



SUPPLIER

Code of Conduct

1.0

Dear Suppliers

At Infobip ("Infobip" or the "Company"), we are committed to conducting business ethically, responsibly, securely, and in compliance with applicable laws and regulations.

This Supplier Code of Conduct ("Code") defines the minimum standards expected from all suppliers, vendors, contractors, consultants, and other third parties providing goods or services to Infobip (collectively, "Suppliers").

Suppliers are expected to comply with this Code and ensure that their employees, affiliates, agents, and subcontractors adhere to equivalent standards. Compliance with this Code is a condition of doing business with Infobip.

This Code should be read together with other applicable Infobip policies and contractual requirements, including:

- Infobip Global Sustainable Sourcing Policy
- Infobip Service Terms and Conditions
- Infobip Privacy Notice
- Environmental Policy
- Modern Slavery Statement.

Depending on the nature of services provided, Suppliers may be required to comply with additional Infobip policies, standards, procedures, and contractual requirements communicated during onboarding or throughout the business relationship.

In the event of any inconsistency between this Code, applicable law, and any written agreement between Infobip and the Supplier, the stricter requirement shall apply to the extent permitted by law, unless the applicable written agreement expressly states otherwise.

Table of contents

Compliance with Laws

Business Ethics and Integrity

Human Rights and Labour Standards

Health and Safety

Environmental Responsibility

Data Privacy, Information Security and Confidentiality

Responsible Use of Technology and AI

Supply Chain Responsibility

Compliance Monitoring and Audits

Reporting Concerns

Violation and Remedies

Acknowledgment

Compliance with Laws

Suppliers shall comply with all applicable laws, regulations, and industry standards in the jurisdictions in which they operate.

Suppliers shall maintain all required licenses, permits, certifications, and registrations necessary to conduct their business.

Suppliers shall promptly notify Infobip of any event that materially affects their legal standing, ability to perform, or suitability as an Infobip supplier, including but not limited to insolvency, sanctions, or loss of a material license.

Where local laws impose stricter requirements than this Code, Suppliers shall comply with the stricter standard.



Business Ethics and Integrity

Fair Competition

Suppliers shall compete fairly and comply with applicable competition and antitrust laws.

Suppliers shall not engage in:

- price-fixing
- bid-rigging
- market allocation
- anti-competitive conduct.

Trade Compliance and Sanctions

Suppliers shall comply with all applicable export control, customs, and trade sanctions laws and regulations.

Anti-Bribery and Corruption

Suppliers shall maintain a zero-tolerance approach to bribery and corruption. Suppliers must not:

- offer, promise, give, request, or accept bribes or improper advantages
- make facilitation payments
- engage in corruption directly or through third parties.

Suppliers shall comply with all applicable anti-corruption laws, including the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and equivalent local legislation.

Conflicts of Interest

Suppliers shall avoid conflicts of interest involving Infobip and promptly disclose any actual or potential conflicts.

Business courtesies, gifts, and hospitality must be reasonable, transparent, lawful, and must not improperly influence business decisions.

Human Rights and Labour Standards

Infobip expects Suppliers to respect internationally recognised human rights principles and applicable labour standards.

Forced Labour and Modern Slavery

Employment must be freely chosen. Suppliers shall prohibit all forms of:

- forced labour
- bonded labour
- involuntary prison labour
- human trafficking
- modern slavery.

Child Labour

Suppliers shall not employ individuals below the applicable minimum legal working age. Young workers shall not perform hazardous work or work that may interfere with their health, safety, or education.

Non-Discrimination and Equal Opportunity

Suppliers shall provide a workplace free from discrimination, harassment, abuse, intimidation, and retaliation. Employment decisions shall not be based on race, ethnicity, nationality, religion, gender, sexual orientation, disability, age, or other characteristics protected by applicable law.

Wages and Working Hours

Suppliers shall comply with applicable laws regarding wages, overtime compensation, working hours, and legally mandated benefits.

Freedom of Association

Suppliers shall respect employees' rights to freedom of association and collective bargaining in accordance with applicable laws.

Whistleblower Protection

Suppliers shall provide mechanisms that allow workers to raise concerns confidentially and without fear of retaliation.

Health and Safety

Suppliers shall provide safe and healthy working conditions for employees, contractors, and visitors.

