Anti-bribery policy

Purpose and Scope

This anti-bribery policy exists to set out the responsibilities of Storyblok and those who work for us in regard to our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for/with us. It helps you recognise and deal with bribery and corruption issues and understand your responsibilities.

Policy statement

✅ Storyblok GmbH is committed to doing business in an ethical and honest way and is committed to implementing systems that ensure bribery is prevented and punished.

✅ Storyblok has zero-tolerance for bribery and corrupt activities. We are committed to acting in a professional and fair way and with integrity in all business matters and relationships, whichever the country we operate in.

✅ Storyblok will constantly comply with all relevant laws related to anti-bribery and corruption that are applicable to us.

Storyblok recognises that bribery and corruption could be punishable by imprisonment and a fine. If we are discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities very seriously.

Who is covered by the policy?
This anti-bribery policy applies to all team members (whether temporary, fixed-term, or permanent), consultants, contractors, partners, sponsors, or any other person or persons associated with us (including third parties). The policy also applies to Investors, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential customers, vendors, business contacts, partners, advisers, and government and public bodies, including their advisors, representatives and officials, politicians, and public parties.

**Definition of bribery and kickbacks**

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

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage and can, but not must end in a personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law and are passively included. Keep in mind:

- Team members must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as a vendor or partner).
- They must not bribe a foreign public official anywhere in the world.
- They must not accept bribes to any degree and, if they are uncertain about whether something is a bribe or a gift or an act of hospitality, they must seek further advice from the company’s compliance committee.

**Kickbacks** are payments of any portion of a contract made to team members of another contracting party or the utilisation of other techniques, such as subcontracts, purchase orders or consulting agreements, to channel payment to public officials, political parties,
to employees of another contracting party, or their relatives or business associates.

✅ What is acceptable?

Storyblok accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets all the following requirements:

- It is **not made with the intention of influencing** a person or influencing to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.

- It is **not above** a certain excessive value, as pre-determined by the company’s compliance officer (**usually in excess of €/$100**). This can range from meals/dinners (never to exceed 100€/$ per person), entertainment tickets, voucher/gift cards, hotels, among others.

- It is **not made with the suggestion that a return favour** is expected.

- It is allowed to **accept it under local anti-bribery** laws applicable to Storyblok.

- It is **given in the name of the company**, not in an individual’s name.

- It **does not include cash or a cash equivalent** (e.g. a voucher or gift certificate).

- 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** (SWAG of a company - T-Shirt, Socks, Drinking Bottle) 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**, without the prior approval of the company’s compliance officer.

- Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence). The gift may be
accepted so long as it is declared to the compliance officer, who will assess the circumstances.

👉 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 €/$100 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 you give/are offered anything that doesn't comply with the above mentioned requirements, it will be considered a bribe. Examples of these can include, but are not limited to:

- Any cash gift or incentive
- Physical gifts of over €/$100 in the form of electronics, jewellery, clothes
- Invitations to meals in luxury restaurants or over €/$100 per person
- Tickets for expensive entertainment like concerts, football matches, theatre, etc of over €/$100 in value
- Trips or hotel nights, cruises
- 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 a RFP process

🚫 Facilitation Payments and Kickbacks

Storyblok does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation

Storyblok does not allow kickbacks to be made or accepted. We recognise that
payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

kickbacks are typically made in exchange for a business favour or advantage.

**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 given.

Every person is equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. You are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

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 the compliance committee.

If any team member breaches this policy, they will face disciplinary action and/or immediate dismissal.

**Reporting Procedure**

**▼ Disclosing received and sent gifts**

If you receive any gifts (Ticket, Voucher, Electronics, Travel Costs) that are over €/$100 value or any amount of cash you have to disclose it to the anti-bribery officer by sending the following information to antibribery@storyblok.com:

- Value of the gift and currency
- Form of the gift (voucher, SWAG, dinner)
- Company who received/sent the gift
- Person from Storyblok who received the gift
- Brief description of the context for the gift

If we decide to do a marketing or sales campaign to attract potential customers or partners the individual gift value is not allowed to exceed €/$100. If the total amount of gifts exceeds €/$1000, you have to disclose it to the compliance officer by sending
the following information to antibribery@storyblok.com. Any gift that is given to a customer, partner or any other related stakeholder has to be approved by the VP.

