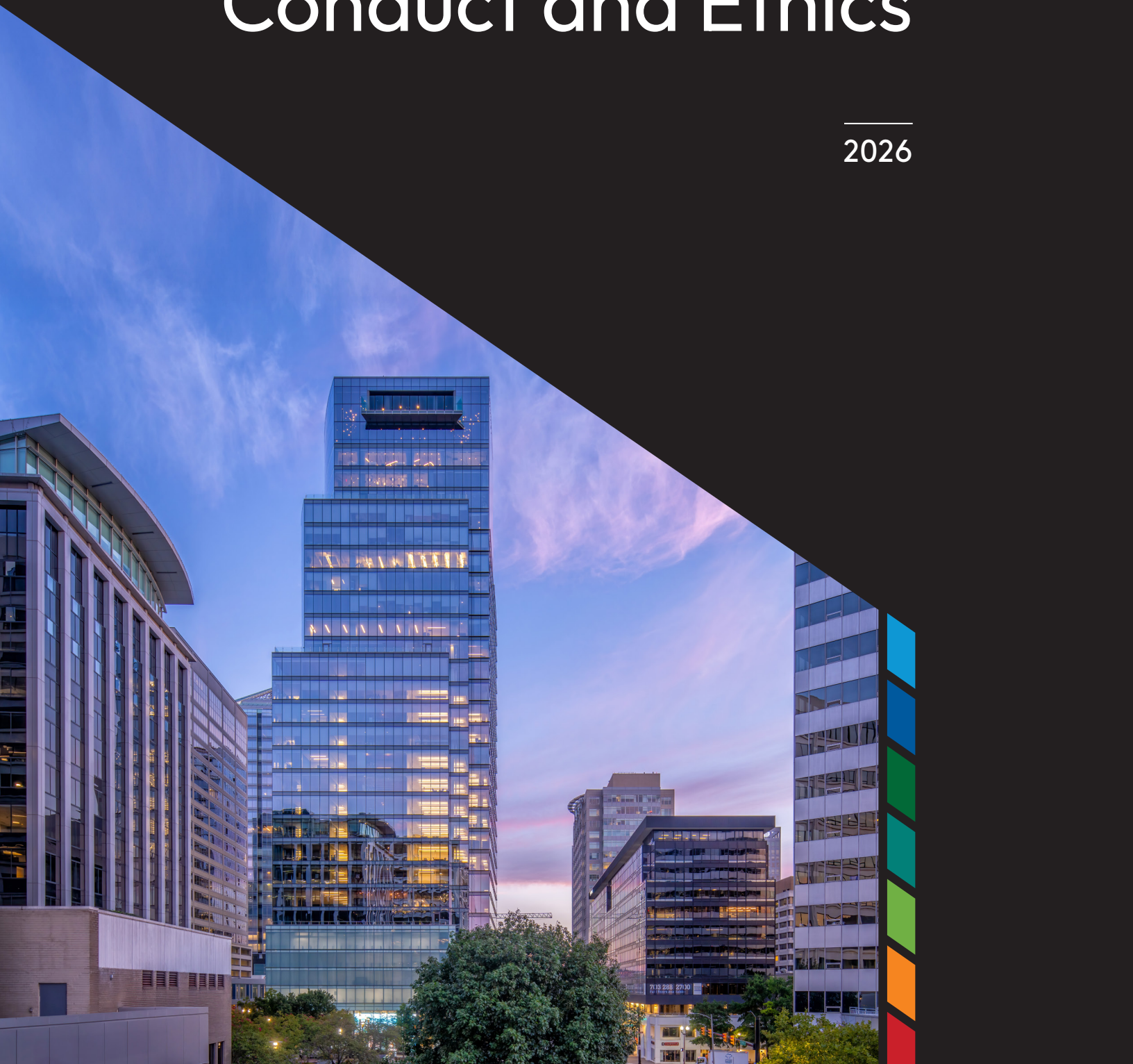




# Code of Business Conduct and Ethics

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2026





## Message from the CEO



At CoStar Group, our mission is bold and transformative: to digitize the world’s real estate and empower people everywhere with the insights and connections that elevate their businesses and lives. This mission is only possible because of you – your integrity, commitment, and collaboration drive everything we achieve.

Our Code of Business Conduct & Ethics serves as a compass for how we operate, innovate, and build extraordinary connections and products. It reminds us to act with integrity, respect one another, and work together to embrace and drive change—both within our company and across the real estate industry.

We’ve built the best teams in the business, and I expect each of us to uphold this Code with the same excellence and commitment that define our products and culture. Compliance isn’t just about policies - it’s about living our values every day, in every decision, every interaction, and every innovation. This is how we keep our customers at the center, strengthen our teams, and continue to build a company we’re proud to be part of.

Thank you for everything you do to make CoStar Group a company that leads with integrity and purpose.

**Andy Florance**  
Founder & CEO

## Commitment to Excellence and Ethical Conduct

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Commitment to excellence and ethical conduct is fundamental to the philosophy of CoStar Group, Inc. and its subsidiaries and affiliates (collectively, “CoStar” or the “Company”). This commitment to excellence means that CoStar’s directors, officers and employees worldwide share a common set of objectives and benefit from the achievement of those objectives. One essential objective is our conviction to uphold ethical standards in all our corporate activities. The purpose of this Code of Business Conduct and Ethics (the “Code”) is to provide basic guidelines for situations in which ethical issues arise to allow all of us to uphold and strengthen CoStar’s ethical standards.

This Code applies to all of CoStar’s directors, officers, employees, and contractors in all businesses and all countries, unless otherwise specifically noted. Employees must comply with all applicable local laws in the jurisdiction in which they work. If there appears to be a conflict between this Code and any law, employees must comply with the applicable law and promptly raise the conflict to their immediate manager and the Legal Department.

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### THIS CODE CAN HELP YOU

Act honestly & ethically

Protect CoStar’s assets & brands

Comply with applicable laws, rules, & regulations

Know who to contact with questions or concerns

Be accountable & adhere to CoStar policies

Support our Community & Culture



## QUESTIONS OR CONCERNS?

No code or policy can anticipate every situation that may arise. We have resources to help you. If you have any questions or concerns, start with your manager or a manager you trust or reach out to any of the following resources.

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### Questions about laws & regulations

RESOURCES TO HELP:  
Legal Department

[Compliance@costar.com](mailto:Compliance@costar.com)

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### Employees located in Australia

RESOURCES TO HELP: All resources listed above but please also refer to [Exhibit 9](#) for additional information about making a report. You can make your report anonymously if you wish to do so.

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### Political contributions made on behalf of CoStar

RESOURCES TO HELP:  
Legal Department

[Gifts & Contributions Register \(GCR\)](#)

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### Policies referenced in this code of conduct

RESOURCES TO HELP: Legal Department

Navex Policy Center via [MyApps](#)

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### Questions about Privacy

RESOURCES TO HELP:  
Legal Department

[Legal Request Submission Form](#)

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### Gifts & charitable donation requests

RESOURCES TO HELP: Legal Department

[Gifts & Contributions Register \(GCR\)](#)

For Domain Employees, see additional information on [Exhibit 9](#)

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### Conflicts of interest disclosures

RESOURCES TO HELP:  
Human Resources

[Workday](#)

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### Violations of the Code, other Company policies or the law

RESOURCES TO HELP: Your manager, your Human Resources Business Partner (HRBP), the Legal Department or CoStar's anonymous Compliance Hotline

Human Resources:  
[AskHR](#)

Legal Department:  
[Compliance@costar.com](mailto:Compliance@costar.com)

Anonymous Reporting Line:  
[costar.navexone.com](http://costar.navexone.com)

Country Specific Compliance Anonymous Hotline Phone numbers on [Exhibit 10](#)

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### Questions about the Code

RESOURCES TO HELP: Your manager, your Human Resources Business Partner (HRBP) or the Legal Department

Human Resources:  
[AskHR](#)

Legal Department:  
[Compliance@costar.com](mailto:Compliance@costar.com)

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### Concerns or complaints about employment or workplace issues

RESOURCES TO HELP: Human Resources

[AskHR](#)

## REPORTING MISCONDUCT

If an employee of CoStar becomes aware of any violation or any potential violation of this Code, local law, or any other CoStar policy, they should report it as soon as possible in accordance with the resources listed above. Reporting potential or actual illegal or unethical conduct is important because failure to report criminal activity can itself be understood to condone the crime and, in some cases, may result in criminal liability. Failure to report knowledge of wrongdoing may in certain circumstances be considered a violation of this Code.

