# **CAMUNDA**

# **Global Expense Policy**

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# 1 1. Introduction

The purpose of this policy is to provide consistent global rules for business travel and expenses to ensure safe and cost-effective travel and spending behavior. This policy applies to all employees of Camunda (including PEO), regardless of employment country, when they travel for business purposes or incur business-related expenses.

This policy is effective June 7, 2024 and supersedes all previous travel and expense policies and is reviewed and revised on an annual basis or when necessary by the Accounting team.

The Global Expense Policy provides clear guidelines on:

- General expense guidelines: Basic principles on how expenses should be handled.
- **Detailed expense categories**: Specifics on what expenses are covered, including travel, meals, and office necessities.
- Reimbursement procedures: How to submit expenses and obtain reimbursements.
- Handling exceptions: Guidance for situations that deviate from standard procedures.
- Compliance and monitoring: Ensuring adherence to the policy and consequences for non-compliance.

For any uncertainties or questions, please contact the Accounting team via Slack in #ask-finance or email at expenses@camunda.com.

# 2 2. Responsibilities

All employees must comply with the guidelines of this policy as applicable. Camunda people managers are responsible for ensuring that their reports have read and comply with this policy.

The Company's Chief Financial Officer (Slack link) is the DRI of this policy and is responsible for establishing and communicating the policy to the organization and for enforcement.

# 3 3. Guiding Principles

- 1. Employees are entitled to make independent expense decisions, while being responsible to use Camunda's funds carefully and treat them with the same consideration as their own.
- 2. Expenses must be directly related to and necessary for business duties.
- 3. Reimbursement requests must be submitted **within 45 days** of the expense. Late expense reports will not be approved except in limited circumstances and with the approval of the Senior Director Accounting & Corporate Controlling.
- 4. Expenses can only be claimed by the employee who has paid for them.
- 5. Expenses must be supported by proper documentation, such as an invoice or receipt that shows what was spent and how much was paid.
- 6. An itemized receipt is always required. A credit card statement is not sufficient.
- 7. If the expense cannot be supported by an itemized receipt (e.g, because it has been lost), the "Lost or missing receipt" process in Camunda's travel and expense management tool, Brex, needs to be followed to create a written declaration to be submitted along with a proof of payment. If the Brex process is not available, the Camunda Self-Receipt Declaration must be used and submitted along with a proof of payment. (Google form here; the document will be emailed to you after submitting the form, be sure to check your spam folder).
- 8. Submission of fraudulent expense claims or any other abuse of Camunda's expense policy will result in disciplinary action.
- 9. Camunda will only cover the expenses listed in this policy. All other purchases must follow the Purchasing Process and must be paid directly by Camunda. Expenses that don't comply with Camunda's policies or that are not covered by this policy will not be approved or reimbursed. For clarification on the distinction between Expenses and Purchases at Camunda, please consult this page: Camunda Purchases and Expenses.

Expenses are reviewed by the Accounting department. In the case of unexpectedly high amounts, Accounting reserves the right to request additional email approval from the employee's manager or the CFO before accepting the request. This ensures that expenses are in the best interest of the company and align with financial policies.

# 4 4. Anti-Bribery and Corruption Policy

All employees must follow our Anti-Bribery and Corruption Guidelines for employees.

# 5 5. Global Travel & Expense Process with Brex

Camunda uses Brex as the global travel and expense management tool. Brex will cover corporate credit cards (physical and virtual), travel bookings and reimbursements.

All employees are eligible for a Brex credit card and will have access to expense management and travel booking through Brex.

The limits are in the local currency that is valid for the Camunda entity the employee is assigned to. For GmbH and PEO employees this will be Camunda Services GmbH that is operating in Euro. The card or limit currency does not define the payment currency, so all currencies can be paid with Euro cards, for example.

### To learn more about Brex, please refer to the Brex Guides.

# 6 6. Global Process for Brex Cards

All employees have the following spend limits assigned to their Brex wallet:

- Monthly remote work budget: 550 EUR/USD/GBP/SGD (up to 500 for individual workspace, up to 50 for office supplies)
- Yearly professional growth benefit: 1000 EUR/USD/GBP/SGD. If you have already used some of this in 2024, accounting will adjust your limit accordingly before Brex is rolled out to the organization.
- Individual travel: No hard limit; to be used for Brex travel bookings and travel expenses.

