

1. Purpose and Scope

This anti-bribery policy defines the responsibilities of Storyblok (meaning Storyblok Group, including Storyblok GmbH and its affiliates, hereinafter “Storyblok”, “we”, “us”), and those who work for or with us in our approach to a zero-tolerance position on bribery and corruption.

The purpose is to provide clear instructions and guidance to internal Storyblok team members on the behaviour and expectations in conducting business, but also to external Stakeholders, such as Storyblok customers, partners, suppliers, etc.

2. Policy Statement

- Storyblok is committed to doing business ethically and honestly and to implementing systems that ensure bribery is prevented and punished.
- **Storyblok has zero tolerance for bribery and corrupt activities.**
- Our goal is to act professionally and fairly and with integrity in all business matters and relationships, in every country we operate in.

Storyblok complies with all relevant laws relating to anti-bribery and corruption that apply to us. Storyblok recognises that bribery and corruption are punishable. If we or any Storyblok team members have participated in corrupt activities, we may be subject to an unlimited fine (and/or imprisonment) and be excluded from tendering for public contracts. Moreover, we understand that Storyblok could face serious damage to our reputation and goodwill.

Who is covered by the policy?

This anti-bribery policy covers the business conduct of all Storyblok team members with Storyblok’s (potential) partners, customers, suppliers, investors, etc., in the status of an individual, business organisation, or public institution.

Definition of bribery and kickbacks

***Bribery** refers to offering, promising, giving, asking, receiving, accepting, or soliciting something of value or advantage to induce or influence an improper action or decision.*

A bribe is the intent to induce or reward an individual to gain unlawful commercial, contractual, regulatory, or personal advantage. A briber intends to influence the other person to act against its policies, laws, regulations, or any code of conduct. It is not essential/relevant if we or the bribing person gains a personal advantage or not. It is also forbidden to request the improper act of the counterpart.

Regarding public officials: the intention or the improper behavior is irrelevant - we will, under no circumstances, offer any kind of gifts/advantage to public officials, no matter who they are or where they are located.

Bribery is not limited to active bribery; if an individual receives a bribe and accepts it (passive bribery), that will also be considered a breach of anti-bribery laws.

Keep in mind:

- Storyblok team members must not engage in any form of bribery, whether it be directly, passively (as described above), or indirectly through a third party (such as a vendor or partner);
- Storyblok team members must not reward or offer an advantage to any public official anywhere in the world;
- Storyblok team members must not accept bribes to any degree and, if they are uncertain about whether something might be a bribe, a gift, or an act of hospitality, they must seek further advice from the company's compliance officer, as defined herein.

Kickbacks are (any) payments (or equivalent) made to any team member of another contracting party to receive an individual share of a contract amount paid by that contracting party. Kickbacks as well are a strict NO-GO.

What is acceptable?

Storyblok accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as it complies with all the following requirements:

- The gesture/hospitality is not made with **the intention of asking for improper behaviour**;
- It is not made with the suggestion/expectation that **a return favour** is expected;
- It does not have an excessive value. The excessive value would usually be considered any amount exceeding three hundred (€/\$300) per individual and/or seven hundred (€/\$700) for the whole business entity/organization. In any case, the amounts mentioned here as a threshold are subject to the manager's approval. The gestures or hospitality can range from meals/dinners, appropriate entertainment tickets, voucher/gift cards, hotels, among others;
- It does **not ever include cash**;
- It is **appropriate for the circumstances** (e.g. giving small gifts around Christmas) and timing (e.g. gifts received before negotiating the pricing in a contract are not acceptable, gifts after the contract has been signed, are acceptable);
- It is of an **appropriate type and value** (t-shirt, socks, bottles, give-aways) and given at an appropriate time, taking into account the reason for the gift;
- It is **given/received openly**, not secretly;
- It is **not offered** to, or accepted from, **a government official or representative or politician or political party**.

We recognise that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. However, as good practice, gifts given and received that are over €/\$300 value have to be disclosed to the compliance officer.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, always ask for the advice of the anti-bribery officer (@Cristina San Martin).

What is not acceptable?