## PROTECTION AGAINST RETALIATION

Any employee who reports a known or suspected violation of this Code, or any known or suspected illegal or unethical behavior by another party will be treated with dignity and respect and will not be subjected by CoStar to any form of corrective action or retaliation for reporting such known or suspected violation or illegal or unethical behavior.

It is the policy of CoStar to prohibit retaliation against an individual who proposes to report, may report or has reported known or suspected illegal or unethical behavior or violations of this Code or laws, or for providing assistance in the investigation of ethical concerns or alleged misconduct. Acts of retaliation should be reported immediately using the [resources](#) in this Code. In appropriate cases, an employee who engages in retaliation may be subject to civil and/or criminal liability.

## INVESTIGATION PROCESS

Any use of these reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of this Code. In addition, employees should not use CoStar's compliance hotline for personal grievances

that do not involve (1) known or suspected violations of this Code or other CoStar policies, (2) known or suspected illegal or unethical behavior, or (3) good faith claims of retaliation.

Employees can choose to identify themselves to facilitate CoStar's investigation of the report. CoStar will use best efforts to protect the identity of any person who reports potential misconduct, and no retaliation will be permitted by CoStar against employees that make such reports. However, if employees wish to make a report anonymously, they may do so. CoStar will also use best efforts to protect the identity of the person about or against whom an allegation is brought, unless and until it is determined that a violation has occurred. Any person involved in an investigation is expected to cooperate fully and must not discuss or disclose information about the investigation to anyone unless required by law, in cooperation with law enforcement, or when seeking their own legal advice.

Once a report is received, CoStar will investigate it promptly and thoroughly. All employees are expected to cooperate in investigations fully and candidly. CoStar will take disciplinary action, up to and including termination, as appropriate, based on a finding that there was a violation of this Code.

If an employee submits or is the subject of a report under this Code, their personal data may be processed in accordance with applicable data protection laws. For more information about how CoStar handles employee data, including rights of access, rectification, and objection, please refer to the applicable employee privacy policy.

# Acting with Integrity

## CONFLICTS OF INTERESTS

Employees are required to refrain from any action or interest that conflicts with, or may reasonably be expected to conflict with, CoStar’s interests. A “conflict of interest” exists whenever an individual’s private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of CoStar.

A conflict may arise when an employee takes actions or has personal interests that may make it difficult to perform their work for CoStar objectively and effectively. For example, conflicts of interest may arise when an employee or a member of their family receives improper personal benefits as a result of the employee’s position with CoStar, whether from a third party or from CoStar directly. A conflict of interest may also arise if an employee conducts business on behalf of CoStar with a member of their family. Moreover, a conflict of interest may arise if an employee conducts business on behalf of CoStar with an entity in which the employee or a family member has an interest, including if the employee or a family member works for an entity that conducts business with CoStar or is a competitor of CoStar, or if the employee or a family member receives a financial or personal benefit from an entity that is a vendor or client of CoStar.

Because conflicts of interest may not always be evident, employees are encouraged to raise questions about particular situations in accordance with the [resources](#) listed in this Code and seek advice as to whether an activity presents a conflict of interest.

## OUTSIDE EMPLOYMENT

CoStar requires that each employee reports any other current employment (including self-employment or public office) that the employee may have or may consider taking while continuing employment with CoStar in accordance with the [resources](#) listed in this Code. CoStar retains the right to determine whether this outside employment creates an actual or potential conflict with CoStar’s policies and procedures, the employee’s assigned duties at CoStar or scheduling assignments, or the employee’s ability to provide their best efforts to CoStar business.

### CONFLICTS THAT SHOULD BE DISCLOSED



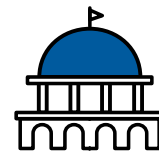
Outside Employment



Romantic Relationships or Relatives



Outside Board Memberships



Public Office

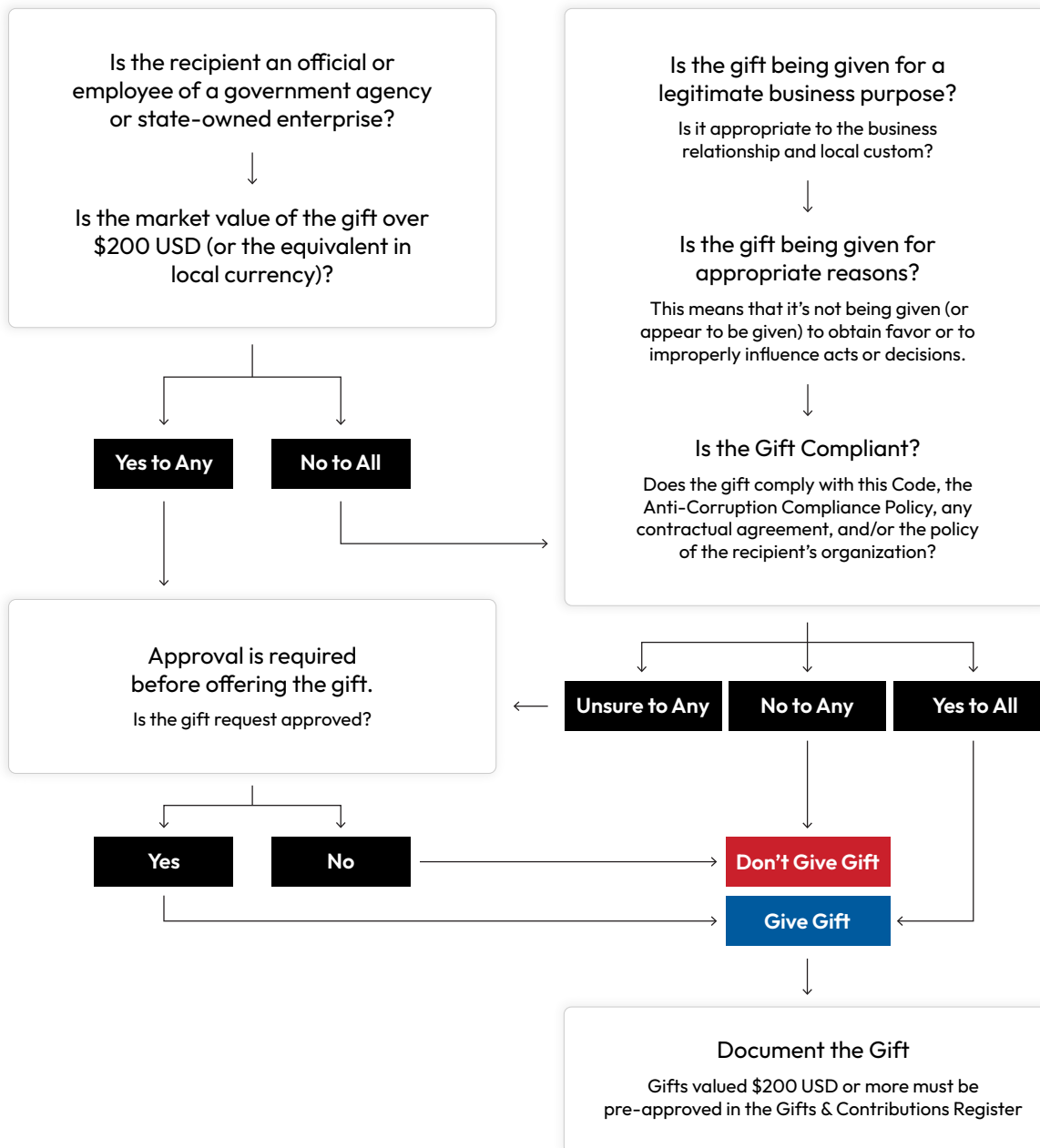


Personal relationships with third-parties (customers, suppliers, partners, etc.)

