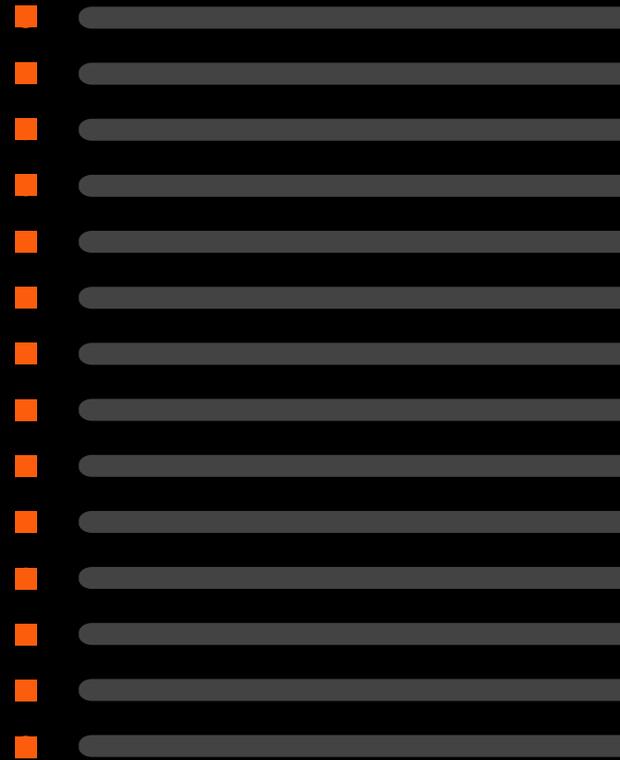


Code of Ethics and Business Conduct



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Camunda's Code of Ethics and Business Conduct

Camunda's (collectively with its affiliates, "Camunda", "we", "our") Code of Ethics and Business Conduct ("Code") reflects our commitment to proper business conduct and ethical behavior. It also serves as a guiding instrument to foster and reinforce such behaviors. This document applies to Camunda employees ("you", "Camundi") who are directly or indirectly employed by Camunda (including leadership members, employees both full and part-time, freelancers, contractors, subcontractors, and any other person who works for Camunda in a salaried or salaried-like relationship). Since it is not viable to cover every topic, contact us at compliance@camunda.com in case you have any questions about this Code.

It is crucial to Camunda to maintain the highest ethical standards and comply with all the applicable legally mandated norms and internal company-wide policies. Our success is based on the trust we receive from you and those with whom we do business. We gain credibility by achieving our goals through ethical behavior.

Every Camundi is expected to follow this Code in letter and spirit while representing our company in both their professional and personal lives. Camunda expects all Camundi to be transparent and honest in all matters related to their work and treating everyone with respect and fairness. Every Camundi has a responsibility to act in good faith and not do anything that would destroy the trust necessary for employment. Any failure to do so may result in disciplinary action in accordance with established company [procedures](#).

If you believe or have a reason to believe that the principles outlined in this Code are being violated or have been violated, you must report the matter promptly in accordance with our [Speak-up Policy](#). We guarantee that there will be no retaliation against the person who voices their concerns in good faith.



