

GLOBAL ANTI-DISCRIMINATION AND PREVENTION OF HARASSMENT POLICY

Introduction

Outbrain Inc. and its group companies (collectively, “**Outbrain**”) are committed to fostering a diverse, equitable, and inclusive work environment where everyone is treated with dignity and fairness - see [Outbrain DE&I Policy](#). In this policy, we strictly prohibit any form of discrimination, harassment, or conduct that creates an intimidating, hostile, or offensive work environment based on, including but not limited to, an individual’s actual or perceived age, race, color, national origin, ancestry, sex, gender (including pregnancy, childbirth or medical condition related to pregnancy or childbirth), gender identity or expression, sexual orientation, religious creed, physical or mental disability, medical condition, or any other personal characteristic protected under applicable laws and regulations that can from time to time occur in any type of person or virtually, including through emails, social media, and other online platforms.

Our commitment to diversity, equity, and inclusion applies to all individuals involved in our operations, including but not limited to employees, contractors, interns, job applicants, and vendors. We are committed to taking all necessary steps to prevent and address such behavior, including actively promoting diversity and inclusion initiatives, providing resources and training to all employees, and holding individuals accountable for any violations of this policy. We also prohibit retaliation against any individual who makes a complaint or cooperates with an investigation related to diversity, equity, and inclusion matters.

Prohibited Harassment

Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature that is sufficiently persistent or offensive enough to interfere with the receiver’s job performance or create an intimidating, hostile, or offensive working environment.

Sexual harassment encompasses a wide range of conduct. Examples of misconduct include, but may not be limited to, the following actions:

- Physical assaults or the attempt to commit an assault of a sexual nature. This physical conduct can include touching, pinching, patting, grabbing, brushing against, or poking another team member's body.
- Unwelcome sexual advances, propositions, or other sexual comments, such as sexually oriented gestures, noises, remarks, jokes, or comments about a person’s sexuality or sexual experience.
- Preferential treatment or promises of preferential treatment to a team member for submitting to sexual conduct, including soliciting or attempting to solicit any team member to engage in sexual activity for compensation or reward.

- Subjecting, or threats of subjecting a team member to unwelcome sexual attention or conduct or intentionally making the performance of the team member's role more difficult because of that team member's sex.
- Creating displays, communications, or publications that include content of a sexually offensive nature.
- Purposely misgendering people, such as consistently referring to someone as 'he' after repeated requests to use 'she' or 'they' and vice versa.

Discrimination

Having a diverse workforce, made up of team members who bring a wide variety of skills, abilities, experiences, and perspectives, is essential to our success. We are committed to the principles of equal opportunity, inclusion, and respect. All employment-related decisions must be based on company needs, job requirements, and individual qualifications. Always take full advantage of what our team members have to offer; listen and be inclusive.

We do not tolerate discrimination against anyone, including team members, customers, business partners, or other stakeholders. Any form of discrimination towards an individual is strictly prohibited, including but not limited to race (includes national origin or ancestry, ethnicity, national origin or ethnic characteristics; interracial marriage or association; traits historically associated with race, including hair color and texture, protective hairstyles, and any other national origin), religion (including all aspects of religious observance and practice, as well as belief or lack of religious belief), sex (including pregnancy, childbirth, and related medical conditions; breastfeeding; sex assigned at birth; gender identity or gender expression; affectional or sexual orientation, including heterosexuality, homosexuality, bisexuality, and asexuality; and differences of sex development, variations of sex characteristics, or other intersex characteristics), age, disability, HIV status, marital status, past or present military service, life expectancy, or any other status protected by the laws or regulations in the locations where we operate.

We comply with laws regarding the employment of immigrants and non-citizens and provide equal employment opportunities to everyone who is legally authorized to work in the applicable country.

Bullying / Workplace Violence

Outbrain does not tolerate violent acts or threats of violence, including but not limited to aggressive behavior toward others, pressuring someone to misbehave, or having unreasonable work demands. The company will not tolerate any inappropriate behavior including but not limited to fighting, bullying, coercion, or use of abusive or threatening words directed to, about, or against a co-worker, lead, manager, executive, candidate, client/customer, vendor, contributor, or any other person. No individual employed by Outbrain should commit or threaten to commit any prohibited behavior including violent acts or discuss committing such offenses, even in a joking manner.

Examples of inappropriate behavior that may constitute harassment under this Policy

Verbal Harassment

Derogatory comments, slurs, or name-calling; inappropriate jokes, emails, or any other form of written communication, comments, noises, or remarks; repeated requests for dates, threats, propositions, or other unwelcome attention.

Physical Harassment or Assault

Impeding or blocking movement; physical interference with normal work or movement; unwanted and unwarranted physical contact, such as touching, pinching, patting, grabbing, brushing against, or poking another employee's body.