## GIFTS

The purpose of gifts is generally to create goodwill, but, in some circumstances, this practice can create conflicts of interest and may be considered a bribe or unethical conduct. Gifts may unduly influence judgment or create a feeling of obligation, and under those circumstances they should not be given or accepted. CoStar’s policy on gifts can be found in the [Anti-Corruption Compliance Policy](#). Gifts given and accepted on behalf of the Company in excess of \$200 USD need to be pre-approved before giving or accepting by submitting in CoStar’s Gifts & Contributions Register (“[GCR](#)”) in accordance with CoStar’s Anti-Corruption Compliance Policy. For the Domain business, prior approval of the Domain Chief Financial Officer or person holding equivalent office is required before giving or accepting gifts or hospitality over \$500 AUD.

### WHEN IS A GIFT APPROPRIATE?



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## WORKPLACE RELATIONSHIPS AND CONFLICTS OF INTEREST

Employees are expected to disclose any relationship that could reasonably be seen as impacting fairness, impartiality, so appropriate steps can be taken to manage potential conflicts.

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## CHARITABLE DONATIONS

Charitable Donations require pre-approval from an officer of the Company. Donations >\$1,000 USD require pre-approval from the General Counsel.

## POLITICAL CONTRIBUTIONS

Political Contributions in any amount require pre-approval from the General Counsel.

**Record charitable donations and political contributions, including evidence of pre-approval in the Gifts and Contributions Register.**

## INTERPERSONAL RELATIONSHIPS & EMPLOYMENT OF RELATIVES

The employment of immediate relatives or of persons in a romantic relationship with a current employee is prohibited if there is a conflict of interest. CoStar strongly discourages romantic relationships between managers and their direct reports (or any subordinates) or other relationships where influence over an employee's performance may exist (for example, a trainer and trainee) because of the potential conflict of interest that may arise. Managers are prohibited from being involved in performance evaluations, promotions or pay of a person that is a relative or with whom they are romantically involved. Each participant in such a relationship must disclose it to the Human Resources Department in accordance with the resources in this Code.

## CHARITABLE DONATIONS AND SPONSORSHIPS

No charitable donations or sponsorships may be offered or provided in exchange for any favor or benefit to the Company. Charitable donations made on behalf of the Company must be directed only to legitimate, properly registered charitable organizations. Donations must not be made to individuals, unregistered entities, or organizations lacking appropriate charitable status. Additional information regarding charitable donations and sponsorships is provided in CoStar's [Anti-Corruption Compliance Policy](#).

## POLITICAL CONTRIBUTIONS

CoStar requires that all political contributions (including contributions to political action committees) made on behalf of the Company are pre-approved in writing by the General Counsel and are made in compliance with local law. CoStar does not reimburse or provide funding to individual employees for political contributions made in their personal capacity. Additional information regarding political contributions is provided in CoStar's [Anti-Corruption Compliance Policy](#).



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A conflict exists if your actions and decisions at work cannot be objectively and impartially executed due to relationships or personal interests.

If you have an actual or potential conflict of interests, discuss it with your Manager, your HRBP and disclose the matter via Workday.

### **CORPORATE OPPORTUNITIES**

Employees of CoStar are prohibited from pursuing personal opportunities discovered through the use of corporate property or their role at CoStar, or in which they anticipate that CoStar might have an interest, to benefit themselves. No employee may use corporate property or information or their position for improper personal gain, and no employee may compete with CoStar directly or indirectly.

### **SPECIAL ETHICAL OBLIGATIONS**

Employees in certain roles or engaging in certain activities must adhere to the special ethical considerations associated with the applicable role or activity. In addition to this Code, employees must adhere to the standards in the applicable exhibit:

**Exhibit 1**

Antitrust and Competition Law Compliance.

**Exhibit 2**

Participation in Company Auctions.

**Exhibit 3**

Customer Service.

**Exhibit 4**

Product Development & Systems.

**Exhibit 5**

Research.

**Exhibit 6**

Field Research & Photography.

**Exhibit 7**

Sales Organization.

**Exhibit 8**

Finance, Accounting & Special Responsibilities for Financial Officers.

**Exhibit 9**

Employees located in Australia

# Protecting CoStar Assets

## PROTECTION OF COMPANY ASSETS

All employees are responsible for safeguarding the tangible and intangible property of CoStar and its customers and suppliers.

## COMPANY PROPRIETARY AND OTHER CONFIDENTIAL INFORMATION

All employees must protect the confidentiality of all proprietary, non-public, and sensitive information related to the Company in accordance with CoStar's [Proprietary Information and Trade Secret Policy](#).

## FINANCIAL REPORTING

CoStar requires honest, accurate and timely recording and reporting of information to make responsible business decisions. All of CoStar's books, records, accounts, and financial statements must be timely, be maintained in reasonable detail, accurately and appropriately reflect CoStar's transactions and conform to applicable legal and accounting requirements, including requirements for preservation of books and records. Please carefully review [Exhibit 8](#) which reinforces the Code of Conduct with respect to these activities and services.

## RECORD-KEEPING

CoStar requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true and actual number of hours worked should be reported, and all expense reports must contain only legitimate expenses. Whenever it becomes apparent that documents of any type will be required in connection with a lawsuit or government investigation, all potentially relevant documents must be preserved, and ordinary

disposal or alteration of documents pertaining to the subjects of the litigation or investigation should be immediately suspended. In ordinary course, documents must be preserved in accordance with the requirements of local law and CoStar's applicable record retention policy. If an employee is uncertain whether documents under their control must be preserved or about the types of documents that must be preserved, they should contact the Legal Department in accordance with the [resources](#) listed in this Code.

## THEFT AND FRAUD

All employees are responsible for the proper use of CoStar's resources and property, as well as its confidential information. Any employee found to be engaging in, or attempting, theft of any property of CoStar, including documents, products or services, equipment, intellectual property, personal property of other employees, cash or any other items of value will be subject to immediate termination and possible civil or criminal action. In addition, allowing third parties to use CoStar's services without a proper license agreement or outside the scope of the license agreement may constitute theft of CoStar's intellectual property. All employees have a responsibility to report any theft or attempted theft to their respective managers or the Legal Department in accordance with the [resources](#) listed in this Code.

## PRICING AND LICENSE CONTROLS

All sales personnel must comply with CoStar's internal pricing policies and with CoStar's licensing policies. For example, CoStar generally establishes its contract rates based upon a client's number of sites, number of users, organization size, business focus, geography, the number and types of

services to which such client subscribes, the number of properties a client advertises and the prominence and placement of a client's advertised properties in search results and requires that each client company have its own license and that each user be identified. Employees are prohibited from submitting false information on a contract to circumvent CoStar's pricing or license controls, knowingly allowing access to CoStar's services by non-clients (unless approved by an officer of CoStar), knowingly allowing access to CoStar's services by competitors, or knowingly being involved in similar situations harmful to CoStar. Any employee that learns of any violation of this policy should report it to their manager or the Legal Department in accordance with the [resources](#) listed in this Code.

### SOCIAL MEDIA

Employees must adhere to this Code when using social media, whether personally or professionally, and ensure that any representation of the Company is accurate and respectful. Employees should refer to CoStar's [Social Media Policy](#).

