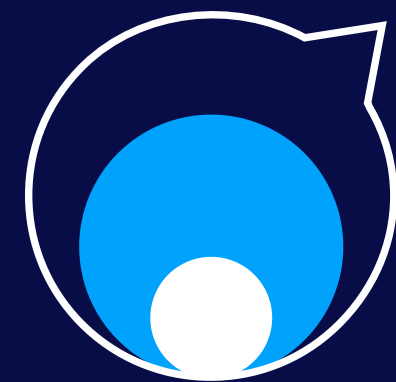
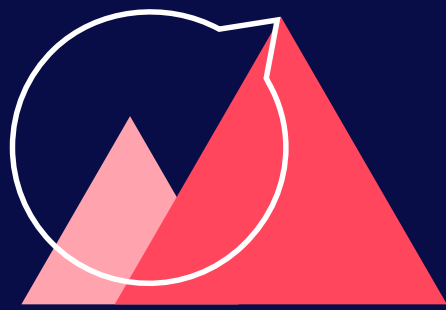




Code of Conduct

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Our vision & values

Our vision and values keep us focused on what truly matters. In relation to this Code of Conduct, keep our values in mind and always act with integrity. When in doubt, our values can support you in doing the right thing.

Our **vision** is to inspire people to achieve great things together.
Our **values** are:



WE TAKE
OWNERSHIP



WE TRULY
CARE



WHEN YOU GROW
WE ALL GROW

We take ownership. We go the extra mile together, leaving no stone unturned in our pursuit of excellence and are empowered to make the difference! We take the initiative and move with purpose, celebrate our achievements, recognize lessons in our mistakes, and move to the next mountain to climb.

We truly care. We love building Staffbase together and put our mission and our customers at the heart of what we do. We always assume positive intent, listen to and respect each other's perspectives, deeply value authenticity, and prioritize clarity over harmony.

When you grow, we all grow. We have a growth mindset, embrace change, and move forward with curiosity and courage. We get better every day, act with humility and ambition, and are enabled by our commitment to learning, honest feedback, and open minds.

LEADERSHIP

People managers, lead by example

If you are a people manager, lead by example and always demonstrate the highest standards of behavior.

Create an environment where team members understand their responsibilities and feel comfortable raising issues and concerns without fear of retaliation.

If an issue is raised, take prompt action to properly address the concerns and correct problems that arise.

Who does this Code of Conduct apply to?

This Code of Conduct sets out the standards of conduct expected from all Staffbase Communicorns (including employees, contractors, consultants and working students).

The way we, as Communicorns, act in any situation should be as a direct consequence of our deeply held values. We take **ownership** for our behavior and **care** enough **to do the right thing, even when it's hard; treat people with respect;** and even though we often need to act quickly in our high **growth** context, we don't forget to **act wisely**.

These values are fundamental to our business, and form the bedrock of our Code of Conduct: a guide to the Staffbase way to act that is important for us as a rapidly scaling company.

Any breaches of the terms of this Code of Conduct, or of the Staffbase Policies that relate to it, will carry potentially serious consequences, depending on the specific circumstances, up to and including dismissal.

DO THE RIGHT THING

At Staffbase, we always want our Communicorns to do the right thing. That ranges from compliance with the law to making sure we act in line with the guiding principles of this Code of Conduct.

Raising questions and concerns

You can use any of the following channels to raise questions or concerns:

- your line manager
- our anonymous [Whistleblowing Platform](#)
- our internal PX complaint procedure on [Stuffbase](#)
- our [Legal Helpdesk](#) or compliance@staffbase.com



We do not allow retaliation against anyone who, in good faith, reports a potential or actual violation of our Code of Conduct. This also applies if the report turns out to be unfounded.

We take all reports seriously and will promptly investigate any allegations of misconduct.

Learn more:

[Staffbase Whistleblowing Policy](#)

Corrupt practices

We have a zero-tolerance approach to bribery and corruption.

Remember, giving or accepting a benefit of any kind to improperly or illegally influence someone's actions or decisions is bribery. This is not limited to the exchange of cash but may also relate to giving or accepting kickbacks, loans, giving lavish hospitality, discounts, or awarding a contract.

Make sure to read and comply with our Anti-Bribery Policy, because failure to comply with these rules will have serious consequences for your employment, as well as potentially amounting to criminal acts.

