

Code of conduct



Dear Bippers

In a competitive and fast-moving environment, our way of doing things will make us stand out. The basis of our culture have always been our actionable principles and behaviors that unite and guide us in how we do business.

Our culture focuses on a positive growth mindset – enabling and empowering people to innovate, collaborate, and learn where we can do better. It comes in part from the founding team's background in engineering, which involves a mindset of not settling with the status quo, constantly innovating, and learning by doing – a big part of it is that we create it all together through the decisions we make, the actions we take and behaviors we show.

Infobip aspires to be a company in which every one of us behaves and operates respectfully, fairly, and ethically. It has always been why we follow the highest possible standards of ethical business conduct.

As we operate in many countries, it may not always be clear how to adhere to the applicable rules, laws, and standards and do the right thing in the right way. This Code is written to outline our business principles to help you understand your important role in our Company and in building our culture. It affirms what we stand for.

Please read the Code carefully and apply it to your daily work.

We expect everyone, no matter what country or position in the Company, to comply with the principles of the Code. We do not allow disrespect, or tolerate breaches of law or our internal policies. If you are in any doubt, our Compliance team is here for you to offer advice and to guide you.

Best,

Silvio Kutić, CEO



What's inside

Who are we?



We make the world a better place by respecting human rights



We act with Infobip's best interest at heart!



We prevent money laundering!



We compete fairly!



We do not offer bribe, and we cannot be bought!



We do not facilitate our or anybody else's tax evasion



Fraud is wrong! Do not facilitate it, help us stamp it out



We carefully choose our suppliers and clients!



We use AI in service of people and principles



Do not be afraid to speak up and reach out for help!



Let's start with the most important guiding principle: We treat everyone with respect, fairly and honestly!



We provide and promote a healthy and safe operating environment



We safeguard company assets, resources, and records



We respect our and others' intellectual property



We preserve confidentiality of information



We value the privacy of personal data



We communicate responsibly and accurately



Think globally, act locally is our way to a sustainable future



*We are the **HUMBLE ENGINEERS** led by our philosophy of **LEARNING BY DOING** and fuelled by our **PASSION FOR TECHNOLOGY.***

*We value **CREATIVITY, PERSISTENCE** and **INNOVATION. INTEGRITY** and living **MEANINGFUL LIVES** are the **FOUNDATIONS** of **ALL OUR VALUES***

Let's start with the most important guiding principle: We treat everyone with respect, fairly and honestly!

We communicate openly, honestly, and fairly while being mutually respectful – with colleagues, customers, suppliers, or any stakeholder we are in contact with. We respect personal dignity, human rights, and privacy. We empower people.

We come from many backgrounds and nationalities, and our differences strengthen us. As a multinational company, we create an inclusive environment and encourage diversity by supporting different cultures, backgrounds, perspectives, and ideas. We believe this is equally important for people's engagement and driving innovation to unreachable heights.

We are committed to fair and equal treatment, allowing each Bipper to reach their potential. We are a diverse workforce and do not tolerate discrimination, harassment, or bullying. We know that your skin color, gender, nationality or religion, age or medical condition, who you love, or how you self-identify does not affect your ability to do your job.



My superior made a joke that I feel was homophobic. What should I do?

You should report any type of homophobia or any other type of discrimination using one of our speak-up channels. Check the last section of the Code to see the ways of reporting.



My superior refers to me almost regularly in front of colleagues in our department, using demeaning words and insults. What should I do?

You should speak up about this immediately, as this represents a case of bullying, and such behaviour is unacceptable in our Company. Check the last section of the Code to see more ways of reporting.



We provide and promote a healthy and safe operating environment

We want you to feel safe at work without worrying that you are going to injure yourself. In the interest of our own and other people's safety, we follow safe work practices, and we actively report any possibly unsafe conditions. We invest in a safe and healthy environment to ensure you can do your job to the best of your abilities.

Substance abuse limits human abilities, so we are all committed to ensuring that our work is not jeopardized or impaired by the consumption of any substance. We are therefore committed to a working environment free of drugs and alcohol, imposing strict zero-tolerance policy towards alcohol and drugs consumption.



My desk is positioned under the air vent and it seems like I have itchy eyes and a severe headache. What can I do?