Suppliers shall:

- comply with applicable health and safety laws and regulations
- identify and manage workplace risks
- provide appropriate health and safety training
- maintain emergency preparedness procedures
- provide appropriate protective equipment where required
- maintain safe, clean, and sanitary facilities.

Environmental Responsibility

Infobip expects Suppliers to operate in an environmentally responsible manner and comply with all applicable environmental laws and regulations. Suppliers are encouraged to:

Measure, report, and seek to reduce Scope 1, Scope 2, and relevant Scope 3 greenhouse gas emissions.

Maintain accurate records of emissions data and provide such information to Infobip upon reasonable request to support Infobip's own climate reporting obligations, including under the Science Based Targets initiative (SBTi).

Set science-based emissions reduction targets aligned with the SBTi framework and the goal of limiting global warming to 1.5°C, where not already in place.

Improve energy and resource efficiency across their operations and minimize waste, pollution, and resource consumption.

Support sustainable business practices and provide relevant sustainability information when reasonably requested.

Data Privacy and Information Security

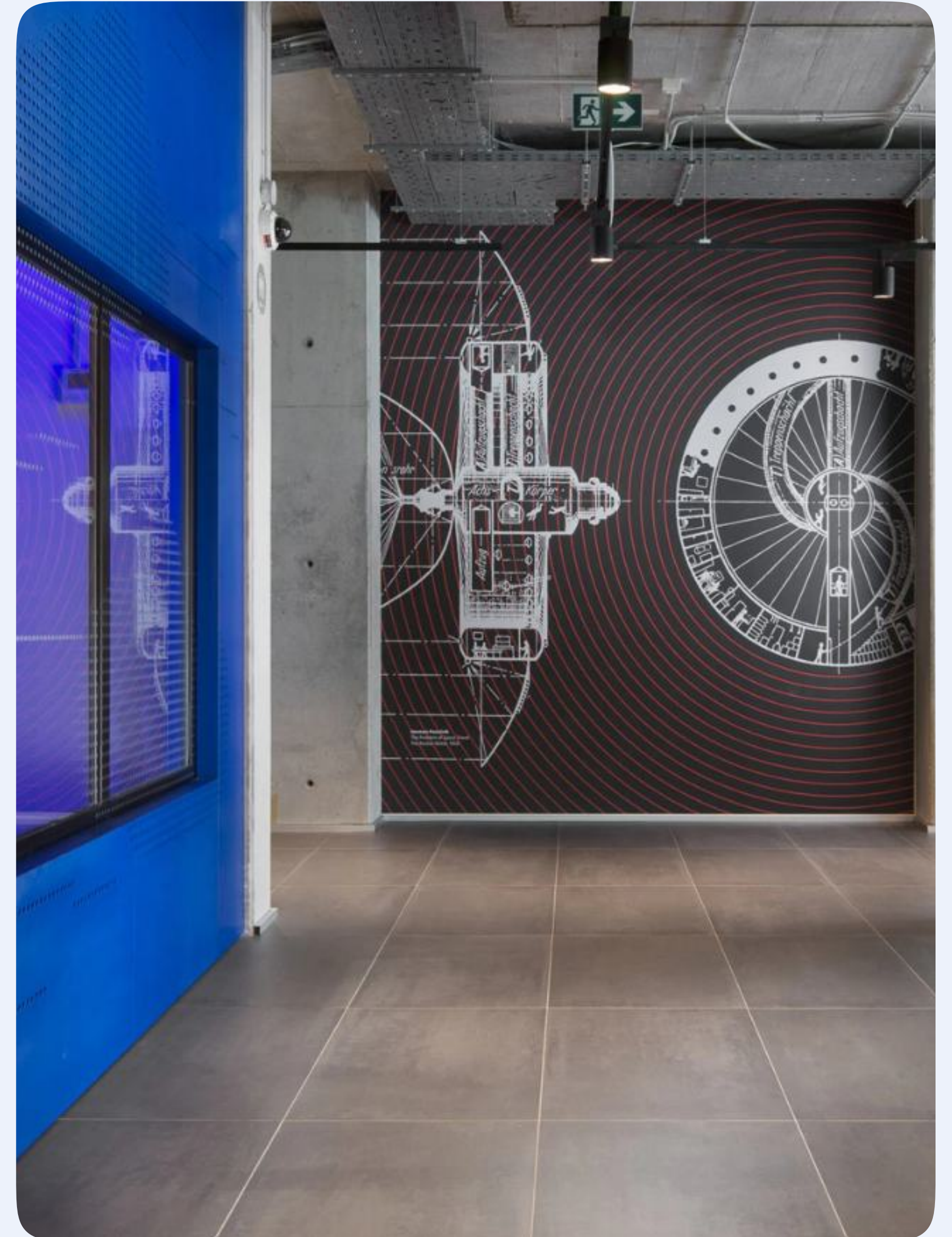
Suppliers handling Infobip information, systems, or data shall implement appropriate technical and organizational safeguards.