### USE OF LARGE LANGUAGE MODELS ("LLM")

To protect CoStar's proprietary information and maintain compliance with data security and confidentiality obligations:

No employee may input, upload, or otherwise disclose any CoStar proprietary, confidential, or non-public information into any commercially available LLM or Artificial Intelligence (AI) tool (such as ChatGPT, Claude, Gemini, etc.) unless such LLM or AI Tool has been approved for use by CoStar and you have received an enterprise-wide license. Speak to your manager about accessing an LLM or AI Tool at the office.

Proprietary and Confidential information includes, but is not limited to, customer data, financial information, internal communications, product designs, source code, business strategies, and any other sensitive or protected content developed by CoStar.

Use of commercially available and open LLMs must be limited to general-purpose inquiries that do not involve CoStar-specific data or intellectual property.

For additional Information refer to CoStar's [Artificial Intelligence Tool Policy](#).



# Compliance with Laws, Rules and Regulations

## COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Obeying the law, both in letter and in spirit, is one of the foundations on which CoStar's ethical standards are built. All employees must respect and obey the laws of the various jurisdictions in which CoStar operates. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from managers or other appropriate personnel.

## INSIDER TRADING

In the course of employment with CoStar, employees may learn or receive information about CoStar or other entities that is not available to the public. Because of the employment relationship with CoStar, employees have certain responsibilities under the US federal securities laws (or comparable securities or related laws in other jurisdictions) regarding insider information and the trading of securities. Employees should refer to the [Insider Trading Compliance Policy](#) for additional information.

## COMPLETE, ACCURATE AND TIMELY DISCLOSURE

CoStar is a publicly traded company whose shares are listed for trading on the Nasdaq Stock Market. As a result, CoStar is obligated to make various disclosures to the public. CoStar is committed to full compliance with all requirements related to its public disclosures and has implemented disclosure controls and procedures to ensure that its public disclosures are timely, compliant and otherwise full, fair, accurate and

understandable. All employees responsible for the preparation of CoStar's public disclosures, or who provide information as part of that process, must ensure that such disclosures and information are complete, accurate and in compliance with CoStar's disclosure controls and procedures.

Pursuant to the SEC's Regulation Fair Disclosure, in the event Material, Non-Public Information (defined below) is disclosed outside of CoStar, CoStar may be obligated to immediately make public disclosure of that information. If an employee becomes aware of a disclosure of Material, Non-Public Information, whether intentional or unintentional, they should immediately bring the disclosure to the attention of CoStar's Legal Department in accordance with the [resources](#) listed in this Code.

"Material" means likely to have a significant effect on the market price of a security (also understood to mean a substantial likelihood that a reasonable investor would consider the information important in making an investment decision.)

"Non-Public Information" means information not broadly disseminated to the general public so that investors have been able to factor the information into the market price of the security.

## RESPONDING TO GOVERNMENT REQUESTS

CoStar cooperates with government investigations and inquiries in an appropriate and lawful manner. All requests from law enforcement and other government agencies (e.g., subpoenas, audits, inspections) must be referred to the Legal Department in

accordance with the [resources](#) listed in this Code. Employees must never respond directly to such requests unless authorized by Legal. Employees must not alter, conceal, or destroy any documents or records in anticipation of or in response to a request for information.

### BRIBERY, KICKBACKS AND FRAUD

CoStar has a zero-tolerance policy for all forms of bribery, kickbacks and fraud. Employees must not engage in any conduct intended to improperly influence business decisions or gain an unfair advantage, whether through payments, favors, or other unethical means. Employees should refer to CoStar's [Anti-Corruption Compliance Policy](#).

### RELATIONSHIPS WITH THIRD PARTIES

CoStar is committed to maintaining business relationships with reputable third parties that act ethically and legally. Prior to entering into a relationship with a third party, CoStar expects that its employees will conduct appropriate due diligence in accordance with its procedures to identify red flags, or circumstances suggesting that a third party may have engaged or may be engaging in illegal or unethical conduct. Employees should escalate red flags or suspected illegal or unethical activity discovered prior to commencement or during the course of the business relationship to the Legal Department in accordance with the [resources](#) listed in this Code to determine whether continuation of the relationship is appropriate.

### MONEY LAUNDERING

CoStar prohibits its employees from engaging in and will not conduct business with any third party that engages in, any activity that constitutes or facilitates money laundering, terrorist financing or any other illegal activity. Employees must immediately report to the



Legal Department, in accordance with the [resources](#) listed in this Code, any red flags suggesting that a business partner has or is engaged in or may engage in money laundering or terrorist financing.

### ECONOMIC SANCTIONS, IMPORT/EXPORT LAWS AND TRANSACTIONS RELATED TO SANCTIONED OR EMBARGOED REGIONS POLICY

CoStar is committed to complying with all applicable laws and regulations governing economic sanctions, export, import and trade control. Employees responsible for conducting due diligence on a third party must carefully screen for and report to the Legal Department, in accordance with the [resources](#) listed in this Code, any indication that conducting business with the individual or entity may violate any applicable economic sanctions or trade laws.



## COMPETITION AND FAIR DEALING

CoStar seeks to outperform its competition fairly and honestly. The Company seeks competitive advantages in the market based on the quality of its products and services, and not through illegal or unethical business practices. Each employee should endeavor to respect the rights of and deal fairly with CoStar’s customers, suppliers, and competitors. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair dealing practice.

CoStar operates in a competitive market. As a result, antitrust and competition laws are an important aspect of everyday business life. The antitrust laws are complex and must be strictly followed. Antitrust laws typically prohibit “restraints of trade,” and prohibit restrictive agreements and business practices that lead to an abuse of market position, and certain conduct involving competitors, customers or suppliers in the marketplace. Their purpose is to ensure that markets for services operate competitively and efficiently, so that customers enjoy the benefit of open competition.

CoStar collects certain data in connection with its analysis and benchmarking services, which may be competitively sensitive. Employees involved in the collection and use of such data must comply with applicable antitrust and competition laws and regulations, as relates to pricing information, surveys, benchmarking and forward-looking projections. Please carefully review [Exhibit 1](#) which reinforces the Code of Conduct with respect to these activities and services.



## Our Culture and Community

CoStar is committed to fostering a work environment in which all individuals are treated equally and with dignity and respect. CoStar is committed to promoting equal employment opportunities and will not tolerate any bias or prejudice based on factors such as orientation, gender identity, sex change or transgender status, marital status, disability, genetic information, military or veteran status, or any other characteristics protected by applicable law. Employees should refer to CoStar’s policies relating to equal employment opportunity and anti-discrimination.

### HARASSMENT

CoStar has zero tolerance for any inappropriate conduct or behavior that is humiliating, intimidating or hostile. CoStar expects that all relationships among persons in the workplace, both internally and externally, will be professional in nature and that all employees will treat each other with respect and integrity. Any harassment, such as using offensive or abusive language or gestures, any discriminatory remarks, intimidating or threatening behavior, sexually explicit or derogatory comments, images or messages, and unwelcome sexual advances are strictly prohibited. Employees should always use good judgment in their interactions. Please refer to CoStar’s policies relating to non-harassment.

### HEALTH AND SAFETY

CoStar is committed to providing a safe and healthy workplace. All employees must comply with all applicable health and safety laws, regulations, or Company policies. Employees should refer to the [Safety in the Workplace Policy](#).

### DRUGS AND ALCOHOL

CoStar is committed to maintaining a workplace free of drugs and alcohol abuse in order to ensure a safe, healthy and productive work environment for employees and others. Employees should refer to CoStar’s [Drug and Alcohol-Free Workplace Policy](#).

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Do not swear at, intimidate, threaten, or act with disrespect towards employees, customers, suppliers or other individuals with whom you interact at work.

If you are about to send a message to someone while you are upset, frustrated, or angry, take a moment to reflect, re-read your message before you hit ‘send.’