Your health is our utmost concern as we don't want you to get sick at work. Therefore, in a situation like this please contact your direct superior or office manager, who will find a solution for the problem.



A colleague next to me just closed a deal and opened a bottle of whiskey to celebrate, what should I do?

As we have zero tolerance to alcohol, you should respectfully remind him of this, and if they persist further, please inform your direct superior or POP Business Partner who should deal with the situation.



We safeguard company assets, resources and data

Our assets and resources include everything that Infobip owns, manages or uses to conduct business with our partners and provide services to our customers. Each Bipper, partner and customer is entrusted with care of these resources and required to protect them!

As a Bipper, you use company assets in everyday work in order to perform and do your job well. Company assets, like computers, chairs, printers, hardware, software etc. are not to be sold, borrowed, given away or removed from the Company, used for personal gain or that of another person or organization.

Within reason and under applicable regulations, Bippers may use company assets for personal use under the following conditions:

- authorized personal use is appropriate,
- personal use does not interfere with your performance for the Company and
- personal use does not violate internal policies or the law.

All company assets should be used in accordance with our internal policies and protected from use by unauthorized individuals.

We expect you to treat company assets with care and respect, using your common sense. **By protecting company assets, we protect our business and future.**



Can I make a personal call on a company phone?

An occasional personal call is reasonable, however please use your common sense: spending hours privately on your company phone is not considered reasonable.



Can I use a personal device for business purposes?

Infobip may allow the usage of personal mobile phones if they are enrolled into Infobip Intune Mobile Device Management. Usage of other personal devices for business purposes is not allowed (e.g., personal laptops, tablets, removable media, etc).



Should I keep something special in mind when using company resources?

It is necessary to take care of proper use of the resources entrusted to us, for example when using a company car or accommodation provided by the Company, it is necessary to use them reasonably and return them in the same condition in which they were found.



Please remember:

Infobip will take all necessary actions to ensure that financial records are kept accurate and confidential as well. These do not only include financial accounts, but other records such as *quality reports, time records, expense reports, etc.*

Every financial record, including sales records and expense reports must be maintained in detail, appropriately reflect the transactions and be in accordance with legal requirements. Ensuring accurate and complete financial records is the responsibility of every Bipper, not just a role for accounting and finance personnel. Accurate bookkeeping and reporting reflects on the Company's reputation and credibility, and ensures that we meet our legal and regulatory obligations.



Can I access and manage my private social media accounts on the Company's laptop?

Again, use your common sense. An occasional peak to your social media account is fine, however spending more time during which you need to work on your tasks for Infobip is not considered reasonable, so please refrain from it. Whenever in doubt, ask yourself what a reasonable person would imagine a company computer should be used for. Also, take note that your activities on Company-owned and managed devices are actively logged and monitored.



What is considered as company assets?

Anything owned by Infobip, such as facilities, furnishing, vehicles, business equipment, supplies, records, trade secrets, data, computer software, hardware and networks, internet accounts and intangible items such as details of business application systems and many more...



We respect our and others' intellectual property

In our daily work, we innovate with passion and come up with creative ideas, processes or designs that make us proud and contribute to our success. That is why we are committed to preserving the Company's intellectual property, including copyrights, patents, trademarks and trade secrets or other intangible assets created, improved and/or enhanced as part of your work duties, roles and obligations.

Likewise, we respect intellectual property rights of others, so we never knowingly infringe on copyrights, trademarks, or patents of others or misappropriate trade secrets of others. We only use the intellectual property rights of others if we have the permission and/or the licence to do so.

Additionally, when using and/or incorporating open-source software into Infobip's products and/or solution, always be mindful of the licence that OSS carries and check with IP_Squad@infobip.com if such specific usage (use case) is compliant with the applicable license.

NOTE: before publishing any technical documentation on Infobip's website, please ensure it does not contain any product/solution specifics (how-to related to "under-the-hood" mechanism, general descriptions are ok) and if in doubt always consult the IP_Squad (IP_Squad@infobip.com) first.



I have created a new product/solution/functionality/feature. Can our Company use it?

You need to contact IP_Squad (IP_Squad@infobip.com) before offering it commercially and they will check whether we infringe third party rights and if we can register such an innovation as our own intellectual property right.