Visual Harassment

Abusive or patently offensive images (whether in photographs, posters, cartoons, drawings, paintings, or other forms of imagery); displaying abusive or patently offensive images, writings, or objects; ogling, staring at, or directing attention to an employee's anatomy; leering; sexually-oriented or suggestive gestures.

Cyberstalking

Harassment using electronic communication, such as e-mail, instant messaging (IM), or social media, or messages posted to a website, blog, or discussion group.

Retaliation

Unfavorable treatment (e.g., dismissal, unfair personnel evaluation, or job rotation) against an employee as a result of an employee seeking counseling about, lodging a protest against, or refusing sexual behavior.

Grievance Procedures

1. Reporting Discrimination, Harassment, Or Retaliation

We encourage employees to report potentially problematic behavior early, even if they are unsure it constitutes harassment. If you feel that you have witnessed or have been subjected to any form of discrimination or harassment, immediately notify your People & Culture representative, or any member of the Outbrain management team or reach out to generalcounsel@outbrain.com and submit a complaint.

In addition, the Company maintains an anonymous hotline telephone/web interface service where an employee may call in to report any compliance concerns and be assured their identity will be protected. Employees can access the service through www.lighthouse-services.com/outbrain or by telephone in the US & Canada at 855.660.0009. For other locations, please click [here](#) and follow the instructions.

2. Obligation to Investigate Harassment

2.1. The Role of Managers

(a) If managers become aware of misconduct, they must deal with any allegations expeditiously, seriously, confidentially, and fairly, whether or not there has been a written or formal complaint made to People & Culture Business Partner. Informed managers are expected to:

- Take all complaints or concerns of violation of this policy seriously regardless of who is involved.
- Ensure that any form of harassment or misconduct is immediately reported to their People & Culture Business Partner.
- Take appropriate action to prevent retaliation, or the alleged misconduct from recurring, during and after an investigation.

(b) Managers who knowingly allow or tolerate any form of violation of this policy, including the failure to immediately report such misconduct to People & Culture Business Partner, violate this policy and are subject to disciplinary action, which may include termination.

2.2. The Role of Individual Contributors

All employees have the responsibility to help create and maintain a safe work environment and can help by:

- Being aware of how their own behavior may affect others, and changing it if necessary.
- Treating their colleagues with dignity and respect.
- Taking a stand if they think inappropriate jokes or comments are being made to others.
- Making it clear to others where they find their behavior unacceptable.
- Intervening, if possible, to stop harassment or bullying from occurring.
- Reporting promptly to their manager and/or the People & Culture Business Partner any incident of any inappropriate behaviors witnessed by them.

2.3. The Role of People and Culture Business Partners

The Chief People & Culture Officer and People & Culture Business Partners are responsible for:

- Ensuring that any individual filing a complaint and any accused individual(s) are made aware of the seriousness of misconduct.
- Explaining Outbrain's no-tolerance discrimination and harassment policy and investigation procedures to all individuals included in a complaint.
- Arranging for an investigation of alleged misconduct and the preparation of a written report summarizing the results of the investigation and making recommendations for remediation to designated company officials.

- Notifying appropriate authorities (police, FBI, country-specific bureaus) when criminal activities are alleged.
- Exploring informal means of resolving the misconduct if a written (formal) complaint is not made when verbal allegations are shared.
- At the discretion of the People & Culture Business Partner, the results of the examination and the handling of the complaint will be reported to the relevant VP or senior management who will be responsible for the implementation and following up of recommendations.

3. Protection of Employees Involved in Harassment Complaints

- (a) In handling consultation requests and complaints, the privacy of the person(s) involved shall be protected. The Company shall not treat the person(s) involved in a disadvantageous manner because they consulted with or cooperated in the fact-finding investigation with the Company regarding the misconduct.
- (b) No employee will be discharged, demoted, suspended, threatened, harassed, or in any way subjected to adverse treatment in the terms and conditions of employment because of raising a complaint in good faith. A supervisor who subjects an employee to such adverse treatment for this reason will be subject to disciplinary action.

4. Disciplinary Action

- (a) Discipline for violation of this Policy may include but is not limited to, reprimand, warning, suspension, demotion, or termination. If the Company determines that harassment or discrimination occurred, corrective action will be taken to effectively end the behavior. As necessary, the Company may monitor any incident of harassment or discrimination to ensure the inappropriate behavior has stopped. In all cases, the Company will follow up as necessary to ensure that no individual is retaliated against for making a complaint or cooperating with an investigation.
- (b) This Policy and its related procedures shall be subject to review, and updated as necessary, to reflect any changes in legislation or company practices. This policy shall be construed and enforced in compliance with Outbrain Code of Business Conduct and Ethics as well as all relevant laws, and to the extent that any provision of this policy conflicts with or contravenes the Outbrain Code of Business Conduct and Ethics and applicable law, the Outbrain Code of Business Conduct and Ethics and applicable law shall take precedence over this Policy.