Learn more

[Staffbase Anti-Bribery Policy](#)

Gifts & hospitality

Giving gifts or hospitality is a great way to build relationships. However not all gifts or hospitality are allowed.

Our Rules on Gifts & Hospitality can be found in our Anti-Bribery Policy. Make sure you know what types of gift or hospitality you can and cannot give or receive. Also make sure you know when to report a gift or hospitality. If the reported gift or hospitality is not in line with our Rules on Gifts & Hospitality, it may be blocked.



Be extra careful when dealing with public or elected officials. It is a complex legal area and strict rules apply. Make sure to act in line with our Anti-Bribery Policy.

Conflicts of interest

We support your personal, professional, and community activities outside work, as long as they don't affect your job or Staffbase's interests.

Communicorns are expected to act in Staffbase's best interests and avoid conflicts of interest at all times.

A conflict of interest may occur whenever your interest in a particular subject may lead you to actions, activities or relationships that undermine the company and may place it at a disadvantage (but that doesn't mean you can't advocate for yourself in a salary negotiation, for example!).

A conflict of interest may seem present even when it isn't. When evaluating a potential conflict of interest, you must consider:

- Whether you have (access to) an advantage others do not have; and
- How the situation might be perceived by others.



Potential conflicts of interest are not uncommon or per se prohibited, as long as they are properly reported and managed.

The best practice in any situation that appears to be a conflict of interest is to not act until you can discuss the situation with your manager, PX, or the Legal team.

If in doubt, please raise a ticket via [the Legal Helpdesk](#) outlining the situation for further advice.

Common potential conflicts of interest:

- Outside employment/advisory roles (even if no confidential or customer information is involved)
- Doing Staffbase business with friends or family
- Close personal relationships (family or romantic) between subordinates/managers
- Investment of more than 5% in a company that is similar to Staffbase
- Being able to influence decisions in hiring, approving rewarding or disciplining any employee of the Staffbase Group with whom you have a family, romantic or significant personal relationship
- Borrowing from or lending money to Staffbase group customers or suppliers (including employees)

