

Our code of conduct



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A note from Steve Sloan



Dear Contentfuler@s,

I am proud to be part of an organization that acts with the highest standards of professional conduct and ethics. Contentful is a special company where we depend on everyone who is here to bring their entire selves to work in order to achieve ambitious goals. We can only achieve these goals by working as one team and living our Contentful Core Values. This Global Code of Conduct and Ethics (the “Code”) is an extension of those values and contains many of our rules and guidelines for professional business conduct that apply to all Contentfuler@s. Please take the time to read through and familiarize yourself with our Code and incorporate these rules and guidelines into your way of working at Contentful. By holding ourselves and each other accountable to these standards, we will ensure Contentful continues to be a great place to work for employees, a great company to do business with for our customers and business partners, and a responsible, ethical global business.

Stephen Sloan

Steve Sloan
CEO

Our core values



Be humble

We are not centered on ourselves but focus on the needs and contributions of others around us.

This is the first value, as it is the foundation for the way we engage with customers, team members, business partners and the broader community.



Embody a growth mindset

We believe in our collective potential to develop and evolve through dedication and continuous learning.



Start with the customer and work backwards

We recognize that we work to serve our customers – both internal and external. The first question we ask ourselves is “what customer need does this solve?”.

We treat each customer with empathy and love and design our products and services to provide value for our customers collectively.



Strive together

We know that creating anything of significance without collaboration is challenging. That’s why we work hard to make an impact together (strive), especially against difficulties.

Global code of conduct and ethics

Our Core Values are an important building block of our culture. They are the lasting and essential beliefs and behaviors that we hold at Contentful as our North Star on how we work together to achieve our goals. Contentful is a global community, and each one of us depends on everyone else to do the right thing every single day. Sometimes, though, the right thing isn't obvious, or you may not be aware of what the law requires you to do. This Global Code of Conduct and Ethics ("Code") is your guide for upholding Contentful's Core Values in your day-to-day activities.

This Code applies to you, whether you are an employee, intern, working student, Board member, independent contractor/freelancer or other representative of Contentful Global, Inc. or its subsidiaries or affiliates. You must also understand and follow the laws and regulations that relate to your job.

This Code applies regardless of location. If you have questions about local laws or customs being different from the Code, please contact the Legal team.

This Code does not replace Contentful's other policies and procedures. However, if there is a conflict with our other policies, procedures, and handbooks posted on Confluence, this Code will take precedence to the

extent permitted by applicable law. All policies are on Confluence, but, if you have trouble finding one, contact the People team or the Legal team.

This Code is not intended to address every issue or situation you may face as a Contentfuler®, but it is designed to help you understand what we mean by good judgment and ethical behavior. You may find yourself in a situation in which you are unsure of the right legal or ethical choice. Contentful has many resources to help. Often the best place to start is with your manager. You may also seek guidance from the Legal team and the People team.

When you are in doubt on whether to take an action or engage in an activity, ask yourself these questions:



Is it Legal?

Does it comply with our policies?

Is it consistent with our Core Values?

Is it in the best interest of our stakeholders?

Would I be comfortable if it were made public?

If your answer to any of the questions is "No," don't do it. If you are unsure, contact the Legal team.

Leading by example

Contentful managers and leaders play a special role in creating and preserving our culture and setting a tone of compliance with laws and Contentful policies. Your team takes its cues from you. Always endeavor to lead by example and uphold the highest standards of ethical conduct. Create an environment in which people feel accountable and comfortable asking questions or raising concerns. If someone raises an issue, you are expected to make sure that it is handled quickly and correctly. You are responsible for your team's compliance as you are accountable for its business performance.

- **Comply with the Code, Contentful Policies, Laws, and Regulations:** You must make it your priority to personally understand and help your team members comply with the Code, Contentful policies, laws, and regulations.
- **Lead by Example:** Your team members will look to you to set the example that they will follow. Endeavor to be clear and unequivocal in your own behaviors and communications.
- **Encourage Open and Honest Discussion:** Strive to create the kind of workplace where Contentfuler@s feel comfortable coming forward with questions and concerns. Adopt an open-door policy and make it a reality.
- **Support Employees Who Raise Concerns:** When Contentfuler@s bring an issue to you, you are expected to listen without interrupting, joking, second-guessing, or jumping ahead to "solutions." Report issues to your manager, or if you don't feel comfortable reporting to them, then report to the People team or the Legal team.
- **Protect Confidentiality:** When Contentfuler@s share a complaint or sensitive issue with you, respect the trust they have placed in you and Contentful. Explain to the employee that you will handle the concern discreetly and as confidentially as possible, and if requested, will maintain the employee's anonymity to the extent possible, consistent with the need to conduct an adequate investigation, provide a fair process to anyone accused of misconduct, and implement follow-up training or corrective action.
- **Recognize and Prevent Retaliation:** You have an absolute obligation to understand the different possible forms of retaliation and prevent it when an employee has raised an issue or concern in good faith, including:
 - Making threats, discriminating against, or harassing someone;
 - Assigning someone an unpopular job or arbitrarily increasing/decreasing their workload;
 - Reassigning someone to a comparable or "better" job that they don't want;
 - Denying someone benefits or training opportunities;
 - Withholding information or excluding someone from meetings, events, or discussions; or
 - Setting unrealistic deadlines to cause an employee to fail.
- **Treat Others With Respect:** Endeavor to ensure that you and all members of your team treat fellow Contentfuler@s, customers, business partners, suppliers, and other stakeholders with respect at all times.
- **Promptly Report Issues:** When Contentfuler@s come to you with a concern, it is important that you take prompt action to report the issue. It is critical that you do not conduct your own investigation of possible violations of law, safety, and security, or Contentful policy.

Contentful prohibits retaliation against anyone who has raised an issue or concern in good faith. If you have any questions about your compliance responsibilities as a Contentful employee, leader or manager, contact your manager, the Legal team or the People team.

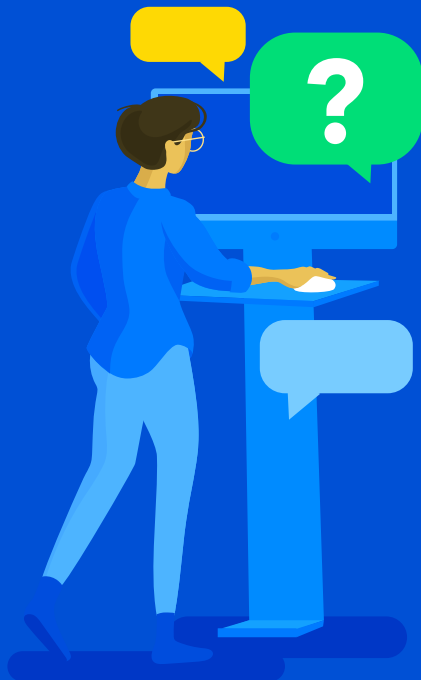
Always remember

Seek guidance if the course of action is not clear to you.

How to report a concern

There are multiple ways to report a concern within Contentful:

- Contacting the People team
- Contacting the Legal team
- Reporting via the Contentful Cares Whistleblower Hotline



Raising issues and concerns

Contentful is committed to maintaining a workplace in which individuals can report an ethical concern, and do so free of any harassment, discrimination, or retaliation. If you have questions about the Code or the right thing to do, please contact your manager, the People team or the Legal team. You must report any suspected violation of laws, rules, regulations, Contentful policies or this Code to your manager, the People team or the Legal team immediately. Contentful will not retaliate, and will not tolerate retaliation against anyone who, in good faith, reports violations or suspected violations or assists in an investigation of a reported violation. Good faith is raising a question or concern that you honestly believe to be true. Immediately report to the People team (people-compliance@contentful.com) or the Legal team (compliance@contentful.com) any acts that appear to be retaliation.