I want to use a cool image/photo/video I found (online/social media) to market and advertise Infobip business

Whenever you design something, before you use it and/or publish it you need to check whether such use is allowed under applicable intellectual property laws. Please contact our IP_Squad (IP_Squad@infobip.com) for a thorough check.



Interesting results of an internally conducted research have been published on Infobip's Intranet. Can I share them with a friend who works in another company?

Such a document is produced internally by Infobip staff, so it is considered confidential information and property of Infobip. Therefore, such unauthorized distribution of these materials is not permitted.



We preserve confidentiality of information

As a Bipper you may have access to information related to different business areas that might be worth a great deal. Such information is considered as the Company's confidential information and it needs to be protected. The Company protects your personal data and keeps it confidential. The same applies to the Company's confidential information.

Our Company might be hurt if information about our clients, suppliers, partners, sales figures or future plans end up in wrong hands!

Therefore, please keep our business information as well as information received from our suppliers, partners and customers confidential at all times and keep it to yourself.

Confidential information should be used only internally for company/business purposes and should not be disclosed to anyone outside of Infobip, also after the termination of employment, unless permitted to do so or where required to do so by the law. Even inside the Company, only those Bippers who truly need to know the information to perform their tasks should have access to confidential information.

We should be careful not to discuss Infobip's confidential information with non-employees (including family members and friends) and at places where it might be overheard by those who do not have a need to know it (e.g. the Company's restaurant and restrooms, public places, airports etc.). Also, be aware of your surroundings when handling confidential information and do your best to avoid shoulder surfing attacks.

Lock your laptop screen if you are not at your desk and ensure to transport and store company-provided equipment in a safe and secure manner.

Use extra caution when accessing external information - don't open suspicious emails (and don't click on the attached links/documents!), especially when received from people you don't know, as well as when you plan to connect external peripheral devices to workstations (such as unverified USB devices or external HDs), otherwise you might jeopardize all information you have access to.

If you are in doubt about your rights and obligations regarding handling confidential information, please contact the Legal Department.



A friend who works in another company asks me during a dinner how the business is going in Infobip. What am I allowed to say?

You are allowed to talk about data that is publicly available. If some information you have is still not publicly reported by Infobip, you should refrain from sharing it.



I just received an e-mail with an attachment from a person I don't know. What should I do?

Do not open it! Use the "Report Message" button in Outlook to report it. A short guide on how to report can be found on [this link](#).



May I share new ideas about future projects in Infobip with my spouse?

No, as this is confidential information and your spouse is not bound by any confidentiality or secrecy obligations for our information.



Does information made available on Infobip's SharePoint qualify as confidential information?

Yes, it does and you shouldn't share any data outside the Company.



We value privacy of personal data

We value the privacy of our Bippers, as well as other persons who work for Infobip that share personal data with us. The same goes for our clients and their end users, suppliers, business contacts, job applicants and any other person with whom Infobip interacts. We protect the data entrusted to us and we handle it properly using it only for the intended and by the law authorized purposes. By doing so, we respect and consider the pertaining rights of the data owner at all times.

But first things first!

Personal data means any information about a particular individual based on which it is possible to directly or indirectly identify an individual (not a company, public authority or legal person).

Personal data processing means anything that is done to, or with, personal data, whether or not by automated means, including simply collecting, storing, disclosing, deleting or accessing those data.

Every Bipper who collects, uses or processes personal data is responsible for its handling within the scope of their work activities and must observe required measures concerning data protection and data security.

Treat privacy as part of innovation.

More information on your rights and obligations and on how we handle personal data can be found on our [SharePoint](#).

For all questions on personal data protection, you can contact us via privacy@infobip.com



Does the term "personal data" refer only to "private" information of an individual?

No, personal data doesn't need to be 'private' information – even information which is public knowledge or is about someone's professional life can be personal data.



How should I treat communication sent through Infobip platform, as personal data?

Yes, you should treat communications sent through the Infobip platform as personal data.



Is a text message or a video of an individual regarded as personal data?

Communications (e.g. content of messages, such as message text, voice, video, files, images) and all traffic data (i.e. metadata) of individuals and of companies (i.e. Infobip clients) are specifically protected.



