

Business Partner Code of Conduct

It is great to be working together!

Policy owner: Legal Last updated: April 2025



Help Us Succeed

At Staffbase we believe in the power of communication to inspire change. Our suppliers and partners (together "Business Partners"), play an important role in helping us succeed in unlocking the power of inspirational communication for our customers.

That is why we carefully select our Business Partners and we expect them to live up to certain expectations and standards. We are committed to doing business in an ethical and honest way, and in compliance with applicable laws and regulations. We expect our suppliers and partners to conduct business with similar commitments.

This Business Partner Code of Conduct (the "Code") outlines our expectations when working together. This Code applies to all business partners, including suppliers of goods and services, resellers, and any other third party having a business relationship with a Staffbase entity (together "Business Partners"), including their employees and contractors.



Offer a Safe and Fair Work Environment

We expect our Business Partners to provide a safe and fair work environment, to act in accordance with all applicable labor and employment laws and regulations and standards (e.g. the International Labor Organization Convention).

Child labor, human trafficking, and modern slavery

Business Partners must enforce a strict prohibition of modern slavery, human trafficking, child labor, and forced labor.

Health & Safety

Business Partner must ensure a safe and healthy work environment that complies with all applicable health and safety laws and regulations.

DE&I

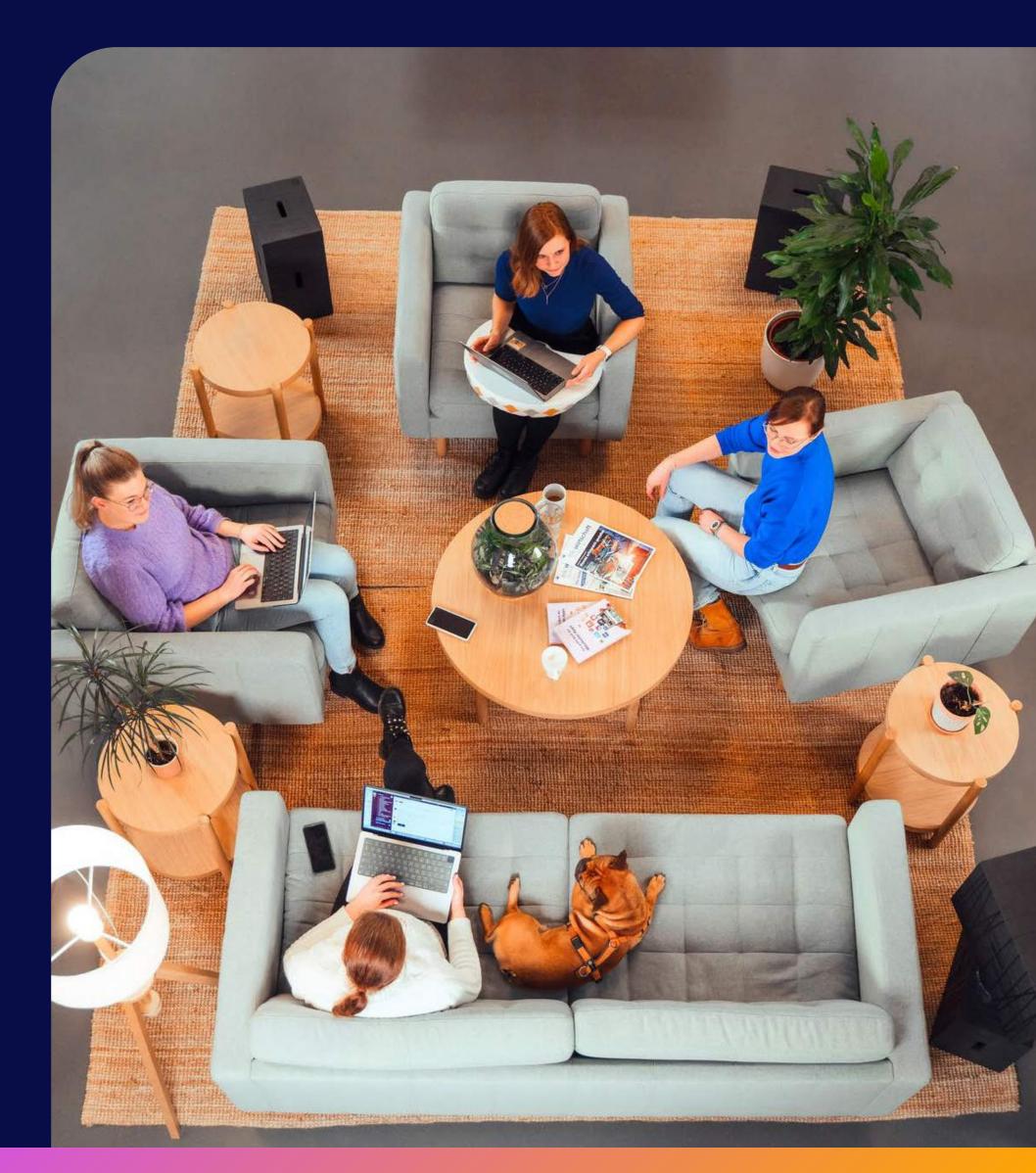
Business Partner must embrace and promote a diverse workforce and inclusive work environment and must not tolerate any form of discrimination, bullying, or harassment.