If you prefer to remain anonymous, you can also report your concerns through the **Contentful Cares Whistleblower Hotline** in one of the following ways:

Mobile: contentfulcaresmobile.ethicspoint.com

Online: contentfulcares.ethicspoint.com

Call Toll-free:

USA: 833-626-1512

Germany: Dial 0-800-225-5288,

then dial 833-626-1512

Investigation of reported issues

All properly reported potential violations of this Code will be taken seriously and will be promptly investigated. We encourage you to provide as much detail as possible about the complaint or concern, since Contentful's ability to investigate depends on the quality and specificity of the information. You may be asked to assist with an investigation as discussed below. At the conclusion of the investigation, if it is determined that a violation of the Code or Contentful policy has occurred, Contentful will take timely remedial action appropriate to the severity of the offense, and violators will be subject to disciplinary action up to and including termination. In addition, any violations of law will be reported to the appropriate law enforcement authorities.

Contentful will keep discussions and actions relating to good faith reports confidential to the extent possible, consistent with the need to adequately investigate, provide a fair process to anyone accused of misconduct, and respond appropriately (e.g., implementing follow-up training or corrective action), and subject to applicable privacy laws and regulations. This also applies if you report anonymously. The reporting channels are established, set up, and operated in a secure manner such that the confidentiality of your identity and third parties mentioned, in the report is maintained and unauthorized employees are denied access to these channels. Please note that in most cases, disclosing your identity when reporting an issue will help the authorized persons investigating the matter more effectively. However, you are free to report anonymously, and in either case, the disclosed information, including your identity, will be treated confidentially.

Cooperation in investigations

Contentful will conduct investigations of any alleged or actual violations of the Code, Contentful policies and procedures, and laws. All Contentfuler@s and business partners who report, are witness to, or are accused of a Code violation are required to cooperate with any Contentful investigation.

You must take your participation in any investigation seriously. The following actions will result in disciplinary action, including possible termination of employment:

- Destruction of evidence related to any violation of the Code, Contentful policy, or the law;
- Failure to provide evidence sought in an investigation or the subject of a preservation request;
- Providing false or misleading information in an investigation;
- Not fully cooperating with an investigation; and
- Not following instructions given to you as part of any investigation (for example, refraining from discussing the investigation with other Contentfuler@s).

Q

Nicola is aware of an internal investigation involving a friend in her workgroup. Nicola does not want to answer any questions that may cause a problem for her friend. Does Nicola have to cooperate in an internal investigation if she is asked to do so by the People team or the Legal team?

A

Yes. All Contentful employees must cooperate in investigations when asked to do so. Not cooperating will result in disciplinary action, including possible termination of employment.

Q

Salman wants to report a concern of suspected fraud but is worried that he will get in trouble or hurt someone's reputation if he is wrong about the allegation.

A

Fraud is serious and must be reported. Contentful does not hold employees accountable for reports made in good faith, even if they turn out to be unfounded. We are careful when looking into alleged wrongdoing to ensure that employees' reputations are protected. Investigations are conducted in an objective, fair, and confidential way.

Q

Barbara, a Contentful engineer, has a complaint about her manager. She is afraid that if she complains, her manager might be angry with her.

A

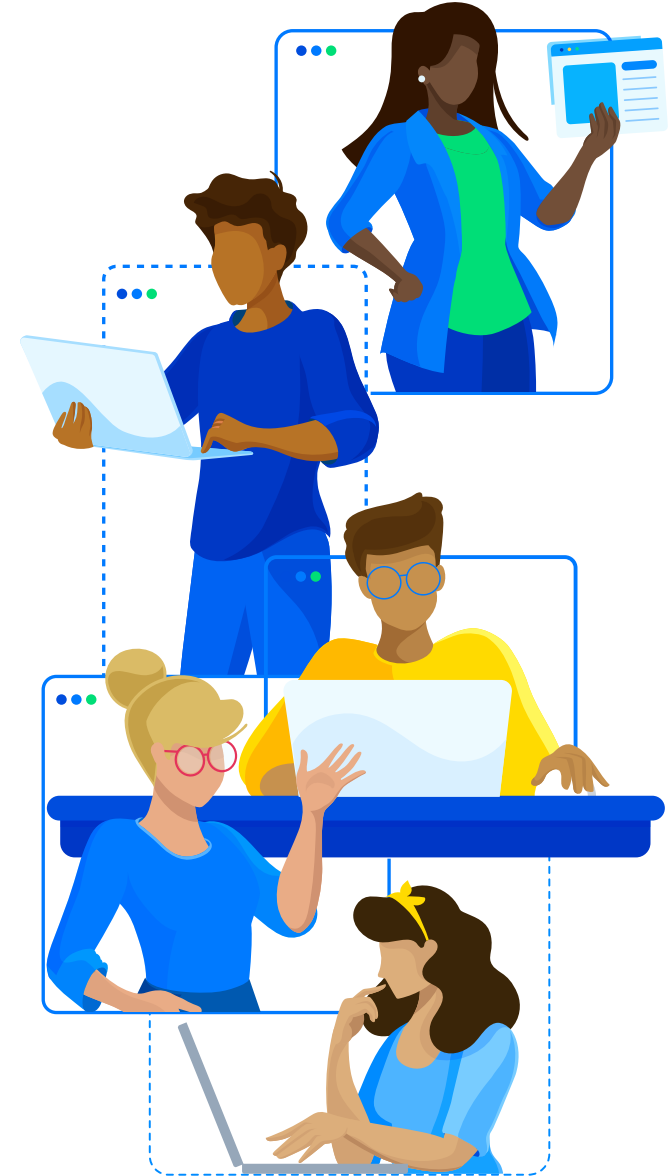
Employees may report issues to the People team or the Legal team without fear of retaliation. Contentful will not tolerate anyone retaliating against someone for reporting a concern in good faith. Anyone found to be retaliating against an employee for reporting a concern is subject to discipline. In other words, you need to speak up!

Interacting in the workplace

Creating a safe and supportive environment is extremely important to us. We treat each other with respect and dignity and embrace the diversity of our viewpoints and ideas. Everyone is entitled to work in a safe and inclusive environment that is free from unlawful discrimination and harassment. Discriminatory and harassing behavior is strictly prohibited in the workplace, at work-related settings and activities, whether inside or outside the office, and in any other setting where the behavior could affect someone's comfort or relationships at work. This policy of non-discrimination and harassment is not limited to employees and potential employees but extends to how we treat our business partners, investors, customers, and other third parties. We ask questions, seek to understand, foster a growth mindset, and contribute to the improvement of our environment and our communities.

Fair employment practices

Contentful is committed to maintaining a work environment free from discrimination and harassment. We are an equal opportunity employer. We do not unlawfully discriminate in employment opportunities or practices on the basis of gender, race, color, religion, age, citizenship, sexual orientation, gender identity, gender expression, marital status, pregnancy, national origin, ancestry, physical or mental disability or condition, or any other protected class under applicable federal, state, or local laws. We also prohibit unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. Contentful will promptly address reports of discrimination, harassment, or retaliation. If you believe you have observed or been subjected to harassment, discrimination, or retaliation, you should immediately contact your manager or supervisor or the People team.



No harassment

Contentful is committed to maintaining an inclusive and respectful workplace, which includes a working environment that is free from harassment. Harassment and any conduct that may foster an offensive or hostile work environment, including unwelcome or unsolicited sexual advances, threats of physical harm or violent behavior, or use of discriminatory slurs or inappropriate remarks or jokes, are strictly prohibited. This policy applies to all work-related settings and activities, whether inside or outside the office and includes business trips, work-related social events, and any other setting where the behavior could affect someone's comfort or relationships at work. If you believe you have observed or been subjected to harassment or any conduct that fosters an offensive or hostile work environment by a Contentful employee, Board member, independent contractor/freelancer, customer, business partner, or supplier, you should immediately contact your manager, the People team, or the Legal team.

