

2026 Global Anti-Bribery and Anti-Corruption Policy

Overview

JumpCloud Inc. and its subsidiaries and affiliates (“Company” or “JumpCloud”) prohibit bribery and corruption in connection with JumpCloud’s business. Employees are expected to do business ethically, fairly, honestly, and openly.

Scope

This policy applies to all directors, officers, employees, temporary employees, consultants, and contractors of the Company and its subsidiaries. This policy will also apply to agents, vendors, channel partners, resellers, business partners, licensees, and any person doing business on behalf of JumpCloud or representing the Company.

Policy

JumpCloud prohibits bribery. Bribery includes:

- Giving any sort of payment or anything of value to (1) a Government Official (defined below), or (2) anyone else, where the intent is to improperly influence the Government Official or other person to obtain or retain business or some other commercial advantage for JumpCloud, or
- Accepting any sort of payment or anything of value from anyone, where the intent is to be influenced to act improperly (e.g., a breach of an expectation that a person will act in good faith, impartially or in accordance with a position of trust).

This policy prohibits direct action by employees and indirect action through others (e.g., third parties) who are performing services on behalf of JumpCloud, such as consultants, advisors, suppliers, distributors, or agents.

Bribes can include money, gifts, hospitality, expenses, favors, political or charitable contributions, or any direct or indirect benefit or consideration. This is not an exhaustive list. There is no set monetary threshold that defines a payment as a bribe, and the bribe does not have to result in the advantage being received to be improper. It is the intent that matters.

Provision of any promotional, entertainment, or travel expenses for a Government Official must first have explicit and prior approval from the legal department.

The U.K. Bribery Act prohibits the giving or receiving of bribes to commercial organizations and private individuals in addition to Government Officials. Bona fide corporate hospitality is permitted (see below), but care must be taken to ensure this is done in compliance with local gift and entertainment policies, and accurate records are maintained in accordance with relevant guidelines.

Payments for Routine Government Action

Facilitation payments are payments to induce officials to perform routine functions they are already obligated to perform.

Facilitation payments are considered bribery and not allowed; however, businesses may pay for legally required “official” administrative fees or fast-track services that are clearly identifiable as being official fees. Some examples of official fees include but are not limited to:

- Processing licenses, permits, or other official documents;
- Processing government paperwork such as visas and work orders;

- Providing services such as police protection, mail pick-up and delivery, loading and unloading of cargo or providing utilities such as phone service, power, water supply; and
- Scheduling inspections associated with contract performance or transit of goods and services. Any transaction must be appropriately categorized and accurately recorded.

Gifts, Entertainment, Hospitality and Travel Expense Funding

All business gifts, hospitality, and business entertainment provided to employees or third parties or received from others working on behalf of JumpCloud must comply with JumpCloud's Code of Conduct, including policies adopted pursuant to the Code of Conduct and the Company's Travel and Expense Policy. Bona fide business hospitality and expenses are acceptable provided they are proportionate and reasonable. Please contact the legal department for further clarification.

Third Party Payments and Use of Agents

It is unlawful to make a payment to a third party or agent if there is knowledge or suspicion that the recipient may use or offer all, or a portion, of the payment directly or indirectly as a bribe. Conscious disregard or ignorance of this responsibility is not an acceptable defense. It is the individual's responsibility to ensure that consultants, agents, or any third party working on behalf of JumpCloud are legitimate service providers. Appropriate bribery/corruption due diligence must be completed and retained before engaging such parties.

Books, Records, and Internal Control Requirements

Expenses incurred as a result of illegal payments must never be hidden or purposefully misclassified and must always be accurately recorded and accounted for. International anti-bribery laws require detailed and accurate accounting records for all transactions, including cash and bank accounts. Violation of this requirement may result in prosecution of individuals and/or the Company.

Consequences of Violating Anti-bribery Laws

Individuals will be held accountable if they pay or receive a bribe or authorize, assist, or conspire to violate anti-bribery law. There is never an excuse for making unethical payments to any person or for directing or permitting someone else to do so.

- Consequences for Individuals: Consequences of violating anti-bribery laws may include imprisonment, probation, mandated community service, and significant monetary fines against the individual (which will not be paid by JumpCloud). Violators are also subject to disciplinary action, including without limitation termination from the Company.
- Consequences for JumpCloud: Consequences of violating anti-bribery laws may include fines, fees, damage to corporate valuation, brand, reputation, loss of import/export privileges, loss of business, legal action by competitors, and litigation expenses. In addition, under some anti-bribery laws, senior officers of JumpCloud can be held personally liable for violations, fines, and/or imprisonment.

Training

Relevant JumpCloud employees and other individuals performing duties on behalf of JumpCloud are required to complete training on a regular basis to ensure that they are familiar with JumpCloud's anti-bribery and anti-corruption policy and what to do if they suspect a bribery or corruption issue. We each have a responsibility for holding each other accountable to assure we follow our Company anti-bribery and anti-corruption policy. Supporting or ignoring an act of bribery is not acceptable. All leaders should ensure their team members understand and comply with this policy.

Questions or Reports

For any questions about this policy, contact the legal department. In certain circumstances, proposed payments may appear to violate anti-bribery and anti-corruption law, but there may be other factors which mean that they are, in fact, allowed within the law. If this is the case or is suspected to be the case, contact the legal department immediately. If there is concern that an anti-bribery violation could occur, is occurring, or has occurred, report the matter immediately to the legal department or via the Company's reporting hotline.

DEFINITIONS:

A "Government Official" is defined as any official of any government department or agency or their family members; an official of any public international organization (such as the United Nations); political parties and party leaders; candidates for public office; executives and employees of government-owned or government-run companies (such as an employee at a state-controlled media outlet or a doctor in a state-controlled hospital); anyone acting on behalf of any of these officials; an individual holding a legislative, administrative or judicial position of any kind, whether appointed or elected, who exercises a public function on behalf of any country or territory or any public agency or public enterprise of that country, or is an official or agent of any public international organization.