## CUSTOMER/THIRD PARTY INFORMATION PRIVACY

CoStar takes the protection of privacy for its customers, consumers and other third parties that have entrusted CoStar with personal data very seriously. CoStar must protect personal data that it is entrusted with during the course of work and ensure all such data is kept secure and private. All employees are required to follow applicable laws, regulations and CoStar policies related to privacy and information security. All employees must safeguard all confidential information and personal data of CoStar customers, consumers and other third parties share with CoStar by ensuring that their confidential information and personal data are only used for the reasons to which such customers, consumers and third parties consented and for which the confidential information or personal data was gathered. Employees are prohibited from accessing this data unless they have a business reason for doing so consistent with the purposes for which the information was gathered. Employees must also take steps to protect confidential information and personal data against unauthorized access, use or release, and to ensure that personal data is not held for longer than permitted under applicable data privacy laws. If any employee has questions concerning a specific situation, they should contact the Legal Department in accordance with the [resources](#) listed in this Code.

## EMPLOYEE PRIVACY INFORMATION

CoStar respects the privacy of its employees. CoStar collects and handles personal employee information only for employment, reporting and other business purposes and in compliance with applicable law. Access to personal employee information is limited only to those who have a legal right to access the information, and then only on a need-to-know basis for the performance of their job. Those who handle personal data are advised on a regular basis of their duty to maintain the confidentiality of this information. All employees are permitted to



review and comment on information contained in their personnel records maintained by CoStar and may perform other actions with their records as allowed by applicable data privacy laws. If any employee has questions concerning a specific situation, they should contact the Legal Department in accordance with the [resources](#) listed in this Code.

## THIRD PARTY INTELLECTUAL PROPERTY RIGHTS

It is CoStar's policy to provide the most accurate, comprehensive commercial real estate information in the marketplace, while respecting the intellectual property rights of others, including third-party trademarks, copyrights, trade secrets and confidentiality obligations, and website terms of use. Employees

should refer to CoStar's [Third-Party Intellectual Property Policy](#).

### WAIVERS OF THE CODE

Any waiver of this Code for an employee may be made only by the Chief Executive Officer, Chief Financial Officer, or General Counsel of CoStar after disclosure of all material facts by the individual seeking the waiver. Any waiver of this Code, including Exhibit 8, for any officer of CoStar, CoStar's non-executive directors, or for CoStar's Chief Financial Officer, Chief Accounting Officer, or Controller (or persons performing similar functions) may be made only by the independent directors of the Board of Directors. Such waiver will be promptly disclosed if required by law or by applicable stock exchange or securities regulations.

### COMPLIANCE WITH THE CODE

A violation of any provision of this Code may result in disciplinary action, up to and including termination from employment for cause, without additional warning, subject to any limitations imposed by local law. Nothing in this Code prohibits or restricts CoStar from taking any corrective action on any matters pertaining to employee conduct, whether or not they are expressly discussed in this Code, and nothing in this Code creates a separate employment contract between CoStar and any of its employees.

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**Approved by Board:** December 17, 2025

**Effective Date:** January 1, 2026

# Employee Certification

Questions related to any provision of the Code and whether any specific set of circumstances should be reported may be directed to the Legal Department or the Human Resources Department at CoStar Group, Inc., 1201 Wilson Blvd., Arlington, VA 22209.

The Legal Department and the Human Resources Department may also be reached by telephone at +1 (202) 346-6500 or +1 (800) 204-5960 or via e-mail at [Compliance@costar.com](mailto:Compliance@costar.com) or [CoStarGroupHR@costar.com](mailto:CoStarGroupHR@costar.com) or [CoStarGroupHRInternational@costar.co.uk](mailto:CoStarGroupHRInternational@costar.co.uk), respectively.

1. I certify that I have read and understand CoStar's Code of Business Conduct and Ethics, including any Exhibits applicable to my department, effective January 1, 2026, as amended (collectively, the "Code").

2. Check either (a) or (b) below:

I certify that I am not now involved, and during the past 12 months, have not been involved in any violations of the Code nor have I engaged in any conduct which violated any laws or policies referenced in the Code.

(a) no exceptions

(b) except as described in the space below or in the attached statement\*

3. Check one of (a), (b) or (c) below:

I certify that I do not currently have, and have not had during the past 12 months, any conflicts-of-interest, including outside employment, self-employment, or service in a public office, that have not been disclosed and approved.

(a) no exceptions

(b) I have outside employment or potential conflict-of-interest, and it has been disclosed and approved

(c) I have outside employment or a potential conflict-of-interest, but I need to obtain approval from CoStar

4. I certify that I understand my continuing obligation to report any violations of the Code or any laws. I will direct any questions related to this Code or report any such conduct to my HR Business Partner, to CoStar's Legal Department, to CoStar's General Counsel, to the Chief Human Resources Officer, or through CoStar's compliance hotline.

5. I understand that failure to comply with the foregoing may result in disciplinary action, up to and including termination of employment.

*\*If you have an exception(s) to items 2 and/or 4 above and wish to maintain confidentiality as to your exception mark the box for "no exceptions" and report the potential violation(s) (1) in accordance with the resources listed in this Code, or (2) in writing to the attention of the General Counsel using the following address: CoStar Group, Inc., 1201 Wilson Blvd, Arlington, VA 22209, or (3) by contacting the compliance hotline set forth on Exhibit 10.*

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**Signature**

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**Date Name and Title (Please Print)**

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**Department**

## EXHIBIT 1 – Antitrust and Law Compliance

This exhibit to the Code of Conduct reinforces the Code of Conduct with respect to employees' compliance with antitrust and competition laws in connection with CoStar's collection of third-party data that may be competitively sensitive in connection with CoStar's analytics and benchmarking services.

CoStar Group's mission is procompetitive – to democratize information and data for all CoStar Group users. CoStar has invested its time, effort, and resources in building databases with information that allows CoStar Group to complete its mission. Ultimately, CoStar Group users are provided with data so that they can drive innovations and improve their own independent business decision-making.

CoStar Group does not make decisions for its clients and customers, and employees should not suggest or imply that CoStar Group's offerings are intended to or will drive price or revenue increases, or lead to any specific economic outcomes. Nor should CoStar Group employees inaccurately imply that CoStar Group offerings can be used to coordinate decision-making with other actors.

CoStar Group offers a number of different data products, with different inputs. For some products, such as CoStar Group's hospitality data product, the information provided to customers and displayed is aggregated and anonymized. Accordingly, it is important for employees working with any such data to ensure that it remains confidential. CoStar expects anyone acting on its behalf or representing CoStar to fully comply with all applicable antitrust and competition laws and regulations.

No CoStar employee shall engage in any conduct that could be perceived as facilitating or enabling any express or implied agreement or understanding among customers who are competitors.

Employees must follow CoStar's established policies and requirements regarding the collection and dissemination of information from our customers and data contributors. If employees are unclear as to what these requirements are, please contact the Legal Department.

No CoStar employee shall engage in activities that would constitute an agreement or understanding with or among a customer's competitor or

competitors to set, control, recommend, or otherwise influence prices of products and services, including agreements or understandings to use a common starting point in competitive bidding.

Employees are not to enter into discussions, understandings, or agreements among CoStar’s customers who are competitors not to compete with respect to certain other parties or geographic areas or to refuse to deal with certain other parties.

**CoStar employees who collect, view and/or work with competitively sensitive data and clients are not permitted to say or do anything during a presentation, conference or other gathering where customer employees, agents or representatives are present that either, directly or indirectly, encourages any particular action with regard to setting of prices or rates.**

Employees should also be careful not to become involved in similarly inappropriate activities or discussions at trade associations or industry conferences, which are frequently targeted by antitrust enforcement authorities. If an employee finds themselves in a situation where they believe price “fixing” or other potentially anti-competitive discussions or activities are taking place, the employee should excuse themselves immediately and in such a manner that other participants are aware of the employee’s departure, then contact the Legal Department.

