

Bynder Global Code of Conduct & Ethics

This Global Code of Conduct & Ethics ("**Code**") is made on behalf of Bynder Holding B.V. and its subsidiaries (collectively referred to as "**Bynder**" or "**we**"). Bynder is a global SaaS provider of a Digital Asset Management platform that offers organizations a smart way to create, find and share creative files and branding materials. Bynder has eight offices globally and conducts business in six countries.

This Code demonstrates the values Bynder holds as a business organization and the minimum standards Bynder expects from everyone that we conduct business with.

This Code applies to everyone conducting business with Bynder including but not limited to employees, members of the Board of Directors, contractors, officers, partners, consultants or other contingent workers of Bynder. If you are conducting business with Bynder, it is your responsibility to read, understand, fully acknowledge and adhere to what is stated in this Code and in all other linked policies and documents.

This Code demonstrates the minimum standards that Bynder expects from everyone working at or doing business with Bynder.

This Code does not change any legal or contractual obligations that you may otherwise have with Bynder. Bynder reserves the right and has the sole discretion to modify or update this Code at any time.

1. **Environmental, Social, Governance**

At Bynder we align our policies and we use [United Nations Sustainable Development Goals](#) (SDGs) as a guideline for our reporting. We have adopted and are implementing a set of policies that clearly focus on the areas that are important for our business and the various stakeholders we

interact with. We have developed methodologies that assist us in quantifying and explaining our journey towards achieving our goals in line with the SDGs and have a set of policies and papers on environmental and social fields.

1.1. Environmental

Our business and actions are aimed at reducing the impact on the environment by taking actions aimed at environmental sustainability. By taking climate focused actions, we ensure our suppliers and business operations reduce environmental footprint. Our policies are in line with the following goals:

- **Goal 7:** Usage of affordable and sustainable energy: we ensure that we minimize the use of energy through the usage of energy efficient equipment. Our heating policy requires that heaters are adjusted temporarily to a minimum of 1 and a maximum of 4.
- **Goal 12:** Ensure sustainable consumption and production pattern:
 - We use best practices to minimize the use of energy and water consumption among Bynder's offices. By employing energy-efficient systems, installing water-saving fixtures, and promoting sustainable behaviors among employees. These measures help reduce our environmental footprint and enhance overall sustainability.
 - We diligently track our carbon footprint to enhance environmental performance. In partnership with AWS, we focus on accurately measuring and reporting our carbon emissions and utilizing AWS's sustainability initiatives to reduce environmental impact of our data centers, for more information please see Sustainability at Amazon. Hence, driving forward decarbonization along Bynder's entire value chain.

- We are a paperless company. We use our best efforts to make use of local products and suppliers. At our offices we use only reusable cups and glasses.
- **Goal 13:** Take actions to combat climate change and its impact: IT recycles laptops, we encourage the use of public means of transportation, hybrid work policy.

1.2. Social

We acknowledge the role human and social capital play in our business. We work at improving our business practices to ensure they are equitable and promote growth. We offer a conducive environment for work, provide opportunities for learning and development. We embrace diversity, equity and inclusion and provide a safe environment for work. We ensure that our employees earn a fair and living wage and feel they are a part of the decision-making process of the company. Our policies are in line with these specific targets:

- **Goal 3:** Provide a healthy and safe environment while undertaking activities/policies that ensure the well-being of all: safety equipment available, provision of social activities like after work hangouts, Bright Funds donation matching platform, Quan and Open up wellbeing platforms, buddy system.
- **Goal 4:** Learning opportunities for all: We have a thriving L&D department that provides learning and continuous improvement initiatives.
- **Goal 5:** Embracing gender equality: DEI committee and initiative to ensure that all Byndies have the freedom to be their true and authentic selves.
- **Goal 8:** Promotion of inclusion and decent and productive work environment for all: our office is accessible to all and provides all the comfort and ergonomic tools needed for work, unlimited holidays.

- **Goal 11:** Make the workspace safe and sustainable: we recycle in line with the local regulations of the locality where our offices are located.

1.3. **Governance**

Bynder is committed to ethics, social benefits and embracing equality in our corporate and management governance structure. We seek to ensure that our actions are anchored in best corporate governance practices by being ethical and responsible. Our governance policies use these goals as standards:

- **Goal 12:** Ensure sustainable consumption and production patterns: support local suppliers through our purchases
- **Goal 16:** promote peaceful and inclusive societies for sustainable development, access to justice for all, effective, accountable and an inclusive institution at all levels: culture council, fair access for promotion, equal opportunity employer and encourage Byndies to engage in voluntary activities.

2. **Compliance with Applicable Laws and Regulations**

Bynder takes compliance with applicable laws and regulations very seriously. Everyone that conducts business with Bynder is strictly prohibited from engaging in any unlawful activity. Bynder expects all of its customers, employees and suppliers to comply with applicable laws and regulations and notify Bynder in case of any actual or suspected breach of applicable laws. The areas Bynder expects compliance include but are not limited to:

- All anti-bribery laws, including the United States Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act.
- Antitrust and fair competition laws.
- Labor laws; and
- laws and regulations concerning data privacy and information security.

