Chief Compliance Officer (CCO), or in the absence of a CCO, the General Counsel. Supervisors and managers are required to notify their supervisors if they receive a report of wrongdoing or suspected wrongdoing.

Employees and others may also anonymously report suspected wrongdoing via secure web form at <https://report.syntrio.com/comscore>, via phone by calling the Company’s confidential and anonymous hotline at 1-833-591-0626, or via mail at the following address:

Attn: Chief Compliance Officer
11950 Democracy Drive
Suite 600
Reston, Virginia 20190

If you make an anonymous report, please provide as much detail as possible, including copies of any documents that you believe may be relevant to the issue. In the event your concerns relate to financial matters such as accounting, internal controls or auditing matters, or if the CCO is implicated in any violation or suspected violation, you may contact the Chair of the Audit Committee (the "Audit Chair") of the Company's Board of Directors at auditchair@comscore.com, or by sending a letter to comScore, Inc., Attn: Audit Chair, 11950 Democracy Drive, Suite 600, Reston, Virginia 20190. The CCO and/or Audit Chair, depending on the nature of the concern, will handle any such reports in confidence to the extent feasible for the Company's review and as permitted by applicable law. Nothing in this Policy precludes employees from making use of the reporting mechanisms created by the whistleblower provisions under the Dodd-Frank Act or any other law.

NO RETALIATION REGARDING REPORTS OF WRONGDOING

The Company will not take adverse employment action against an employee in retaliation for:

1. making reports of actual or suspected financial wrongdoing or non-financial wrongdoing made in good faith;
2. providing information or causing information to be provided, directly or indirectly, in an investigation conducted by the Company or any federal, state or local regulatory agency or authority;
3. making reports concerning the violation of any applicable law, rules or regulations, including those governing safety, health, discrimination and harassment; or
4. participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with a report of wrongdoing.

This Policy is intended to encourage the reporting of wrongdoing or suspected wrongdoing by the Company's employees and presumes that employees will act in good faith and will not make false accusations. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith will be subject to discipline, which may include termination of employment.

Any claims of adverse employment action in retaliation for the reporting of financial wrongdoing or non-financial wrongdoing under this Policy, including those described in items 1 through 4 above, should be submitted to the CCO or the Audit Chair for investigation by one of the methods described above.

Any employee who retaliates against an employee who has reported a claim of wrongdoing in good faith or who has participated in an investigation or other proceeding in connection with a report of wrongdoing is subject to discipline, up to and including termination of employment.

It is both illegal and against the Company's policy to discharge, demote, suspend, threaten, intimidate, harass or in any manner retaliate against whistleblowers.

Any employee who retaliates against an employee who has reported a claim of wrongdoing is subject to criminal penalties, including imprisonment, for retaliation against whistleblowers.

PROTECTED RIGHTS

Nothing contained in this Policy limits the ability of employees of the Company or others to file a charge or complaint with the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration, the Securities and Exchange Commission or any other federal, state or local governmental agency or entity (each, a “**Government Agency**”) and anyone who does so will be protected under this Policy as if the charge or complaint had been reported to the CCO or Audit Chair. This Policy does not limit the ability of the Company’s employees or others to communicate with any Government Agency or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including providing documents or other information, without notice to the Company. This Policy does not limit the right of any of the Company’s employees or others to receive an award for information provided to any Government Agency.

An individual will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law. An individual will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

The Company also hereby notifies its employees of the U.S. government policy toward employee whistleblower rights and protections. No employee may waive the rights and remedies provided for under this Policy.

U.S. Government Policy: The U.S. government has implemented statutory whistleblower programs, which apply to civilian agencies, other than the National Aeronautics and Space Administration and the U.S. Coast Guard. Under these laws, as implemented in FAR Subpart 3.9, U.S. government contractors, subcontractors, contractor and subcontractor employees, and their agents shall not:

Discharge, demote, or otherwise discriminate against an employee as a reprisal in retaliation for the employee’s disclosure to an authorized entity information that the employee reasonably believes is evidence of:

- (i) a gross mismanagement of a federal contract;
- (ii) a gross waste of federal funds;
- (iii) an abuse of authority as it relates to a federal contract;
- (iv) a substantial and specific danger to public health or safety; or
- (v) a violation of law, rule, or regulation relating to a federal contract (including the competition for or negotiation of a contract).

