

# Anti-Bribery Policy

Policy owner: Legal

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# Staffbase takes a zero-tolerance approach to Bribery and corruption

Staffbase (or “**we**”) is committed to conduct all of our business in an honest and ethical manner. We act professionally, fairly, and with integrity in all our business dealings and relationships.

This Anti-Bribery Policy (this “**Policy**”) provides a framework for Communicorns to understand what activities and behavior is acceptable or prohibited. It also specifies what conditions may apply before you are allowed to provide or accept gifts or hospitality.

This Policy will be reviewed regularly and we may amend it at any time to update with best practices and processes.

## Who does this Policy apply to?

This Policy applies to all Staffbase Communicorns (including employees, contractors, consultants, and working students).

You must ensure that you read, understand and comply with this Policy. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Preventing, detecting, and reporting Bribery in any part of our business or supply chains is the responsibility of **everyone** working for or with us. You must avoid any activity that might lead to a breach of this Policy.

# Bribery Rules

## Key Definitions

A “**Bribe**” is a benefit of any kind that someone is not entitled to, given in exchange for someone else changing their position or behavior in a way that is unethical or illegal.

Bribes don't always have to cash. Look out for bribes that could take the form of: a gift, a kickback, a gift, a loan, overly-costly hospitality, a service, a discount, the award of a contract.

“**Bribery**” includes offering, promising, giving, accepting, asking for, or facilitating a bribe.

# All forms of Bribery are strictly prohibited

**Staffbase does not allow any form of Bribery.**

If you need any help working out if something is Bribery, or you just need some advice if something doesn't feel right, then please contact [compliance@staffbase.com](mailto:compliance@staffbase.com) or simply raise a support ticket via the [Legal Helpdesk](#).

## You must never:

- Give or offer any benefit (including discount codes for Staffbase events) expecting to receive a business favor in return, or to reward a business favor.
- Accept or demand any offer from a third party that feels like a 'secret' business deal.
- Give or offer any payment (sometimes called a facilitation or greaser payment) to a government official to make something happen, or make it happen faster than normal.
- Threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## Rules on giving & accepting Gifts and Hospitality

Giving and / or accepting gifts and hospitality are allowed in some circumstances.

On the next page you can find rules on when you are allowed to give or accept a gift or hospitality, what definitely is not allowed, and in what situations you need to be extra careful.

**Be sensible - if what you are getting or giving feels excessive or over the top, then check in with the Legal Compliance team before taking any action.**

Note that there are circumstances in which something you receive from a business contact might be subject to tax - if in doubt, please check with Finance.



## What is allowed?

As long as you take account of the rules regarding public officials set out on the next page, it is **OK** to give or accept:

**Reasonable corporate hospitality** (like a meal, or tickets to a sporting event, concert) that is not excessively costly for legitimate purposes like building relationships or marketing our products. It's great to spend time with contacts and customers, we just need to make sure this is in line with the rules and isn't excessive.

**Gifts of an appropriate type and value** depending on the circumstances and taking account of the reason for the gift. **In general, the value of a gift should not exceed 50 GBP/EUR/USD.**

**Branded items** like pens, bags, shirts, hats, may be given to or accepted from existing customers, suppliers, and business partners.

## What is prohibited?

You are **never** allowed to:

Provide gifts in your name or in private settings. Gifts must always be given in Staffbase's name and be exchanged in work environments.

Offer anything to another party while you are in the process of a tender or contractual negotiations - right from the first contact until after the contract closes. Gifts or hospitality will be inappropriate if they could be seen as an encouragement or reward for any preferential treatment in the negotiations.

Offer or accept **cash gifts** or **gifts given in secret**.

Provide cash as a charitable donation to a customer cause - we are happy to support customers' charitable efforts in other ways where we can.

**If you are offered a gift that is prohibited, please raise a support ticket via the [Legal Helpdesk](#).**



## What needs special attention?

### Vouchers

Cash equivalent items (such as shopping vouchers) may only be given in very limited situations as part of a Staffbase-approved promotional campaign or research project. Raise a ticket in **the Legal Helpdesk** to share your plans and to seek advice and approval.

### Regulated industries

If you have a customer or potential customer in a regulated industry like Financial Services, then check with your contact person whether they can accept gifts or hospitality before you offer anything.

### ! Public Officials and Elected Officials:

Strict rules apply if the gift or hospitality is offered to a Public or Elected Official\*.

You must be particularly cautious about offering gifts, free stuff or any kind of advantage to Public or Elected Officials. This is a complex area so you must seek advice and written consent from the Legal Compliance team before offering any gift or hospitality to a public or elected official.

**\* Not sure what a 'Public Official' is? We list some examples on the next page.**

# Key Definitions

A “Public Official” means different things in different countries, but could cover:

Civil servants

Judges

A person in any other official relationship under public law

A person who is appointed to perform public administration tasks for public authorities or any other body on their behalf.

Employees of a public radio or television broadcaster

Employees of nationalized or party nationalized organizations or institutions (at a country or if relevant, European level)

An “Elected Official” is someone who has a mandate given by a voter, so could include:

A member of Parliament (country or if relevant, state or European)

A local councilor



# Reporting Obligations

## ! Rules on reporting a gift or hospitality

### Gifts

All gifts  $\geq 50^*$  must be reported.

*\* gifts < 50 do not have to be reported.*

### Hospitality (e.g. meals, coffee, event tickets)

- giving hospitality requires prior reporting if it's  $\geq 250$  per person.
- receiving hospitality must be reported if it is  $\geq 250$  per person.

## How to create a Report?

You create a Gift and Hospitality Report by raising a ticket via [the Legal Helpdesk](#).

If the reported gift or hospitality is not in line with this Policy, it may be blocked.



## Do not forget about our Travel & Expenses Policy

In addition, you must make sure any hospitality or gifts are properly recorded with Finance in line with the Travel & Expenses Policy. All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers must be honest and accurate. Accounts must not be kept "off-book" in any circumstance - if you are found to have done so, this will result in a disciplinary investigation.

## When and how to notify about Bribery

Notify your manager and/or the Legal Compliance team as soon as possible if you are offered a Bribe, are asked to offer one to someone else, or if you suspect any Bribery, corruption or other breach of this Policy. You can also raise a concern via our [whistleblowing platform](#) if you wish to remain anonymous.

We will support anyone who raises genuine concerns in good faith under this Policy, even if their concerns turn out to be mistaken. We will make sure that no one suffers any detrimental treatment (including dismissal or disciplinary action) as a result of reporting any suspicion of Bribery or corruption in our business or supply chains in good faith. If you believe that you have suffered any such treatment, you should raise this formally with your People Experience (PX) representative immediately.

# Communication and Awareness

Training on this Policy, and on the risk our business faces from Bribery, forms part of the regular training for Communicorns.

Our position on Bribery and corruption in our business and supply chains should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced regularly throughout the duration of the relationship.

## Breaches of this Policy

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal.

We may terminate our relationship with other individuals and organizations working for us or on our behalf without notice if they breach this Policy.

