## **B** storyblok



# **Code of Conduct**

storyblok.com

# Table of Contents

- 1 Our Understanding of a Code of Conduct
- 2 Goal of our Code of Conduct
- 3 To whom does this code of conduct apply?

#### 4 How we do business

- 4.1 Responsiveness
- 4.2 Business courtesies
- 4.3 Money laundering
- 4.4 Bribery, kickbacks or any other form of corruption
- 4.5 Respect for global cultures
- 4.6 Working together
- 4.7 Fair competition
- 4.8 Contracts
- 4.9 Make purchasing decisions
- 4.10 Donations and sponsorships
- 4.11 Confidentiality & information security
- 4.12 Modern slavery and forced labor
- 4.13 Human Rights
- 4.14 Freedom of association and right to collective bargaining

#### 5 How we do work

- 5.1 Fair working conditions
- 5.2 Reliability and integrity
- 5.3 Better together
- 5.4 Creativity and innovation
- 5.5 Healthy work environment
- 5.6 Diversity and equal treatment
- 5.7 Conflict of interest
- 5.8 Mutual respect and recognition
- 5.9 Respectful communication
- 5.10 Professional and sober workplace
- 5.11 Company property

#### 6 How would we like to grow

6.1 Investor Relations

#### 7 How to report concerns or a possible breach

- 7.1 General reporting process
- 7.2 Anonymous reporting
- 7.3 Who can report breaches

#### 8 Record keeping



## 1. Our Understanding of a Code of Conduct



A Code of Conduct should explain our values, ethical, professional and legal standards and general ways of acting. This code is a shared statement of our commitment that we use as the basis for our daily and long-term interactions, actions, and decisions. We conduct our operations with honesty, integrity, respect, and recognition, as well as fairness, diversity, and we strive to integrate these values into our behavior and practices. Additionally, we believe in ever growing responsibility and sustainability and respecting human rights. Living through our Code of Conduct brings our values and purpose to life, everyday and in everything we do.

## 2. Goal of our Code of Conduct



The Storyblok Code of Conduct is one of the ways we put our company values into practice. Our commitment to the highest standards helps us work with great people, build a great product, and attract loyal users. The intent of this Code of Conduct is to set clear expectations for ethical business practices and social and environmental awareness

by all Third Parties (Customer, Supplier, Vendor, Partner, Consultant, Government), Shareholders and team members of Storyblok. Storyblok expects all stakeholders to honor the Code of Conduct and will take measures to ensure compliance and will quickly address instances of non-compliance.

## 3. To Whom does this Code of Conduct apply?



This Code of Conduct applies to Storyblok's employees, contractors, agents, advisers, suppliers, customers, partners and any stakeholder that conducts business with Storyblok. All stakeholders agree that by entering into a business relationship with Storyblok, they comply with the same or higher values, standards, laws and restrictions when conducting business.

#### 4. How We Do Busines



We comply with the law regardless of economic disadvantages caused thereby. We always act in an honest, professional and ethical way and want to build a trustworthy relationship with all our stakeholders. We expect the same from our business partners.

#### **4.1 RESPONSIVENESS.**

When we receive relevant user feedback we act on it in a timely manner. We take pride in responding to communications from our users, whether questions, problems, or compliments. If something is broken, we fix it.

#### **4.2 BUSINESS COURTESIES.**

Accepting gifts, entertainment, travel or meals can create the appearance of a conflict of interest. Therefore, business courtesies or any other favors of value should be avoided that might influence, or even appear to influence, the independent judgment of Storyblok team members or representatives. Giving or accepting any gift of cash, gift cards is never allowed. More details are given in our Anti-bribery policy.

#### 4.3 MONEY LAUNDERING

Money laundering involves obfuscating illegal sources of funds by introducing such funds into legal business and financial systems. Payments to or by Storyblok in cash are forbidden, except for when the sums involved are negligible. All payments should comply with the applicable tax laws and anti money laundering and anti-corruption regulations.