Health and safety

Contentful strives to provide a safe, healthy, and sanitary work environment. You are responsible for maintaining a safe and healthy workplace for everyone by following safety and health laws, rules, policies, and practices and promptly reporting accidents, injuries, and unsafe equipment, practices, or conditions.

Everyone is expected to treat others fairly and with respect and to maintain a professional demeanor. We have a zero-tolerance policy for acts or threats of violence, aggression, intimidation, hostility, or other threatening behaviors. Any potentially dangerous situations must be reported immediately to your manager, the Workplaces team, or the People team.

Drugs and alcohol

Contentful's position on substance abuse in the workplace is simple – it is incompatible with the health and safety of our employees, and we don't permit it. You may choose to drink alcohol provided by Contentful at the office or at company events but use good judgment, act in a professional, respectful, and responsible manner, and never drink in a way that leads to impaired performance or inappropriate behavior, puts yourself or others in danger, or violates the law. You are strictly prohibited from driving a vehicle while on Contentful business (including transporting others to and from an event) while under the influence of alcohol, non-medical or illegal drugs, or other controlled substances. Illegal and non-medical legal drugs in our offices or at sponsored events are strictly prohibited and will result in your immediate dismissal.

While the use of marijuana has been legalized under certain state laws for medicinal and recreational uses, it remains an illegal drug under federal law and its use in the workplace is prohibited by Contentful's policy. You may not consume or be under the influence of marijuana while on duty or at work.

Protecting confidential information and intellectual property

As a leader in content management, our innovation is the key to Contentful's success. It is essential for us to protect our intellectual property ("IP") and to prevent misuse or unauthorized disclosure of Contentful confidential information and the confidential information entrusted to us by our customers, business partners, and suppliers.

Confidential information

We must strive to protect all confidential information concerning Contentful, as well as confidential information with which other parties have entrusted us. Unauthorized use or disclosure of confidential information is extremely serious; it would violate the NDA and the Proprietary Information and Inventions Agreement ("PIIA") or similar agreement you signed when you joined and it could be illegal and result in civil liability or criminal penalties. It would also violate Contentful's trust in an employee, and the trust of a customer, business partner, supplier, or vendor in Contentful. Even if information is not marked "confidential," if it is confidential in nature, we must strive to protect it.

Examples of confidential information are:

- Financial data and projections, such as sales bookings and pipelines;
- Proprietary and technical information, such as trade secrets, patents, inventions, product plans, roadmaps, and prospect and customer lists;
- Information about corporate developments, such as business strategies, plans for acquisitions or other business combinations, major contracts, expansion plans, financing transactions, and management changes;
- Personal information about individuals; and
- Confidential information of customers, business partners, suppliers, stockholders, and others.

Additionally, all company emails, voicemails on Contentful-issued mobile devices and other Contentful-related communications are presumed confidential and should not be forwarded or otherwise disseminated outside of Contentful except where required for legitimate business purposes. If you have any questions about whether something is confidential, ask your manager or the Legal team.



Always remember

Don't get "phished" – i.e., don't inadvertently get lured into disclosing Contentful confidential information to an online scammer or an impostor by phone.

If you don't trust or own it, don't download it from the web.

And the corollary, if it is Contentful confidential information, don't upload it to the web or cloud SaaS sites not authorized by Contentful.

Lock your mobile devices that connect to Contentful network or contain Contentful confidential information.

Handling Contentful's confidential information

In the course of your work, you will learn confidential information about Contentful. As a general rule, you are prohibited from sharing Contentful's confidential information with outsiders, even with your close family or friends. This duty continues even if you leave Contentful. Please see the NDA and the PIA you signed when you joined for more details.

Need to know: Only share confidential information inside of Contentful with people who actually need to know to do their job.

Only access or use Contentful's confidential information for Contentful's benefit. Protect it and be careful not to reveal confidential information on the internet, including through social media.

When you need an NDA: Sometimes you may need to share confidential information outside of Contentful for a deal or project. Before doing so, make sure that the information is appropriate to share and that you have put safeguards in place to protect it (for example, an NDA is in place that covers Contentful's confidential information, documents are marked "Confidential," and you are not sharing more than necessary). Always propose the use of the [Contentful standard NDA](#) as it covers the appropriate safeguards for Contentful. Additionally, when sharing any confidential information outside of Contentful, strictly follow our [Information Security Policies](#) and any other policies referenced that apply to the specific type of information.

If you find yourself in a situation where you think that you may need to disclose confidential information

and are uncertain how to proceed (for example, you receive a subpoena or demand letter), contact the Legal team first, and they will take the lead.

Handling third-party confidential information

In the course of your work, you may learn confidential information that belongs to or concerns other parties, like customers, prospects, job applicants, suppliers, or business partners.

When you have permission to use someone else's confidential information, handle it responsibly and follow any agreements we have with them. Specifically, you should always strive to:

- Follow any NDA or confidentiality obligations, including return or destruction obligations;
- Only use the information for the owner's intended purpose and refrain from use for other purposes within Contentful;
- When accessing any type of customer information, strictly follow our [Information Security Policies](#) and any other policies that apply to the specific type of information;
- Only share the confidential information with other Contentfuler@s who have a real business need to know it;
- Protect the information from being stolen or unintentionally released; and
- Never trade in the stock of any company based on material nonpublic information that you know about them. This is not only a violation of Contentful policy, it is illegal.

Always remember

Use extra caution while working in public places and while traveling to prevent others from seeing confidential information on your mobile devices or overhearing confidential conversations.

Don't use unknown or unprotected networks or WiFi to access Contentful information or services.

Be smart about what you publicly say or write about Contentful. If you are uncertain, ask Legal and also refer to the Speaking Together section below.

If you have questions or concerns regarding these practical tips, please contact team-security@contentful.com.

Do not knowingly take, accept, or use third-party confidential information without official permission. It goes without saying that you may not coerce or bribe anyone to share other companies' or individuals' confidential information. You should never knowingly attempt to obtain a competitor's confidential information improperly. This includes asking a fellow Contentfuler@ to disclose confidential information that you know may have been received working for another employer. If you have or receive confidential information from another company, accidentally or from an unknown source, it may be unethical to use it, or even illegal – do not use it, access it, or delete it, and consult with the Legal team immediately to determine how best to proceed.

Protecting Contentful's intellectual property

Intellectual property is the heart of our business, and everyone here works extremely hard to create, market, and safeguard it. If we don't protect it, Contentful risks losing its intellectual property rights and the critical competitive advantages they provide. Intellectual property covers many things, but common and valuable examples are our products and services, code, development roadmaps, business strategy, customer and prospect lists, and trade names and logos. Endeavor to protect our intellectual property by avoiding inappropriate

disclosures (see "Handling Contentful's Confidential Information" above). When disclosure is authorized, mark the information as confidential or with a trademark, copyright, or patent legend (check with Legal if you're unsure about what to write). Please also refer to [Contentful's Data Classification Policy](#).

When you create new intellectual property related to Contentful on Contentful's time, or using Contentful's resources, it is Contentful intellectual property and you must share it with your manager so that Contentful can decide whether to seek formal protection.

Protecting the Contentful brand

Contentful is a worldwide brand; make sure to protect it. Don't alter our logo and don't permit third parties to use our logo unless they are approved to do so pursuant to the Contentful [Trademark and Brand Usage Policy](#) or pursuant to a Legal-approved contract. Marketing runs all design and merchandising projects (like gear and posters), even if they are only for internal use. If you have any questions about branding, please contact Marketing.



