

CODE OF BUSINESS CONDUCT & ETHICS**I. INTRODUCTION****Purpose and Scope**

The Board of Directors of Collibra B.V. (collectively with its subsidiaries, the “**Company**”) adopted this Code of Business Conduct and Ethics (this “**Code**”) to aid the Company’s directors, officers, employees, independent contractors and agents, and others working on behalf of the Company, (“**you**”) in making ethical and legal decisions when conducting the Company’s business and performing their day-to-day duties. This Code applies to all directors, officers and employees. In addition, managers are also expected to ensure that all consultants and contractors, suppliers, partners, and others working on behalf of the Company comply with the standards set forth in this Code when working for or on behalf of the Company.

The Company’s Board of Directors (the “**Board**”), in conjunction with its Audit Committee, is responsible for administering the Code. The Board has delegated day-to-day responsibility for administering and interpreting this Code to Michelle Rosen, the Company’s General Counsel, as the Company’s Compliance Officer (the “**Compliance Officer**”) under this Code.

This Code is intended to ensure and promote:

1. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
2. compliance with applicable laws, rules and regulations;
3. fair and accurate books and records, including financial reporting;
4. the prompt internal reporting of violations of this Code (as described in the Code);
5. a culture of honesty and accountability; and
6. the deterrence of wrongdoing.

It is the Company’s policy to promote high standards of integrity and to conduct its affairs in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness and integrity brought to the job by each person associated with it. The Company understands that this Code serves as a source of guiding principles and will not contain the answer to every situation you may encounter or every concern you may have about conducting the Company’s business ethically and legally. The Company expects you to exercise good judgment and the highest personal ethical standards in making business decisions when conducting the Company’s business. The Company encourages you to refer to this Code frequently to ensure that you are acting within both the letter and the spirit of this Code. You can obtain a copy of the current version of this Code by requesting one from the People Team or at



<https://cintra.collibra.com/home/code-of-business-conduct-ethics-people>. If you have questions or concerns about this Code, the Company encourages you to speak with your manager (if applicable) or with the Compliance Officer. A good rule to follow, however, is to consider whether you would feel comfortable if your potential actions or dealings were made public -- if the answer is no, you should reconsider them and consult with your manager or the Compliance Officer if you have any questions.

Contents of this Code

This Code has two sections that follow this Introduction. The first section, “Standards of Conduct,” contains the actual guidelines that you are expected to adhere to in the conduct of the Company’s business. The second section, “Compliance Procedures,” contains specific information about how this Code functions, including who administers the Code, who can provide guidance under this Code and how violations may be reported, investigated and disciplined. This second section also contains a discussion about waivers of and amendments to this Code.

A Note Regarding Other Obligations

This Code is not intended to reduce or limit any contractual or legal obligations that you may have to the Company. Rather, the standards in this Code should be viewed as the *minimum standards* that the Company expects from you in the conduct of its business.

II. STANDARDS OF CONDUCT

Conflicts of Interest

The Company recognizes and respects your right to engage in activities outside the scope of your duties to the Company, provided that these activities do not impair or interfere with the performance of your duties or your ability to act in the Company’s best interests. A “conflict of interest” arises when your personal interest impairs or interferes with the Company’s interests. Conflicts of interest may arise in many situations. Each individual’s situation is different and in evaluating your own situation with respect to a conflict, you will have to consider many factors. However, even just the appearance of a conflict of interest can be damaging and should be avoided. Whether or not a conflict of interest exists can be unclear. Areas in which actual or potential conflicts of interest frequently arise include (but are not limited to) the following:

- *Personal Relationships.* When a family member of an employee – defined as a parent, sibling, spouse, child, in-law, grandparent, grandchild, step-relative, domestic partner, or any other person who resides in your household – interacts with such employee in the workplace, actual or perceived conflicts may arise. To avoid even the appearance of favoritism, in the event two family members work for the Company, they should not work in the same reporting chain without approval of the Compliance Officer. If a family member or someone with whom you have a close personal relationship owns or works for a company that does business with Collibra, you should disclose this fact. Without pre-approval of the Compliance Officer, an employee may not manage a relationship between the Company and another company where a family member or someone with whom

such employee has a close personal relationship works or holds a substantial ownership interest.