CoStar cooperates, to an extent reasonable and practical, with any legitimate antitrust or competition investigation by a U.S. federal or state agency or similar foreign governmental entity. Any CoStar employee contacted by a representative of the U.S. Department of Justice, Federal Trade Commission, Federal Bureau of Investigation, state attorney general’s office, or other investigator, or similar foreign governmental entity must report such a contact immediately to the Legal Department in accordance with the [resources](#) listed in this Code. Any request for data, copies of documents, or a review of files by a government investigator must be referred to the Legal Department before any information is provided. This procedure must be followed whether the request is in writing or made orally.

# EXHIBIT 2 – Participation in Company Auctions

This exhibit to the Code of Conduct reinforces the Code of Conduct with respect to conflicts of interest that may arise in connection with the Company’s operation of online auctions (each, a “Company Auction”).

<p><b>Participation as a Seller in Company Auctions</b></p>	<p>CoStar Employees may participate as Sellers in Company Auctions, subject to the following conditions:</p> <ul style="list-style-type: none"> <li>i. <b>Manager Notification:</b> CoStar Employees must provide prior notification to their immediate supervisors that they plan to participate as a Seller in a Company Auction.</li> <li>ii. <b>No Special Treatment:</b> Except as expressly set forth in this Exhibit, CoStar Employees must follow all terms, conditions, policies and procedures generally applicable to other Seller participants in Company Auctions.</li> <li>iii. <b>No Access to Confidential Information:</b> CoStar Employees may not access, or have the ability to access, confidential information that could give them an unfair advantage. Example: Maximum proxy bids from prospective Buyers in Company Auctions.</li> <li>iv. <b>Disclosure on Property Display Page:</b> The applicable property’s display page must disclose to prospective Buyers that the Seller is a CoStar Employee. Example: “Seller is a CoStar employee.”</li> <li>v. <b>Personal Email Address:</b> CoStar Employees must use their personal email address, and not a work email address, in connection with their participation as a Seller in a Company Auction.</li> </ul>
<p><b>Participation as a Buyer in Company Auctions</b></p>	<p>In order to avoid any actual or apparent conflicts of interest (e.g. CoStar Employees may be privy to confidential information in connection with Company Auctions, such as the reserve price, or pricing guidance from the Seller or other buyers), CoStar Employees may not participate as Buyers in Company Auctions.</p>
<p><b>Participation as an Agent of a Seller or Buyer in Company Auctions</b></p>	<p>In order to avoid any actual or apparent conflicts of interest, CoStar Employees may not participate as agents of parties in Company Auctions (except to the extent required in connection with the CoStar Employee’s role in providing the Company Auction services).</p>

## EXHIBIT 3 — Customer Service

This exhibit to the Code of Conduct reinforces the Code of Conduct with respect to employees responsible for CoStar Customer Service. Specifically, examples of some acts that are prohibited by the Code of Conduct include, but are not limited to, directly or indirectly engaging in any the following:

1. Providing customer service to an individual that does not work for a licensee;
2. Where the licensee has been previously notified about the need to add Authorized Users, providing customer service to an individual that works for a licensee but is not an Authorized User;
3. Overlooking licensed users exceeding the scope of authorized access and use under the terms of their license agreement. Among other things, this prohibits overlooking a licensee sharing User IDs/ passwords, populating an internal database with content from CoStar, or providing content from CoStar to a competitor of CoStar;
4. Providing any person with access to or use of a CoStar subscription service other than the products and markets for which the person is an Authorized User under a license agreement with CoStar. Among other things, this prohibits: (i) disseminating content from the subscription-only areas of CoStar products to anyone that does not subscribe to the pertinent products and markets; (ii) sharing with anyone else a personal User ID/password to the CoStar products; (iii) providing any CoStar User ID/password to anyone that is not the Authorized User; or (iv) providing any internal CoStar User IDs/ passwords to anyone outside of CoStar; and
5. Providing anyone outside of CoStar with screen shots, exports, printouts or other copies of any portion of Enterprise.

No CoStar employee shall engage in any of the prohibited acts set forth above unless explicitly approved, in advance, by the VP of Customer Service, Senior VP of Research, or the Chief Executive Officer of CoStar.

## EXHIBIT 4 – Product Development & Systems

This exhibit to the Code of Conduct reinforces the Code of Conduct with respect to the CoStar Product Development & Systems. Specifically, examples of some acts that are prohibited by the Code of Conduct include, but are not limited to, directly or indirectly engaging in any of the following:

Unauthorized disclosure, use or copying (including without limitation screen shots, exports, printouts or other copies) of any portion of the CoStar products and services, including CoStar databases, software code, methodologies, processes, or models or other confidential or trade secret information;

1. Unauthorized installation, copying or use of any software applications from outside vendors;
2. Creating processes that an employee knows or should've known could maliciously interfere with the proper functioning of CoStar's products, systems or network;
3. Intentionally or knowingly developing any software or product designs from unauthorized sources;
4. Copying someone else's copyrighted material without proper authorization;
5. Misuse of administrative permissions, including unauthorized access to, use of and/or disclosure of information found on CoStar systems, emails, and network files;
6. Sharing with any other person any User ID and/or password to the CoStar products or systems; and
7. Disseminating content from the subscription-only areas of CoStar products to anyone who does not subscribe to the pertinent products and markets.

## EXHIBIT 5 – Research

This exhibit to the Code of Conduct reinforces the Code of Conduct with respect to employees responsible for CoStar Research. Specifically, examples of some acts that are prohibited by the Code of Conduct include, but are not limited to, directly or indirectly engaging in any of the following:

1. Initiating telephone calls to non-research related parties in an attempt to manipulate performance metrics;
2. Inputting information or making changes to Enterprise, that the employee knows to be inaccurate;
3. Failing to conduct independent research before inputting information or making changes to Enterprise. Independent research generally consists of obtaining information directly from one or more of the following:
  - i. an “involved” source in the transaction, such as the broker or representative, owner, tenant or property management firm, either via phone call, personal conversation, e-mail, text, a company press release, or specific referral to portions of a company’s website;
  - ii. public records; and
  - iii. personally inspecting a property.
4. Copying someone else’s copyrighted material without proper authorization;
5. Providing anyone outside of CoStar with screen shots, exports, printouts, or other copies of any portion of Enterprise;
6. Solicitating freelance work from CoStar’s clients;
7. Sharing with any other person any User ID/password to the CoStar products; and
8. Disseminating content from the subscription-only areas of CoStar products to anyone that does not subscribe to the pertinent products and markets; provided, that: (a) strictly for updating or marketing purposes, employees may provide a broker, property manager, owner or tenant with their own listings or tenant information; (b) if necessary to obtain or confirm a lead, employees may provide up to 1-3 comparables in exchange for equivalent detailed comparable information from the involved source; and (c) for marketing purposes, but not to fill a specific research need, employees may provide a prospect with up to 1-3 comparables or 1-3 listings.

No CoStar employee shall engage in any of the prohibited acts set forth above unless explicitly approved, in advance, by the SVP of Research, VP of Research, SVP of Global Operations, or the Chief Executive Officer of CoStar.