These spend limits can be used through Brex cards or to request reimbursements.

All other expenses require a spend limit request, before it can be used.

**Spend Limit Request Submission:** The employee submits the spend limit request. The request must include detailed information about the expense, including the nature of the expense and the estimated amount to be paid (converted to the local currency of the assigned Camunda entity).

**Review and Approval:** The assigned approver, which may be the Accounting team or the manager, depending on the nature of the request, will review and approve the spend limit request. The Accounting team is committed to making a decision within one business day (Monday through Friday) in accordance with the guidelines and thresholds outlined in this policy.

**Notification:** After a request is approved, the employee is notified by Brex, and can create a virtual card for payment.

**Receipt Submission:** After payment, the employee is responsible for collecting and organizing all necessary documentation to support the expense (such as receipts or invoices).

# 7 7. Global Process for Reimbursement Requests

**Initial Submission**: When an employee incurs an eligible business expense, they are responsible for collecting and organizing all necessary documentation to support the expense (such as receipts).

Expense Reimbursement Request Creation: The employee submits an expense request through Brex.

**Accounting Review and Approval:** The Accounting team reviews and approves the expense request in accordance with the Guiding Principles and thresholds outlined in this policy.

**Reimbursement Timing:** After an expense request is approved, the payout process is initiated. The reimbursement will be paid within two weeks of accounting review and approval.

# 8 8. Quick Guide per Expense Type

The following table summarizes the expense categories and the specific expense limits, if any. The specific explanation is provided in the appropriate chapter of this policy.

Expense Type	Expense Category	Limit EUR/USD/GBP/SGD and/or Specification	Budget Types
Travel Expe	NSES (see page 15)		
	Accommodation	Limits are set in Brex Travel Use your 'individual travel' spend limit in Brex for all business travel booking and spend. Refer to the chapter Travel Expenses (see page 15) for the limits in case of exceptional reimbursement requests.	Business Travel Retreat CamundaCon Regional Social Gatherings Sales Kick Off (#value-driven- feb-2024) Camunda Kick Off Board Meeting SLT Offsite Team Event / Offsite
	Airfare	<ul> <li>Limits are set in Brex Travel</li> <li>Use your 'individual travel' spend limit in Brex for all business travel booking and spend.</li> <li>Refer to the chapter Travel Expenses (see page 16) for the limits in case of exceptional reimbursement requests.</li> <li>Refundable tickets if the cost is not more than 30% higher than the non-refundable option.</li> </ul>	Business Travel Retreat CamundaCon Regional Social Gatherings Sales Kick Off (#value-driven- feb-2024) Camunda Kick Off Board Meeting SLT Offsite Team Event / Offsite

Ground Transportation	Train tickets (Brex Travel), public transportation, taxi, parking fees Use your 'individual travel' spend limit in Brex for all business travel booking and spend.	Business Travel Retreat CamundaCon Regional Social Gatherings Sales Kick Off (#value-driven- feb-2024) Camunda Kick Off Board Meeting SLT Offsite Team Event / Offsite
Car Rental	Limits are set in Brex Travel Use your 'individual travel' spend limit in Brex for all business travel booking and spend. Refer to the chapter Travel Expenses (see page 17) for the limits in case of exceptional reimbursement requests.	Business Travel Retreat CamundaCon Regional Social Gatherings Sales Kick Off (#value-driven- feb-2024) Camunda Kick Off Board Meeting SLT Offsite Team Event / Offsite
Mileage	Country-specific rate; if this is less than 0.40 EUR (converted into the local currency), Camunda will top up to this amount, see chapter Mileage (see page 17). Use your 'individual travel' spend limit in Brex for all business travel booking and spend.	Business Travel