- *Outside work.* Employees are expected to devote their full-time working hours to Collibra. For any for profit-related activities, including being asked to sit on the Board of Directors or Advisory Board of a for-profit organization, employees need approval from their manager and the Compliance Officer, even if the employee is not being compensated personally for the outside activity. For any nonprofit activities that could conflict with the Company's business, an employee needs approval from his or her manager. If an employee has been asked to sit on the Board of Directors of a nonprofit organization, such employee needs approval from his or her manager and the Compliance Officer.
- *Financial interests.* Holding a significant or controlling interest in one of the Company's competitors, customers or suppliers could create an actual or perceived conflict. This also applies to financial interests held by a family member. Financial interests that could create an actual or perceived conflict of interest require approval from your manager and the Compliance Officer.
- *Corporate opportunities.* Employees cannot take advantage personally of business or investment opportunities that are discovered through the use of Company property, business or information, or as a result of their position with the Company.

If you have questions about whether specific factors and circumstances represent an actual or potential conflict, you should discuss the matter with your supervisor, the People Team or the Compliance Officer. Any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest should be reported promptly to the Compliance Officer. Actual or potential conflicts of interest involving a director or an executive team member also should be reported promptly to the Compliance Officer and, if necessary, the appropriate authorization for the conflict situation should be sought. The Compliance Officer may notify the Board or its Audit Committee as she deems appropriate. Actual or potential conflicts of interest involving the Compliance Officer should be disclosed directly to the Chief Financial Officer.

Corporate Opportunities

You are prohibited from:

- diverting for yourself or for others any opportunities that are discovered through the use of the Company's property, business or information, or as a result of your position with the Company, unless such opportunity has first been presented to, and rejected in writing by, the Compliance Officer of the Company;
- using the Company's property, business or information or your position for improper personal gain; or
- competing with the Company.

In the interest of clarifying the definition of “conflict of interest,” if any member of the Board who is also a partner or employee of an entity that is a holder of the Company’s equity securities, or an employee of an entity that manages such an entity (each, a “**Fund**”) acquires knowledge of a potential transaction (investment transaction or otherwise) or other matter, other than in connection with such individual’s service as a director (including, if applicable, in such individual’s capacity as a partner or employee of the Fund or the manager or general partner of a Fund), that may be an opportunity of interest for both the Company and such Fund (a “**Corporate Opportunity**”), then, provided that such director has acted reasonably and in good faith with respect to the best interests of the Company, such an event shall be deemed not to be a “conflict of interest” under this policy.

Compliance with Laws, Rules and Regulations

The Company seeks to conduct its business in compliance with applicable laws, rules and regulations. You are prohibited from engaging in any unlawful activity in conducting the Company’s business, nor are you permitted to instruct or encourage others to do so.

The Company expects its employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. While the Company does not expect you to memorize every detail of these laws, rules and regulations, you should be able to determine when to seek advice from others. If you have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your supervisor or the Compliance Officer.

International Business Laws

You are expected to comply with the applicable laws in all countries in which the Company does business or to which you travel on behalf of the Company, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as a rationale for noncompliance.

In addition, certain U.S. laws, rules and regulations extend to our activities outside the United States. These include:

- The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded;
- U.S. trade sanctions and embargoes, which generally prohibit U.S. companies, their subsidiaries, their employees, and third parties acting on their behalf from engaging in transactions or dealings involving certain countries and territories subject to embargoes imposed by the U.S. government (currently, Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine), as well as specific entities and individuals identified on sanctions lists published by the U.S. Department of the Treasury’s Office of Foreign Assets Control;

- U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibits transfers of U.S.-origin items to denied persons and entities; and
- Antiboycott Regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

If you have a question as to whether an activity is restricted or prohibited, seek assistance from the Compliance Officer before taking any action, including giving any verbal assurances that might be regulated by international laws.

Please also refer to the Company's Global Anti-Corruption Policy.

Anti-Money Laundering Compliance

The Company is committed to the fight against money laundering and terrorist financing. Money laundering is the act of concealing or disguising the existence, illegal origins, and/or illegal application of criminally derived income so that such income appears to have legitimate origins or constitute legitimate assets. While money-laundering involves giving "dirty" money the appearance of legitimacy, terrorist financing generally involves using legally earned income to finance illegal activities. You are expected to comply with all applicable anti-money laundering and countering the financing of terrorism laws and regulations.