If Storyblok gives/is offered anything that doesn't comply with the requirements of this policy, or with Anti-Bribery laws applicable to Storyblok, it will be considered a bribe. Examples of these can include, but are not limited to:

- Any cash gift or incentive that is given/received by Storyblok team members on behalf of Storyblok with the intention of gaining an unlawful advantage;
- Any type of gift to a government official or representative, or politician, or political party, from any country;
- Invitations to meals that have an inappropriate intention;
- Tickets for excessive entertainment including but not limited to concerts, football matches, theatre, exceeding the amount of three hundred (€/\$300) per individual and/or seven hundred (€/\$700) to a business entity/organisation;
- Trips or hotel nights that don't fall within the normal/usual business expenditures;
- Any paid event or activity that is against the law or our code of conduct;
- Any asset gifts like cars, apartments, or grounds;
- Any type of gift given/offered during the contract negotiation process;
- Events that do not have any business/product-related context (i.e. just a party);
- Events without the participation of any Storyblok Team Members.

Facilitation Payments and Kickbacks

Storyblok does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

3. Team Member's Responsibilities

As a team member of Storyblok, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are provided. You shall not participate in any activities that do not comply with this anti-bribery policy or Storyblok Code of Conduct.

If you have a reason to believe or suspect that an act of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your manager or the compliance officer.

Any team member who breaches this policy will face disciplinary action and/or immediate dismissal.

4. Reporting Procedure

Receiving gifts or invitations to events. If you receive any gift (Ticket, Voucher, Electronics, Travel Costs, etc.) or any amount of cash that is reasonably believed to be of a higher value than the above-set limits, you have to disclose it to the compliance officer by sending the following information to antibribery@storyblok.com

1. Value of the gift and currency
2. Form of the gift (voucher, SWAG, dinner)
3. Company who received/sent the gift
4. Storyblok team member who received the gift
5. Brief description of the context/reason for the gift

Providing gifts or invitations to events. If someone at Storyblok plans to send an invitation to an event or a gift to an individual that exceeds three hundred (€/\$300) per individual and/or seven hundred (€/\$700) total amount to an entity/organisation, you must disclose it in advance to your manager or compliance officer by sending the following information:

1. Total value of the gifts given in the campaign and currency
2. Form of the gifts (voucher, SWAG, dinner)
3. Company/ies who received the gift
4. Storyblok team member who sent the gifts and respective amounts
5. Brief description of the reason for providing the gift

Disclaimer: *Since Storyblok is an international company and conducts business worldwide, the above amount is always to be seen in the context of the local cultures. An amount that might be considered excessive in one country, might not be considered excessive in another one. The monetary thresholds provided herein are only for the purposes of general reference. Storyblok will evaluate it on a country-by-country basis, keeping in mind our core principle of not bribing any public officials or business organizations and complying with the applicable anti-bribery laws.*

Who can report breaches

Breaches mentioned in this policy can be reported by any Storyblok team member, supplier, partner, customer, public official, or any third party that has information using the reporting method specified in the section below.

Reporting infringements of anti-bribery policy

Any Storyblok team member is obliged to report any situations or behaviours that are not in accordance with this policy as soon as possible (if they are offered a bribe by anyone, if they are asked to offer a bribe, if they suspect that they may be bribed).

The compliance officer at Storyblok is [@Cristina San Martin](#)

Contact details:

Email: antibribery@storyblok.com

Phone number: +447360496195

The compliance officer will discuss the reports she receives with the legal team and will send an email to legal@storyblok.com. Based on the advice of the legal team and the gravity of the situation, the compliance officer and the legal team shall involve other team members to ensure that the case and the investigation (when necessary) are handled properly.

The reporting can be done verbally or in writing. You can choose to report through the following channels:

- Team manager (for Storyblok team members)
- Dedicated reporting email address: antibribery@storyblok.com
- If you want to verbally report you can use the following number +447360496195 (Compliance Officer)
- Send a Google invite for a meeting to antibribery@storyblok.com

If you feel more comfortable and don't want Storyblok to disclose your identity in reporting an infringement, please write this information to us in the reporting email. We will consider the request and if the investigation allows it, we will not disclose your identity.

5. Training and communication

Training and communication. Storyblok will provide training on this policy as part of the onboarding process for all new team members as well as provide refreshing training regularly.

Record-keeping. Storyblok will keep detailed and accurate records, in compliance with the requirements of the applicable laws, and will have appropriate internal controls in place to act as evidence for all payments made.

Storyblok reserves the right to update or modify this policy at its sole discretion at any time. Changes will become effective upon posting this policy on the website.

While our team members will receive direct notification of policy updates, stakeholders other than our team members will not receive individual notifications. Instead, we encourage stakeholders to periodically check our website for the latest version of this policy or contact us at legal@storyblok.com to request a copy of the updated/modified policy.