Message from our Senior Leadership Team

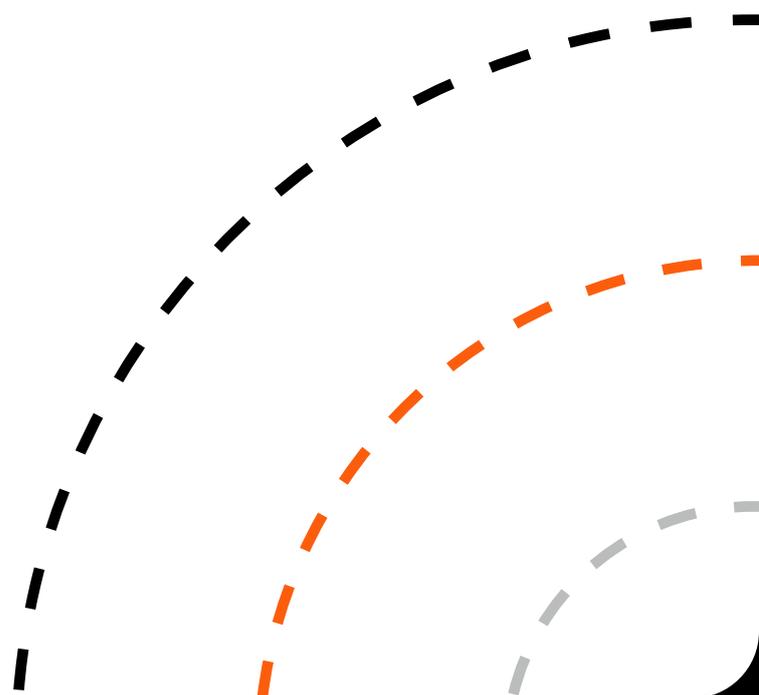
With our products, we help organizations to orchestrate any endpoint (people, systems, or devices) along a BPMN process model thus bringing business and IT together at scale. By empowering these organizations to automate any process, anywhere, we enable them to transform into truly digital enterprises.

The secret to our success is simple: people and culture are essential to everything we do. We stand up for the fundamental rights and dignity of everyone associated with Camunda. We strive for a diverse, equitable, and inclusive culture because we sincerely believe that it is the foundation for community and belonging inside and outside Camunda.

Camunda is a remote-first and global company as we believe that it is not only processes that can be automated anywhere, but also the exchange of ideas and successful collaboration that can be driven by anyone, from anywhere. The success of Camunda is largely owed to the cross-continental collaboration of all Camundi, and our aim is to enable them to work as they are and wherever they are.

Wherever you are located, it is our shared commitment to always act lawfully, in compliance with our values, ethically, and in the best interests of Camunda.

We have established our Code to affirm the values that define Camunda as a company, and to govern actions and interactions with our fellow Camundi, customers, partners, community members, suppliers, and subcontractors. Each of us is expected to understand and adhere to the values and principles prescribed herein.



Our values

At Camunda, our culture and values are at the core of everything we do – these are the guiding principles we stand for individually and collectively and are at the heart of how we do business.

In line with our goal of rapid and sustainable growth, more and more people are joining us around the world. We want to ensure that these people can thrive in our cultural environment by adapting their qualities to Camunda's growth. We avoid the term "cultural fit" though because it makes it sound like newcomers have to assimilate and discard the culture they bring with them. That would be a shame as we love our culture evolving and being inspired by newcomers. What we do retain, however, are the fundamental principles that make Camunda a great place to work. We call these our values, **FAITH**:



Focus – From day one, we have been obsessed with staying focused, for example by focusing on BPMN as a consulting topic in the early days of Camunda. While talent and ambition give you the ability and drive to achieve extraordinary results, focus makes sure you apply these traits in a way that has maximum impact. We typically have an abundance of ideas, but impulsively following every idea will lead to distraction. By avoiding distraction you will stay persistent and eventually overcome any impediment that stands between you and your vision.



Ambition – Once you have an idea, a vision, and you feel that urge to make this vision come true, you develop a certain kind of energy. Sometimes it's about the big strategies, but more often about directly tangible achievements, like a new feature or a big customer. And once the vision comes true and the achievement is there, you immediately develop the next idea which becomes the next vision and creates that energy again. It's that energy that makes us ambitious and impatient and life at Camunda so exciting.



Integrity – We want to be successful, but not at all costs. We have experienced that staying true to our principles has not hurt our success but helped it. We do not need to appear perfect, we are humans with all our flaws, but we're self-confident and we respect, trust and help each other.



Talent – It is incredibly rewarding to unfold your own talent and grow personally, as well as help and observe others doing the same. Camunda should be the place that allows you to unfold your talent. It is your manager's responsibility to give you this opportunity, and your own to use it.



Humor – It should not be all work and no fun...