We communicate responsibly and accurately

We are all proud Bippers and we are encouraged to share Company's events, news and happy moments. We appreciate our Bippers to be actively involved in diverse activities both professionally and privately. However, please always make sure that you behave responsibly and use good judgement, no matter the context. Your words and behaviours may be associated with the Company.

Whether online or offline, please refrain from speaking on behalf of the Company, unless specifically authorized to do so. The messages that the Company conveys are carefully constructed. Leave it to our dedicated teams to handle any inquiries or comments and represent our standpoints and principles. Please, remember that Infobip values diversity and inclusion, which means the Company is impartial and respects the opinions and preferences of all individuals. Therefore, do not associate political, religious, or otherwise biased content with the Company when posting on your personal social media profiles or any other external communication channel.

It is equally important not to share any confidential information by using social media or any other media. The sending of information of a professional nature outside the Company via messaging services or other external media that are unrelated to the professional environment is prohibited in principle. Please refrain from sharing, posting or commenting or in any other way disclosing information that has not been shared publicly through the Company's official channels and/or Public Relations team.

Please make sure to clearly distinguish that opinions expressed on social media or otherwise are solely your own and do not express the views or opinions of the Company. While expressing your opinion, refrain from using any type of slurs, insults or biased language. Remember, you are part of a community that promotes diversity and inclusion - we respect other people's opinions, and we tackle challenges by arguments, not offensive language. The same principles apply to all internal communication channels: we respect all our colleagues and diversity.

Lastly, when in doubt whether certain behavior is in accordance with our Social Media Policy, please consult and contact our Global External Communications Team at social@infobip.com or pr@infobip.com, which will gladly point you in the right direction.



I just saw financial results that should be made public next Monday. I am so proud that I would like to share it on my Facebook. Would that be ok, as results are awesome?

No, as those results are still not publicly available, and we have departments in the Company whose job and primary responsibility is to control and publicize what is required and decided in the timeframe and form as agreed. Please allow them to do their job well!



On my LinkedIn profile, one of my connections was heavily criticizing Infobip. Can I tell her that she is ignorant and doesn't know anything about our Company?

Insult is not our company language. Any answer in that direction would do more harm than good to our reputation. Therefore, be proud of our community to which you belong and please answer in a polite way, with good arguments.



“Think globally, act locally” is our way to sustainable future

We are committed to doing business in a responsible, sustainable, and ethical way. We believe long-term success comes from creating value not only for our business, but also for our employees, customers, partners, communities, and the environment. We align our business practices with applicable laws, international standards, and stakeholder expectations, while continuously improving how we manage and communicate our impact.

We strive to operate efficiently and reduce our environmental footprint by lowering emissions, improving energy use, minimizing waste, and supporting broader climate efforts. We promote responsible practices across our value chain and expect our partners and suppliers to uphold high standards in environmental protection, human rights, fair working conditions, and ethical business conduct.

We think globally and act locally. Even our small acts can make a positive change in the communities where we work and contribute to upgrading the quality of life. Beyond our products and services, we actively support the communities in which we operate.

Through our initiatives, partnerships, and employee engagement, we aim to:

- Support education, digital inclusion, and community development
- Contribute to humanitarian and environmental initiatives
- Encourage employee participation in socially responsible activities.

All employees are expected to contribute to our ESG commitments by acting responsibly in their daily work. This includes making environmentally conscious decisions, supporting ethical practices, and contributing positively to our workplace and communities. We also encourage our partners and stakeholders to uphold similar standards and collaborate with us in advancing sustainable and responsible business practices.

#WeAreJustStarting on our way to a more sustainable future

As a member of the United Nations Global Compact, we are committed to upholding the principles relating to human rights, labour, environment, and anti-corruption. We ensure transparency and accountability through regular public disclosures and alignment with internationally recognized ESG frameworks and standards.

Our commitment is further supported by participation in independent external assessments and ratings, which inform continuous improvement of our environmental, social, and governance practices. For more information on our ESG practices and initiatives, please contact our ESG team at esg@infobip.com



What does ESG mean in Infobip’s business context?