TREAT PEOPLE WITH RESPECT

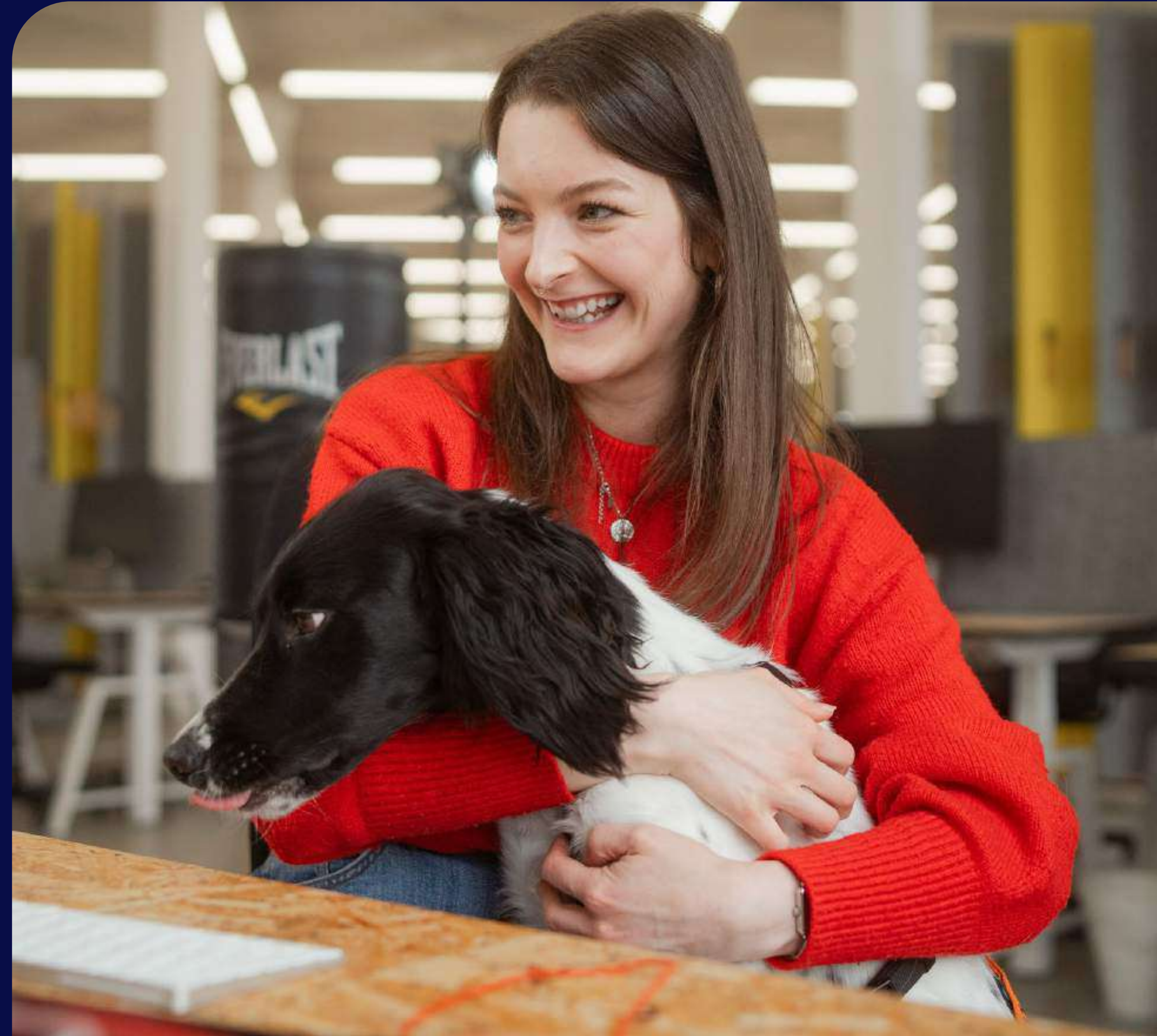
We build a culture everyone loves

At Staffbase, we believe that people deserve to work in an environment that allows them to be fully themselves. We believe that everyone who works at or with Staffbase should be treated with respect - which sometimes will include respectful disagreement.

All Communicorns are expected to maintain a respectful workplace culture that is free of harassment, bullying, bias, and unlawful discrimination of any kind. Together, we will cultivate a workplace culture that everyone can be proud of.

Learn more

- [Diversity and Inclusion Statement](#)
- [Anti-Discrimination, Anti-Harassment, and Anti-Bullying Policy](#)



Human rights

We do not allow any form of human right violations, not within our own operations, and not within the operations of our business partners. Staffbase will adhere to internationally applicable human rights guidelines, laws, and regulations (such as the International Labor Organization (ILO) Convention).

Human right violations include:

- Modern slavery, child labor, and human trafficking
- Discrimination, harassment, and abuse
- Offering unfair wages and not respecting laws on working hours
- Offering unsafe working conditions
- Restrictions on freedom of association & collective bargaining

Please share your concerns. We want our Communicorns to feel safe, respected, and heard. We also care about individuals working for our business partners. If you have any concerns about a (potential) violation of human rights in our organization or at our partners, make sure to raise such concerns.

Learn more:

- [Human Rights & Modern Slavery Policy](#)
- [Business Partner Code of Conduct](#)
- [Staffbase Whistleblowing Policy](#)

Health & safety

Staffbase is committed to providing a healthy and safe work environment for all Communicorns. Even though Staffbase does not operate in a dangerous work environment with physically demanding labor, an accident at work could still happen.

We strive to continuously improve our working conditions. All Communicorns should, to the best of their ability, comply with the applicable health and safety policies. It is important that you carry out your work to the benefit of everyone's health & safety.

Learn more

- [Human Rights & Modern Slavery Policy](#)
- [Health & Safety Rules](#)
- [Business Partner Code of Conduct](#)

A woman in a green sweater is standing in a kitchen area, smiling. The word "STAFFBASE" is written in large, green, block letters on the wall behind her. In the foreground, a person's hand is holding a clear plastic bottle, partially obscuring the view. The background shows a modern kitchen with dark cabinets, a sink, and various kitchen items on the counter.