Compensation & working hours

Business Partners must comply with all applicable local laws regarding working hours, including overtime, rest breaks and paid vacation.

Freedom of association & collective bargaining

Employees must be free to join or not to join an employee representation of their choice.



Help Protect our Assets and Data

When we share information, data, products, or other Staffbase assets with Business Partners, we expect them to protect such data and assets, including where relevant, our customer's data.

Confidential and proprietary information

Business Partners must protect Staffbase's confidential and proprietary information and act to prevent its misuse, theft, fraud, or improper disclosure.

Responsible Al

We like to innovate and we support our Business Partners to innovate as well. We expect our Business Partners to use Artificial Intelligence (AI) responsibly, ensuring that AI systems are designed, developed, and deployed in fair and transparent way. Business Partners must take appropriate measures to prevent bias, discrimination, and harm while maintaining security, accountability, and compliance with applicable laws and regulations.

Data Protection

Business Partners must comply with all applicable data protection and privacy laws, and with their contractual obligations with Staffbase.

Intellectual property

Business Partners must safeguard and take appropriate steps to protect Staffbase's proprietary intellectual property (including trademarks, patents, copyrights, inventions, and other proprietary works), even when such information is public. Use of Staffbase intellectual property is only allowed for the purposes approved by Staffbase.

Act with Integrity

Bribery & Corruption

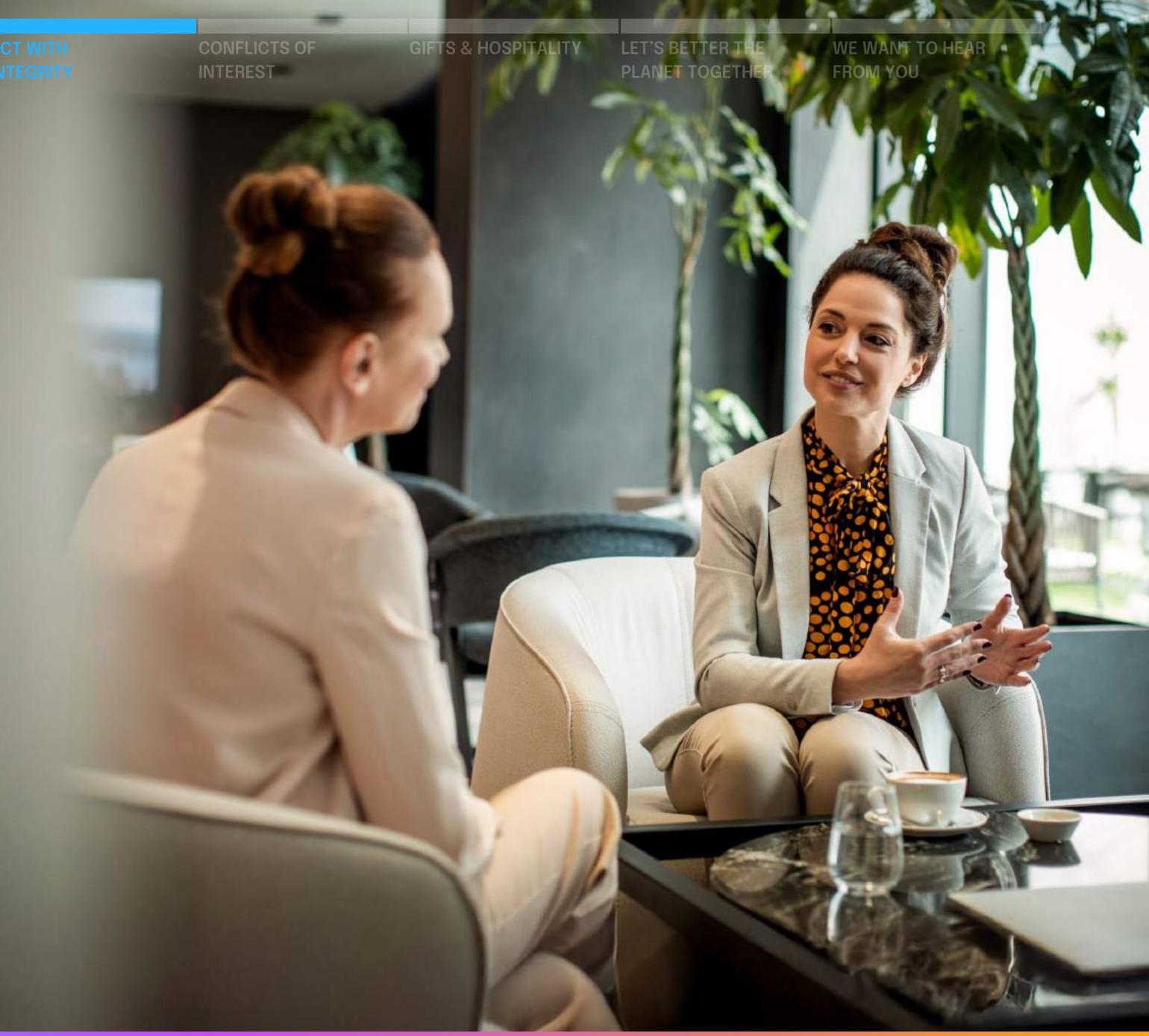
Staffbase takes a zero-tolerance approach to bribery and corruption. We do not allow any form of bribery, as outlined in our <u>Anti-Bribery Policy</u>. We expect our Business Partners to comply with applicable anti-corruption laws. Our Business Partners must not tolerate, permit, or engage in any form of corruption, extortion, or bribery.