ESG is about how we do business in a responsible way. It covers how we care for the environment, how we treat people, and how we build trust with everyone we work with. At Infobip, it means growing our business while staying mindful of our impact on the world around us.



Why is that important?

The way we operate matters. It means thinking beyond just business results. It’s about making sure our growth creates positive and lasting value. It also ensures that as we grow globally, we do so in a way that respects people, communities, and the environment.



We make the world a better place by respecting human rights

We are committed to respecting and promoting human rights around the world, ensuring that technology and our business operations impact people's lives for the better.

We are guided by the principles established under the UN Universal Declaration of Human Rights and International Labour Organisation Declaration on Fundamental Principles and Rights at Work as well as its corresponding core conventions, and we do not knowingly engage in activities that are contrary to the guiding principles.

You as a Bipper are encouraged to be a human rights advocate and promote the fundamental values and principles of our society in your everyday business relationships with clients, suppliers and partners.



What can I do to promote human rights?

You can treat your colleagues and clients with respect and dignity while avoiding any engagement in human rights abuse or business with those who do not respect international human rights standards.



What should I do if I see or suspect possible human rights infringements?

Please report it! Look at the last section of the Code to see exactly how to do so.



We act with Infobip's best interest at heart!

While performing our daily jobs, we don't let our personal interests affect the business decisions we make on behalf of Infobip.

If you use your position at Infobip for personal gain or if your personal activity could compromise your ability to make sound business decisions for Infobip, that situation is known as a conflict of interest.

To avoid conflict of interest, we must first know how to recognize it. Here are the most common examples of Col:

- conducting business with someone you have a close personal relationship with
- hiring or supervising a relative
- owning shares of our competitor's stock
- using company equipment or any other resource to support an external business
- taking business opportunities that belong to Infobip for yourself

...or you can just ask yourself: will my private interests affect my decisions while performing any of my duties in Infobip? If the answer is yes, this is a potential conflict of interest.

There is also a formula, not mathematical at all, that can help you tackle a potential conflict of interest:

X= My private interests or relationships

Y = Business decisions I make in Infobip

X < Y should always be the result



I am currently in the process of negotiations with a company whose owner is my best friend. What should I do?

We are all advised not to participate in making decisions that may be affected by conflicting interests, so please inform your superior (who can transfer the task to another Bipper) and the dedicated Col Team at COL@infobip.com on the details of the situation and wait for their feedback. Notifying your manager and the Col Team should be done as soon as possible.



Also to remember: Having a conflict of interest does not necessarily mean a Code violation, but not reporting a conflict of interest (your own or your colleague's) does.

We prevent money laundering!

We are committed to conducting business with reputable clients and partners whose funds come from legitimate sources. As a diligent Bipper, always check the (potential) client and partner in order to identify if there are any potential signs of their involvement in money laundering or terrorist financing.

Money laundering is a process of integration of money generated from criminal activity into legitimate financial systems; criminals convert money and other assets into clean money or assets that have no obvious link to their criminal origins.



How can I recognize money laundering?

Here are some potential warning signs of money laundering:

Regarding new clients (or partners):

- initial Internet searches and use of news services have revealed issues related to the behavior or integrity of the client;
- checking the client's identity is unusually difficult;
- the client delays to provide identity details or provides fake documents.

Regarding existing clients (or partners):

- the transaction deviates (e.g. in size) from the regular client's business transactions;
- there has been a significant improvement in the client's financial situation for which there is no valid explanation.

Regarding transactions:

- an unrelated 3rd party bears the costs of the provided service;
- the counterparty requests the payment to be split to several bank accounts;
- overpayment requests followed by refund requests;
- unusual payment methods (e.g. cash over wire transfer);
- settlement requirements in cash or foreign currency, with weak or no explanation;
- unusually complex deal structure.



Our customer is suggesting that they could pay for the provided service in cash. What should I do?

Paying in cash is not allowed and it imposes a great risk of being involved in money laundering. In case of such a request from the customer, you should decline the proposal and ask the Compliance Team for advice.



During preparation of a payment to a supplier, the counterparty advises that we remove certain information from the payment instruction because the bank could refuse the transaction due to the reference of the destination country.