### 4.4 BRIBERY, KICKBACKS OR ANY OTHER FORM OF CORRUPTION.

Storyblok does not request, accept nor offer or promise any bribes, kickbacks, or participate in any corrupt practices in any form by any party. We have zero tolerance in this regard. Furthermore, Storyblok does not do any business based on bribery, corruption or unethical business practice. We comply with all local and international laws regarding anti-bribery. The rule at Storyblok is simple: Don't give or accept bribes to anybody (Government, Supplier, Partner, Customer), anytime, for any reason. More information can be found in our Anti-bribery Policy.

#### 4.5 RESPECT FOR GLOBAL CULTURES.

Storyblok's services are employed with companies all over the world and we are committed to being responsible corporate citizens. This requires us to be aware of and to respect the traditions, business customs, social norms, and expectations of our customers and partners and make every effort to pursue the right course of action.

#### **4.6 WORKING TOGETHER.**

We try to process inquiries quickly and to the satisfaction of all parties. If there are differing opinions, we endeavor to quickly find a common solution. We aim to listen to our third parties, deliver as quickly as possible, improve every day and treat everyone equally. Our users value Storyblok not only because of our valuable software, but because we hold ourselves to a higher standard in how we treat users and how we conduct ourselves professionally. We keep the following principles in mind which help us to maintain that high standard: Integrity, regular delivery of new features and listening to our customers. We strive to continually improve our services and our company.

#### 4.7 FAIR COMPETITION.

We are committed to fair and open competition as a prerequisite for the social market economy and we follow the laws to protect competition. We achieve our competitive advantages through our unique selling propositions and our hard work rather than through illegal or unethical business practice. All team members are obligated to comply with the rules of fair competition. Examples of prohibited behaviors not tolerated by us are: illegal exchange of information, price agreements, and market allocations with competitors or suppliers. Espionage, theft and other illegal methods of gathering information from competitors are strictly forbidden. We rely on an honest, reliable business relationship where mutual respect is paramount. Our communications must be truthful and accurate.

When we say something about our products and services, we must be able to substantiate it. We sell the quality of what we do and we never disparage our competitors.

#### 4.8 CONTRACTS.

Storyblok drafts, reviews and negotiates all agreements with any stakeholder in a legal and professional way adhering to the recognized best practices. Our goal is to have the contracts in a written form and clearly defined.

#### 4.9 MAKE PURCHASING DECISIONS.

When we decide for a supplier, vendor or consultant we follow a defined procedure, evaluate them according to our standards and values. We chose the company that meets our high standards and based on the best value received by Storyblok. Verifying the quality, services on a regular basis and confirming the compliance with our commercial, information security and legal conditions are part of our procurement process.

#### 4.10 DONATIONS AND SPONSORSHIPS.

Donations from Storyblok are always made transparently as a social commitment and on a voluntary basis, without expecting anything in return. To ensure transparency, we document explicitly: the purpose of the donation, the name of the recipient and the confirmation of the donation. Sponsorships can be communications or marketing activities for the group of companies Storyblok considers Partners. All sponsorship activities must have written agreements and be reasonably related to the sponsorship services. Sponsorship must in no way be used to circumvent the provisions on the allocation of donations.

### 4.11 CONFIDENTIALITY & INFORMATION SECURITY.

Any stakeholders with which Storyblok

conducts business, will hold the Confidential Information received from/about Storyblok or its customers, suppliers, partners, etc. in strict confidence. Confidential Information of any kind, including information received from our business partners, may not be used to pursue a team members' own interests or made accessible to third parties. Storyblok's team must comply with Storyblok's internal confidential Information policies and procedures. Furthermore, Storyblok handles personal data in compliance with the EU General Data Protection Regulation (GDPR). Storyblok regularly trains its team about information security and personal data protection to keep any data confidential and safe.