Guiding principles of Conduct

1. People

We are committed to providing a safe and inclusive work environment

1.1. Diversity, Equality, and Inclusion

Everyone is welcome at Camunda, whoever they are, from wherever they are

Camunda is passionate about creating and nurturing an inclusive workplace that promotes and values diversity. We believe that when all people feel respected and included, and are empowered to have a voice, they can be more ambitious, creative, and successful.

We strive to include the principles of Diversity, Equality, and Inclusion (“DEI”) in every way possible and in all that we do, from creating a transparent environment where all globally dispersed voices are heard and welcomed, to promoting a culture where people feel included and can contribute to their best ability. With over 100K users utilizing Camunda Platform SaaS & self-managed from 190 different countries, we aim for a team that is representative of our users.

To nurture and uphold these values at Camunda, you are required to undertake the necessary DEI training to have awareness and understanding surrounding this topic. We also encourage you to participate in the Inclusion Advisory Group and Employee Resource Group initiatives to ensure we are creating and maintaining a working environment that reflects our DEI philosophies.



1.2. Harassment

Be considerate, act respectfully, and regard boundaries

Camunda consists of people from all over the world, with different backgrounds and opinions. It is our responsibility to make Camunda a great place to work for all of us by being considerate and empathetic to each other’s feelings. We value diversity, and we do not tolerate racism, sexism or any form of harassment, let it be physical or verbal.

We all want to work in an environment where we can do our best work. That includes being treated with courtesy, respect, and dignity – and free from any form of harassment, including sexual harassment. We will not tolerate any instances of harassment between and against Camundi and, therefore, correct and discipline any and all behaviors that violate this principle. To achieve our goal of creating a safe and healthy working environment for all the Camundi, it is expected you to:

- Contribute to an inclusive and collaborative working environment;
- To respect each other at all times and to ensure that all Camundi feel safe, respected, and fully valued as they work at Camunda;
- Undertake the mandatory Anti-Harassment Training, as we believe the better employees are informed of the standards expected at work, the less likely harassment manifests itself;
- To report an incident as per the [Speak-Up Policy](#) if you believe you have been subject to or witnessed harassment of any kind.

2. Business Integrity

As a business, we are committed to acting responsibly, ethically, and in compliance with the laws

2.1. Compliance with applicable laws and regulations

Doing business rightfully and ethically, wherever we operate

Camunda conducts business in various jurisdictions of the world, and we ensure to comply with the laws wherever we operate. It is not expected of you to know the specificities of all laws, rules, and regulations but what is expected of you is to be able to determine the situation where and when you need to seek advice from the dedicated Legal team at Camunda. It is, however, still required that you read and adhere to the internal policies in our Handbook that are framed according to the regulatory requirements and the principles mentioned in this Code.

2.2. Fair competition

We obtain competitive intelligence in an ethical and fair manner

Camunda will sell its products and services based on merit, superior quality, functionality, and competitive pricing. Camunda's confidential information and that of other companies – including our competitors – are important and valuable assets and require every Camundi's commitment to protect and preserve consumer trust and business integrity.

To stay competitive, we may gather information about our competitors in a lawful manner. However, you must not acquire or seek to acquire a competitor's trade secrets or other proprietary or confidential information by improper means, and we will not engage in the unauthorized use, copying, distribution, or alteration of software or other intellectual property.



2.3. Anti-bribery and corruption

We take a zero-tolerance approach to bribery and corruption

Camunda is committed to acting professionally, fairly, and with integrity in all its business dealings, individual conduct, and relationships. It is the goal of Camunda to avoid acts that might reflect adversely upon our integrity and reputation. Bribery and corruption are serious offenses and carry civil and criminal penalties in many jurisdictions. The laws regulating such offenses prohibit offering, promising, or paying anything of value to obtain an undue advantage in a manner that is favorable for Camunda or to any of its stakeholders. Our Anti-bribery and Corruption [Guidelines](#) require you as a Camunda employee to:

- Not offer or give anything of value to anyone to improperly obtain or retain any business or to improperly secure a favorable business;
- Not make contributions on behalf of Camunda, whether in cash, kind or by any other means, to support any political parties or candidates;



- Not make any form of facilitation payments and kickbacks with the intention to speed up the process or gain an undue business advantage;
- Not take or give anything that can be perceived as an act of impropriety. If in doubt – always consult with the designated ESG [Coordinator](#);
- Only give gifts and pay for entertainment consistent with the Anti-bribery and Corruption [Guidelines](#);
- Report promptly as per the established Speak-Up [Policy](#), any breaches and concerns about bribery or corrupt activities in relation to Camunda.

