

CODE OF CONDUCT

Meltwater

4 September 2023



Introduction

Built around our company values of Moro, Enere, Respekt and MER, a fundamental belief in people, hands-on entrepreneurship and a lot of hard work, we have grown Meltwater from a two-man start into a global player in the SaaS and Media industry. And we want to continue to grow and “Be More” as we aspire to be the best in class in whatever we do.

This aspiration helps us hire outstanding people, build innovative products, and attract great clients around the globe. Our code of conduct helps us with that, setting the tone of following the law, acting honourably and treating each other with professionalism and respect wherever we operate. Scope.

Who must follow our Code?

All Meltwater employees are expected to know and follow this Code of Conduct. In addition, to uphold our values, we expect contractors, board members, interns, consultants and others who may be working within the Meltwater organization, to follow the Code. Failure to act within the principles as set forth in this Code may result in disciplinary action.

We expect our managers to be role models and lead their teams in a manner exemplifying our core values. They must be knowledgeable of, adhere to, and be able to instruct their teams on Meltwater policies, including this Code of Conduct. In the event of a breach of the Code of Conduct, managers are ultimately responsible for the actions of their team.

Who to turn to?

Legal and HR have taken ownership of creating this Meltwater Code of Conduct and will be available for your questions, concerns or ideas. So if you are unsure about any items or how to deal with certain aspects, please reach out to the Legal or HR team in your region.

If you become aware of any violation to the Code, become victim to a violation, or find yourself subject to a conflict of interest, please discuss this with your manager, HR or Legal.

RESPECTFUL WORKING ENVIRONMENT

At Meltwater, we are committed to a supportive work environment, where employees have the opportunity to develop to their full potential. Each of us is expected to do his or her utmost to create a respectful, fun and inspiring workplace culture that is free of harassment, intimidation, bias and unlawful discrimination of any kind.

Equal opportunity employment

At Meltwater, employment and career progression are based upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment of any kind, including discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation

or any other characteristics protected by applicable law. We make all reasonable accommodations to meet our obligations under applicable laws protecting these rights.

Positive environment

Meltwater prohibits unlawful harassment in any form – verbal, physical, psychological, or visual.

Safe workplace

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace.

Communication

Part of a respectful working environment is communicating right. We take pride in professional, open and honest communication with our employees as well as in responding promptly to communication from our clients or partners, whether questions, problems or compliments.

Drugs and alcohol

Meltwater does not permit substance abuse as it can impact employee health and safety. Whereas we cherish the tradition of Fredagspils, we expect our employees to use good judgment and never drink in a way that leads to inappropriate behavior, endangers the safety of others or violates the law. Illegal drugs in our offices or at company or client events are strictly prohibited. If a manager has reasonable suspicion to believe that an employee attends work or work events under the influence of drugs or alcohol, the manager may request an alcohol and/or drug screening.

Avoiding conflicts of interest

While working for Meltwater, you should always strive to do what is in the best interest of the company. When you find yourself in a situation where you could pursue a personal benefit for yourself, your family or friends at the expense of Meltwater, you may be facing a conflict of interest. You may not engage in activities that compete with Meltwater or compromise Meltwater's interests.

When in doubt whether or not you may have a conflict of interest, you can ask yourself the following questions to help you understand whether a given situation may constitute a conflict of interest:

Could my personal interests in this situation affect the decision I might make for Meltwater?

Do I, or a friend or family member, stand to gain any advantage from my actions or decisions?

Would I be embarrassed if anyone at Meltwater knew about the situation?

Do I feel any obligation as a result of the nature of the relationship I have with a third party doing business with Meltwater?

If the answer to any of these questions is yes, this could indicate that you have a conflict of interest.

Outside employment

The nature of Meltwater's business requires focus, commitment, and a high level of performance, speed, and flexibility. You are expected to protect Meltwater's business interests and to perform your work responsibilities to the highest levels so that you can excel in your role at Meltwater. You are expected to be available and work during the normal business hours. You are entrusted with access to confidential business information, and you must avoid conflicts of interest at all times. Accordingly, outside employment, consulting, advising, board of directors or trustee role, and other such work (any or all, "Outside Work") is generally prohibited subject to applicable law. Any non-profit, charity, or volunteer work is not considered Outside Work, provided that it does not impact your work responsibilities at Meltwater. In limited situations, Outside Work may be approved if you first, prior to accepting Outside Work, provide written notice to HR regarding the nature of the contemplated Outside Work, provide requested information, and cooperate with HR's evaluation of necessary issues, including, for example, any actual or potential conflicts of interest, potential disclosure or use of confidential information, and impact on business interests and your work hours and responsibilities.

Friends and relatives; co-worker relationships

Avoid participating in a potential or existing Meltwater business relationship involving your relatives, spouse or significant other, or close friends. This includes being the hiring manager for a position for which your relative or close friend is being considered or being a relationship manager for a company associated with your spouse or significant other. If you are uncertain, discuss the situation with your manager and Legal. Withholding such relationships could result in termination of employment of involved Meltwater employees, and at a minimum, reassignment to eliminate the conflict.

Romantic relationships between co-workers can, in certain situation, i.e. one reporting to the other, create a conflict of interest. If it does, it may require changes to work arrangements or even the termination of employment of either or both individuals involved. Please reach out to HR for additional guidance on this issue.