Information security

Information security and data protection are core to our business. All of us must do our best to continuously protect and maintain the proprietary information and data of Contentful or any of its customers, business partners, suppliers or vendors. It only takes one breach to cause extensive damage to our business, reputation, and prospects. With that in mind:

- Always secure your laptop, important equipment, files, and your personal belongings, even when you are at the office;
- Do not leave sensitive documents on your desk or on your computer screen when you walk away, even just for a minute;
- Do not plug any personal external drive into your Contentful devices;
- Be paranoid in public. Don't work on a confidential presentation on a train or have a sensitive conversation in elevators, airports, or while you're waiting in line at your local coffee shop;
- Don't modify or disable passwords or other security and safety features;
- Don't let anyone you don't know to be a Contentfuler@ "tailgate" behind you through our doors, even if it feels a little awkward;
- Immediately report any security incidents (including lost, stolen, or accidentally distributed sensitive information or confidential information) to team-security@contentful.com; and
- Report suspicious activity in the office to building personnel or your local Workplace team.

Please see the [Information Security Policies](#) for more information.

Contentful assets and resources

Contentful provides you with tools and technology you need to do your job. Please remember that these tools and technology are Contentful or its licensors' property. To the extent permitted by law, Contentful may monitor, access, and disclose communications and other information on Contentful equipment, including laptops, our corporate electronic facilities, or on our premises, with or without your knowledge or approval. Contentful equipment should be used primarily for business purposes, although incidental personal use is allowed.

Third-party software – commercial and open-source software (OSS)

Unsanctioned software and services present a significant security risk to Contentful. All third-party software used for Contentful business or installed on Contentful equipment must be pre-approved by Security and IT and be appropriately licensed. Never make or use illegal or unauthorized copies of any software since doing so may constitute copyright infringement and may expose yourself and Contentful to civil and criminal liability. You should never download or use any software or code that has not been approved by Security and IT. Please see the [Software Procurement Process](#).

Contentful is committed to OSS development and uses OSS extensively in its products. However, the careless use or inclusion of third-party OSS, or release of Contentful technology under an OSS license, can seriously impact Contentful's IP rights in such technology. Consequently, before using or modifying third-party commercial software or OSS, or incorporating it in a Contentful product, technology, tool, or service offering – and before releasing any Contentful product under an OSS license – you must adhere to Contentful's [Open Source Guidelines](#) and submit a request for approval through Contentful's [Open Source Project Approval Process](#).



Personally identifiable information (PII) and data privacy

Personally identifiable information (“PII”) generally consists of information that alone or in combination with other personal data can be used to identify or locate an individual.

Contentful is committed to protecting the PII of its employees, customers, partners, suppliers, and other business partners. In order to create an environment of trust and to comply with applicable laws such as GDPR and CCPA, you are required to protect all PII that you may receive or handle as “Need to Know.” This means using PII only for the legitimate business purposes for which it was collected, as well as following Contentful’s [Privacy Policy](#) and [Information Security Policies](#) whenever using online or offline systems, processes, products, and services that involve the use, storage, or transmission of any PII.

Contentful reserves the right at any time to monitor the use of company property, premises, and resources (e.g., office sites, network usage, computers, email and messaging, etc.) in accordance with applicable laws to protect the interests of Contentful and ensure compliance with Contentful policies.

Legal holds

Contentful may be involved in litigation or inquiries that require us to indefinitely preserve certain documents and records. This is referred to as a “Legal Hold,” and you will receive written notification of specific Legal Holds that may apply to you and the information in your possession. You must not destroy, delete, alter, or modify records or supporting documents that have been placed under a Legal Hold under any circumstances. The Legal team will inform you when the Legal Hold is no longer applicable.

Notice required by law

You are not prohibited or limited from filing a charge or complaint with, or otherwise communicating with or participating in any investigation or proceeding conducted by, any federal, state, or local government agency or commission (“Government Agencies”) without giving notice to, or getting permission from, Contentful (a “Government Communication”). You are also not prohibited from disclosing documents or other information pertaining to Contentful to Government Agencies in the course of a Government Communication. However, you should take all reasonable precautions to prevent any unauthorized use or disclosure of Contentful confidential information to any parties other than the Government Agencies. You are also not permitted to disclose any Contentful attorney-client privileged or attorney work product to any third party.

In addition, pursuant to the Defend Trade Secrets Act of 2017, you will not be held criminally or civilly liable under any federal or state trade secret law for any disclosure of a trade secret that (i) is made (A) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and (B) solely for the purpose of reporting or investigating a suspected violation of law; or (ii) is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding. Further, if you file a lawsuit for retaliation by Contentful for reporting a suspected violation of law, you may disclose Contentful’s trade secrets to your attorney and use the trade secret information in the court proceeding if you: (a) file any document containing the trade secret under seal; and (b) do not disclose the trade secret, except pursuant to court order.

To learn more

[Information Security Policies](#)

[Data Classification Policy](#)

[Software Procurement Process](#)

[Open Source Guidelines](#)

[Open Source Project Approval Process](#)

[Privacy Policy](#)

Q | **Nikhil kept some documents from his last two employers that might help him with his new job at Contentful. Is it OK for Nikhil to use these documents at Contentful?**

A | If the documents contain any confidential information of Nikhil's prior employers, he cannot use or share the information. If he is unsure, he should consult with the Legal team before he uses or shares the information.

Q | **While working for Contentful, Mary, a professional services employee, came up with a novel software tool that significantly speeds up the deployment of Contentful software in customer private clouds. Does Mary have to disclose her innovative idea to Contentful?**

A | Yes. Mary does need to disclose her invention to Contentful if it (a) relates to Contentful's existing or reasonably anticipated products, services, or businesses, (b) relates to Mary's position, work or experience at Contentful, or (c) is developed using Contentful resources. It does not matter whether it was developed as part of her standard job responsibilities so long as it was developed while Mary was employed by Contentful. She can submit her invention to innovationboard@contentful.com.

Q | **Devin wants to evaluate an open-source software (OSS) program for possible use in a new Contentful product. Does Devin need to request approval to download the OSS before starting the evaluation or can he wait until he decides whether to incorporate it in the Contentful solution?**

A | Devin needs to request and obtain approval through the Open Source Project Approval and from IT and Security through the Software Procurement Process before downloading the OSS for evaluation, since even internal use of OSS requires Contentful to comply with certain OSS license terms.

Q | **Adrianna is responsible for deploying a sales operations management system using a third-party Software as a Service (SaaS) solution, which requires the transfer of sales employee names, Contentful employee IDs, and work email addresses to the vendor. Does Adrianna have to follow any processes for ensuring the security of that data before transferring it to the vendor?**

A | Yes. Since general employee contact information is personally identifiable information, or PII, in many countries in which Contentful does business and has employees, Adrianna must follow the Software Procurement Process and work with IT, Security and the Legal team to ensure that the vendor agrees contractually to protect Contentful employee PII in accordance with applicable data protection and privacy laws.

Speaking together

You are a Contentful ambassador, and what you say or post may be attributed to Contentful, whether or not you mean it that way. Make sure that you reflect Contentful culture and our Core Values.

Contentful is committed to providing accurate disclosure in our public communications. Because any external communications can have an effect on our business, you must be thoughtful and conscientious about what you say and write in public, including on social media.

Keep the following Dos and Don'ts in mind when communicating with outsiders about Contentful:

DOs



- DO disclose your Contentful affiliation if you share industry content, and include a disclaimer that your views are your own
- DO disclose whether you are acting as a Contentful representative
- DO remember that what you publish might be public for a long time, even if deleted
- DO tell the Marketing team about any potential problems or issues you find about Contentful
- DO use good judgment when accepting any public speaking engagement
- DO reach out to Marketing or the Legal team if you are uncertain or have questions

DON'Ts



- Do NOT share any confidential or proprietary information of Contentful or that Contentful is obligated to protect (e.g., customer confidential information)
- Do NOT speak as an official Contentful representative unless specifically authorized
- Do NOT use Contentful's name in any social media identity (handle, username, screen name, etc.)
- Do NOT provide references for Contentful partners without prior approval from the Marketing team
- Do NOT speak to the press, analysts, or any other people who reach out to you for company, business, or industry information

Always remember

If someone from the media (newspaper, radio, TV), analyst community (financial or industry), or social media community (blogger, pundit) contacts you, please do not respond and direct the person to the Sr. Director, Brand and Communications

Public statements on behalf of Contentful

Do not speak on behalf of Contentful unless you are authorized to make the specific statement.

