

Business Partner Code of Conduct

This Code of Conduct ("Code") demonstrates the values Bynder Holding B.V. and its subsidiaries ("Bynder") hold as a business organization and the minimum standards expected from everyone with whom we conduct business. It sets clear, enforceable expectations for ethical, responsible, and lawful conduct throughout our supply chain, consistent with Bynder's values: *Unite. Create. Thrive.*

We expect all our suppliers, vendors, contractors, consultants, agents, and partners conducting business with Bynder ("Partners") to:

- Read, understand, and comply with this Code;
- Ensure that equivalent commitments are upheld throughout their own operations, supply chains, and business relationships;
- Promptly report incidents of non-compliance with this Code or any other wrongdoing.

All capitalized terms not defined herein shall have the meanings ascribed to those under the applicable law.

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE

I. Environmental Responsibility

At Bynder, we are dedicated to minimizing our environmental impact and promoting social responsibility. Bynder's environmental policies and guidelines align with the United Nations Sustainable Development Goals (SDGs). We require our Partners to comply with all applicable environmental laws, regulations, standards, and permits; manage energy, water, and waste responsibly; and work to reduce greenhouse gas emissions and other pollutants. Hazardous substances must be handled, stored, transported, and disposed of safely. Where relevant, Partners must comply with restrictions such as RoHS and REACH and avoid prohibited substances. Sustainable materials and packaging should be preferred, and efforts made to minimize single-use items. Partners must accurately report environmental data to Bynder upon request. Bynder also encourages Partners to adopt science-aligned climate targets and transparently report their progress.

II. Social Responsibility

We are committed to upholding ethics, social responsibility, and equality within our corporate and management governance structures. Our goal is to ensure that our actions

are grounded in best practices for corporate governance, ethical, responsible, and aligned with the UN Sustainable Development Goals (SDGs). We therefore expect our Partners to support local suppliers through sustainable purchasing and consumption practices, to promote peaceful and inclusive societies for sustainable development, to provide access to justice for all, and to help build effective, accountable, and inclusive institutions.

In addition, we emphasize the importance of fair access to promotion, equal employment opportunities, and active engagement in voluntary and community support initiatives.

People

Like Bynder, Partners must be committed to the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Declaration of Human Rights, the UN Global Compact, and the principles set out in the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We take a zero-tolerance approach to any violations of these principles. We expect Partners to follow all applicable laws relating to human rights and employment practices and to strive to ensure their workplaces are welcoming and inclusive for everyone, in accordance with the following:

- Prohibit forced, bonded, or indentured labor, human trafficking, and prison labor;
- Prohibit child labor and comply with minimum age and compulsory education laws;
- Ensure freely chosen employment and not retain original identity documents;
- Avoid discrimination in hiring, pay, training, promotion, and termination;
- Provide fair wages and benefits, with timely and accurate wage statements;
- Keep working hours within legal limits;
- Respect freedom of association and collective bargaining;
- Maintain a harassment-free and inclusive workplace;
- Charge no recruitment fees to workers and use responsible recruitment practices, with contracts provided in workers' native languages;

- Provide relevant training (e.g., human rights, anti-bribery, data protection, security hygiene) and maintain completion records.

Health, Safety & Well-being

Partners must provide safe workplaces and, where applicable, safe living conditions. Partners must identify and mitigate hazards, including chemical, electrical, mechanical, ergonomic, and psychosocial risks. Emergency preparedness must be ensured through risk assessments, drills, alarms, clear evacuation routes, and access to first aid. Workers must receive proper training and have appropriate personal protective equipment. Facilities must maintain proper sanitation, potable water, adequate ventilation, and cleanliness. All incidents must be reported, analyzed for root causes, and followed by corrective actions. Bynder encourages Partners to promote worker well-being and mental health.

Equality, Diversity & Inclusion

Bynder Love guides how we support our people and celebrate diversity. We expect Partners to foster inclusive workplaces that value different backgrounds and perspectives, recognizing that diversity strengthens organizations. Everyone must be treated with dignity and respect, free from discrimination, harassment, or exclusion based on any protected characteristic. Partners must ensure equal opportunity in all employment practices, provide equal pay for equal work, make reasonable accommodations for disabilities, and comply with all applicable non-discrimination laws. Workplaces should remain free from harassment, and all disrespectful or intimidating behavior must be challenged and reported.