Accepting gifts, entertainment and other business courtesies

Accepting occasional gifts and entertainment can be appropriate in developing business relationships. There are some rules that you need to keep in mind. You should not accept any gifts, favors or forms of entertainment if this could appear to influence your business judgment in any way. Giving and accepting gifts should further the business interests of Meltwater and not be excessive compared to generally accepted business practices in your country.

You can accept gifts of low value, which feature the logo of the company providing the gift (umbrellas, calendars, note pads etc.). In the following circumstances, you need to seek prior approval from your manager:

Gifts/entertainment exceeding a value of USD/EUR 40;

Gifts/entertainment involving travel expenses;

Use of Meltwater products and services

You should not use Meltwater products, services or information in a way that improperly benefits someone you know. This does also apply to the usage of the so-called Buddy Accounts.

PRESERVING CONFIDENTIALITY

Confidential information

Meltwater employees must make sure that confidential information is preserved and protected. This applies to Meltwater confidential information as well as to confidential information from third parties that you receive during the course of business.

Meltwater confidential information includes Meltwater financial, employee, product and client information. This particularly applies to information shared during Town Halls and/or on Inside Meltwater. You should never disclose this information outside of Meltwater without authorization.

When dealing with third parties, such as clients and suppliers, you should not disclose any confidential information related to such parties. In addition, try to only accept the information you may need to accomplish your business objectives.

Employee data

We collect and store personal information from employees around the world in line with the local requirements of data protection. Access this data only in line with local law and keep it secure according to those standards.

Outside communications/social media

From press releases to posts on social media, the things we say in public and the way we say them have a big impact on our reputation as a company. You should not discuss Meltwater with the press unless you have been authorized to do so by our ED of Marketing or the CEO. You should never misrepresent facts about Meltwater, its products and services, or other aspects of Meltwater's business.

We all love Social Media but should use common sense when communicating on social media sites. When blogging or posting in relation to Meltwater you should follow the Social Media Policy for Employees as published on the Intranet by the Marketing department.

Also be sensitive about your online presence and protect your reputation. Always keep professionalism in mind, as it can impact not only your career, but also Meltwater as your employer/

PROTECTING MELTWATER'S ASSETS

We are all responsible for the proper use, protection and conservation of Meltwater's assets and resources. Meltwater assets and resources, as well as business opportunities arising by virtue of your position with Meltwater, should be used solely to pursue company goals and not for your personal benefit.

Use of Meltwater's equipment and facilities

We expect that you are responsible and not wasteful with the equipment provided by Meltwater. While traveling, attending meetings or using your equipment outside the office, ensure to secure your equipment, so it does not get stolen or lost.

Anything you do using Meltwater's corporate electronic facilities (e.g., our computers, mobile phones, network, etc.) or store on our network (e.g., letters, memos and other documents) might be disclosed to people inside and outside the company. For example, Meltwater may be required by law (e.g., in response to a subpoena or warrant) to access and disclose the contents of corporate email, voicemail, computer files and other materials.

Security

If you have any reason to believe that our network security has been violated – for example, you lose your laptop or smart phone or think that your network password may have been compromised – please promptly report the incident to the IT department.

FINANCIAL INTEGRITY AND RESPONSIBILITY

Spending Meltwater's money

Meltwater is a cost conscious company. We are working hard for our money, we take pride in spending it wisely and expect you spend company money as if it were your own. When you submit an expense for reimbursement or spend money on Meltwater's behalf, make sure that the cost is reasonable, directly related to the business and supported by appropriate documentation. This also applies to business travel spending. In principle, you should not combine business and personal travel. In case this occurs, any extra expenses caused must be borne by you. Always record the business purpose and comply with other submission requirements. Managers are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spend and expenses before approving.

OBEYING THE LAW

At Meltwater, we take our responsibilities to comply with applicable laws and regulations seriously. Each of us is expected to comply with such laws and regulations.

Trade controls

We comply with all recognized boycotts and sanctions, and all legal requirements for the proper import and export of goods and technology.

Competition laws

We believe in open and fair competition and only seek competitive advantage through fair and lawful means. You cannot exchange information or make agreements (in writing or otherwise with competitors regarding costs, pricing policies, bids, promotions, terms of sale or any other information in violation of antitrust laws.

Anti-bribery laws

Meltwater and every employee are subject to the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and related laws in other jurisdictions and you must comply with these laws at all times. It is not allowed to engage in bribery or any other form of corruption. Employees cannot directly or indirectly promise, offer or provide any improper (financial) advantage to any person – including officials of a government or a government-controlled entity – for the purpose of obtaining or retaining business or services.

Third parties may not be used to circumvent the bribery and corruption prohibition. Employees are not allowed to accept such an advantage, if given to motivate them to act contrary to their duties.

If you become aware of improper activity, including improper activity by partners or third parties, you should report this immediately to Legal.

CONCLUSION

It is not always easy to identify the right thing to do. If you have any questions regarding this Code of Conduct or need further guidance, feel free to reach out to your manager, Human Resources or Legal. If you are not comfortable raising the issue with your manager, you can choose to report the matter with the Head of HR or the Head of Legal.

If you become aware of a breach of the rules laid down in this Code, we encourage you to come forward and report the matter to our Head of HR or Head of Legal. We will not allow any retaliation against any employee who reports or participates in an investigation of a possible violation of this Code of Conduct.

Meltwater's compliance with this Code of Conduct is regularly monitored. Findings and recommendations are reported to the Board of Directors.