Meals (see page 20)		Per meal and per person:	Business Travel
		<ul> <li>20 USD/EUR/GBP/SGD for breakfast</li> <li>40 USD/EUR/GBP/SGD for lunch</li> <li>80 USD/EUR/GBP for dinner</li> </ul>	Retreat CamundaCon Regional Social Gatherings
		Total per day per person:	Sales Kick Off (#value-driven- feb-2024)
		• 140 USD/EUR/GBP/SGD	
		Per meal and per person for remote team event:	Camunda Kick Off Board Meeting SLT Offsite Team Event /
		• 30 USD/EUR/GBP/SGD	
		The limits include tips.	Offsite
		Use your 'individual travel' spend limit in Brex for all <b>meals</b> .	
Entertainmo	ent (see page 21)	1	
	<b>Client Entertainment</b>	Detailed information required:	
		<ul> <li>Why: Specific business reason (no vague ter service")</li> <li>Where: Location of entertainment (name an place)</li> <li>When: Date of entertainment</li> <li>Who: Full names of all attendees, and their of Use the 'Entertainment and group travel' template entertainment (other than meals).</li> </ul>	d address of the company.
	Internal Events	Follow Internal Meetings (Team Building) Guidelines and Internal Events	
		Use the regular travel expense categories and specify the event over the budget type	
	Use the 'Entertainment and group travel' template in Brex.		in Brex.
Remote Wo	rk (see page 0)		
	Home Office	See table in the chapter Home Office Equipment (see	e page 22)
Equipment		Use the additional 'Remote work' spend limit request template in Brex.	

	Workspace Rental	Day pass:	
		• 50 EUR/USD/GBP/SGD	
		Month-to-month contract	
		• 500 EUR/USD/GBP/SGD	
		Use your 'Monthly workspace and office supplies' sp	oend limit in Brex.
	Office Supplies	Camunda covers what is essential for day-to-day o personal workspace management (Examples listed Office Supplies (see page 23))	in the chapter
		Use your 'Monthly workspace and office supplies' sp	end limit in Brex.
Learning and Development (see page 24)		Follow Professional Growth Benefit guidelines. Use your yearly 'Yearly professional growth benefit' spend limit in Brex.	Professional Growth Benefit
		Additional Learning & Development expenses that are not related to the Professional Growth Benefit. Use the Learning & Development spend limit request template in Brex.	Department sponsored L&D
Gift Giving (se	ee page 25)		
	Internal Gifting	Managers to team members only:	
		<ul> <li>For individual gifts: 50 EUR/USD/GBP/SGD</li> <li>For singular personal occasions (e.g. births, USD/GBP/SGD</li> </ul>	weddings): 60 EUR/
		Use the Gift spend limit request template in Brex.	
	External Gifting	Non-branded gifts:	
		<ul> <li>60 EUR/USD/GBP</li> </ul>	

# 9 9. Travel Expenses

At Camunda we continuously strive to reduce our impacts, including the environmental impacts associated with work-related travel. We recognise that travel, especially road and air travel, has a direct impact on the environment.

Therefore, we are committed to reducing the need for unnecessary business travel and encouraging the use of more sustainable forms of transport across our operations, as stated here: How can you help as a Camundi to achieve our environmental goals?

All travel bookings (flights, hotels, trains or rental cars) should ideally be made through Brex Travel to centralize and streamline our bookings, improve compliance and security, and increase financial efficiency. This approach supports our environmental objectives and simplifies accounting processes by providing a single view of travel spend and ensuring that all bookings are in line with our policy.

However, we recognize that exceptional circumstances may require alternative arrangements. In such cases, reimbursement requests for bookings made outside of Brex Travel will be considered and may be approved based on specific criteria justifying the exception.

We encourage all employees to use Brex Travel wherever possible as it offers significant benefits, including enhanced security, risk management and the ability to leverage travel points for company benefit.

# Please note that frequent flyer and loyalty program details can still be used within the Brex platform to ensure you benefit from personal and corporate rewards.

For more information and guidance around business travel please refer to this page: Business Travel at Camunda.

Use your 'individual travel' spend limit in Brex for all business travel booking and spend.

## 9.1 9.1. Visas

Expenses for obtaining or maintaining a visa for work and/or business travel are reimbursable.

## 9.2 9.2. Accommodation

Employees can only expense reasonable and necessary accommodation for business travel. Select affordable, standard hotels that meet safety and comfort standards. Ensure optimal cost effectiveness while making appropriate judgments.