## EXHIBIT 6 – Field Research and Photography

This exhibit to the Code of Conduct reinforces the Code of Conduct with respect to employees responsible for CoStar Field Research. Specifically, examples of some acts that are prohibited by the Code of Conduct include, but are not limited to, directly or indirectly engaging in any of the following:

1. Providing any third party with building information, photographs or video that the employee collected, or shot during work hours or while using CoStar equipment;
2. Updating a Tenant record that the employee has not physically inspected or inputting information or making changes to Enterprise, Field Pro, or Scout that you know to be inaccurate, including, for example, submitting to CoStar a photograph that does not actually depict the assigned property;
3. Failing to conduct independent research before inputting information, submitting imagery or making other changes to Enterprise, Field Pro, or Scout. Independent research generally consists of obtaining information or imagery directly from one or more of the following:
  - i. an “involved” source in the transaction, such as the broker or representative, owner, tenant or property management firm, either via phone call, personal conversation, e-mail, text, a company press release, or specific referral to portions of a company’s web site;
  - ii. public records; and
  - iii. personally inspecting a property;
4. Copying someone else’s copyrighted material without proper authorization;
5. Providing anyone outside of CoStar with screen shots, exports, printouts, or other copies of any portion of Enterprise, Field Pro or Scout;
6. Sharing with any other person any User ID/password to the CoStar products; and
7. Disseminating content from the subscription-only areas of CoStar products to anyone that does not subscribe to the pertinent products and markets; provided that strictly for updating purposes, employees may provide a broker, property manager, owner or tenant with their own listings or tenant information.

No CoStar employee shall engage in any of the prohibited acts set forth above unless explicitly approved, in advance, by the SVP of Research, VP of Field Research, VP of Photography, SVP of Global Operations, or the Chief Executive Officer of CoStar.

## EXHIBIT 7 – Sales Organization

This exhibit to the Code of Conduct reinforces the Code of Conduct with respect to all members of the Company's sales organization and applies to all of CoStar's brands, products and services. Specifically, examples of some acts that are prohibited by the Code of Conduct include, but are not limited to, directly or indirectly engaging in any of the following:

1. Providing any person with access to or use of a subscription to a CoStar brand, product or service other than the brand, products and services for which the person is an Authorized User under a license or marketing agreement. Among other things, this prohibits:
  - i. disseminating content from the subscription-only areas of CoStar brands, products and services to anyone that is not an Authorized User under a license or marketing agreement and/or does not subscribe to the pertinent products and services (other than for approved client support, sales and prospect interactions);
  - ii. sharing with anyone else personal User ID/password to a CoStar products and services;
  - iii. providing any CoStar User ID/password to anyone that is not the Authorized User;
  - iv. providing any internal CoStar User IDs/passwords to anyone outside of CoStar and its brands; or
  - v. providing customer rates or contract terms, copyrighted photographs, leads, results or individual customer proprietary information .
2. Preparing, processing or approving a license agreement that an employee knows:
  - i. does not comply with the then-current CoStar pricing and licensing guidelines;
  - ii. contains false or inaccurate information;
  - iii. does not capture the true quantity of pertinent users or sites of a licensee; or
  - iv. identifies the licensee as an individual, small shop, or fake shop when such person is part of a larger unlicensed shop with commercial real estate information needs;
3. Overlooking licensed users exceeding the scope of authorized access and use under the terms of their license agreement. Among other things, this prohibits overlooking a licensee sharing User IDs/passwords, populating an internal database with content from CoStar, or providing content from CoStar to a competitor of CoStar;

4. Providing or altering information in Web Enterprise or a CoStar product's database (e.g. LoopNet) that the employee knows to be inaccurate with the purpose of circumventing CoStar's licensing, pricing or commission guidelines. Among other things, this prohibits changing the true number of pertinent users at a shop to facilitate a license agreement being approved or in an attempt to inflate commissions;
5. Knowingly allowing access to CoStar's products and services by, or selling CoStar's products and services to, a direct or indirect competitor of CoStar, or providing, disclosing or transmitting any portion of CoStar's products and services to a direct or indirect competitor of CoStar. A "direct or indirect competitor" includes employees, independent contractors and agents of CoStar's competitors; and
6. Deliberately manipulating product data, results or any other sales data to inflate commissions. Among other things, this prohibits using a client's User ID to make the user "active" or to increase the user's login/page hit activity.
7. Offering a credit or some other incentive to keep or earn business without receiving prior approval from an authorized approver.

If you have concerns or questions about the above, seek clarification from your leadership team.

## EXHIBIT 8 – Finance and Accounting

CoStar requires honest, accurate, transparent, and timely recording of information in order to make responsible business decisions. All of CoStar's books, accounts and financial statements must be timely, maintained in reasonable detail, accurately and appropriately reflect CoStar's transactions, and conform to applicable legal and accounting requirements, including requirements for preservation of books and records. Unrecorded or "off the books" funds or assets are not permitted under any circumstances. The accurate and timely reporting of Company financial results and financial condition requires that all financial information be recorded promptly and accurately, and that CoStar systems for recording and reporting that information be properly functioning and subject to regular and thorough evaluations.

CoStar adheres to global best practices in finance and accounting ethics and controls, continuously striving to improve Company processes. All financial reporting must follow applicable standards (such as U.S. Generally Accepted Accounting Principles (GAAP) and International Financial Reporting Standards (IRFS)), and employees are expected to uphold these standards of accuracy, integrity, and transparency in all transactions.

Any falsification of, or attempts to falsify, books and records, or any circumvention of, or attempts to circumvent, or failure to implement, CoStar's internal controls are prohibited and shall be deemed a violation of this Code. While not all employees may be familiar with accounting procedure, employees do need to make sure that every business record is accurate, complete and reliable. Employees must also support CoStar's

internal control processes and must not circumvent them; strong controls are vital to the integrity of Company financial operations.

In addition, no officer or employee, or any person acting under the direction thereof shall take any action to fraudulently influence, coerce, manipulate or mislead CoStar's independent public accountants engaged in the performance of an audit of CoStar's financial statements. Employees must also cooperate fully with both external and internal auditors and never withhold or distort information during any audit or review.

This policy also applies to all operating reports prepared for internal or external purposes. False, misleading or incomplete information impairs CoStar's ability to make good decisions, undermines trust in the long term, and may be illegal.

All employees are responsible for reporting any concerns regarding questionable accounting, auditing or internal control matters that may come to their attention in accordance with the Resources Provided in this Code.

Employees involved in mergers, acquisitions (M&A), or other strategic transactions must uphold the same ethical standards throughout the deal process. This includes conducting thorough and honest financial due diligence, accurately disclosing all relevant information, and maintaining strict confidentiality of non-public data. Any attempt to misrepresent facts or to misuse confidential information (such as engaging in insider trading) in the context of an M&A transaction is strictly prohibited and will be treated as a severe violation of this Code.

## SPECIAL RESPONSIBILITIES OF FINANCIAL OFFICERS

The Finance and Accounting Departments bear special responsibility for promoting honesty, integrity and ethical conduct throughout the organization, and are responsible to stakeholders both inside and outside of CoStar. The Chief Executive Officer, Chief Financial Officer and other personnel have a special responsibility to adhere to these principles themselves and to ensure that a culture exists throughout CoStar that ensures the fair and timely reporting of CoStar's financial results and condition.

Because of this special responsibility, the Chief Executive Officer, Chief Financial Officer and all other managers in the Finance and Accounting Departments are bound and agree to abide by the following principles ("Financial Officer and Manager Code of Ethics)."

Act with honesty and integrity, avoiding actual or perceived conflicts of interest involving personal and professional relationships.

Provide information, both in reports and documents filed with or submitted to the SEC (or securities regulators in other jurisdictions) or other public communications, that is full, fair, accurate, complete, objective, timely and understandable.

Comply with rules and regulations of all governmental entities, as well as other private and public regulatory agencies, to which CoStar is subject.

Act at all times in good faith, responsibly, with due care, competence and diligence, and without any misrepresentation of material facts.

Act objectively, without allowing their independent judgment to be compromised.

Maintain the confidentiality of CoStar information, except as authorized or required by law, and not use any CoStar information for personal advantage.

Promote ethical behavior among employees under their supervision at CoStar.

Support and maintain a robust system of internal controls and ensure that any co-sourcing or outsourcing of finance functions or audits is conducted in adherence to CoStar's ethical standards and internal policies.

Ensure responsible use of and control over all assets and resources of CoStar entrusted to him or her.

