



## HUMAN RIGHTS POLICY

---

Outbrain Inc. and its group companies (collectively, the “**Company**”) are committed to respecting all human rights in the workplace. We believe everyone deserves to be treated with fairness, respect, and dignity and therefore, our goal is to ensure that our products and services are provided in a way that respects, encourages, and supports human rights. This policy and code of conduct help us ensure we are doing that.

The Company recognizes its responsibility to respect internationally recognized standards of fair treatment and non-discrimination in our operations. We are guided by the standards outlined in the United Nations Guiding Principles on Business and Human Rights and the UN Universal Declaration of Human Rights. Further, we are committed to respecting all internationally recognized human rights wherever we do business.

We are committed to investing in our employees and the communities in which we operate. This policy outlines our company-wide approach to human rights. This global Human Rights Policy applies to all Company the Board of Directors, officers, employees, contractors, and those doing business with, or for, the Company and others who may act on the Company’s behalf. This policy applies to all Company office locations and wherever the Company business is conducted.

### Company Workplace

We are committed to promoting a respectful, safe, and inclusive work environment wherever we do business.

- *Safe and healthy workplaces:* We are committed to providing a clean, safe, and healthy work environment. The health, wellness, and safety of our workers is a top priority. Everyone has the right to a safe and healthy workplace with proper reporting rules and practices in place.
- *Diversity and Inclusion:* We are committed to diversity and inclusion throughout our business. We seek individuals from all backgrounds to join our teams.
- *Equal opportunity:* We are committed to ensuring that all our workers are treated equally, and we do not tolerate discrimination based on race, gender identity, gender, sexual orientation, color, national origin, religion, age, disability, political opinion, pregnancy, migrant status, ethnicity, marital or family status, or similar personal characteristics in hiring or working practices. We aim to ensure employment decisions and actions are based solely on business-related considerations and not on personal characteristics. As outlined in our Code of Business Conduct and Ethics, we strictly forbid any kind of discrimination, harassment, mistreatment, or bullying.
- *Freely chosen employment:* We do not tolerate the use of forced labor, child labor or human trafficking in any form throughout our operations.

### Our Shared Responsibility

- *Ensuring Compliance:* We expect and encourage everyone in our business to embed these principles into their everyday work and provide employee training to raise awareness of them.

- *Continuously Improve:* To ensure we are continuing to uphold the highest standards, we continuously review our policies and practices to ensure alignment with these principles and periodically provide updates on progress to senior management.
- *Raising concerns:* Any employee who believes a conflict arises between the language of the policy and the laws, customs, and practices and the Company's work practices, or who has questions about this Policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with their local management, the People and Culture Team or the General Counsel at [generalcounsel@outbrain.com](mailto:generalcounsel@outbrain.com). Employees can also report suspected policy violations via our Whistleblower Hotline at [www.lighthouse-services.com/outbrain](http://www.lighthouse-services.com/outbrain) or by telephone (in the US & Canada at 855.660.0009 or outside the US & Canada at 855.603.2869). No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address, and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

## Questions

If you have any questions in relation to this Policy or any other policy, please contact [ethics@outbrain.com](mailto:ethics@outbrain.com).