A reprisal is prohibited even if it is undertaken at the request of an executive branch official, unless the request takes the form of a non-discretionary directive and is within the authority of the executive branch official making the request.

Employees may make any such disclosures to: (1) a Member of Congress or a Congressional committee representative; (2) an Inspector General; (3) the Government Accountability Office; (4) a federal employee responsible for contract oversight or management at the contracting agency; (5) an authorized official of the Department of Justice or other law enforcement agency; (6) a court or grand jury; or (7) a management official, or other employee who has the responsibility to investigate, discover, or address misconduct.

Any employee who believes that he or she has been discharged, demoted, or otherwise discriminated against contrary to this U.S. government policy may submit a complaint with the Inspector General of the contracting agency for the relevant federal contract, within three years of the date the alleged reprisal or retaliation took place. Procedures for submitting complaints are typically accessible on each agency's Office of Inspector General Hotline or Whistleblower Internet sites. Barring a finding of bad faith on the part of the employee, if the agency head issues an order denying relief or has not issued an order within 210 days of the complaint submission or within 30 days following the expiration of an extension of time for the submission of the Inspector General's report to the agency head, the employee will be deemed to have exhausted administrative remedies and may bring an action at law or equity against the contractor or subcontractor seeking compensatory damages and other relief available in the appropriate district court of the United States. Such an action, at the request of either party, will be tried by the court with a jury. Such an action may not be brought more than two years after the date on which remedies are deemed to have been exhausted. An Inspector General determination and an agency head order denying relief under this section will be admissible evidence in any action; the rights and remedies entailed in the law regarding contractor protection from reprisal for disclosure of certain information cannot be waived by agreement, policy, form, or condition of employment.

Employees, agents, subcontractors or others who violate this U.S. government policy may be subject to discipline by the U.S. government, including but not limited to:

- (1) Ordering the contractor to take affirmative action to abate the reprisal;
- (2) Ordering the contractor or subcontractor to reinstate the employee in the position he/she held prior to the reprisal, together with compensation (including back pay), employment benefits, and other terms and conditions of employment that would apply to the person in that position if the reprisal had not been taken;
- (3) Ordering the contractor or subcontractor to pay the employee an amount equal to the aggregate amount of all costs and expenses (including attorney's fees and expert witness fees) reasonably incurred by employee for, or in connection with, bringing the complaint regarding the reprisal.

DEFINITIONS

The following descriptions of terms used in this Policy are intended to assist your understanding of this Policy.

1. *Good Faith.* Good faith exists when the report is made without ill intent or consideration of personal benefit and the reporter has a reasonable basis to

believe that the report is true; provided, however, a report does not need to be proven to be true to be made in good faith. Good faith is lacking when the report is made maliciously or is known by the reporter to be false.

2. *Financial Wrongdoing.* Examples of financial wrongdoing include, but are not limited to, fraud, including fraud relating to accounting, internal control or auditing matters, violation of securities laws, violation of a rule or regulation of the Securities and Exchange Commission and violation of federal or state laws relating to fraud against stockholders.
3. *Non-Financial Wrongdoing.* Examples of non-financial wrongdoing include, but are not limited to, violations of the Company's Code of Business Conduct and Ethics or other Company policies, sexual and racial harassment, false statements made to other employees, clients or any other party, violations of state and federal employee safety and health laws and any other illegal activities.
4. *Adverse Employment Action.* Examples of adverse employment action include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotions, denial of benefits, or denial of compensation as a result of the employee's report of wrongdoing, or any act against an employee in the terms and conditions of employment because of any other lawful act undertaken by the employee pursuant to this Policy, Section 806 of the Sarbanes Oxley Act of 2002 or the Dodd Frank Wall Street Reform and Consumer Protection Act.

Last reviewed December 19, 2024