Fair Competition

We expect our Business Partners to comply with all competition and antitrust laws that apply to their work with Staffbase.

Money Laundering

We expect our Business Partners to comply with all applicable laws and regulations designed to combat money laundering activities.





Insider Trading

Business Partners that gain access to any material, non-public information about Staffbase or our customers while working with Staffbase must not share that information with others or use it for market trading or to tip anyone else in market trading.

Trade & Export

We expect our Business Partners to comply with all trade and export control laws that apply to their work with Staffbase.

Be Transparent About Conflicts of Interest

Business Partners must be transparent about any interests, activities, or relationships that conflict or may appear to conflict with the interests of Staffbase. Business Partners must not engage in any activity that may interfere with their contractual responsibilities to Staffbase.

Examples of situations that could create conflicts of interest:

- Business Partner employs or is controlled by Staffbase employees or their family members
- Business Partner has gained improper advantage by acting on information learned through your relationship with Staffbase

Reach out to compliance@staffbase.com or use our Whistleblower Platform to raise reports or concerns of conflicts of interest.



Giving and receiving gifts and hospitality is a great way to build and maintain relationships. However, some caution is required! Staffbase has rules on what gifts are appropriate, as outlined in our Anti-Bribery Policy.

What do we allow?

- We can accept reasonable corporate hospitality (like a meal, or tickets to a sporting event, concert) that is not excessively costly and is intended for legitimate purposes
- 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
- We like merch and are happy to receive your branded items like pens, bags, shirts or hats.

What is never allowed?

- Business Partners must never give cash gifts or give gifts in secret
- Business Partners must not offer gifts or hospitality to Staffbase employees at any time during a vendor selection process or during contract negotiations
- Business Partners must not offer gifts or hospitality if it is extravagant, creates a sense of obligation, or is given with the intent to influence a business decision.



Let's Better the Planet Together

Staffbase aspires to better the planet. At a minimum, we expect our Business Partners to:

follow all applicable environmental laws and regulations and to consider how their business decisions impact the environment.

take environmental and climate protection into account in their own operations, for example, by setting climate protection goals.

comply with all applicable laws with respect to the sourcing of minerals and materials from conflict affected regions and high-risk areas.

More information about how Staffbase tries to make a difference can be found at: https://staffbase.com/en/sustainability/.



We Want To Hear From You

Staffbase strives to create a work environment where everyone feels safe, heard, and supported.

To meet our goals we are committed to creating an environment where our Business Partners also feel comfortable raising concerns.

How to raise concerns?

You can raise concerns about suspected reportable conduct at Staffbase or in our supply chain via our Whistleblower Platform. Our Global Whistleblower Policy can be found at https://staffbase.com/en/legal/.

All reports will be carefully reviewed and handled with the utmost care.