III. Governance

Bynder has zero tolerance for bribery, corruption, extortion, and all related illegal practices. Partners, their employees, and any third parties acting on their behalf must operate ethically and in full compliance with all applicable laws. Bribes, kickbacks, facilitation payments, and any improper advantages are strictly prohibited. Gifts, entertainment, or hospitality must be modest, infrequent, and transparent, never involving cash or intended to improperly influence business decisions. Partners must comply with all applicable anti-bribery and anti-corruption laws (e.g., UK Bribery Act, U.S. FCPA), compete fairly, and maintain accurate financial records. Any conflicts of interest must be disclosed to Bynder and managed with approved controls.

Data Privacy & Information Security

Bynder prioritizes data privacy and security across our entire supply chain and expects the same from its Partners. To the extent applicable, Partners must:

Protect Personal Data and Confidential Information with appropriate administrative, technical, and physical safeguards (e.g., encryption at rest and in transit, least-privilege access, secure key management, vulnerability management, logging, and monitoring).

Comply with applicable data protection laws (e.g., GDPR, UK GDPR, CCPA, CPRA) and execute required agreements before processing Personal Data.

Notify Bynder without undue delay (within 48 hours or sooner if legally required) of any suspected or actual security incident affecting Bynder data and cooperate fully with investigation and remediation efforts.

Maintain a current list of Sub-Processors and notify Bynder at least seven (7) calendar days before any new Sub-Processor begins to process Personal Data, allowing Bynder to object on reasonable and legitimate grounds. Equivalent data protection obligations must be flowed down to all Sub-Processors.

Do not subcontract material obligations without Bynder's prior written approval. Disclose all locations where services are performed, or data is processed or stored and ensure all cross-border data transfers are lawful.

For software development, follow a secure software development lifecycle (SDLC), conduct Static Application Security Testing (SAST) and Dynamic Application Security Testing (DAST), and remediate critical vulnerabilities promptly.

Maintain relevant certifications or attestations (e.g., SOC 2 Type II, ISO 27001) and provide reports or summaries to Bynder upon request.

Collect only necessary Personal Data, retain it only as long as needed for the specified purpose, and securely delete or return all data without undue delay at the end of the contract.

Safeguard Bynder's confidential information and intellectual property, use it only for the intended business purpose, and return or destroy it upon request or contract termination. Public references to Bynder require prior written consent.

Responsible AI

Where applicable, Partners must use datasets and models responsibly, respecting privacy, intellectual property rights, and all applicable laws. They should assess and mitigate risks related to bias, safety, and security, and ensure transparency about the use and limitations of artificial intelligence in their deliverables. Human oversight must be applied to all material decisions involving AI, and Partners must never generate or deploy unlawful, discriminatory, or deceptive content.

Supply Chain Responsibility

Partners must conduct appropriate due diligence on their suppliers and subcontractors to ensure compliance with standards equivalent to this Code. Where feasible, Partners are encouraged to prioritize local suppliers and sustainable products to minimize environmental impact. All third parties engaged must be appropriately screened, and Partners must never knowingly conduct business with any supplier, contractor, or third party involved in, or suspected of involvement with, criminal activity.

Whistleblower Policy and Reporting

Partners must provide safe, accessible channels to raise concerns without fear of retaliation. Concerns relating to Bynder or this Code can be raised via legal@bynder.com.

Bynder reserves the right to reasonably monitor, audit, and assess Partner compliance with this Code. Upon Bynder's reasonable request, Partners must provide evidence required to certify compliance. Where non-compliance is identified, Partners must implement a corrective action plan within a reasonably agreed timeframe. Bynder reserves the right to terminate its business relationship with any Partner for material breaches of this Code.

Acknowledgment

Bynder may update this Code from time to time. The most current version will be provided to the Partner or posted on a designated webpage. If this Code conflicts with a binding contract between Bynder and a Partner, the provision imposing the higher standard of conduct or protection will apply.