## Expense Limit, including all fees and taxes

- Europe:
- <= 210 € per night
- <= 290 € for expensive cities like Zurich, Amsterdam, Dublin
- North America:
  - <= 290 \$ per night
  - <= 400 \$ for expensive cities like NYC, Boston, San Francisco
- Other regions:
  - <= 320 \$ per night

These limits include room and taxes, Internet access and parking fees.

In addition, laundry and dry cleaning will be covered up to a value of 100 EUR/USD/GBP/SGD for trips exceeding 8 consecutive days.

Extras such as room upgrades, minibar drinks or in-room movies are not reimbursable.

If your accommodation costs exceed the stated expense limit, including all fees and taxes, you must provide an explanation and obtain manager approval when submitting your expense.

## 9.3 9.3. Airfare

As soon as the travel dates are confirmed, it is strongly encouraged to promptly book airfare, ensuring a minimum of 14 days' advance notice. Refundable flight tickets are preferred to accommodate any unforeseen changes. However, if the price difference between a refundable and a non-refundable ticket exceeds 30%, please opt for the non-refundable option.

To minimize the risk of impact on the business in the case of an accident, all team members within the same department, as well as members of the Senior Leadership Team (SLT), should carefully evaluate the necessity of traveling together on the same flight.

### Economy Class

We generally fly economy.

Upgrades are possible in these cases:

- Long-haul flight with more than 8 hours door-to-door: Premium Economy / Economy Plus
- Business class is possible only for medical reasons with a doctor's note and approval before booking, sent to our Senior Director Accounting & Corporate Controlling.

It is permitted to upgrade all flights at your own cost.

Please note that in accordance with our commitment to cost efficiency and equitable treatment of all Camundi, all employees are required to travel economy class for the annual company retreat. This includes long-haul flights over 8 hours (with the exception of medical reasons as noted above). In addition, please be sure to follow the guidelines outlined on the dedicated retreat websites.

Wifi access to work during the flight will be reimbursed.

# Flight receipts are created automatically in Brex where possible. If not, the flight receipt must be added separately to the payment in Brex and must contain the following details:

To be reimbursed for a flight, the flight receipt must include the following details:

- Passenger name
- Flight dates, including departure and arrival airports
- Total cost of the ticket
- Airline / Airport Lounge Pass (under the condition that lounge access is required for conducting legitimate business meetings or as part of necessary work-related activities while traveling). Employees must attach a calendar invite showing the scheduled business meeting, along with the receipt for the lounge pass purchase, to their expense claim.

#### Non-reimbursable airfare expenses include, but are not limited to:

- Ticket upgrades that are not permitted by policy
- Baggage fees for excess baggage (generally more than one checked bag)
- Baggage insurance (except for business equipment)
- · Lost or damaged baggage (including luggage, clothing, toiletries)
- Baggage purchases
- In-flight telephone and entertainment charges
- Frequent flier miles used by employees for business travel
- Airline club memberships
- CO2 consumption

• Personal expenses

## 9.4 9.4. Ground Transportation

We prefer to use public transportation whenever possible, especially in cities with mass transit options such as trains.

If public transportation isn't available or cost effective, choose the safest and most economical way to get to your destination. This may include sharing rides with coworkers, carpooling, using your own car, public transportation, taxis, ride-sharing apps like Uber or Lyft, shuttles, or renting a car.

**Train Tickets:** Employees can book 1st class train tickets via Brex Trave. If train use is already covered by a transportation pass (such as a monthly rail pass), additional expense claims are not allowed. This policy covers rail passes, including annual or semi-annual passes such as BahnCards if required by role and approved by the manager.

**Taxi:** Taxis can be used when public transportation is not available, in an unfamiliar area where public transportation is infrequent, for personal safety, or to save time. Use local taxis, ride-hailing services like Uber or Lyft, or public transportation when you're in a city for business.

Parking Fees: Parking fees may be claimed, but we do not pay for parking fines or traffic fines.

To ensure the health and security for our employees, Camunda will not cover e-scooters or bike rentals.

## 9.5 9.5. Car Rental

Car rental, booked through Brex Travel, is an option when it's more convenient than using public transportation. The most economical car with full insurance coverage must be selected to meet business needs.