### 4.12 MODERN SLAVERY AND FORCED LABOR.

Storyblok complies with all the Modern Slavery laws relevant to its jurisdiction. Storyblok's suppliers and all persons associated with them, undertake to comply with these laws and regulations as well. The suppliers shall implement due diligence procedures for their subcontractors and suppliers, to ensure that there is no slavery or human trafficking in their supply chain, and shall include in the contracts with these persons anti-slavery and human trafficking provisions. Child labor is also prohibited at Storyblok.

#### 4.13 HUMAN RIGHTS.

Storyblok respects all human rights and the fundamental freedoms of all persons in all countries of the world in accordance with the Universal Declaration of Human Rights (UDHR) and the EU Charter of Fundamental Rights.

### 4.14 FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING.

Freedom of association is a fundamental human right proclaimed in the UDHR, hence Storyblok complies with it. The employees at Storyblok have the right to form and join organizations of their own choosing.

## 5. How We Work at Storyblok



#### **5.1 FAIR WORKING CONDITIONS.**

Fair working conditions and an equitable employment relationship are important to us. Storyblok respects fundamental human rights and we recognise our responsibility to observe those rights. As an employer, we take our obligations to our team members seriously. As a remote company, we provide each team member the same working conditions and treat everyone with equity while always complying with local labor laws.

#### 5.2 RELIABILITY AND INTEGRITY.

Each team member is personally responsible for compliance with the law and our code of conduct. A team member's appearance, actions and behavior contributes significantly to the image of Storyblok. Team managers are role models for all team members, representing the foundation of this Code of Conduct. We trust one another to always work in a truthful and ethical manner, comply with internal policies and not hide or lie about any possible breach. We have zero tolerance for manipulation of information or results.

#### **5.3 BETTER TOGETHER.**

We make greater strides collaborating as a team than working in isolation. We rely on clear and honest communication and constructive feedback is always welcome. Because the team comes first, we make every decision with care and we are mindful of our company goals. Support and guidance is ongoing and our team members know that help is always available. Trust, mentoring, collaboration, respect, and know-how transfer are at the core of our values. For us no challenge is too big - we keep learning and improving.

#### **5.4 CREATIVITY AND INNOVATION.**

Being at the forefront of the industry is highly valued at Storyblok thus we encourage team members to: follow developments within our domain, use our professional experience in a constructive manner, contribute to the evolution of Storyblok by committing to sharing our knowledge, share with internal parties any information that could benefit them in their work, being open to new ideas and approaches, adopt alternative outlooks in order to generate new thoughts and concepts, conduct our work in a structured way to enhance knowledge transfer and continuity.

#### 5.5 HEALTHY WORKING ENVIRONMENT.

We always strive to provide a healthy working environment and positive working conditions. We offer everyone the needed and high standard equipment to have an ergonomic work environment or the possibility to work from a shared working space. We value a healthy work-life balance and expect team members to communicate when this is not happening. We offer flexible working hours and, with remote work, team members can work wherever they are happiest and suits them best. This means that we allow for asynchronous work in order to accommodate all time zones and work time preferences.

#### 5.6 DIVERSITY AND EQUAL TREATMENT.

Storyblok believes that a diverse team is a strong team that performs best when every team member feels a sense of belonging and inclusivity. Every team member is treated equally with respect and dignity at all times, in line with our company values. We are curious about other cultures and leverage our differences to bring the best out of each other. We reject any form of

discrimination, racism, harassment or unequal treatment (be it based on gender, nationality, age, race, ethnicity, religion, sexuality, political affiliation or beliefs). Storyblok operates a zero tolerance policy on harassment and discrimination which includes, but is not limited to, physical, verbal or written abuse, physical or sexual harassment (in any form, including the distribution of sexual material), any other unlawful harassment or any threats or other forms of intimidation. We commit to uphold everyone to our <u>Diversity</u>, <u>Equity</u>, <u>Inclusion and Belonging Policy</u> standards.

#### **5.7 CONFLICTS OF INTEREST.**

Whilst acting in your capacity as a team member or other representative of Storyblok, you must base your decisions on the best interests of Storyblok, rather than your personal self-interest. You must avoid conflicts of interest or the appearance of a conflict of interest. Along with legal and ethical considerations, you must at all times be governed by the best interests of Storyblok. Conflicts of interest must be disclosed immediately.

