



# Business Partner Code of Conduct



# Dear Business Partner

Infobip is committed to the **highest standards of ethical and responsible business conduct**, and expects its Business Partners to uphold this commitment. This Business Partner Code of Conduct (“Code”) applies both to (i) suppliers of goods or services to Infobip or any of Infobip’s subsidiaries, such as vendors, agents, and sub-contractors; as well as (ii) partners of Infobip, such as resellers, consultants, strategic partners, intermediaries, mobile network operators, aggregators and all other providers of telecommunication services (collectively for purposes of this Code, “Business Partners”).

Infobip has developed this Code to clarify our global expectations of our Business Partners with respect to legal and ethical compliance. We expect our Business Partners to comply with all laws, rules, and regulations applicable to their dealings with Infobip. This Code is expected to complement applicable laws, any agreements a Business Partner has with Infobip, and each Business Partner’s own policies and procedures. By working with Infobip, we expect our Business Partners to commit to comply with the principles and standards set out in this Code.

Failure to comply with the Code may impact a Business Partner’s business relationship with Infobip, up to and including termination (consistent with applicable laws and agreement terms).

Infobip reserves the right to audit, directly or with the assistance of a third party, a Business Partner’s compliance with this Code, with reasonable notice and consistent with local law and applicable agreement terms. Business Partners are expected to comply with such reasonable audit requests.

Infobip may require a Business Partner to implement corrective actions resulting from such audits; failure to implement such corrective actions may negatively impact the business relationship with Infobip.

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# Anti-Bribery & Corruption

We seek Business Partners who adhere to the highest ethical standards in their business practices and interactions, particularly in their work related to Infobip.

Business Partners are expected to comply with all applicable anti-bribery and corruption laws and/or regulations including, but not limited to, the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and the anti-bribery and corruption laws where the Business Partner does business.

When undertaking activities related to Infobip, **under no circumstances may a Business Partner offer, promise, authorize or provide anything of value** (including cash, gifts, special pricing, etc.) directly or indirectly (i.e., via agents or subcontractors) to any person, including any Government and Public Official, for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage.

In addition, when engaging in activities related to Infobip, Business Partners must never:

Ask for, accept or receive any gift, payment or other benefit from any person as a reward or encouragement for improper conduct

Make payments to speed up performance by a Government and Public Official of a routine, nondiscretionary action (often referred to as facilitation payments)

## Also to remember:

If permitted under a Business Partner's agreement with Infobip, gifts, meals, travel, or entertainment related to Infobip's business must not be used as bribery or kickbacks and must not compromise (or appear to compromise) objective and fair business decisions.



# Trade Controls

Infobip is committed to all applicable standards of ethical and responsible business, including compliance with all applicable trade control laws. Infobip expects its Business Partners to ensure they conduct their business related to Infobip in compliance with all applicable trade laws, including, but not limited to export controls, sanctions and anti-boycott laws administered by the United Kingdom, the United States of America and the EU.

Infobip Business Partners must not engage in unlicensed or unauthorized transactions or dealings with individuals, entities, or jurisdictions subject to international economic sanctions or in unauthorized activities restricted by applicable trade laws.

We also do not tolerate participation in illegal international boycotts; boycott requests related to Infobip must be reported to Infobip.

## Also to remember:

Business Partners must also comply with all customs and import laws and regulations when engaging in international trade related to Infobip. This includes ensuring that items comply with import bans imposed by relevant government bodies. Business Partners must cooperate with Infobip in its reasonable efforts to ensure compliance with such restrictions

# Anti-Money Laundering

Infobip is committed to conducting its business in a lawful and ethical manner. Infobip believes that money laundering and terrorist financing poses risks to Infobip's business and reputation.

Therefore, Infobip strives to follow the laws relevant to Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) in all jurisdictions in which it operates.

In addition, when engaging in activities related to Infobip, Business Partners must never:

Not engage or attempt to engage in any transaction involving proceeds derived from unlawful activity.