Wire Stripping (removing information from the payment instruction) is not allowed, as it is considered a method of circumvention of Anti-Money Laundering & Terrorism Financing measures. The purpose and destination of the payment should always be clearly stated in the payment instruction. Please contact the Compliance Team for further instructions in case such a request occurs.



We compete fairly!

Infobip competes fairly, with integrity and makes its own business strategy free from arrangements with competitors and suppliers that restrict competition!

Competition rules (also known as "antitrust rules ") apply in all countries in which Infobip does business. The objective of these rules is to ensure equal conditions for all competitors on the market by setting the limits to the freedom on how to compete and prohibiting certain market behaviour.

Most common example of prohibited behaviour: Company X and Company Y are telecom service providers. They agree on not to lower their current prices and not to reach out to each other's clients.

In order to respect competition rules, keep in mind to avoid any formal or informal, written or oral, explicit or tacit or any other kind of discussion/agreement with competitors on:

- prices, contract terms, investments, business strategy and any other competitively sensitive information
- dividing clients or markets.



A sales director from a competing company reached out to me to discuss the price of our services. I am not sure what to do in this situation.

If a competitor starts a conversation on the prohibited topics (in this case, prices), the best possible move you can make is to inform them that you do not want to participate in this kind of conversation. If necessary, leave the meeting and inform the Regulatory/Antitrust Team about the incident.



Please remember: violating competition laws is a serious matter that may result in substantial fines and penalties for Infobip, in some jurisdictions even with imprisonment of individuals. If you are not sure whether certain behavior/agreement is contrary to the competition rules, you can always contact the Regulatory/Antitrust Team (Legal_Regulatory_Antitrust@infobip.com) and ask for their advice.

We do not offer bribe and we cannot be bought!

Offering, promising, giving or accepting money or anything of value to or from others in order to acquire any kind of business advantage is strictly forbidden.

Most countries where Infobip does business consider such behavior a crime. Even a relatively small gift or donation to a third party could in some situations be construed as a bribe and result in severe penalties for you and the Company.

Therefore, employees of Infobip are advised to:

- never offer, promise or give any gift, payment or other benefit to any person in order to reward or encourage improper conduct;
- never ask for, accept or receive any gift, payment or other benefit from any person as a reward or encouragement for improper conduct;
- never make payments to a Public Official in order to secure or speed up performance of a routine action which the payer is already entitled to (facilitation payments).

Bippers, the rule here to remember is quite simple: Don't bribe anybody, anytime, for any reason.

Business entertainment and gifts may be offered or accepted:

- **without approval** – where the entertainment or gift is modest, appropriate and in accordance with our Anti-Bribery and Corruption Policy, reasonable business practices and law
- **with approval** - entertainment or gifts of value exceeding the amount defined in the Gifts and hospitality threshold table must be approved by your line manager and the relevant Compliance Manager.



A potential partner gave me a branded pen. Is that a bribe?

No, this would not be considered a bribe, but please remember that there is a thin line between a gift and a bribe. In any event, common sense judgement must prevail.



I received a gift from a supplier. It is a ticket for a football match which is worth more than is allowed by our Anti-Bribery and Corruption Policy. What should I do?

Ask the Compliance team for advice.



But it is my favorite club's match and it is from a supplier with whom we have been collaborating for a long time.

The answer is still the same.



Please remember: the exchange of entertainment and gifts is strictly prohibited during any tender or competitive bidding process, as the entertainment or gifts in such cases may be seen as influencing business transactions.

We do not facilitate our or anybody else's tax evasion

Tax is a difficult technical topic – But one thing is clear, we should not involve ourselves in anyone's attempts at fraudulently evading the taxes they should pay.

All countries have offences of tax evasion or tax fraud. Equally they will make it an offence to dishonestly help someone else criminally evade tax. The particular issue with tax is the perceived complexity of it. It's easy for a wrongdoer to blind his/her colleagues with technical explanations and obscure justifications. But you don't need to be a tax expert to spot tax evasion! At the heart of it will be lies and deceit.

Therefore, employees of Infobip are advised:

- never communicate anything you know to be false or misleading about your, our or a third party's tax affairs
- use caution when communicating with a tax authority on our or a third party's behalf. Generally, staff will need to be specifically authorised to do this
- if you have concerns, raise them. If attempts are made to justify conduct to you, make sure you understand the rationale

Bippers, you don't need to be a tax expert, we should not say or write anything false or misleading.