**Receipts will be created automatically in Brex.** If not, the receipt must be added separately to the payment in Brex and must contain the name and address of the Camunda entity associated with the employee must appear on the rental agreement. When driving outside the home country, employees must ensure that they are legally allowed to drive in the destination country and must follow all local rules.

If the rental car is damaged, the employee must complete the rental car accident report and notify his/her manager and the People Business Partner.

Camunda will cover expenses related to the use of a rental car for business purposes, including gas, tolls, parking and other related costs.

Short-term car rental services such as Car2Go, Miles or DriveNow are also covered.

## 9.6 9.6. Mileage

We provide reimbursement for the use of your personal vehicle when it's used for business purposes, excluding regular commuting.

Camunda will take the average of the rates specified in the table below across different countries and reimburse the higher of the statutory amount or the average amount. For the fiscal year of 2024, the average mileage rate per kilometer (km) is 0,40 EUR. If the average amount is higher, Camunda will reimburse as a separate amount via payroll, subject to taxes. This list will be reviewed annually.

The employee submits the mileage request based on the statutory rates listed in the table (e.g. within the automatically calculated Brex "Mileage" request) and the Camunda Payroll team takes care of adding the difference to your payslip, if applicable.

Country	Statutory mileage/km 2024 (EUR)
Australia	0.536
Austria	0.42
Belgium	0.4269
Canada	0.483
Croatia	0.27
Czech Republic	0.19
France	0.697
Germany	0.3
Hungary	0.079
Ireland	0.2056
Italy	0.44
Netherlands	0.23
New Zealand	0.542
Poland	0.24
Portugal	0.40
Spain	0.26
Sweden	0.223
Switzerland	0.691
UK	0.319

United States	0.387	
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## 10 10. Meals

Camunda will cover the cost of breakfast, lunch and dinner during your business trip. **For full-day business trips, the total daily limit applies.** However, if the business trip spans only part of the day, covering just one or two meals, then the respective per meal limits will apply.

#### **Expense Limits:**

### Per meal and per person:

- 20 USD/EUR/GBP/SGD for breakfast
- 40 USD/EUR/GBP/SGD for lunch
- 80 USD/EUR/GBP/SGD for dinner.

#### Total per day per person:

• 140 USD/EUR/GBP/SGD

### Per meal and per person for remote team event:

• 30 USD/EUR/GBP/SGD

These limits include tips. If not shown on the receipt, the tip and total amount that was paid must be added manually.

**Expense Details:** Please provide the following information via Brex:

- What: Breakfast, lunch, dinner or specific business reason (no vague terms like "customer service")
- When: Date of the expense
- Where: Location
- Who: Full names of all attendees, and the company (if not Camunda)

Use your 'individual travel' spend limit in Brex for **all meals**.

## 11 11. Entertainment

At Camunda, we understand the importance of fostering positive relationships and conducting business in a professional and ethical manner. As such, we allow for certain entertainment expenses that are in line with our values and guidelines.

## 11.1 11.1. Client Entertainment

All entertainment activities must follow good business ethics, ensure the safety and comfort of all participants, and enhance our company's reputation. Under no circumstances will we cover activities at adult entertainment venues like "gentlemen's clubs." Be sure to follow our Anti-Bribery and Corruption Policy.

Our policy entrusts employees to exercise sound judgment and discretion in client entertainment expenses. While we do not set a specific spending limit, we emphasize the importance of prudence and necessity in each expense. All expenditures should be reasonable, justifiable, and reflect a meaningful investment in our business relationships. Please remember that while discretion is given, the Accounting team will review each expense.

Accounting reserves the right to reject expenses that it deems unreasonable. In cases where spending appears excessive or not in line with our professional standards, the accounting team may require additional approval from a manager. We count on our team's good judgment to ensure all spending is sensible, appropriate, and aligns with our company's values and financial practices.

## **Expense Request Details**

When submitting the expense request, the following information must be included:

- Why: Specific business reason (no vague terms like "customer service")
- Where: Location of entertainment (name and address of the place)
- When: Date of entertainment
- Who: Full names of all attendees, and their company

Use the 'Entertainment and group travel' template in Brex for all client entertainment (other than meals).