Occasionally, you may be contacted by outside sources, like the press, requesting information about Contentful, including Contentful products, services, and financial information or information about current or former Contentful employees, directors, or customers. All of this is Contentful's confidential information and may not be shared. You must decline to comment and immediately contact our Senior Director, Brand and Communications.

Social media

We encourage you to promote Contentful on social media, however, you must exercise proper care and good judgment when using social media. Contentful owns all Contentful social media handles and accounts, and only those authorized may post on behalf of Contentful under these accounts. If you engage in social media related to Contentful under a Contentful-owned account or under your own account, you are expected to protect Contentful's brand at all times and adhere to Contentful's [Guiding Principles of Social Media](#), Contentful's social media policy as set forth in our employee handbooks or manuals, and any other specific guidance provided by the Marketing team as part of a launch or other public announcement. You must never disclose confidential information about Contentful, our customers, business partners, suppliers, vendors, or any third parties we do business with.

You are ultimately responsible for what you post online. Inappropriate or offensive social media posts may result in disciplinary action, up to and including termination of your employment.

Public speaking opportunities

If you are asked to speak publicly at an event that may relate to your position at Contentful or to Contentful's business or market, you must obtain approval from your executive leadership team (ELT) leader. Please be aware that you cannot accept any personal compensation for public speaking at an event that relates to your position at Contentful or to Contentful's business. However, if the organization asking you to speak offers reimbursement for expenses, you may accept this reimbursement only with the prior approval of your ELT leader and the Chief Legal Officer. Also, refer to the "Conflicts of Interest" section of this Code.

Q Forbes magazine has reached out to ask me questions about Contentful and our exciting future. What should I say?

A Nothing. Only authorized individuals may speak to media outlets. Kindly redirect the person who reached out to you to our Sr. Director, Brand and Communications.

Q I've been asked to speak at a technology conference and share my thoughts on the future of content management and my experiences and challenges as an engineer at Contentful. Any issue with my participation?

A No, provided that your ELT leader and Marketing has approved your participation and that you make clear that your thoughts and opinions are your own and that you are not speaking on behalf of, or as a representative of Contentful.

Q An industry or financial analyst has reached out to me requesting an interview. Can I speak to the analyst?

A No. Only authorized individuals may speak to analysts on behalf of Contentful. Kindly redirect the person who reached out to you to our Sr. Director, Brand and Communications.

Engaging in outside activities

As representatives of Contentful, it is important that we all strive to use good judgment and make honest and ethical decisions for our teams, our work, and for Contentful.

Conflicts of interest

Doing what's right for Contentful is extremely important. If you base work-related decisions and actions on anything other than the best interests of Contentful, you run the risk of undermining Contentful's success. For that reason, you must avoid any activity that creates or appears to create an actual or potential conflict of interest. Conflicts of interest can arise not only with outsiders, such as customers, business partners, or vendors, but also with colleagues, such as your manager, or as a result of a relationship with a family member, friend, or business with which you are connected. Any activity that competes with Contentful or opposes Contentful's interests will not be permitted. The important thing is to recognize and disclose potential conflicts of interest so that precautions can be taken to protect both you and Contentful. You should understand that a potential conflict of interest is not uncommon or necessarily prohibited, if properly disclosed and managed.

While potential conflicts of interest can present themselves in many forms, below are some common examples:

- Working on outside employment, development activities or business interests, either alone or with others, whether or not they compete with Contentful, or offer similar products or services as Contentful;
- Having an interest, or making an investment in a company that (a) is or wants to become a Contentful competitor, or (b) is a current or potential Contentful customer, supplier, or business partner where the investment might cause, or appear to cause, action that could harm Contentful;
- Hiring a vendor that is affiliated with, or has any financial relationship with, you, a friend, or relative;
- Familial or other personal relationships with Contentful employees or contractors/freelancers that could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at Contentful's expense;
- Participating in a technical advisory or standards board or serving as a director on a board; or
- Development of a product or creating other intellectual property that (a) relates to Contentful's existing or reasonably anticipated products, services, or businesses, (b) relates to your position, work or experience at Contentful, or (c) is developed using Contentful resources.

Always remember

Transparency is key. Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is

Never OK

Outside employment with a Contentful business partner or competitor

Significant financial interest in a Contentful business partner or competitor held by you or family member

Conducting business with a Contentful business partner when someone in your family or with whom you have a close personal relationship has a substantial role in that company

If you have an interest in a transaction involving Contentful – including an indirect interest through a relative, friend, or business – you must disclose it in writing to the Chief Legal Officer, refrain from pursuing the transaction, and follow any instructions you receive before proceeding. The Chief Legal Officer may permit such a transaction to move forward if the interest or transaction is determined to be fair and in the best interests of Contentful. Contentful may at any time rescind prior approvals to avoid a conflict of interest or the appearance of a conflict of interest. Transactions involving directors or officers of Contentful may require Board approval. If a previously approved transaction has changed or expanded, you must inform the Legal team.

Outside opportunities and activities

You may not take personal advantage of opportunities for Contentful that are presented to you or discovered by you as a result of your position with us or through your use of Contentful property, resources or information without first contacting the Legal team for review and obtaining the written approval of the Chief Legal Officer. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. You may not serve as a director, investor, partner, employee of, or consultant to, or otherwise work for or receive consideration (monetary or otherwise) for services from, any affiliate, customer, business partner, supplier, vendor, or competitor of Contentful or any other business that does or seeks to do business with Contentful without the prior written approval of the Chief Legal

Officer. You may not use your position with us or Contentful property, resources, or information for improper personal gain, nor should you compete with us in any way. Failure to obtain prior written consent from the Chief Legal Officer may result in disciplinary action, up to and including termination of your employment.

Volunteering and working with nonprofits

We encourage you to volunteer or work with nonprofit organizations that do not fall into the categories above on your own time, but you may not do so as a representative of Contentful (for free or for a fee or other form of payment) unless otherwise approved by your ELT leader and the Chief Legal Officer.

Personal investments

Generally, you may invest in the shares of public companies without creating a conflict of interest, as long as you own less than 1%. Investments in private companies are also usually allowed, but you must get permission from the Chief Legal Officer if you or members of your family or household make or hold a significant investment in or serve as a director or officer of any private business that competes with, does business with, or seeks to do business with Contentful. If any investment would create an actual, perceived, or potential conflict, you'll need to notify the Chief Legal Officer and follow the rules described above.



Never OK

Giving or receiving gifts to influence any decision impacting Contentful's interest

Always OK

Avoiding situations where your personal interests may interfere with Contentful's interests

Doing business with a related party after disclosure and approval from the Chief Legal Officer



How can I disclose a conflict and what happens after that?



Please contact the Legal team to review the conflict. In some instances, you and your manager will need to sign a guidance letter that outlines how you and Contentful can manage the conflict. Any conflict of interest involving a member of the ELT or a member of the Board of Directors requires approval by the Board of Directors.



As a Contentful employee, may one of my family members be a supplier to Contentful?