2.4. Conflict of interest

We act in the best interest of Camunda and maintain a culture of open communication and cooperation

A conflict of interest occurs when a Camundi's private interest conflicts with the interests of Camunda. This is the case whenever the possibility of direct or indirect personal gain may influence or impact your decision related to Camunda's business operations. Whenever there is an overlap of interests, you must act in a manner that benefits Camunda's business interest and does not create conflict. We are bound by the duty of good faith and obligation of loyalty towards Camunda. To avoid such conflicts, we expect you to:

- Not engage in outside activities that compete with those of Camunda or assist Camunda's competitors;
- Award business solely based on merit and not because of personal relationships or potential personal gain;
- Not use or disclose any business information or opportunities obtained through work for personal advantage or personal gain;
- Report any situations that may present an actual or perceived conflict of interest to your manager or Compliance Officer.



2.5. Compliance with export and import laws

We comply with the international standards concerned with trade of technologies and related services

In light of the dynamic development in the trade laws, we ensure through our established process of compliance checks that Camunda adheres to all the applicable rules and regulations pertaining to sanctions and embargoes. Export and import laws regulate the export, re-export, and import of Camunda's software and services. The Federal Office of Economic Affairs and Export Control (BAFA), the US Department of Treasury, HM Treasury, and other trade departments of other countries strictly control and regulate the trade with certain countries, entities, and individuals. Therefore, you are expected to follow the established internal guidelines of Blocked lists of companies and countries and only do business with the countries, entities and individuals that have gone through prior compliance checks and approved by the Ethics Team.

2.6. Business recordkeeping

We maintain accurate and correct business and financial records

Camunda is responsible for ensuring that we produce accurate and correct business-related documents and take care while maintaining such documents. All our books, records, accounts, and financial statements are maintained in reasonable detail and appropriately reflect our transactions in conformity with legal requirements and our system of internal controls.

It is a good practice that enables us to make business decisions on authentic records, but it also fulfills the legal and accounting requirements. It is therefore essential to record business transactions, like reimbursement or purchase orders (no matter how big or small), and make entries consistent with their purpose, nature, and value. We would not tolerate any unfounded transactions or disguised expenditures or proceeds.



2.7. Human Rights, Employment, and Labor

We stand up for the fundamental rights and dignity of everyone

Camunda abides by and adheres to the principles enshrined in the Universal Declaration of Human Rights. Not only do we ensure that the human rights of all Camundi are respected, but we also ensure that we only sell to companies that we have previously screened for human rights. It is therefore expected of you to comply with the internal human rights-related policies and only engage in business with the companies that the Ethics team has approved.

Camunda fully complies with the employment and labor laws and does not engage in any kind of forced or involuntary labor. All employment relationships are regulated as per the applicable laws and regulations. Furthermore, every Camundi receives legally mandated benefits, working hours, and compensation. We have a Flexible Time Off policy where Camundi can take additional vacation days besides the legally mandated requirement, so long as business continuity is maintained.

3. Third-party assets

We maintain the security and integrity of the third-party assets with whom we engage

3.1. Confidential information

We take care of your information

We maintain the confidentiality of all information entrusted upon us unless disclosure is authorized or legally permitted, and we use such information only for our legitimate business purposes. Confidential information includes but is not limited to non-public information about our customers, partners, suppliers, and Camundi. We are therefore expected to handle such information on the basis that:



- A Camundi who has access to such confidential information may only communicate such information to other Camundi on a 'need to know' basis for legitimate business reasons;
- Any kind of non-public information shall only be shared with the business partners after the parties have signed a contractually agreed non-disclosure agreement.