## 11.2 11.2. Internal Events

You can spend on company-only employee entertainment (like offsite meetings or team events) if it's part of a legitimate department meeting for training, planning, or team building. It can also be used to celebrate business achievements, promotions, or long service. For information on Camunda's internal events, please refer to this section in the handbook: Internal Events.

When planning internal meetings, it's important to first consult the Internal Meetings (Team Building) Guidelines for guidance on budget allocations. This ensures that your event aligns with our financial framework and departmental budgets. All team events must adhere to these pre-approved budgets.

As an event organizer, you are responsible for ensuring that all expenses incurred during these events are necessary, reasonable, and align with the company's values. Proper documentation of these expenses is essential.

When traveling to attend internal events, the following travel times qualify for an overnight stay, time calculated from door to door:

- Zero nights Travel time is less than 2 hours (one direction only)
- One night Travel time is between 2 4 hours (one direction only)
- Two nights Travel time is more than 4 hours (one direction only)

# 12 12. Remote Work

## 12.1 12.1. Home Office Equipment

Camunda covers the purchase of furniture and equipment to work from home.

**Working Students:** Before purchasing equipment/furniture, please email your manager for approval and copy expenses@camunda.com.

Employees need handle its delivery, setup, claims and any returns. Each home office item can only be ordered once.

Discuss role-specific equipment with your line manager in advance and obtain their approval. Managers have to consider the nature of work, the frequency of use, and the availability of alternatives to decide the need of role-specific equipment.

## Expense Limits:

Make sure to stick to the items and amounts listed in the following table:

Item	Maximum amount in EUR/GBP/USD/SGD (including tax, shipping and other fees)
Desk, height adjustable	500 EUR/GBP/USD/SGD
Office Chair	350 EUR/GBP/USD/SGD
Up to 2 external screens	500 (in total) EUR/GBP/USD/SGD
Docking station	250 EUR/GBP/USD/SGD
Mouse	100 EUR/GBP/USD/SGD
Keyboard	200 EUR/GBP/USD/SGD
Headset	200 EUR/GBP/USD/SGD
Webcam	100 EUR/GBP/USD/SGD
Laptop bag	100 EUR/GBP/USD/SGD
Small gear (Mousepad, USB hub, adapter, cables, desk organization, etc.)	250 EUR/GBP/USD/SGD (in total)
Printer (role-specific equipment)	200 EUR/GBP/USD/SGD

Shredder (role-specific equipment)

#### 100 EUR/GBP/USD/SGD

Mobile Internet: Camunda does not cover home internet connections, including WiFi routers, repeaters or similar. For more information on mobile phone expenses, please see Mobile Phone Policy.

## 12.2 12.2. Individual Workspace Rental

Camunda covers the individual rent of a desk or a private space in a workspace provided by coworking suppliers and short-term contracts (up to one month). Camunda does not cover long-term workspace contracts as well as renting personal offices, or apartments.

#### **Expense Limits:**

• The monthly budget is 500 EUR/GBP/USD/SGD. Up to this amount, day passes or a monthly contract will be approved.

#### Additional Guidelines:

- In cases where workspace expenses exceed these limits, employees are required to submit a detailed justification along with manager approval.
- It's important to ensure transparency and adherence to company policies when requesting exceptions to these limits.

Use your 'monthly remote work' spend limit in Brex.

Space rental for team meetings, offsites or other events must be requested separately in Brex. Use the 'Entertainment and Group Travel Request' spend limit for team events and offsites, and the additional 'Remote Work' spend limit for business-related meetings.

## 12.3 12.3. Office Supplies

Office supplies needed to work from home will be covered and require a sufficient receipts.

Examples of items considered essential for day-to-day operations and personal workspace management include:

- **Stationery Items:** Pens, pencils, highlighters, markers, erasers, and notepads.
- Paper Products: Printer paper, notebooks, envelopes, index cards, and ink cartridges.
- Basic Office Equipment: Staplers, paper clips, scissors, tape dispensers, and hole punches.
- Cleaning Supplies: Screen cleaners, dusters, and desk cleaning wipes.
- Business Cards: Custom business cards for networking and professional representation.
- Small Printing Services: For the need of small prints for a customer, workshop, or other work material.

#### Use your 'monthly remote work' spend limit in Brex.

# 13 13. Learning and Development

## 13.1 13.1. Professional Growth Benefit

All Camundi can take advantage of the Professional Growth Benefit, an annual learning & development allowance for self-directed learning needs.