Suppliers may be required to comply with additional Infobip information security requirements, standards, or contractual obligations depending on the nature of services provided.

Suppliers shall protect Infobip confidential information, trade secrets, and intellectual property rights, and shall not use or disclose them except as authorized by Infobip or permitted by applicable agreement or law.

Suppliers shall:

- comply with applicable data protection and privacy laws, including GDPR where applicable
- protect personal data and confidential information against unauthorized access, disclosure, alteration, or destruction
- use Infobip information solely for authorized business purposes and not for any secondary use (including AI training) without prior written approval
- promptly notify Infobip of actual or suspected security or data protection incidents
- ensure subcontractors handling Infobip data maintain equivalent standards and remain fully responsible for them.



Responsible Use of Technology and AI

Suppliers shall ensure responsible, lawful, and secure use of technology, artificial intelligence, and automated systems. Suppliers shall not:

Use Infobip confidential, proprietary, or personal data to train any AI model, or for any AI related development or testing purpose, without Infobip's prior written authorization.

Use AI or automated technologies in violation of applicable laws or human rights principles.

Suppliers shall implement appropriate controls to prevent unauthorized disclosure or misuse of Infobip data through AI-enabled systems or tools.

Supply Chain Responsibility

Suppliers are expected to apply standards equivalent to this Code throughout their own supply chains. Suppliers shall:

Conduct appropriate due diligence over subcontractors and suppliers.

Communicate relevant standards to subcontractors.

Cooperate with Infobip in reasonable supplier due diligence activities.

Suppliers may be subject to risk-based due diligence, security, privacy, compliance, or sustainability assessments prior to and during the business relationship. Suppliers shall ensure that all permitted subcontractors, agents, and affiliates involved in providing goods or services to Infobip are bound by written obligations that are no less protective than those set out in this Code. Suppliers shall remain fully liable for the acts and omissions of such parties.

Compliance Monitoring and Audits

Infobip reserves the right to assess Supplier compliance with this Code through questionnaires, documentation requests, compliance certifications, audits or assessments where appropriate. Suppliers shall cooperate reasonably and provide accurate information in a timely manner. Where non-compliance is identified, Suppliers may be required to implement corrective actions within a reasonable timeframe.

Reporting Concerns

Suppliers and their employees are encouraged to report concerns regarding suspected violations of this Code or applicable laws. Infobip prohibits retaliation against individuals reporting concerns in good faith.

Reports may be raised:

- through designated Infobip procurement or compliance contacts
- through applicable reporting or whistleblowing channels.

Violations and Remedies

Failure to comply with this Code may result in corrective actions, suspension of activities, reassessment of supplier status, or termination of the business relationship.

Infobip reserves the right to take appropriate contractual or legal action in cases of significant or repeated non-compliance.

A breach of this Code may be treated by Infobip as a material breach of the Supplier's contractual obligations, entitling Infobip to exercise its rights under the applicable agreement, including suspension or termination, subject to the terms of that agreement and applicable law. Any rights or remedies of Infobip under this Code are cumulative and without prejudice to any other rights or remedies available under contract, law, or equity.

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

E-mail: reportit@infobip.com

Acknowledgment

By engaging in business with Infobip, the Supplier acknowledges that it has read, understood, and agrees to comply with this Supplier Code of Conduct.

The Supplier further acknowledges that Infobip may request environmental, social, and governance (ESG) information and performance data to support Infobip's regulatory and voluntary reporting obligations.

The Supplier shall provide accurate and complete information in a timely manner upon reasonable request.

Oversight

This Code of Conduct is approved by the Company's highest governing body and is owned and administered by the Source-to-Pay Global Head, the Source-to-Pay Manager, and the Purchasing Team Lead.



One communication platform.
Billions of conversations.