What's expected of you:

- be vigilant
- report your suspicions
- don't be satisfied with technical or obscure justifications



An existing client has asked us to contract with an offshore special purpose vehicle owned by them under a blind trust. If I ask questions I'll quickly be out of my depth.

Ask the client for an explanation. If the explanation doesn't satisfy you, speak to your line manager. What the client suggests may be fine, in which case they should be able to provide a clear rationale.



A supplier has asked me to send them an invoice for a greater sum than they're going to pay? I cannot see the problem. They know and will pay the correct amount

No, this is a situation of particular danger. There's no good reason for doing this. Speak to your line manager, do not do what's been requested of you.



Fraud is wrong!

Do not facilitate it, help us stamp it out

Fraud is a common term. It arises in numerous ways and fraudsters are creative and devious. Fraud is wrong for so many reasons:

- it is contrary to how we want to do business
- it damages our bottom line and harms our business prospects
- it exposes us and our employees to the risk of prosecution and at the very least criminal investigation
- it leaves us vulnerable to claims and litigation from third parties

Be clear: All countries criminalise fraud. And what's more, many countries such as the UK reserve the right to investigate and prosecute frauds which are only loosely connected with them.

There are numerous types of fraud:

- Investor fraud, lies told to prospective investors to encourage them to invest
- Identity fraud, imitating someone else to obtain a financial advantage
- Public sector fraud, perpetrated on tax authorities, planning authorities or other public departments
- Abuse of position, frauds which make use of a trusted position the fraudster holds
- Online fraud, perpetrated through IT systems, which commonly take advantage of another person's trust or lack of experience of IT security measures

Frauds can appear bewildering and complicated. But note that other types of wrong – for example, bribery and tax evasion – are in truth types of fraud. And while fraud methodologies change rapidly there are some invariable features:

- at the heart of all frauds is a lie or a deceit
- fraudsters like complexity, that means there lies may go undetected
- frauds may appear to be helpful to the company, it may seem that they are creating revenue
- fraudsters often use the line: 'this is what everyone is doing...!', to support a practice and to take the moral high ground
- fraudsters are often plausible, friendly and charming

Here are some myths:

- Frauds can help the company
Wrong! We don't want any revenue or profit based on fraud or other criminal wrongdoing
- It depends on the victim. Frauds against government and big business don't really count
All frauds are wrong, the victim doesn't have to be elderly or vulnerable to make the fraud unacceptable
- The battle against fraud is lost, there's no point trying
We have put in place anti-fraud controls, if these are followed fraudsters will be deterred, caught and punished
- It's not a fraud if the victim made the mistake
We should correct clear errors by third parties, and not use their mistakes to enrich ourselves



A client has paid our invoice twice, it's clear that's what they've done, I don't see why we should correct their mistake

We have a moral duty not to take advantage of a clear error such as this one.



In the above example, what will happen when the client finds out they've paid twice? The employee might be tempted to lie further to conceal the fact that he knew about their error. The original wrongdoing would be compounded

Fortunately frauds are rare, but this makes detection harder. Be alert to the following:

- colleagues who seem never to take holidays or breaks from work. They may be trying to conceal wrongdoing
- employees with very close relationships with customers and suppliers, where a line is crossed
- someone who takes an inordinate interest in fraud controls. This might raise concerns about attempts to subvert those controls
- a single individual negotiating a transaction and approving it, or performing an activity and supervising it
- colleagues who give very complicated justifications for what they do. Challenge if you don't understand

What we expect of you:

If you believe or suspect that a fraud has happened or may happen then notify:

- your Line Manager
- the Compliance Team

We carefully choose our suppliers and clients!

We expect our suppliers and clients to operate in full compliance with the laws of their respective countries and in full compliance with international human rights, as a minimum.

Here's a short description of the business partners we value and want to work with:

- They act in ethical and professional manner in all engagements with Infobip and Bippers
- They consider business integrity as the basis of business relationships
- They promote a workplace free of discrimination and harassment
- They strictly prohibit child labor or any other kind of forced labor
- They recognize employees' right to freedom of association and collective bargaining
- They enable their employees and other stakeholders to report concerns or potentially unlawful practices at the workplace
- They provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws

...and they share the vision of behavior as set in this Code.