Use your yearly 'Yearly professional growth benefit' spend limit in Brex.

## 13.2 13.2 Department sponsored L&D

Learning & Development expenses related to specific department, division, team, functional or technical learning needs should be funded through the employee's department L&D budget.

Use the Learning & Development spend limit request template in Brex.

# 14 14. Gift Giving

In our commitment to fostering a positive work environment, gift-giving is encouraged within the framework of professionalism and appropriateness. As a manager, you have the discretion to recognize and celebrate the achievements of your team members through thoughtful gifts. The following guidelines ensure transparency, fairness, and compliance with our policies.

To ensure compliance and fulfill legal documentation requirements, an accounting review is required prior to the purchase of the gift.

To request approval, employees need to create a Gift spend limit request in Brex prior to the purchase of the gift. To ensure fast decision, please ensure to add the following information to the request:

- Recipient full name
- Company name (if internal, please indicate "Camundi")
- Relationship (customer, partner, community member, etc.)
- Purpose of the Gift

### Make sure to stick to the limits listed below and use the Gift giving spend limit request template in Brex.

## 14.1 14.1. Internal Gifting

- Only people managers are authorized to give gifts to their team members. Managers can delegate the spend limit request to someone in their team. In this case, Accounting will decide if manager approval is needed and request this via Brex.
- Gifts should be given for specific reasons, such as outstanding team achievements or the successful completion of a project.
- Cash-related gifts, including gift certificates, vouchers, tickets, etc., are strictly prohibited and will not be coveres.
- Be sure to use the Gift giving spend limit request template in Brex before making the gift.

## **Expense Limit**

- 50 EUR/USD/GBP/SGD for gifts to individual team members
- 60 EUR/USD/GBP/SGD for singular personal occasions, such as bereavements, births, or weddings

## 14.2 14.2. Gifting to Third Parties (External Gifting)

- Camunda branded SWAG (promotional items) can be sent to third parties, including customers, partners, or community members. However, SWAG cannot be sent to governmental authorities or public sector organizations
- Be sure to use the Gift giving spend limit request template in Brex before making the gift.

## **Expense Limit**

• 60 EUR/USD/GBP/SGD for gifts to third parties

# 15 15. Procedure for Handling Exceptions

In the case of exceptions, please ensure that you strictly adhere to the following process for handling exceptions to this policy, which details the documentation requirements, submission processes and responsibilities involved in reviewing and approving exceptions to ensure compliance and maintain transparency.

### **Documentation Requirements**

• All requests for exceptions must be accompanied by comprehensive documentation, including receipts, detailed descriptions, and a justification explaining the need for the exception.

### **Submission Process**

• Employees must submit exception requests through Brex, clearly identifying the request as an exception. The request must include all necessary documents and details of the business reason

### **Review and Approval**

- Exception requests are reviewed by the Accounting team.
- Decisions are communicated through Brex. In cases where an exception is denied, the reason for the denial will be clearly explained.

#### **Record Keeping**

• All approved exceptions are recorded for audit purposes. Records will include the nature of the exception, the reason given and the details of the approval.

### Responsibilities

- Employees are responsible for ensuring that all exception requests are well documented and submitted in accordance with policy guidelines.
- Managers are responsible for reviewing their team members' requests and approving valid exception requests.
- The accounting team performs the final review and approval of exceptions, ensuring that all submissions are justified and in compliance with the company's financial policies.

# 16 16. Compliance Monitoring

Compliance is the responsibility of the manager. An audit may be conducted on any individual and/or transaction at any time. A violation of this policy may be considered a violation of the Company's Code of Conduct, depending on the severity of the violation. Consequences of such violations will be pursued in accordance with the Camunda's Code of Conduct.

# 17 17. Data Privacy

All information submitted in a claim will be subject to a detailed review.

Authorized Company personnel may view detailed expense data for the purpose of managing expenses and complying with policy.

Data will be used for internal spend analysis and compliance monitoring and enforcement purposes.

DRI	@Jeannine Krüger
Approver	@Clemens Morgenroth
Relevant Readers	Company
Review Cadence	Annually

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