3.2. Data privacy

Data Protection of personal information within the framework of applicable data protection laws is of paramount importance to us

Camunda processes, collects, and uses personal data that is necessary for the effective operation of its business or as required by law. It is our responsibility and duty to respect and protect the privacy and personal data of all parties and individuals connected to Camunda. To do so, Camunda complies with applicable privacy, security, and data protection regulations and conducts regular training to create awareness. Camunda ensures to follow data protection principles such as the principles of legality, purpose limitation, data minimization, transparency, need-to-know, confidentiality and privacy by design and by default.

It is, therefore, your responsibility to undertake relevant data protection training and reach out to our internal [Data Privacy Coordinator](#) if you plan or have questions around any data processing activities. Always keep personal data you have access to confidential and stick to instructions, policies and procedures when processing any personal data. You may only access the personal data that is necessary to complete your tasks. Keep in mind that the purpose of processing the data must be consistent with the business purpose for which it was collected. While dealing with such data, take caution as per Camunda's Privacy Policy and report any suspected breach according to the protocols laid out.



3.3. Security

Our mission is to establish trust through transparency

We have a shared responsibility to minimize the information security risks that arise from our day-to-day business operation. To take our responsibility to a prime level, Camunda commits itself to a company-wide Information Security Management System, conducts security training, and has been certified with ISO / IEC 27001 and SOC 2, Type 1 for adherence and compliance to security requirements. Despite these accreditations, we still require your cooperation to secure our IT system. It is your responsibility to familiarize yourself and understand the security policies and procedures that have been put into place and undertake necessary security training.

4. Social Responsibility

We believe in giving back and doing our part in making the world a better place

4.1. Contributing towards communities

We want to help where we can to support a good cause

Chosen by all Camundi, Camunda supports the public welfare of the communities in which it operates through annual donations to accredited charities and charitable causes. It is your responsibility to ensure that the charities do not have any political ties and to verify the legitimacy of the charitable organization. Any such contributions should be in alignment with our Anti-bribery and Corruption [Guidelines](#).



4.2. Camunda for Common Good

We want to give back to organizations that are making a tangible difference in the lives of people around the world

It is Camunda's mission to enable organizations with socially relevant missions by increasing their potential impact through our products and services. We care about supporting causes that make a difference. We also know that sometimes, these organizations require help to get started. We have put together a special [package](#) for NGOs and non-profit organizations that could benefit from automating processes, whether that means more quickly processing paperwork, connecting individuals with proper resources, or easily notifying applicants of their status. You are highly encouraged to get involved with such organizations or connect us to a non-profit or NGO that could benefit from using our product.



5. Accountability

We are accountable for both our actions and inactions

5.1. Compliance with the Code

Read, understand and comply

You must ensure that you carefully read, understand, and act in accordance with Camunda's values, internal policies, and procedures that are relevant to this Code. Disciplinary action will be taken against anyone who engages in unlawful activities or violates this Code, up to and including dismissal. If you are unsure how to apply the standards of this Code, or if you find yourself in an ethically or legally challenging situation, it is best to ask the Compliance Officer for advice before taking any step.



5.2. Reporting concerns

We encourage you to raise your voice without fear and reprisal

At Camunda, we strongly encourage you to speak up whenever you observe or are concerned about wrongdoings and violations of laws. It is your obligation to promptly report any illegal or unethical behavior, including violations and potential violations of this Code. Your report shall be dealt with anonymously, discreetly, and with full confidence. To share your concerns, you can:

- Directly reach out to your line managers or representatives of the [People team](#);
- Contact the Compliance Officer via email to compliance@camunda.com.
- File a secure and anonymous report in our [Speak-Up Tool](#) as per the established [Speak-Up Policy](#).

We assure you that any concerns made in good faith are protected from reprisal, threats, discrimination, harassment, retribution, and retaliation.

6. Adoption and review

This Code has been published as of January 2023. It will be reviewed periodically and may therefore be amended in accordance with updates to Camunda's internal policies and guidelines and legal requirements.