2.1. **Anti-Bribery and Corruption**

Bynder is committed to complying with all applicable anti-bribery laws and regulations and has no tolerance for bribery, corruption, and all related illegal and unethical business practices. Bynder has a Global Anti-Bribery and Corruption policy that demonstrates how Bynder upholds the importance of anti-bribery laws and expects full compliance with its Global Anti-Bribery and Corruption Policy without exception.

For more details, please see Bynder's [Global Anti-Bribery and Corruption Policy](#).

2.2. **Modern Slavery**

We are committed to respecting internationally recognized human rights laws and preventing any violations in our organization's supply chain. Please read [Bynder's Modern Slavery Statement](#) for more details.

3. **Diversity, Equity and Inclusion at Bynder**

Bynder Love is the principle that guides the way we grow our teams, support our employees, and celebrate our differences. At Bynder we strive to create a culture that embraces every Byndie because differences in background, experience, and perspective makes Bynder even better. At Bynder, a diverse, inclusive, and equitable workplace is one where all employees, whatever their ethnicity, color, sex, age, religion, disability, sexual orientation, gender identity, national origin or physical and mental ability are valued and respected.

Our commitment is for all Byndies to have the freedom to be their true authentic selves. Just as we are never finished innovating, Bynder's commitment to being An Even Better Bynder is a constant, evolving commitment that includes education, listening, and action. With 50+ nationalities represented across the organization; nurturing diversity is intrinsic to Bynder's culture. By integrating our different points of view, perspectives, and backgrounds, we create an environment that fosters growth and promotes individual wellbeing.

For more details on Diversity, Equity and Inclusion at Bynder, see our [Diversity, Equity and Inclusion policy](#).

3.1. **Equal Employment Opportunity**

Bynder is an equal opportunity employer. We are committed to complying with all federal, state, national and local laws providing equal employment opportunities, and all other employment laws and regulations. It is our intent to maintain a work environment that is free of harassment, discrimination, or retaliation based on race (including natural hairstyle), color, ancestry, religion (including religious dress and grooming practices), gender, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity, transgender (including whether or not you are transitioning or have transitioned), national origin, age, marital status, physical or mental disability, medical condition, military or veteran status, or genetic information and other characteristics protected under state, federal or local laws. We want all employees to treat others with respect and professionalism and as such:

All decisions to hire or promote people are based on skills, experience, and/or potential.

- We strive to reduce bias in every process.
- We commit to equal pay for equal work.
- We will make accommodations to help people with disabilities.
- We conduct diversity and communication training.
- We will not tolerate discriminatory, offensive, or inappropriate behavior.

We ask you to report any discriminatory action against yourself or your colleagues to a member of management, People & Talent, or the Anonymous reporting platform. Bynder will not retaliate against anyone who files a complaint or participates in any workplace investigation or complaint process, and will not tolerate or permit retaliation by management, employees, or co-workers.

4. **Anti-Harassment and Anti-Bullying**

Bynder is committed to providing a workplace free from discrimination, harassment, bullying and retaliation. Therefore, Bynder will not tolerate harassment of any form based on the following protected categories: race (including natural hairstyle), color, ancestry, religion (including religious dress and grooming practices), gender, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity, transgender (including whether or not you are transitioning or have transitioned), national origin, age, marital status, physical or mental disability, medical condition, military or veteran status, or genetic information and other characteristics protected under state, federal or local and national laws.

Such conduct in any form is outrightly prohibited in the workplace, at work-related functions, or outside of work if it affects Byndies in the workplace.

We implore all to use common sense to ensure that no actions are perceived as negative and remember that it's not just the intention of the remarks or actions that determine whether harassment has taken place it is also the impression such remarks or actions make.

Any suspected or actual breach of the above should immediately be reported to Bynder's Anonymous Counselors.

All Byndies must ensure you understand this policy and your obligations.

5. **Whistleblower Policy**

Byndies are expected to act in an ethical manner in all commitments to Bynder. Bynder is committed to the highest possible ethical standards and encourages everyone associated with Bynder to commit to acting in the best interest of Bynder whilst adhering to Dutch, EU and all other applicable local and international laws. Should you suspect fraud, abuse, or misuse of Bynder resources or assets, encountered dishonest actions or deeds, suspect a conflict of interest, or any other behavior that violates Bynder policies or applicable laws and regulations, you have a responsibility to report the violation or suspected violation to the appropriate person(s) or entities as indicated below. (Complaints of suspected harassment,

discrimination or retaliation should be reported in accordance with the procedure outlined in the Policy Against Harassment, Discrimination and Retaliation.)

In addition to suspected harassment, discrimination, or retaliation, examples of other concerns or complaints that should be reported include, but are not limited to:

- Misuse of Bynder fund or resources
- Conflicts of interest
- Safety concerns
- Potential illegal conduct
- Acts that threaten or likely to threaten public health

Anyone who reports a violation in good faith will not suffer adverse employment consequences or be disadvantaged with respect to work. Anyone who in any way adversely affects the employment of an employee who raises a good faith complaint or concern will be subject to disciplinary action, up to and including termination of employment.