STAFFBASE

ACT WISELY

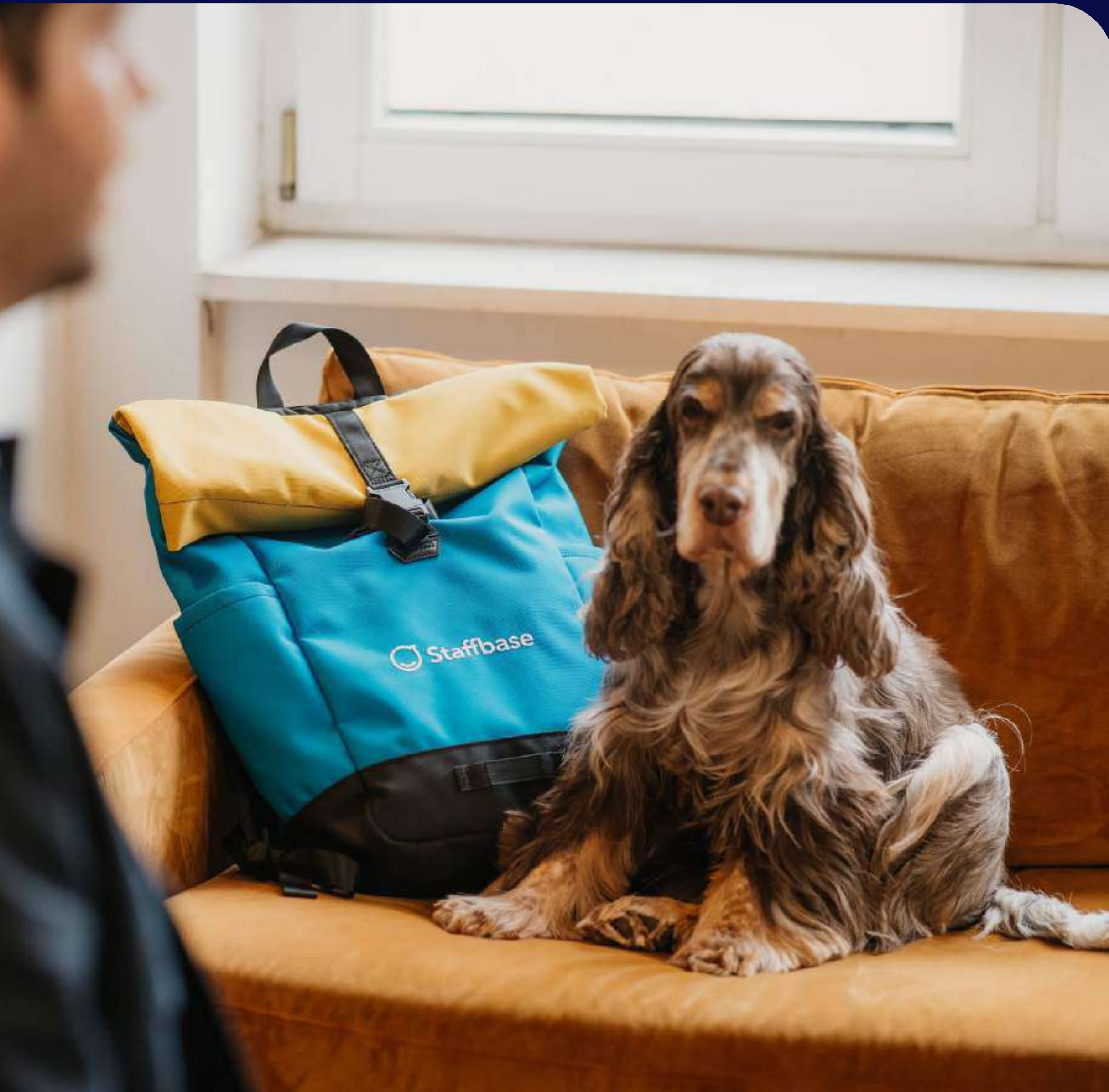
Protect our assets

Personal data & privacy

Keeping personal data secure is extremely important to us: we owe a responsibility to our employees, our customers, and any other individual whose personal data we handle, to take the utmost care with their data. All Communicorns are expected to process personal data in accordance with applicable laws and our Data Protection Policy.

The protection of your personal data as an employee is very important as well, of course. If you wish to know how Staffbase, as an employer, processes your personal data, please read our Employee Privacy Notice.