Protection and Proper Use of the Company's Assets

The Company's assets include, but are not limited to, its intellectual property rights, information systems, computers, servers, other equipment, and communication facilities. Loss, theft and misuse of the Company's assets have a direct impact on the Company's business and its profitability. You are expected to protect the Company's assets that are entrusted to you and to protect the Company's assets in general. You are also expected to take steps to ensure that the Company's assets are used only for legitimate business purposes (although incidental personal use may be permitted) and at all times in accordance with the Company's Technology Acceptable Use Policy.

Confidentiality

One of the Company's most important assets is its confidential information. In the course of the performance of your obligations to the Company, you may learn of information about the Company, its clients, and other parties that is confidential and/or proprietary. You are expected to take special care to keep this information confidential. "**Confidential Information**" includes all verbal and written non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed. You may not disclose or distribute the Company's Confidential Information, except when disclosure is authorized by the Company or required by applicable law, rule or regulation or pursuant to an applicable legal proceeding (in which case you shall notify the Compliance Officer before disclosure). You should use Confidential Information solely for legitimate Company purposes. You must return all of the Company's Confidential Information and proprietary information in your possession to the Company when you cease to be



employed by or to otherwise serve the Company. However, the obligation to protect confidential information does not end when an employee leaves the Company. Any questions about whether information is confidential should be directed to the Legal Department.

Data Privacy

The Company is committed to protecting personal data of its directors, officers, employees, consultants, agents and contractors, as well that of its customers and business partners and only to process it within the boundaries of applicable law. Accordingly, the Company at all times strives to comply with the applicable laws and regulations of the jurisdiction in which it collects, stores and uses personal information including by processing the minimum amount of personal data necessary to achieve a legitimate purpose and retaining such information only for so long as necessary for their processing purpose.

Fair Dealing

Competing vigorously, yet lawfully, with competitors and establishing advantageous, but fair, business relationships with customers and suppliers is a part of the foundation for long-term success. However, unlawful and unethical conduct, which may lead to short-term gains, may damage a company's reputation and long-term business prospects. Accordingly, it is the Company's policy that you must deal ethically and lawfully with the Company's customers, suppliers, competitors and employees in all business dealings on the Company's behalf. You are prohibited from taking unfair advantage of another person in business dealings on the Company's behalf through the abuse of privileged or confidential information or through improper manipulation, concealment or misrepresentation of material facts. If you receive confidential or proprietary information of a third party by mistake, you should return or destroy such information.

Accuracy of Records

The integrity, reliability and accuracy in all material respects of the Company's books, records and financial statements are fundamental to the Company's continued and future business success. All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely. Furthermore, all books, records, accounts and financial statements must conform both to applicable legal requirements and to the Company's system of internal controls. Employees are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to the Company. You may not cause the Company to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, you may not create any false or artificial documentation or book entry for any transaction entered into by the Company. Similarly, officers and employees who have responsibility for accounting and financial reporting matters have a responsibility to accurately record all funds, assets and transactions on the Company's books and records.

Trading in the Securities of Other Companies

In the course of working for the Company, you may learn of material, nonpublic



information about a company with which the Company does business (*e.g.*, a customer, supplier or other party with which the Company is negotiating a major transaction, such as an acquisition, investment or sale). You are prohibited from trading in that company's securities until the information becomes public or is no longer material.

International Trade Controls

Many countries regulate international trade transactions, such as imports, exports and international financial transactions. In addition, the United States prohibits any cooperation with boycotts against countries friendly to the United States or against firms that may be "blacklisted" by certain groups or countries. It is the Company's policy to comply with these laws and regulations even if it may result in the loss of some business opportunities. Employees should learn and understand the extent to which the U.S., E.U. and other international trade controls apply to transactions conducted by the Company.

Promoting a Positive Work Environment

The Company is committed to creating a supportive work environment and each employee is expected to create a respectful workplace culture that is free of harassment, intimidation, bias and unlawful discrimination. The Company is an equal opportunity employer and employment is based solely on individual merit and qualifications directly related to professional competence. The Company strictly prohibits discrimination or harassment of any kind 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 law.

III. SPEAKING UP

When to Speak Up

Be Proactive. You are encouraged to act proactively by asking questions, seeking guidance and reporting suspected violations of this Code and other policies and procedures of the Company, as well as any violation or suspected violation of applicable law, rule or regulation arising in the conduct of the Company's business or occurring on the Company's property. **If you believe that actions have taken place, may be taking place, or may be about to take place that violate or would violate this Code or any law, rule or regulation applicable to the Company, you are obligated to bring the matter to the attention of the Company.**

Ask for Guidance. The best starting point for you to seek advice on ethics-related issues or reporting potential violations of this Code will usually be your manager. However, if the conduct in question involves your manager, if you have reported the conduct in question to your manager and you do not believe that he or she has dealt with it properly, or if you do not feel that you can discuss the matter with your manager, you may raise the matter with the Compliance Officer.