- Total value of the gifts given in the campaign and currency
- Form of the gifts (voucher, SWAG, dinner)
- Company/s who received the gift
- List of people from Storyblok who sent the gifts and amounts
- Brief description of the context for the campaign
- Proof of approval for the campaign

▼ Reporting infringements of anti-bribery policy

For reporting any anti-bribery infringement Storyblok installed a anti-bribery committee which included the following people (Dominik, Lydia, Cristina, Clemens). The compliance officer is Cristina

Contact details:

- Dominik: da@storyblok.com
- Lydia: +43 660 31 45 741 lk@storyblok.com
- Cristina: +447360496195 cristina.sanmartin@storyblok.com
- Clemens: clemens.rosner@storyblok.com

Any individual has to inform our compliance as soon as possible if they are offered a bribe by anyone, if they are asked to make one, if they suspect that they may be bribed or asked to make a bribe in the near future, or if they have reason to believe that they are a victim of another corrupt activity. People should also report if they think any other team member has accepted or offered any bribery as defined in this policy.

The report can be done verbally or written. They can choose to report through the following channels:

- Line manager and anti-bribery office
- Treasury team
- Legal team
• Dedicated reporting email address antibribery@storyblok.com. (The compliance committee will have access to the sent E-Mails.)

• If any of the 4 people in the compliance committee are deemed not be neutral enough about the topic or are too close to the person being reported or are the ones about whom a report is being done, the team member that wants to report the infringement can address the other people in this committee directly without using their individual email address

• If you want to verbally report you can use the following number +43 660 31 45 741 (VP of Operations).

• Sent a google invite for a meeting to antibribery@storyblok.com

Storyblok will ensure that there is no retaliation against the person reporting a possible breach. We will protect the identity of the whistleblower/person reporting the possible infringement to a possible extent. If the identity needs to be disclosed for investigation purposes, we will also seek the person's consent. The channels for receiving the reports are designed and operated in a secured manner.

Anonymous Reporting

Storyblok encourages everyone to provide their contact details when reporting concerns to facilitate effective communication and investigation. However, anonymous reporting is also allowed, and appropriate measures will be taken to protect the anonymity of the reporter, if requested. The following channels can be used for anonymous reporting:

• Dedicated reporting email address antibribery@storyblok.com. (The compliance committee will have access to the sent E-Mails.)

Who can report breaches?

Breaches mentioned before can be reported by any Storyblok team member, supplier, partner, customer or any third party that has information.

Protection offered to the person reporting the breach - Prohibition of retaliation

According to the directive Storyblok will follow the protections for any reporter:

• No disclosure of the identity, unless the person gives consent
- Protection against suspension, lay-off, dismissal, demotion or withholding a promotion, transfer of duties, wage reduction, change in working hours, withholding of training, negative performance assessment or employment reference, no disciplinary measure or financial penalties, harassment, intimidation, discrimination, unfair treatment, early contract termination, failure to renew the contract, etc.

**Training and communication**

Storyblok will provide training on this policy as part of the induction process for all new team members. Team members will also be asked annually to formally accept that they will comply with this policy.

**Handling and investigation**

Upon receiving a report, Storyblok will ensure that all concerns are treated seriously, objectively, and in a timely manner within 5 business days. The committee will investigate the topic. If the report is not anonymous, the committee will contact you, by your preferred method of communication, to discuss the investigation process and any other matters that are relevant to the investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and Storyblok will conduct the investigation based on the information provided to it.

Depending on the topic, the CEO, VP of Operations, Treasury Team or Senior Legal Associate will recommend actions. Every report will be handled at least by two different people.

We will take any report seriously and do a diligent investigation. This might include interviewing/talking to the person reporting the breach, to the accused party and to other peers or stakeholders that might have observed or witnessed the breach.

The investigation of the topic is done and recommended actions are given and executed by the Committee (warning, immediate termination, other). Storyblok will provide feedback to the reporter by not exceeding three months from the acknowledgment of the receipt.

**Record keeping**
Storyblok will keep detailed and accurate financial 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. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to official review.

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document Name</td>
<td>Internal anti-bribery policy</td>
</tr>
<tr>
<td>Effective as of</td>
<td>01/07/2023</td>
</tr>
<tr>
<td>Version</td>
<td>V1</td>
</tr>
<tr>
<td>Created by</td>
<td>Cristina Victoria San Martín Herrera Marisa Alves Pereira and reviewed by Amarilda Ulrich</td>
</tr>
<tr>
<td>Needs to be Approved by</td>
<td>Dominik Angerer, Lydia Kothmeier, Marisa Pereira</td>
</tr>
</tbody>
</table>

Working File

External Version to share