



Anti-Bribery & Anti-Corruption (ABC) Policy

Purpose & Scope

BigID Inc. (“BigID”) is committed to conducting its business operations in accordance with rigorous ethical standards and prohibits all forms of bribery and corruption. This Anti-bribery and Corruption Policy (this “Policy”) forbids bribery of government officials as well as private sector bribery, including the offering, promising, authorizing or providing anything of value to any customer, business partner, vendor or other third party in order to induce or reward the improper performance of an activity connected with BigID’s business operations, products or services. This Policy details principles that control BigID’s conduct in order to adhere to the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), and similar anti-corruption laws throughout the world and reinforces BigID’s ambition and responsibility to act honestly and ethically in all business dealings.

BigID applies and enforces this Policy upon all its employees, officers, directors, and agents, including those of its affiliates and subsidiaries located throughout the world. BigID insists all employees, officers, directors, and agents to refrain from engaging in any form of bribery or corruption, irrespective of citizenship, domicile, or location.

Bribery & Corruption

Bribery and corruption do not, and will not, align with BigID’s values or mission. Bribery and corruption are illegal and can expose both BigID and its representatives to fines and penalties, including imprisonment and reputational damage. BigID does not influence third parties by offering, paying, or receiving bribes or kickbacks, or by any other means that is unethical, illegal, or harmful to BigID’s reputation of honesty and integrity. BigID’s employees, officers, directors, and agents are to decline any opportunity that would place such person’s or BigID’s ethical principles and reputation at risk.

Bribery occurs when one person offers or accepts anything of value to or from another person to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through third parties. “Anything of value” includes, but is not limited to (a) cash, cash equivalents (such as gift certificates/cards), stock, personal property, and assumption or forgiveness of a debt; (b) gifts, meals, entertainment, and travel; (c) political contributions; (d) charitable contributions; and (e) job offers or internship awards. In addition, corruption is defined by BigID as dishonest or fraudulent conduct by those in a position of power.

Zero Tolerance & Prohibition

BigID implements a zero-tolerance policy for any actions in violation of this policy.

BigID’s prohibition on bribery applies to all improper payments regardless of size or purpose, including “facilitating” (or expediting) payments. Facilitating payments refer to small payments to government officials





to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or business permit, processing government papers such as visas, customs clearance, providing telephone, power or water service, or loading or unloading of cargo.

BigID and its employees, officers, directors, and agents acknowledge and agree to adhere to the laws and regulations that control dealings with government officials. Regular corporate hospitality deemed acceptable with private sector customers, partners, and vendors may be impermissible when government officials are involved.

If any BigID employee, officer, director, or agent wishes to incur expenses due to dealings with a government official, BigID's legal team must preapprove the activity before such expenses are incurred.

For purposes of this Policy, a government official is any (a) individual elected or appointed to a governmental entity; (b) official or employee of a government; (c) official or employee of a company wholly or partially controlled by a government (such as state-owned companies); (d) candidate for political office, political party or official of a political party; or (d) person acting in an official capacity for any of the above regardless of rank or position.

BigID and its employees, officers, directors, and agents acknowledge and agree it is never permissible to provide gifts, meals, travel, or entertainment to anyone (government officials or private sector persons) in exchange for any improper favor or benefit. Gifts of cash or cash equivalents, such as gift cards, are never permissible unless expressly permitted and preapproved by BigID's legal team.

In addition, BigID and its employees, officers, directors, and agents are not permitted to do any of the following in exchange for any improper favor or benefit (a) provide a donation to improperly influence a government official or private sector person; (b) direct promotional expenses or activities to a government official or private sector person; (c) hire or engage a government official, or his or her immediate family members; nor (d) provide a political contribution to improperly influence a government official. If the purpose of any of the foregoing activities is believed to be legitimate business activity by an employee, officer, director, or agent of BigID, then such BigID representative may submit it to BigID's legal team, and any such activity must be preapproved by BigID's legal team.

Third Party Management & Diligence

BigID and its employees, officers, directors, and agents acknowledge and agree they cannot avoid liability by using a third party to act in violation of this Policy. Third parties include, but are not limited to consultants, agents, representatives, subcontractors, and advisors. BigID conveys to third parties representing the company that they are to comply with this Policy.

If BigID or an employee, officer, director, or agent seeks to engage a third party in which the third party may interact with a government official or private sector commercial entity or person for or on behalf of the company, the following guidelines apply: (a) due diligence should be performed to ensure that the third party is a bona fide and legitimate entity; (b) is qualified to perform services for which it will be retained; (c) and maintains standards consistent with the legal, regulatory, ethical, and reputational standards of BigID. Any agreements between BigID and third parties must be in writing and should contain provisions related to the following, based on corruption risk present in the third-party relationship: (a) a representation that the



third party will remain in compliance with all applicable laws, applicable to its performance under the agreement and (b) a provision that requires the third party to respond to reasonable requests for information from BigID regarding the work performed under the agreement and related expenditures by the third party.

Reporting Obligations

BigID employees, officers, directors, and agents are encouraged to attain clarification on any questions or concerns regarding activities implicated by this Policy or the interpretation of any law. If a BigID employee, officer, director, or agent is offered a bribe from a person or entity doing business with or seeking to do business with BigID, or such person becomes aware of a bribe or potential bribe, any such person is obligated to report it immediately to BigID's legal team. If a BigID employee, officer, director, or agent is offered something of value and is uncertain whether it is permissible to accept, check with the appropriate BigID leadership and BigID's legal team. Violations can be reported anonymously by using the reporting tool on BigID's website or through other internal processes established by BigID. BigID's whistleblower policy protects employees, officers, directors, and agents who report concerns in good faith.

Review

This Policy applies across BigID's business operations and representatives and is monitored to account for any needed updates, changes, and or discoveries due to the ever-shifting regulatory landscape. This Policy was last updated in April 2024 and is subject to change as the company considers necessary or advisable. BigID aims to review this policy on an annual basis and is always open to feedback and suggestions from its employees, leadership, Board, customers, and partners.