How to Speak Up

Communication Alternatives. Any officer or employee may communicate with the Compliance Officer, or report potential violations of this Code, by any of the following methods (all of which may be done anonymously as described below):

- In writing, addressed to the General Counsel, by mail to Collibra B.V., c/o Collibra Inc., 28 Liberty Street, Suite 4050, New York, New York, 10005;
- Via the phone at the telephone numbers listed at <https://collibra.ethicspoint.com>; or
- Via an internet portal at <https://collibra.ethicspoint.com>.

Reporting Accounting or Similar Concerns. Any concerns or questions regarding any potential violations of this Code, any Company policy or procedure or applicable law, rules or regulations that involves accounting, internal accounting controls or auditing matters will be reported promptly to the Audit Committee or a designee of the Audit Committee and the Audit Committee shall be responsible for supervising and overseeing the inquiry and any investigation that is undertaken. You may also communicate directly with the Audit Committee or its designee regarding such matters by the following methods (all of which may be done anonymously as set forth below under “Anonymity”):

- In writing, addressed to the Chairperson of the Audit Committee, by mail to Collibra B.V., c/o Collibra Inc., 28 Liberty Street, Suite 4050, New York, New York, 10005;
- Via the phone at the telephone numbers listed at <https://collibra.ethicspoint.com>; or
- Via an internet portal at <https://collibra.ethicspoint.com>.

Anonymity

When reporting suspected violations of the Code, the Company prefers that you identify yourself. Identifying yourself will allow the Compliance Officer to obtain follow-up details from you that may be necessary to investigate the matter or otherwise take appropriate steps to address the report. However, the Company also recognizes that some people may feel more comfortable reporting a suspected violation anonymously. Therefore, if you wish to remain anonymous, you may do so. If you make a report anonymously, please provide as much detail as is reasonably necessary to permit the Company to evaluate the matter(s) reported and, if appropriate, commence and conduct an appropriate investigation.

Whether you identify yourself or remain anonymous, the Company will use reasonable efforts to protect your confidentiality to the extent reasonably possible within the objectives of the Code and applicable law, rule or regulation.

Other Considerations

Speaking Up Without Fear of Retaliation

The Company expressly forbids any retaliation against anyone who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Any person who participates in any such retaliation will be subject to disciplinary action, including termination.

Cooperation

You are expected to cooperate with the Company in any investigation of a potential violation of this Code, any other Company policy or procedure, or any applicable law, rule or regulation.

Penalties for Violations

If any investigation indicates that a violation of this Code has probably occurred, the Company will take such action as it determines to be appropriate under the circumstances. If the Company determines that an employee, officer or director is responsible for a code violation, he or she may be subject to disciplinary action up to, and including, termination and, in appropriate cases, civil action or referral for criminal prosecution.

Waivers and Amendments

No waiver of any provisions of this Code for the benefit of a director or an executive officer (which includes without limitation, for purposes of this Code, the Company's principal executive, financial and accounting officers) shall be effective unless approved by the Board or, if permitted, the Audit Committee.

Any waivers of this Code for other employees, consultants or contractors may be made by the Compliance Officer.

The Company periodically reviews and updates its policies, and therefore reserves the right to amend this Code at any time for any reason. All amendments to this Code must be approved by the Board.

Adopted: January 1, 2023

ACKNOWLEDGMENT

I acknowledge that I have reviewed and understand Collibra B.V.'s Code of Business Conduct and Ethics (the “**Code**”) and agree to abide by the provisions of the Code. I understand my obligation to comply with this Code and with the law, and my obligation to report to appropriate personnel within the Company any and all suspected violations of this Code or of applicable laws, rules, or regulations. I understand that the Company expressly prohibits any director, officer, or employee from retaliating against any other such person for reporting suspected violations of the Code or of any laws, rules or regulations. I am familiar with all the resources that are available if I have questions about specific conduct, the Company’s policies, or applicable laws, rules, or regulations.

Signature

Name (Printed or typed)

Position

Date