How can I know if our business partners follow the above rules?

Conduct can be assessed through due diligence performed by the dedicated Compliance team, which may include questionnaires and screening against various compliance-related databases (sanctions, AML watchlists etc.) followed by monitoring.



Please remember: Infobip is committed to all applicable standards of ethical and responsible business conduct, including but not limited to all applicable customs, export control, anti-boycott laws and regulations, as well as all relevant economic and financial sanctions and trade embargoes. Therefore, Infobip does not conduct business with third parties that are subject to any type of trade embargoes, sanctions or other regulatory restrictions. In case of any questions concerning this, please reach out to the Compliance team.

We use AI in service of people and principles

AI can help us learn faster, work better, and make everyday tasks easier. As humble engineers with a passion for technology and a learning-by-doing mindset, we welcome useful tools and new ways of working.

At the same time, AI does not replace judgment, integrity, or accountability. We are still responsible for what we write, build, decide, and share. AI should help us do better work, not distance us from responsibility.

When using AI, keep a few simple principles in mind:

- Use only approved tools for business purposes and use them in the way the Company allows
- Do not enter confidential information, trade secrets, customer data, personal data, source code, contracts, security-related information, or other sensitive material into AI tools unless that is clearly permitted and properly protected
- Always review AI-generated output before you use it, share it, or rely on it. AI can sound convincing while still being wrong, incomplete, biased, or misleading
- Take responsibility for the final result. If AI helped you write something, analyze something, or create something, you are still accountable for it
- Do not use AI to create content that is false, deceptive, offensive, discriminatory, or otherwise inconsistent with our values
- Be careful when using AI-generated text, code, images, or designs. We must respect Infobip's intellectual property as well as the rights of others

We should be especially careful when AI is used in work that may affect customers, colleagues, candidates, or business partners. If the output could influence an important decision, external communication, legal position, or another person's rights or interests, it must be reviewed by a human with the right judgment and context.

AI is not a shortcut around approval processes, expert review, or escalation. If something feels unclear, sensitive, or questionable, ask before acting.

Do not be afraid to speak up and reach out for help!

We have explained the guiding principles of how we behave and make decisions in Infobip.

Reach out in case you:

- are unsure about someone's behavior or actions,
- feel treated unfairly,
- saw something you think goes against our guiding principles.

Remember, it is vital that you speak up and address your concerns. The Company is dedicated to ensuring a safe and pleasant workplace for all Bippers as well as compliant business conduct according to the applicable rules, regulations and internal policies, but we need your help in detecting any irregularities. Breaches of the law or internal policies may have consequences, both legal and employment-related implications.

We are aware that such situations may be stressful and uncomfortable. However, ignoring inappropriate behavior only serves to make the problem worse as we are not doing anything to fix it. For this reason, please rest assured that we will have zero tolerance for retaliation. No Bipper will suffer any adverse consequences for reporting a concern and/or being involved in an investigation following such a report.

To whom do I send the question about the Code or how do I report a concern?

If you have any questions regarding the Code, you can always send an e-mail to the dedicated Compliance team - the mailing address is Compliance_Infobip@infobip.com.

For reporting non-compliance with the Code or any other regulation, law or Infobip's policy, you can use the address reportit@infobip.com or the [Speak-Up Platform](#).

In the process of resolving of such reports, the Compliance team will involve the relevant stakeholders. The final assessment will be confirmed by the Ethics Committee.

You may choose to stay anonymous and use our Speak-Up Platform, but we encourage you to provide your name and contact details, because anonymous reports can be more difficult to investigate.

You will receive the feedback on your report in the same way you submitted the report.

We strongly encourage you to seek help and advice from our Compliance Team whenever needed. The Compliance Team will assure that:

- the reported concerns are addressed seriously and promptly;
- maximum confidentiality of all parties involved is ensured.

Please remember: Infobip will never tolerate retaliation against or the victimization of any Bipper who raises a concern in good faith.

Please speak up to safeguard the Bip Culture and reputation!