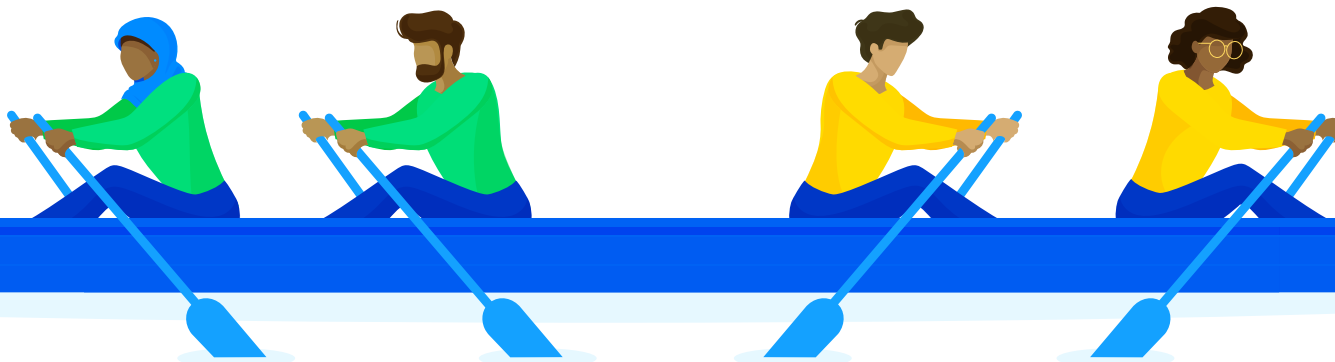
Yes. You may direct your family member to the Contentfuler@ who may be interested in their product or service. However, if you do refer your family member to a Contentful contact, your manager and the Contentfuler@ making the purchasing decision should be told about the relationship, and you should completely remove yourself from the decision-making process. Any attempt to influence the process is a violation of the Code.



I own stock in a publicly traded software company that provides products and services to Contentful. Is this investment a conflict of interest?



If the investment is small, there should not be a problem. A good rule of thumb is that an investment in a publicly traded company that is a competitor, supplier, or business partner of Contentful should not exceed 1% of the outstanding securities of that company or approximately 1% of your assets.



Following the rules

Contentful takes its obligation to comply with the law very seriously. While it's impossible for anyone to know all aspects of every law, you should proactively make sure that you understand the major laws and regulations that apply to your work. Each of us is personally responsible for complying with all applicable legal requirements and prohibitions. You may not do business with a third party on behalf of Contentful if you know or should know that it engages in illegal business practices. If this Code or any other Contentful policies conflict with law, always follow the law. Ask the Legal team if you have any questions about the correct course of action.

Competition and fair dealing in the marketplace

While Contentful competes vigorously in all of its business activities, we are committed to dealing fairly with our customers, business partners, suppliers, and competitors, and conducting our global activities in accordance with all applicable laws, including competition laws. Contentful will not participate in any activities that have the effect or intent of reducing or destroying competition. At Contentful, we want to win, but win fairly and in the right way.

Many of the countries in which we conduct business have laws designed to encourage and protect free and fair competition. These laws are broad and far-reaching and regulate Contentful's relationships with its actual and prospective customers, business partners, vendors, resellers, and distributors, and also impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages. Contact the Legal team if you have any questions.

Dealings with business partners

You may not do any of the following without approval from the Legal team:

- Discriminate among or give preferential treatment to individual business partners;
- Dictate or impose restrictions on the price charged by a business partner to an end user;
- Grant or assign any exclusive sales territory to any business partner; or
- Enter into any non-compete with a business partner.



Never OK

Agreeing with a competitor to set a fixed price for our respective products or services

Commenting on competitors' products or services in an inaccurate or untruthful manner

Requesting, accepting, using, or sharing another company's confidential information

Always OK

Collecting competitive intelligence via public sources

Agreements with competitors

Competition laws also strictly govern relationships between Contentful and its competitors. Collusion among competitors is illegal, and the consequences of a violation are severe. You must never enter into any agreement or understanding, written or oral, express or implied, with any competitor to:

- Fix prices or discounts or other terms or conditions of sale;
- Fix profits, profit margins, costs;
- Limit production or supply;
- Allocate products, markets, customers or territories;
- Boycott customers or suppliers;
- Rig bids;
- Violate fair bidding practices; or
- Share competitively sensitive information with a competitor (such as costs, prices, contract terms, inventories, and marketing plans), even if under a nondisclosure agreement, as these activities may also be illegal or create the appearance of impropriety. Any agreement with competitors must be approved by the Legal team.

Obtaining competitive information

We must obtain business intelligence appropriately. You cannot steal or unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of anyone, including business partners and customers.

Anti-bribery and corruption

Contentful is committed to conducting business with the highest level of integrity. Contentful prohibits the offering or giving of bribes, directly or indirectly, through our business partners or other third parties, including consultants or agents acting on Contentful's behalf.

What is a bribe?

A bribe is making, giving, or promising to give, anything of value (no matter how small) to improperly influence a business decision or gain an unfair business advantage.

- Bribes may come in many forms. For example, cash, gifts, travel, entertainment, loans, charitable donations and sponsorships, political contributions, employment offers, and favors may all be considered bribes under certain circumstances.
- Facilitation payments or "grease" payments to expedite routine government procedures such as clearing goods through customs or issuing permits are also considered a bribe and strictly prohibited.

Discounts and marketing funds

- Excessive discounts to our business partners or other third parties may be improperly used to fund a bribe. Therefore, all documents requesting discounts must accurately reflect the purpose or character of the discounts and the truth of the underlying transaction.
- Marketing or other funds such as market development funds ("MDF") expended by Contentful or entrusted to our business partners or other third parties must be used only as intended and accurately captured in our books and records.



Charitable donations and sponsorships

We need to ensure that any charitable donations or sponsorships are being given for the right reason and not intended to win improper influence over a decision. All charitable donations and sponsorships require prior approval from the Legal team.

Political contributions

As a general rule, Contentful does not permit political donations or contributions using Contentful funds, assets, or facilities. Any proposed political contributions by Contentful or any use of your Contentful title when making such a donation – in any form – requires prior approval from the Legal team.

Gifts, travel and entertainment

Business gifts and entertainment are normal and can be a healthy part of business. But gifts, meals, or trips that are extravagant or lack transparency or a legitimate business purpose may be viewed as bribes or as simply inappropriate. Generally, you are able to give and accept inexpensive “token” non-cash gifts and participate in occasional and moderate business meals and entertainment with prospective and actual customers and business partners. If you have any questions about whether any gifts, travel, or entertainment are appropriate, ask the Legal team first.

A problem can arise if you:

- Receive a gift or entertainment that compromises, or could reasonably be viewed as compromising, your ability to make objective and fair business decisions on behalf of Contentful; or
- Offer a gift, travel, or entertainment that is, or could reasonably be seen as, an attempt to obtain business through improper means or to gain any special advantage in our business relationships.

No gift or entertainment should be given or accepted by any Contentfuler@, family member, or agent unless it meets ALL of the following conditions:

- Is not a cash gift;
- Is consistent with customary business practices;
- Is not excessive in value;
- Cannot be construed as a bribe or payoff;
- There is no expectation of a favor, gift, or action in return;
- Does not violate any laws or regulations (such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act); and
- Is not one of a series of small gifts or entertainments that can be construed as part of a larger, expensive gift.

Never OK

Offering excessive, lavish or too frequent hospitality

Offering cash, cash gift cards (e.g., Visa, MasterCard), loans, stock

Offering gifts and hospitality in violation of the recipient’s own company policies or applicable laws

Always OK

Offering reasonable and appropriate business courtesies that are within the thresholds of the GTE table set forth herein or approved in advance by the Legal team



The following GTE table provides guidance on pre-approved thresholds for the giving and receiving of gifts, travel, and entertainment:

You must notify and obtain written approval from the Legal team if you receive or would like to give a gift that exceeds the thresholds and limitations set forth in the GTE table. If you are giving a gift, it is your responsibility to ensure that you comply with the limitations and approval requirements of this table and Contentful’s [Purchasing Policy](#) and [Expense Reimbursement Policy](#).

See also “Working with Governments – Improper Payments to Government Officials” below for important information about giving gifts or entertainment to, or receiving gifts or entertainment from, government officials.