### 5.8 MUTUAL RESPECT AND RECOGNITION.

The Storyblok culture ensures that each member does meaningful work and is recognized for their efforts. We form a collaborative and inclusive community where the pursuit of new ideas and high performance can thrive, and each team member's contributions are recognized. Our culture is built on honesty and trust; we value differences in approaches and views and communicate openly with each other all in a spirit of goodwill.

#### 5.9 RESPECTFUL COMMUNICATION.

Team members are responsible for ensuring that communication, whatever the form may be, is clear, correct and appropriate. Responsible and appropriate communication is essential to our business, reflects our values and is key to our reputation. Communication may include

in-person interaction, written memoranda, hand-written notes, email, computer files, virtual calls and voicemail. Ensure that communication is only sent to those who have a need to receive it and avoid email chains with unnecessary content or recipients. Internally we commit to communicate according to our <a href="Communication & Collaboration Charter">Communication & Collaboration Charter</a>.

### 5.10 PROFESSIONAL AND SOBER WORKPLACE.

Storyblok is a business and everyone must behave professionally, respectfully, and appropriately at all times. Every interaction with colleagues and customers, both internally and externally, must be in line with our core values. This means that we do not tolerate hostile behavior or permit the use of any substances at work and during work hours or on any business trip. Substances such as alcohol, drugs or any performance enhancing substances of any kind are prohibited. Exceptions can occur for legal drugs like alcohol at events or business meals.

#### **5.11 COMPANY PROPERTY.**

The ownership of company property should be carefully handled by all team members. Each team member agrees to handle resources and equipment responsibly and for their intended purpose. Team members are asked to treat company equipment as if it were their own property. We have zero tolerance for misuse of company credit cards or funds. To the extent permitted by law and educated within our security policies we may monitor, access and disclose communication and information (eg. installed apps, added extensions, registered services through storyblok.com account) on Storyblok's equipment and accounts, including laptops, virtual communication and work tools & software.

## 6. How would we like to grow?



#### **6.1 INVESTOR RELATIONS.**

Storyblok focuses on creating sustainable value. We are committed to the long-term financial, social and environmental impact of our activities. Our commitment is based on good core values, good shareholder relationships, active management of operations, responsible business practices and a truly excellent product we provide to our customers. We record our books accurately and communicate and interact truthfully and honestly with all stakeholder groups. Transparency, high quality communication, and an open sharing of information are required at Storyblok. We provide reports and are open to sharing corporate information, even if the information is uncomfortable to communicate. In addition, we reasonably cooperate and tell the truth when responding to an investigation, due diligence, board meeting questions or audits.

## 7. How to report concerns or a possible breach



#### 7.1 GENERAL REPORTING PROCESS

Storyblok provides the right channels and tools that provide everyone the possibility to report a breach of our Code of Conduct. The role of every

leader at Storyblok is to create a culture of trust and ensure that no retaliation takes place when someone points out or reports a possible breach. You are encouraged to raise your concerns or inform us of every potential violation, breach or infringement as early as possible.

#### 7.2. OUR POLICIES

Depending on the concern please refer to our different policies detailing how to report a breach of the Code of Conduct:

- Anti-bribery Policy
- Whistleblowing Policy
- Infringement Reporting and Disciplinary Policy
- Diversity, Equity and Inclusion Policy

#### 7.3. HOW WE HANDLE REPORTS

Upon receiving a report, Storyblok will ensure that all concerns are treated seriously, objectively, and in a timely manner. Storyblok will ensure that no retaliation is done against the person reporting a possible breach. We will protect the identity of the whistleblower/person reporting the possible infringement to the extent possible. The channels for receiving the reports are designed and operated in a secure manner. Please refer to our policies for further details.

#### 8. 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.

Read our Code of Conduct and keep it in mind in your day-to-day business.

