



Global Anti-Bribery and Corruption Policy

Bynder has no tolerance for bribery, corruption, and related illegal and unethical business practices. This is a global policy governing Bynder and applicable to the management, employees and contract workers of all entities around the world; even in areas where such practices are either legal or common, Bynder expects total compliance with this global policy without any exception.

Anti-Corruption

Corrupt practices can be called by many names, but whatever the label, you must always avoid all corrupt practices, including these activities:

Bribery - giving or offering anything valuable to improperly influence the recipient. Bribery can involve anything that is valuable: cash, gifts, entertainment, payments to a third party (including a charity), offers of employment--anything valuable. You should not give, offer, or accept a bribe; if anyone gives or offers a bribe to you or any employee of Bynder, inform the Chief Legal Officer immediately.

Facilitation Payment - a payment made to a government official to encourage the official to take routine government action. This does not include official fees charged by a government.

Kickback - returning a portion of money paid (or money due) as an improper incentive to direct business to the payor. You should not give, offer, or accept a kickback; if anyone gives or offers a kickback to you or any employee of Bynder, inform the Chief Legal Officer immediately.

Gifts

All gifts--including meals and entertainment--must have a reasonable, non-corrupt business purpose and must be reasonable in value.

Applicable Laws

Bynder requires its employees to comply with this global policy as a minimum standard. Applicable laws such as the Foreign Corrupt Practices Act (United States), the Bribery Act (United Kingdom), the anti bribery and anti-corruption provisions in the Dutch Criminal Code (The Netherlands) may set higher or more specific standards; all applicable laws must also be followed to the utmost.

Reporting and Questions

If you have any questions regarding the application of this global policy, contact anyone on the Bynder



Legal Team directly or at legal@bynder.com.

Each employee of Bynder has the responsibility to report suspected violations of this global policy to the Chief Legal Officer.

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