Gift travel entertainment Threshold Guidance (in € or \$)					
Giving or Receiving	Recipients (1)	Gifts (2)	Meal (3)(4)	Entertainment (4)	Travel / Accommodation (4)
Giving	Government (incl. state-owned enterprises)	0	0	0	0
	Non-government Recipients	150	100	150	150
Receiving	Contentful Employee	150	100	150	150
All GTE must be: • Reasonable in value • Open and transparent • Cannot reasonably be construed as a bribe or payoff • Does not violate any laws, regulations, or applicable policies of the other party’s organization					
(1) Per person calculation includes any family members, friends, or other affiliates of the individual recipient.		(2) No cash or a gift card for more than nominal value of €/\$20 per person. Total gift per organization/year of no more than €/\$500.		(3) Consistent with customary business practices. For instance, in the US, generally, breakfast no more than €/\$25; lunch no more than €/\$50; dinner no more than €/\$100.	
(4) Combination of meal, entertainment, travel, and/or accommodation of no more than €/\$300 per person.					

Corporate social responsibility

Contentful complies with all applicable laws and respects internationally recognized human rights, and we expect the same of our business partners. All labor must be voluntary. We don't engage in child labor; forced, bonded, or indentured labor; involuntary prison labor; slavery; trafficking of persons; or physical punishment. We pay applicable legal wages under humane conditions. We comply with all applicable environmental laws and regulations.

In addition, Contentful seeks to be a good corporate citizen and operate its business in a way that enhances our community and the environment. To help us to organize and focus our efforts, we have a [CSR Employee Resource Group](#) that drives initiatives and advocates for changes in our corporate practices in areas such as conserving energy and mitigating waste in the office, organizing volunteer-based community service events, and pursuing sustainable travel and purchase policies. Each of us plays a role in CSR in the way we interact with our workplace, our community, and in our purchasing and travel decisions.

Hate organizations

We will not knowingly do business with an organization when prohibited by U.S., German, or E.U. laws and regulations. Additionally, Contentful will not knowingly do business with any hate organizations as further defined in our [Policy Against Doing Business with Hate Organizations](#).



Q | How can I legitimately obtain competitive intelligence?

A | Competitive intelligence can be obtained fairly and ethically from publicly available sources such as media reports, trade journals, annual reports, governmental filings, speeches of company executives, and from customers in the context of meeting competitive offers. Competitive intelligence should never be obtained through misrepresentation, trespassing, theft, invasion of privacy, or obtaining information from co-workers about previous employers.

Q | In my country, giving small bribes or “grease payments” is a customary part of doing business. Is this okay?

A | No. The fact that bribes may be common in a particular country does not matter. Bribes are illegal and regardless of local customs, you must follow Contentful's policies and the law.

Maintaining financial records

Contentful strives to maintain the integrity of its records and financial information. Contentful's corporate and business records, including all supporting entries to its books of account, must be completed honestly and accurately. The making of false or misleading entries, whether they relate to financial results or test results is strictly prohibited.

Accuracy of business records and reports

A business record is any document or communication in paper or electronic form (e.g., email) that is maintained in the course of business. Business records may include invoices, purchase orders, legal agreements, information in filings with governmental agencies, quality control tests, travel and expense reports, discount request forms, accident reports, and product development roadmaps.

Contentful's records are important to governments, taxing authorities, investors, and creditors. They serve as a basis for managing our business and are important in meeting obligations to business partners, suppliers, vendors, creditors, employees, and others with whom Contentful does business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenue, costs, and expenses, as well as all transactions and changes in assets and liabilities. To ensure the continued integrity of our business records, we require that:

- No entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities, or misclassifies any transactions as to accounts or accounting periods;
- Transactions be supported by appropriate documentation;
- The terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- You comply with our system of internal controls; and
- No cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

Our accounting records are also relied upon to produce reports for our management, stockholders, and creditors. Anyone involved in collecting, providing or analyzing information for or otherwise contributing in any way in preparing or verifying these reports should strive to ensure that our financial records are accurate and complete.

Always remember

Create business records that accurately reflect the truth of the underlying transaction

Sign only documents, including contracts, that you are authorized to sign and believe are accurate and truthful



In addition:

- You may not take or authorize any action that would intentionally cause our financial records to fail to comply with generally accepted accounting principles or applicable laws, rules, and regulations of any of the locations that Contentful has a legal presence;
- You must cooperate fully with our finance and accounting department, as well as our independent auditors and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records are accurate and complete;
- You may not coerce, manipulate, mislead or fraudulently influence our finance and accounting department, our accountants or counsel, if you know or should know that the action, if successful, could result in rendering our financial statements materially misleading; and
- Anyone who becomes aware of any departure from these standards has a responsibility to report their knowledge promptly to the Legal team or the Finance team or via the section on Raising Issues and Concerns.

Side agreements

Contentful policy prohibits the creation of side letters and side agreements. A side agreement is any written or verbal agreement, promise, or commitment with another entity (e.g., business partner, supplier, or customer) that would modify the terms of a written contract or create a new agreement that has not been pre-approved by Contentful's VP GTM Legal and VP Finance and in accordance with our [Approval Policy for Non-standard Terms](#). Side agreements may include an offer to provide additional products or services, including software or service features. Any such communication or presentation of software features is subject to Contentful's then-current Booking Policy, requires that confidentiality obligations be in place with the other party, and prior approval as set forth in the [Approval Policy for Non-standard Terms](#).

Dealing with auditors

Our auditors have a duty to review our records in a fair and accurate manner. You are expected to cooperate with any external independent and any internal auditors in good faith and in accordance with law. In addition, you must not fraudulently induce or influence, coerce, manipulate, or mislead our auditors about financial records, processes, controls, or procedures, or other matters. You may not engage, directly or indirectly, any outside auditors to perform any audit or audit-related tax, or other services, including consulting, without written approval from the VP Finance.

Never OK

Backdating contracts or other documents

Creating or entering into false contracts or any contract not approved by the Legal team

Entering into side letters and side agreements that alter the written commitments to a customer or business partner

Hiding or destroying records to avoid disclosures in legal or government proceedings

Always OK

Submitting expense reports with a full and accurate description of the nature of the expense and in a timely manner

Obligation report potential violations

You should immediately report any case of suspected financial or operation misrepresentation or impropriety to the Chief Legal Officer.

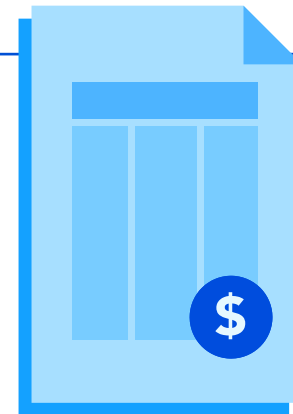
For example:

- Financial results that you have reason to believe are inconsistent with underlying business performance;
- Inaccurate financial records, including travel and expense reports, timesheets, or invoices;
- The circumventing of mandated review and approval procedures;
- Transactions that appear inconsistent with good business economics;
- The absence or weakness of processes or controls; or
- Persons within Contentful seeking to improperly influence the work of our internal or external financial or accounting personnel or auditors.

Dishonest or inaccurate reporting can lead to civil or even criminal liability for you and Contentful, damage your and our reputation, and lead to a loss of trust in Contentful.

Compliance certifications

Depending on what your role is at Contentful, you may be asked to complete compliance certifications in connection with Contentful's quarterly closing procedures or in another context. Contentful relies on certifications to record transactions, make legal and accounting determinations, and comply with the law. You must take these certifications very seriously and answer them carefully. Any failure to provide requested certifications or to fully, honestly, and accurately complete a requested certification is a violation of the Code. This will result in disciplinary action, which may include termination of your employment. If you have any questions about certifications, please contact the Legal team.



Q

To help process my expense claims, I occasionally list an expense under a different category, so it can be approved more easily and paid faster. Is this okay? It is still the same amount of money.

A

This is not acceptable. Contentful's accounts must accurately reflect the true nature of all expenses. Expense categories are an essential aspect of our accounting and financial systems and should never be compromised, even for small amounts.