Comply with any AML / CTF related responsibilities related to their dealings with Infobip.

Report to Infobip any matter suspected to be related to money laundering or terrorism financing in any way related to Infobip.

# Antitrust

Infobip is committed to conducting business in full compliance with all applicable competition and antitrust laws. We believe in open, fair, and lawful competition as a foundation of a healthy business environment. Accordingly, we expect the same level of commitment from our Business Partners.

Accordingly, we expect the same level of commitment from our Business Partners. In all forms of cooperation and activities related to Infobip, Business Partners shall avoid any conduct that could restrict or distort competition, whether directly or indirectly.

In particular, Business Partners shall not engage in any agreements, whether formal or informal, written or verbal, that involve:

Fixing prices or other terms and conditions of sale.

Dividing or allocating customers, territories, or markets.

Limiting production, supply, or access to markets.

Exchanging competitively sensitive information with competitors.

\*Infobip takes competition compliance seriously and expect our Business Partners to uphold the same standards of integrity and legality in all market interactions.

# Conflicts of Interest

Infobip expects its Business Partners to avoid all conflicts of interest or perceived conflicts of interest related to Infobip – i.e., instances where the Business Partner's personal interests (including the interests of the Business Partner itself or its employees, officers, or directors) interfere or appear to interfere with Infobip's interests.

For example, a potential conflict of interest exists if a Business Partner's employee or his or her family member has a close relationship with an Infobip employee who can make decisions which affect the Business Partner's business with Infobip.

## Also to remember:

Business Partners are required to immediately disclose actual or potential conflicts of interest with Infobip at **[reportit@infobip.com](mailto:reportit@infobip.com)** whenever they arise.

# Data Privacy and Cyber Security

At Infobip, data privacy and information security are of paramount importance. We expect our Business Partners to uphold the highest standards in safeguarding all data related to their relationship with Infobip.

This includes, but is not limited to, **personally identifiable data, whether it pertains to Infobip, its customers, clients or any other confidential information**. Such data must be handled responsibly, used solely for its intended and legally authorized purposes.

Business Partners are required to implement and maintain robust policies, procedures and processes with respect to information security, cloud security and privacy. These measures should **align with recognized industry standards**, legal and regulatory requirements, and current best practices.

Infobip strongly prefers to work with Business Partners who hold certifications and undergo independent audits in accordance with internationally recognized standards for data privacy, information security and cyber security.

# Confidentiality



At Infobip we are committed to maintaining the confidentiality of business information (including confidential information obtained from suppliers, partners and customers), and our Business Partners are key stakeholders in protecting confidential business information.

## EXAMPLE

Confidential information includes information related to performance, sales, financial, contractual and special marketing information, ideas, technical data, and concepts disclosed from one party to the other, which was not previously known to the general public, and which the disclosing party desires to protect against unrestricted disclosure or competitive use.

All information obtained through a Business Partner's relationship with Infobip must be treated as confidential and shall not be disclosed unless permitted by Infobip or expressly required by law.



# Use of Infobip Corporate Opportunities and Assets

Business Partners are prohibited from taking corporate opportunities that are discovered because of their relationship with Infobip; from using Infobip corporate property, information, or their relationship with Infobip for personal gain; or from competing with Infobip for business opportunities.

## Also to remember:

Should a Business Partner be given any Infobip asset, the Business Partner is required to treat it with respect and use it with due care and in accordance with applicable laws and all requirements set by Infobip.

# Diversity and Inclusion

Infobip is a multinational company that values diversity and inclusion in all forms, including background, origin, ethnicity, race, nationality, color, gender, age, status, and orientation.

Infobip expects its Business Partners to embrace a zero-tolerance approach to discrimination & harassment by:

Promoting a respectful, fair, and honest working environment

Prohibiting any discriminatory, harassing, or bullying behavior

Implementing adequate policies to prevent discrimination and harassment



# Intellectual Property

Business Partners must respect and protect Infobip's intellectual property (IP), including innovations, patents, copyrights, trade secrets, and other intangible assets.

