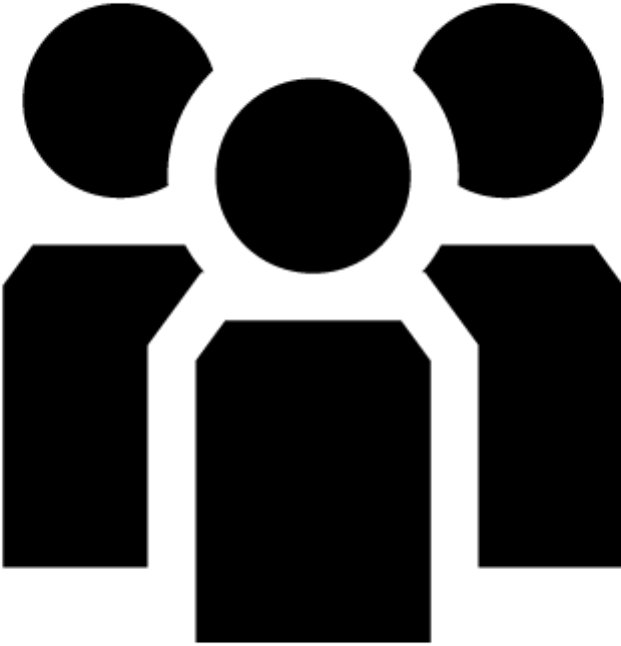


1. Guiding Principles

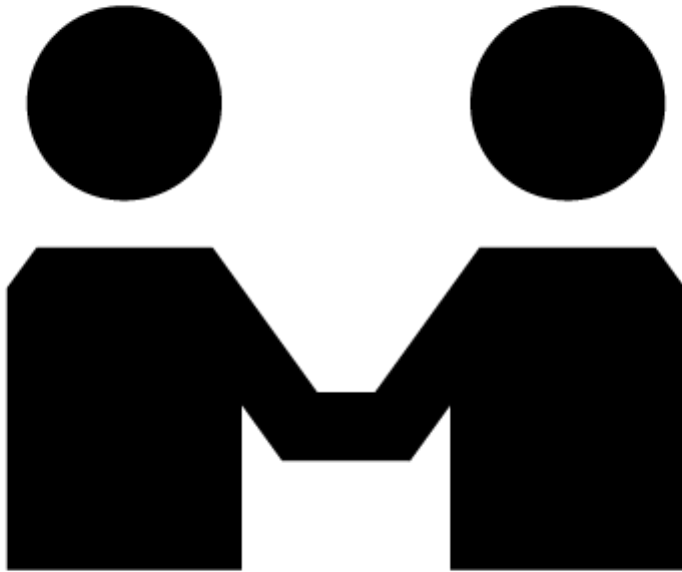
At Camunda, we uphold a zero-tolerance position on bribery and corruption. Every Camunda employee must adhere to the highest ethical standards of conduct in all of our business activities and must act in a manner that enhances Camunda's reputation. At Camunda, these fundamentals must be considered when conducting business.



We do not bribe. We do not engage in offering, promising, giving or accepting money or anything of value to or from anyone to improperly obtain or retain business, secure an improper advantage or to otherwise influence or be influenced to act improperly.



We do not allow third parties to bribe on our behalf. We do not use third parties to take actions that we cannot take ourselves. We have outlined fundamental aspects and red flags in our Anti-bribery and corruption internal guidelines to be mindful of while engaging with third parties.



We do not engage in activities that create the appearance of impropriety. We are mindful of how our actions may be perceived, no matter the intent.



We comply with laws. We will constantly uphold the applicable laws relating to bribery and corruption in all the jurisdictions in which we operate. Regarding our conduct both at home and abroad – we are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, in whichever country we operate.

We take this matter very seriously. We recognise that bribery and corruption are punishable offenses. If our company is discovered to have taken part in bribery or corrupt activities, we may be subjected to a heavy fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to prevent bribery and corruption in our business, and



take our legal responsibilities seriously.

2. Introduction

This Anti-bribery and corruption policy (“Policy”) exists to set out the responsibilities of Camunda and those who work for us regarding observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for Camunda as well as to those who enter into a commercial relationship with Camunda. It helps them recognise and deal with bribery and corruption issues, as well as understand the prevailing responsibilities. We have also created an internal Anti-bribery and corruption guidelines (“Guidelines”) to assist our employees implementing and following the below stated rules and principles in practice.

This Policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, working students, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the Federal Republic of Germany). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

Any employee or third party with knowledge or suspicion of violations of this Policy must report their concerns (as allowed by local law) to the designated Environmental, Social and Governance (“ESG”) Coordinator by reaching out at compliance@camunda.com.

No retaliation of any kind will be taken against anyone who reports suspected violations in good faith. We will take steps to protect each complainant from retaliation in compliance with the Camunda’s Speak-up Policy.

3. Important Concepts

- a. In the context of this policy, **third-party** refers to any individual or organization our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- b. **Bribery** refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision.
- c. A **bribe** refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage.
- d. Bribery is **not limited to the act of offering a bribe**. If an individual is on the receiving end of a bribe and they accept it,

they are also breaking the law.

- e. **Bribery is illegal.** Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes to any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from Camunda's ESG Coordinator.
- f. **Corruption** is defined as the abuse of entrusted power for private gain. It is deceitful behavior that people in positions of power exhibit for personal gain. It is most commonly seen amongst government officials or managers. There are different forms of corruption, including bribery, embezzlement, extortion, networking, under-the-table transactions, manipulation of the election result, money laundering, and more.
- g. **ESG Coordinator** is responsible for developing and overseeing environmental, social and corporate governance policies and procedures. The incumbent provides technical expertise on key issues, including bribery and corruption related matters and helps in the design, preparation, implementation and supervision of said policy in consideration of best industry practices and standards. The ESG Coordinator of Camunda can be reached out via email at compliance@camunda.com.

4. What IS and what IS NOT acceptable

Camunda is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. We ensure that any act that involves providing and receiving things of value are undertaken in compliance with the set out internal Guidelines and never to improperly influence a decision of anyone (a person, company or organization). Furthermore, we also lay down certain do's, don't's and prohibited actions with regards to Gifts and Hospitality, Facilitation Payments and Kickbacks, Political Contributions and Charitable Contributions.

4.1 Gifts and hospitality

- a. Camunda accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:
 - It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
 - It is not made with the suggestion that a return favour is expected.
 - It follows local law.
 - It is given in the name of the company, not in an individual's name.
 - It does not include cash or a cash equivalent.
 - It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
 - It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
 - It is given/received openly, not secretly.
 - It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
 - It is not above a certain excessive value, as pre-determined and specified in the internal Guidelines.
 - It is not acceptable to offer to, or accepted from, a government official or representative or politician or political party, without the

prior approval of the company's ESG Coordinator.

- b. Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared without a delay to the ESG Coordinator, who will assess the circumstances.
- c. Camunda recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- d. As good practice, gifts given and received should always be specified and disclosed.
- e. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the ESG Coordinator should be sought.

4.2 Facilitation Payments and Kickbacks

- a. Camunda does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.
- b. Camunda does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

4.3 Political Contributions

Camunda will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

4.4 Charitable Contributions

- a. Camunda accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions and agrees to disclose all charitable contributions it makes.
- b. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- c. We will ensure that all charitable donations made are legal and ethical under local laws and practices; and that donations are not offered/made without conducting prior compliance checks on the charities to check the legitimacy of the donation.

5. Employee Responsibilities

- a. As an employee of Camunda, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.
- b. All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Policy.
- c. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the ESG Coordinator.
- d. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct.

6. Raising Concerns

It is important that any suspicion or instance of bribery or corrupt activities as outlined in this Policy or otherwise that occurs in relation to Camunda should be reported. To enable the provision of reporting, this section of the policy covers three areas: How to raise a concern, What to do if you are a victim of bribery or corruption and Protection.

6.1 How to raise a concern

- a. If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Camunda, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behavior can be considered bribery or corruption, you should nevertheless inform the ESG Coordinator of Camunda who can be reached through at compliance@camunda.com.
- b. Camunda has familiarized all employees with its whistleblowing procedures so that the employees can also vocalize their concerns swiftly and confidentially via the established whistleblower tool.

6.2 What to do if you are a victim of bribery or corruption

You must inform the ESG Coordinator by sending an email at compliance@camunda.com or via the established whistleblower tool as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

6.3 Protection

- a. If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Camunda understands that you may feel worried about potential repercussions. Camunda will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.
- b. Camunda will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.
- c. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavorable treatment in relation to the concern the individual raised.
- d. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the ESG Coordinator at Camunda.

7. Monitoring and reviewing

- a. Camunda's ESG Coordinator is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular cadence. They will assess its suitability, adequacy, and effectiveness.
- b. Any need for improvements will be applied as soon as possible. Employees or concerned parties are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the ESG Coordinator.