Dealing with government and regulatory agencies

Special rules apply to our business and other dealings with governments of any kind – U.S. (federal, state, provincial, or local) or international. If you are involved in business with the government, please make sure to read and understand this section.

Government contracts

Government officials must follow specific codes of conduct and laws. As a result, we must take special care when we sell to, or do business with, the government. It is important to accurately represent which Contentful products are covered by government contracts, and avoid improperly soliciting or obtaining confidential information, such as sealed competitors' bids, from government officials prior to the award of a contract. When doing business with government officials, work with the Legal team. Legal must approve all bids submitted to governmental agencies and all agreements with governmental entities.

Improper payments to government officials

There are strict gift, travel, and entertainment requirements when dealing with government officials, and in some cases, laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, specifically, prohibit offering or giving anything of value to government officials to influence official action or to secure an improper

advantage. "Government officials" may include officials, employees, and candidates at all levels of government, military personnel, political candidates, as well as employees of state-owned or controlled entities such as internet service providers, public schools and universities, public international organizations, hospitals and healthcare organizations, and telephone companies.

We must never engage in any activity that could be interpreted as improperly influencing a government official. This includes things like meals, travel, political or charitable contributions, and job offers (including jobs for family and friends of governmental officials). Never give gifts to thank government officials. The U.S. federal, state, and local governments also have rules that strictly govern any gifts given to a government official, regardless of intent. Certain expenditures that are directly tied to promoting Contentful's business may be acceptable. Gifts, travel, and entertainment to government employees in the U.S. or other countries must follow the applicable local rules and be within the thresholds as defined in the GTE table as set forth in the subsection titled "Gifts, Travel and Entertainment" or pre-approved by the Chief Legal Officer.

Key takeaways:

When responding to a government bid, ALWAYS contact the Legal team to review and approve the content

NEVER give anything of value to an employee or representative of a government entity without approval from the Legal team

Never OK

Reading, passing on, or acting on any competitor bid or source selection information received before a contract is awarded

Providing anything of value to a government official in the hopes of a obtaining favorable business decision



Requests by regulatory authorities

Refer all government requests for Contentful information, documents, or investigative interviews to Legal immediately.

Political contributions

Contentful may communicate its position on important issues to elected representatives and other government officials. It is Contentful's policy to comply fully with all applicable laws regarding political contributions. Contentful's assets – including funds, volunteer time during Contentful hours, premises, and equipment – must not be used for, or be contributed to, political campaigns or political activities without the Chief Legal Officer's prior written approval.

Trade compliance: export controls and restricted parties

Export and trade controls can be complex, but essentially focus on prohibiting or controlling exports to specific places and people, for specific uses, and of specific things.

- **Restricted places:** Laws in the U.S. and Germany prohibit us from doing business with certain other countries, regions, and governments. For example, U.S. laws generally prohibit doing business with or relating to parties in U.S. embargoed countries and regions. Seek compliance guidance from the Legal team if this comes up in the performance of your duties.

- **Restricted parties:** Based on specific suspected misconduct or other reasons, many persons and entities have been placed on sanctioned parties lists published by the U.S., EU and other countries. Sanctions make it illegal not only to export-controlled products, software, or technical data to sanctioned parties, but also in many cases to furnish services to or engage with the sanctioned party or its affiliates in any sort of transactions, either directly or indirectly.
- **Restricted end uses:** International export controls generally prohibit the sale or export of any product or technology that is to be used, for example, in the development, production, or operation of weapons of mass destruction, missiles, or nuclear weapons. These prohibited end uses are most often a concern with government military end users, but they also may be of concern when dealing with universities and research facilities.
- **Controlled technologies:** U.S., EU, and other international trade control laws impose heightened oversight on the export or disclosure of encryption technologies. Many countries also impose import licensing obligations before high-end networking and encryption solutions can be imported to their country. The proper export and import control handling of our products is dependent on accurate documentation and classification of our product features and the identity and location of the end user.

In sum, if you are involved in sending or making available Contentful product, services, software, or any form of technical data from one country to another, work with the Legal team to make sure that the transaction complies with applicable export laws.



Key takeaways

You may be surprised to learn that an export may also be involved in any of the following cases:

Transferring technical data to someone in another country (whether or not a Contentful employee), such as through the internet, email, conversations, meetings, or database access

Revealing any technical data to an individual who is neither a U.S. citizen nor permanent resident (a so-called "foreign person") or revealing U.S.-developed technical data or source code software to a foreign person outside the United States

Lobbying and business development

Persons and entities who contact government officials on public policy issues, including procurement, face additional reporting requirements. Any such activities, directly or indirectly, require prior approval from the Legal team. In addition, you must obtain prior written approval from the Legal team before engaging the services of any government or regulatory consulting agency, or independent consultant.

Q | I am in contact with a customer who says they are based in Greece. However, the contact address they have provided is in Iran. What should I do?

A | There is a “red flag” raised here that requires greater scrutiny. These facts suggest the possibility that the end user’s location is not clearly known and may in fact be in a country that we are prohibited from doing business in. The true location and identity of the customer must be validated and documented. The presence of this type of “red flag” requires that you contact Legal before proceeding at legal@contentful.com.

Q | While waiting to attend a proposal meeting for a U.S. government agency, I overheard a conversation that a procurement officer had with one of our competitors. The competitor told the procurement officer about his product’s specifications and costs. Can I still attend the meeting? Can I write a similar proposal and send it to the officer with a lower bid?

A | The answer is NO to both questions. You cannot take advantage of the information in any way. You should politely excuse yourself from the meeting and contact Legal immediately. Avoid any disclosure of any of the information to individuals connected with the program or proposal. As an individual, you will probably have to withdraw from the bid team, but you have done your best to protect the ability of Contentful to move forward.

Never OK

Carrying any Contentful laptop, mobile device, products, prototypes, assemblies, or components with you on any travel to the countries listed in [Contentful’s High Risk Countries List](#)



Administration, changes to the code, waiver of code provisions and no rights created

Administration

Contentful has adopted this Code and the Chief Legal Officer oversees compliance with this Code.

Changes to the code

Contentful reserves the right in its sole discretion to modify or eliminate any of the contents of the Code without prior notice. If you fail to read and/or acknowledge the Code, you are not exempted from your responsibility to comply with the Code, Contentful policies, and applicable law, and regulations that are related to your job. Any material amendments to the Code require approval of the Chief Executive Officer; however, non-material amendments (e.g. references to new or amended policies) may be approved by the Chief Legal Officer. Any transaction that would otherwise require CEO approval will instead require CLO approval if the transaction relates to the CEO.

Waiver of code provisions

Any waivers of this Code must be approved in writing by the Chief Legal Officer or, with respect to Chief Legal Officer by the Chief Executive Officer.

No rights created

This Code is a statement of fundamental principles, policies, and procedures that govern the conduct of Contentful's employees. It is not intended to and does not create any legal rights for any business partner, supplier, vendor, competitor, stockholder, or any other non-employee or entity.

Adoption and Amendment History:

Date of Adoption:
November 18, 2021

Date of Amendment (if any):
June 17, 2022

Document Owner:
Chief Legal Officer

Document Approver:
Chief Executive Officer

Acknowledgement and receipt of the global code of conduct and ethics

I have received and read Contentful's Global Code of Conduct and Ethics (the "Code") and all other policies referred to therein (together with the Code, the "Policies"). I understand the standards and policies contained in the Policies and understand that there may be additional policies or laws specific to my job. I understand that Contentful may update the Policies from time to time, and I agree to comply with the Policies (including all future updates).

If I have questions concerning the meaning or application of the Policies, any other Contentful policies or procedures, or the legal and regulatory requirements applicable to my job, I know that I can consult with Contentful's Legal team. I agree to comply with this Code and all other Policies at all times during my employment or my provision of services to Contentful, and when and if requested, to recertify my compliance with the same.

Name: _____

Signature: _____

Date: ____ / ____ / ____