Company property

We expect all of our Communicorns to treat any Staffbase property that you are provided as part of your role with care and respect. If we find that you have damaged or lost it on purpose, or through carelessness, we may deduct the cost of replacing or repairing the property from your salary.

Personal use of Staffbase property should not interfere with your work or your work environment, should not cause harm to others and should always be in compliance with our policies.

Confidentiality & intellectual property

All of our Communicorns should have signed a Confidentiality and Proprietary Rights Agreement or a Non-Disclosure Agreement (or both) depending on their employment status. You are required to comply with the terms of those documents at all times and to ensure that you keep information that is confidential to our company, within our company.

Learn more

- [Staffbase Data Protection Policy](#)
- [Staffbase Employee Privacy Notice](#)
- [Information Security Standards](#)
- [Acceptable Use Policy](#)

Act professionally

Alcohol

We expect our Communicorns to avoid being under the influence of alcohol while working or driving for work. You can consume alcohol at Staffbase sponsored events whether within or outside of the office, but we expect you to behave reasonably and maintain professional standards of behavior (and of course, to always comply with drink driving legislation).

No one should be put under pressure to consume alcohol at a Staffbase social event, whether it is organized by us, or a gathering of colleagues outside of work - and we expect everyone to behave respectfully to their colleagues at all times, including outside of work.

Drugs

We expect our Communicorns to avoid being under the influence of illegal drugs or controlled substances (except as prescribed by a doctor) or distributing these substances while working or driving for work.



Value healthy competition

At Staffbase, we want to win – but not at the cost of our integrity. We rely on the quality of our product and service to win and keep our customers. When we market our products, including when we talk to customers or prospects, we do so in a way that is truthful and accurate.

Most countries have antitrust and competition laws that promote fair competition and prohibit certain unfair practices. Communicorns must not:

- Seek or use information about or from our competitors that is improperly or unlawfully obtained
- Seek an unfair advantage by trying to limit competition or fix or rig any bidding process (or helping others to do so).
- Dictate the price that our independent partners charge their customers.

Respect export controls & sanctions

Even though Staffbase does not develop physical products, we must still be mindful about export restrictions and trade laws. Be mindful that:

- Doing business with certain countries, entitled, or individuals comes with risks. More information can be found on [Staffbase](#)
- Certain encryption exports may require licenses or approvals. Reach out to the Legal team if you are implementing encryption types into our software.

Keep things confidential

You may have access to confidential information belonging to Staffbase, our customers, partners, or third parties. It is essential to protect this information at all times. Communicorns are expected to:

Only use information as part of our roles and as permitted by law

Not use confidential or customer information for your own personal benefit, such as by trading on material non-public information in those companies.

Maintaining confidentiality is key to preserving the trust of our employees, customers, and partners—they rely on us to handle their information responsibly. This obligation doesn't end when you leave Staffbase; it continues even after your employment or engagement ends.