They are also expected to uphold the intellectual property rights of third parties that they may use or access in the course of their collaboration with Infobip.

In all business dealings related to Infobip, Business Partners shall:

Respect intellectual property rights of Infobip and third parties, and handle such proprietary information with care and confidentiality.

Appropriately manage and safeguard know-how, data, and other information that may constitute or relate to intellectual property rights of Infobip and third parties.

Use third-party intellectual property only when authorized by a valid license or permission.

Avoid any actions that would infringe upon the copyrights, trademarks, patents, or other IP rights of Infobip or others.

# Health and Safety

BPs must promote a working environment where:

Employees are granted a safe and healthy working environment in compliance with applicable laws, regulations and standards for health and safety.

Health and safety risks are understood, and appropriate health and safety management systems and procedures are in place (including training, as appropriate).

Procedures and systems are in place to prevent accidents at work.

# Environmental Protection



At Infobip, we believe environmental protection is essential to creating sustainable value and securing long-term success for our business and our partners. We are dedicated to minimizing our environmental footprint and expect the same commitment from our Business Partners.



## Compliance and Cooperation

Business Partners are encouraged to comply with all applicable environmental laws, regulations, and standards in connection with their work for or with Infobip. Business Partners are expected to notify Infobip of any environmental non-compliance in any way related to their dealings with Infobip.



## Alignment with Infobip's Standards

All Business Partners are encouraged to review Infobip's Sustainable Sourcing Policy. We expect our partners to actively support Infobip's environmental objectives, including the reduction of greenhouse gas emissions, responsible resource management, and minimization of waste across their operations.



## Collaboration for Positive Impact

We encourage Business Partners to develop structured policies and procedures to identify, manage, and reduce environmental impacts relevant to their operations. This includes promoting environmentally responsible practices in areas such as energy use, resource efficiency, emissions reduction, and waste management. We believe that building a more sustainable future is only possible when we work together. That's why we seek to collaborate with business partners who share our values and commitment to environmental responsibility.

# Human Rights and Fair Treatment of Workers

As our Business Partner, you are encouraged to be a human rights advocate and promote the fundamental values and principles of our society in your everyday business relationships with your employees and third parties by:

Preventing any involuntary labor, slavery and human trafficking by ensuring there is no forced, bonded, indentured or prison labor anywhere in your operations, including in your supply chain.

Allowing freedom of association and collective bargaining for workers, allowing them to join or form trade unions and to bargain collectively.

Ensuring that any third-party employment agencies you engage understand and comply with the above expectations.

Providing fair pay and working conditions for employees, including meeting minimum wage and benefits requirements.

Preventing any employment under legal age.

# Raising Concerns

Business Partners must notify Infobip of non-compliance with the Business Partner Code of Conduct as soon as possible. How to report a misconduct:

**E-mail: [reportit@infobip.com](mailto:reportit@infobip.com)**



# AI ethics and compliance

At Infobip we are committed to responsibly design, develop and deploy AI solutions. We have established a set of expectations for our Business Partners to ensure that together, we adhere to the highest standards of AI ethics and compliance.

## Infobip expects its Business Partners to:

Comply with all applicable laws, regulations and ethical standards when using, developing, or integrating AI solutions, whether Infobip-provided or third-party.

Design and operate AI solutions that are fair, non-discriminatory, transparent and subject to appropriate human oversight.

Maintain reliable, well-documented AI systems that undergo ongoing testing, monitoring and improvement, with prompt remediation of any vulnerabilities or unintended harms that may arise.

Collect only the data strictly necessary for each use case, obtain required consents, and implement robust privacy, security and confidentiality controls.

Remain fully accountable for their AI outputs and associated risks. This includes applying these same standards to all third-party AI, and ensuring relevant personnel receive adequate training.

Immediately report to Infobip any AI-related incidents, violations, or ethical or regulatory concerns.



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