Promptly report any conduct that violates any law or any provision of this Code.

If an employee becomes aware that a violation of the Financial Officer and Manager Code of Ethics has occurred, they must report it as soon as possible in accordance with the resources described in this Code. It is the policy of CoStar to prohibit retaliation against any employee for reporting violations of this Code, including the Financial Officer and Manager Code of Ethics, or for participating in any investigation relating to a known or suspected violation.

## EXHIBIT 9 — Australia Jurisdiction Specific Information

This Appendix provides additional information to supplement our Code of Conduct in respect to Australia.

### Reporting Process for Australia

#### WHO CAN MAKE A REPORT

Under the Corporations Act 2001 (Cth) (Corporations Act) or Tax Administration Act 1953 (Cth) (Tax Act) (if the conduct relates to tax avoidance behaviour or other tax issues), an individual who is or who has been, any of the following in relation to the Company may make a report under the Code of Conduct and will be eligible for certain Australian law protections:

- an officer or employee;
- an individual who supplies services or goods (whether paid or unpaid);
- an employee of a person who supplies services or goods (whether paid or unpaid);
- an individual who is an associate (within the meaning of section 318 of the Australian Income Tax Assessment Act 1936) of the entity;
- a relative of an individual referred to in any of paragraphs (a) to (c); or
- a dependent of an individual referred to in any of paragraphs (a) to (c), or of such an individual's spouse.

#### WHO SHOULD I TELL

The Code details how an individual may make a report. In addition, in respect of Australia, for the purposes of the Corporations Act and/or Tax Act, disclosures may also be made to the following:

- an officer or senior manager of the Company;
- auditor of the Company (or a member of that audit team);
- an actuary of the Company;
- a registered tax agent or BAS agent (within the meaning of the Tax Agent Services Act 2009) who provides tax agent services (within the meaning of that Act) or BAS services (within the meaning of that Act) to the Company;
- the Australian Securities and Investment Commission (ASIC);
- the Australian Prudential Regulation Authority (APRA);
- a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Act; or
- in limited circumstances for a matter of public interest or an emergency (e.g. substantial and imminent danger to health or safety or to the natural environment), a journalist or a Member of Parliament (we recommend you obtain legal advice if you are considering making a public interest or emergency report).

## PROTECTING YOUR IDENTITY

If you are an eligible whistleblower under the Corporations Act and have made a report under the Code of Conduct, you will be entitled to certain protections under Australian law (Whistleblower Protections).

CoStar has Australian legal requirements to protect the identity of people who report violations of the Code of Conduct. Your identity (and any information CoStar has because of your report that someone could likely use to work out your identity) will only be disclosed if you give your consent to CoStar to disclose that information or in exceptional circumstances where the disclosure is allowed or required by law.

Some examples of ways in which the Company will look to reduce the risk that you will be identified from the information contained in a disclosure include:

- personal information or reference to you witnessing an event may be redacted;
- you may be referred to in a gender-neutral context;
- where possible, you may be contacted to help identify certain aspects of your disclosure that could inadvertently identify you; and/or
- disclosures will be handled and investigated by suitably experienced persons.

The Company will also look to protect the identity of people who make reports by endeavouring to maintain secure record-keeping and information sharing processes, for example:

- paper and electronic documents and other materials relating to disclosures will be stored securely;
- access to information relating to a disclosure will be limited to those involved in managing and investigating the disclosure;
- only a restricted number of people who are involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- communications and documents relating to the investigation of a disclosure will only be sent to a secure printer and not an openly accessible printer.

It is possible that someone might deduce your identity in certain circumstances, including but not limited to as a consequence of the nature of the investigatory process. There may also be circumstances where the Company is required to disclose information to a court or tribunal, where the court or tribunal considers it necessary in the interests of justice or to give effect to the whistleblower provisions in the Corporations Act.

## Gifts and Hospitality Process for Employees of Domain Entities

### APPLICATION

This Exhibit sets out the gifts and hospitality monetary thresholds, reporting requirements and approval processes applicable to Employees of the following entities:

- Domain Holdings Australia Limited
- Domain Group New Zealand Limited
- Domain Group Philippines, Inc.
- Any other entities that the Company designates as coming under this Exhibit from time to time.

This Exhibit supplements the Code of Conduct in respect of such Employees.

### REPORTING AND APPROVAL REQUIREMENTS

**Gifts, entertainment, or hospitality received or given over \$100 AUD:** All gifts, entertainment, or hospitality received or given over \$100 AUD in value must be recorded in Domain's gift register within 7 days of receipt or offer. The gift register can be accessed by following the steps set out on the Finance intranet page or as otherwise advised by the Domain Finance team. Without limiting any other part of this or any other applicable CoStar Group policy, pre-approval of the giving or receipt of gifts or hospitality at this monetary level is not required.

**Gifts, entertainment, or hospitality received or given over \$500 AUD:** Gifts, entertainment or hospitality over \$500 AUD must not be given or received without the prior written approval of the Domain Chief Financial Officer or the person holding equivalent office from time to time. This approval can be sought by following the steps set out on the Finance intranet page or as otherwise advised by the Domain Finance team.

Once the relevant executive's approval has been received via email, the Employee must register the approved gift or hospitality on the local gift register.

## EXHIBIT 10 – Compliance Hotline Access

Employees in any country may report a concern confidentially by accessing the NAVEX site at [costar.navexone.com](https://costar.navexone.com) or by using the QR code to the right.



Employees may also report a concern confidentially by telephone using the access numbers for each country provided below:

<b>UNITED STATES</b>	1-855-603-7317 (Toll Free)	<b>INDONESIA</b>	From an outside line dial the direct access number for your location: – 001-801-10 At the English prompt dial 855-603-7317
<b>CANADA</b>	1-855-603-7317 (Toll Free)	<b>IRELAND</b>	From an outside line dial the direct access number for your location: – 1-800-550-000 – 00-800-222-55288 (UIFN) At the English prompt dial 855-603-7317
<b>AUSTRALIA</b>	From an outside line dial the direct access number for your location: – 1-800-551-155 (Optus) – 1-800-881-011 (Telstra) At the English prompt dial 855-603-7317	<b>ITALY</b>	From an outside line dial the direct access number for your location: – 800-172-444 At the English prompt dial 855-603-7317
<b>CHINA</b>	From an outside line dial the direct access number for your location: – 855-603-7317 At the English prompt dial 855-603-7317	<b>SINGAPORE</b>	From an outside line dial the direct access number for your location: – 800-011-1111 (SingTel) – 800-001-0001 (StarHub) At the English prompt dial 855-603-7317
<b>COLOMBIA</b>	– 01-800-911-0010 – 01-800-911-0011 (Spanish) At the English prompt dial 855-603-7317	<b>SPAIN</b>	From an outside line dial the direct access number for your location: – 900-99-0011 At the English prompt dial 855-603-7317
<b>FRANCE</b>	From an outside line dial the direct access number for your location: – 0-800-99-0011 (France Telecom) – 0-800-99-0111 (Paris Only) – 0-800-99-1011 – 0-800-99-1111 – 0-800-99-1211 – 0805-701-288 (Telecom Development) At the English prompt dial 855-603-7317	<b>UNITED ARAB EMIRATES</b>	From an outside line dial the direct access number for your location: – 8000-021 – 8000-061 (Military-USO and cellular) – 8000-555-66 (du) At the English prompt dial 855-603-7317
<b>GERMANY</b>	From an outside line dial the direct access number for your location: – 0-800-225-5288 At the English prompt dial 855-603-7317	<b>UNITED KINGDOM</b>	From an outside line dial the direct access number for your location: – 0-800-89-0011 (British Telecom) At the English prompt dial 855-603-7317
<b>INDIA</b>	From an outside line dial the direct access number for your location: – 000-117 At the English prompt dial 855-603-7317		