Use AI responsibly

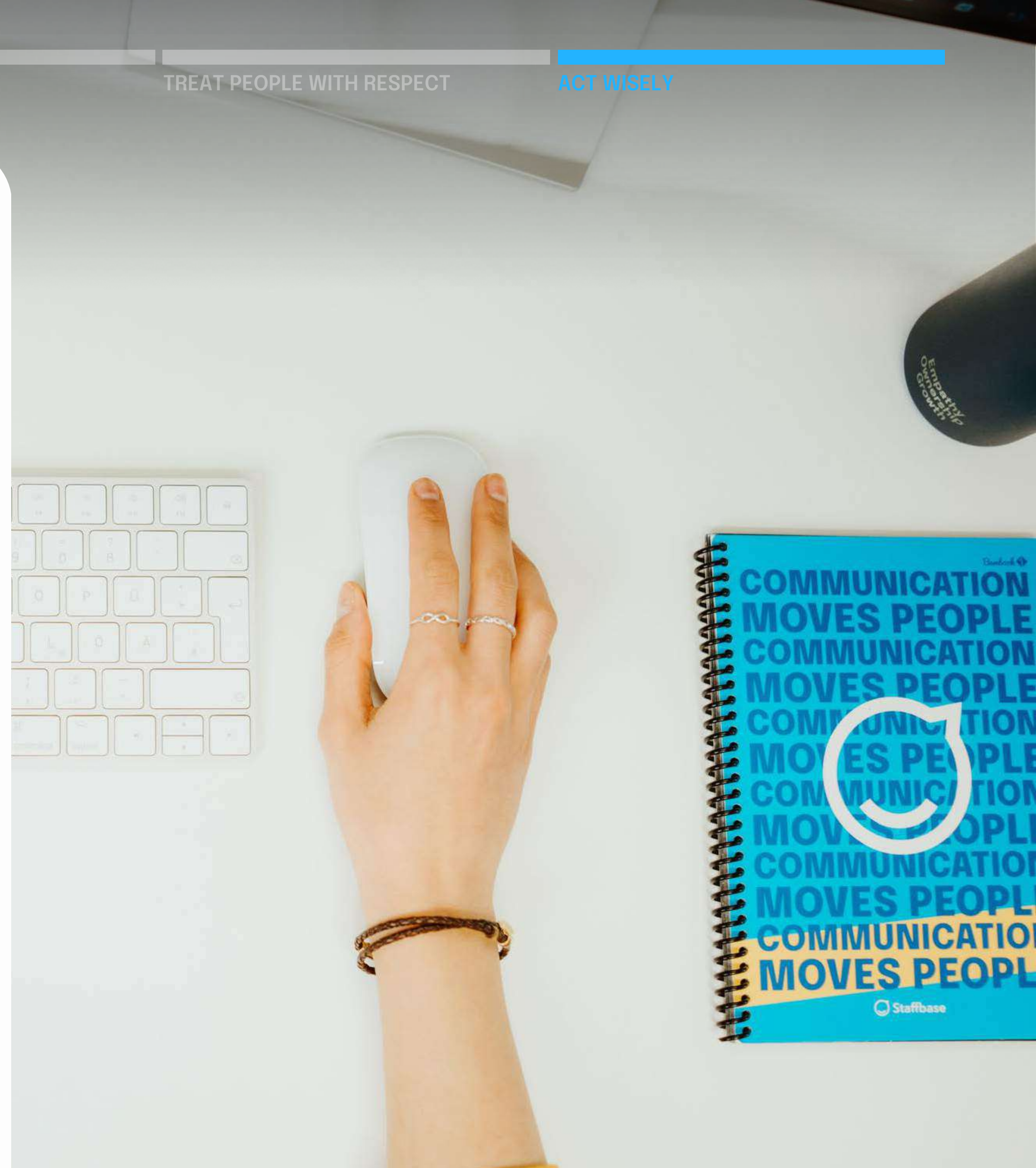
We are committed to using technology for positive impact. We recognize the potential of artificial intelligence (AI) and other emerging technologies to benefit both businesses and society. While generative AI can boost efficiency, we acknowledge it also presents risks.

We prioritize the responsible and ethical use of AI tools. All Communicorns are expected to:

- Make sure the AI tools is reviewed by the Legal and Security teams prior to use
- Follow our data security policies, our Responsible AI Usage Policy and any specific AI tool guidelines when using AI for business purposes
- Comply with applicable laws and regulations (including the EU AI Act, the GDPR and other data protection regulations)
- Use technology to inform, not replace, human decision-making
- Carefully review AI-generated content for accuracy
- Design AI features that meet the needs of our customers

Learn more:

- [Responsible AI Usage Policy](#)
- [Business Partner Code of Conduct](#)



Support our planet

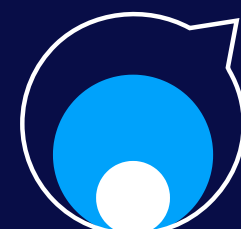
Staffbase is dedicated to supporting both our people and the planet. We drive environmental initiatives that reflect our core values and commitments to stakeholders.

Every Communicorn can contribute to our initiative in some way. More information about how Staffbase's tries to make a difference, and how you can contribute, can be found at: <https://staffbase.com/en/sustainability/>

Learn more

- [Our path to net-zero](#)
- [Business Partner Code of Conduct](#)





In summary

Acting ethically and obeying the law, both in letter and spirit, are among Staffbase's core values.

You are expected to act with integrity and to exercise good judgment and common sense in your efforts to comply with all applicable laws, rules, and regulations and are encouraged to ask the Legal Team for advice if you are uncertain about these.

You are responsible for becoming familiar with Staffbase's policies and ensuring that you integrate them into every aspect of our business.