Employees should report violations or suspected violations to the culture council using the laid down internal reporting procedure. Anonymous reporting is assured and available through the Bynder Anonymous reporting procedure. All reports involving a potential violation are treated seriously and will be fully investigated to determine the facts and resolution appropriate under the circumstances and substantive feedback report will be issued.

6. **Prohibition of Improper Payments**

All Byndies are required to use lawful practices involving payments to customers, political parties, officials, candidates, or governmental authorities. As a result, kickbacks and bribes offered with the intent of inducing or rewarding specific buying decisions or actions are strictly prohibited. No Byndie may offer to make direct or indirect payments of value in the form of compensation, gifts or contributions.

For more details, please see [Bynder's Global Anti-Bribery and Corruption](#)

Policy.

7. **Confidential Information and Bynder Property Policy**

During your relationship with Bynder, you may have access to confidential and proprietary data that is owned by Bynder or is in Bynder's possession under non-disclosure obligations agreed with third parties. Confidential information and proprietary data are not generally known by competitors or within Bynder's field of business. You will be asked to sign a confidentiality agreement with Bynder, which regulates how you treat such information.

This information (hereinafter referred to as "**Confidential Information**") includes but is not limited to: **(a)** information relating to Bynder that is not generally known to the public or that constitutes a trade secret; **(b)** information that is owned, developed or otherwise acquired by Bynder, including Bynder's financial data, technical information, systems and use documentation; and **(c)** other information that would reasonably be considered confidential.

To protect Bynder's interest in this valuable asset, you must:

- Not use any such Confidential Information for your personal benefit or for the benefit of any person or entity other than Bynder, and
- Use your best efforts to limit access to such Confidential Information to those who have a need to know it for the business purposes of Bynder.

8. **Drug & Alcohol and Smoke-Free Policy**

Bynder is committed to protecting the safety and well-being of all Byndies in our workplace. We recognize that alcohol abuse and drug abuse pose a significant threat to our goals. Bynder is a drug-free workplace, which means that you can't possess, use, sell, distribute, manufacture, purchase, transfer, or cultivate drugs in the office.

Drinking in the office after working hours before the office is closed and during scheduled happy hours is permitted although we ask you to use good judgment and act as a responsible Byndie, keeping the drinking after work hours to a minimum.

Bynder is a smoke-free environment. Smoking, chewing, use of e-cigarettes/pipes, and other tobacco and nicotine products is not permitted at any time in Bynder work areas, vehicles, or client work areas or vehicles.

Any individual who conducts business for Bynder or applies for a position with Bynder is covered by our drug & alcohol and smoke free workplace policy. Our policy includes, but is not limited to, full-time Byndies, part-time Byndies, volunteers, contractors, interns, and applicants. Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for Bynder. Therefore, this policy applies during all working hours, whenever an individual is conducting business or representing Bynder, and while an individual is on call, on Bynder property, and at a Bynder-sponsored event.

9. **Data Privacy and Security**

At Bynder, we are committed to protecting the privacy and security of our customers' personal and confidential information. We recognize the importance of data privacy and cybersecurity in today's digital age, and we take the necessary steps to safeguard our customers' information and prevent any unauthorized access, theft, or disclosure.

9.1. **Data Privacy**

We collect and process personal information in accordance with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA). We only collect and use personal information for the purposes for which it was collected only after the proper legal basis has been established.

We take the following measures, amongst others, to protect our customers' personal information:

- Regular security assessments to identify and address potential vulnerabilities

- Encryption of personal information during transmission and storage
- Access controls and logging mechanisms to prevent unauthorized access to personal information
- Secure disposal of personal information when it is no longer needed

9.2. **Cybersecurity**

We maintain a comprehensive cybersecurity program to protect our systems, networks, and data from cyber threats. Our cybersecurity program includes the following measures:

- Regular security assessments and vulnerability testing to identify and address potential risks
- Implementation of security controls to prevent unauthorized access, malware, and other cyber threats
- Encryption of sensitive data during transmission and storage
- Monitoring of network traffic and logs to detect and respond to cyber incidents
- Regular training and awareness programs for employees and third-party service providers on cybersecurity best practices
- Resilient business continuity management program
- Secure Development principles
- Infrastructure security based on industry best practices

We are committed to continuously improving our cybersecurity program and complying with applicable laws and regulations, including the ISO 27001, ISO 27018 and ISO22301 international standards for information security management, storing PII in the cloud and business continuity management.

Please visit <https://www.bynnder.com/en/legal/responsible-disclosure-policy/> for more information.

10. **Raising Issues & Reporting Violations**

Stay vigilant against any possible violations of this Code and be proactive in case you spot an issue relating to the violation of this Code. Every person within our organization or conducting business with Bynder has the responsibility to prevent, detect and report suspected violations of this Code. Any suspected violation should be reported to the Bynder Legal Team directly at legal@bynder.com or to People & Talent Team at hr@bynder.com