



A dSPACE
COMPANY

Code of Conduct.

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UAI Public

Table of Content.

Our Responsibility as a Member of Society.	3
Human Rights.	3
Protection of the Environment.	3
I. <i>Climate/Energy.</i>	4
II. <i>Health.</i>	5
III. <i>Waste & Resource Management.</i>	5
IV. <i>Noise.</i>	5
Our Responsibility as a Business Partner.	6
Compliance with Laws and Regulations.	6
Avoiding Conflicts of Interest.	6
Gifts, Hospitality and Invitations.	7
Anti-Corruption Guidelines.	8
Anti-Money Laundering.	8
Dealing with Public Authorities.	9
Accounting and Financial Reporting/Taxes/Duties.	10
Transparent and Fair Business.	10
Export Control.	11
Our Responsibility in the Workplace.	12
Equal Opportunity and Equal Treatment.	12
Fairness Pay.	12
Working Hours.	13
Occupational Safety and Health Protection.	13
Data Protection.	14
Information Security.	14
Information, Knowledge and Intellectual Property.	14
Corporate Property.	15
Right of Association and Right to Collective Bargaining.	15
Whistle Blowing.	16
Contact.	17

Our Responsibility as a Member of Society.

■ Human Rights.

We respect, protect, and promote the applicable regulations for the protection of human and children's rights worldwide. We reject any use of child, forced, and compulsory labor as well as any form of modern slavery and human trafficking. We promote and foster non-discrimination and harassment, Women's Rights and diversity, equity, and inclusion as well as rights of minorities.

This applies not only to UAI, but naturally also to the cooperation with our business partners, suppliers and sub-suppliers.

Background:

We base our regulations on the United Nations Universal Declaration of Human Rights and the European Conventions for the Protection of Human Rights and Fundamental Freedoms.

My Responsibilities:

Keep human rights at the core of your own actions. Apply the human rights standards to your coworkers, our suppliers, customers, and any other person, that we may interact with. Speak to your supervisor or to Human Resources if you are concerned that human rights are not being respected.

■ Protection of the Environment.

As part of society, we feel obliged to preserve the environment and to use natural resources as sparingly as possible. This applies to company processes and products alike. We comply with the applicable environmental legislation, standards, and other regulations. We take environmental protection into account in our daily business operations and strive to minimize environmental pollution and hazards as far as possible. Therefore, we develop and take appropriate measures for the efficient use of energy, water, and raw materials to ensure the use of renewable resources and minimization of environmental damage.

In addition, we take suitable and appropriate measures in the product life cycle, among other things, to achieve the avoidance of waste, the reuse of resources, recycling, and the safe and environmentally friendly disposal of residual waste, chemicals, and wastewater.

As Germany based company we comply with all environmental rules and regulations as set forth by the German environmental protection office ([Umweltbundesamt](#)).

Background:

We apply the UAI Environmental policy to ensure that we meet our environmental targets and objectives.

My Responsibilities:

Rethink your own actions and adopt a more environmentally friendly behavior. Use resources and energy appropriately and sparingly and ensure that your activities have the least possible negative impact on the environment and that they comply with environmental laws and regulations. You can do this, for example, by arranging video conferences instead of business trips or by saving paper and energy.

Based on our industry and main activities as an IT software services company we focus our attention on the following topics:

I. Climate/Energy.

Heating.

- UAI uses district heating (“Fernwärme”) which is 61% fed by waste heat (Abwärme) and 21% by gas (status 2022).
- Our ground floor offices (back up and conference space) are not heated in winter except when in use.
- For energy saving all radiators are turned to “x” (non-freeze) when offices are not in use or at the end of the working day by the last person leaving the office.

Electricity/Power supply.

The local power supplier provides electricity from more than 70% renewable resources.

IT hardware, lighting and air condition (summer) represent the main drivers of energy consumption.

As a rule lighting is switched off at the end of the working day in offices and corridors.

During the summer months air condition is limited to office spaces and only turned on when the office is occupied.

There is no air condition in the corridors.

Emission reduction.

In order to encourage UAI team members to use public transport or bikes for traveling to work, UAI sponsors the so-called “Deutschland-Ticket” and the lease of a business bike. See the relevant sections in HR operations.

II. **Health.**

The health and safety of our team members is of utmost importance to UAI and also defined in our UAI code of conduct.

Occupational Safety and Health Protection.

Our work areas are regularly checked for risks and optimized to avoid hazards. All employees are familiarized with the regulations applicable to their area and receive regular training on the subject of occupational safety.

UAI engages an independent third party to regularly (2x per year) check compliance with the local Labor rules and regulations.

In collaboration with our health consultant (AZK - Arbeitsmedizinische Zentrum Karlsruhe) UAI offers on-site or remote presentations and practices to improve individuals' mental or physical health, including free offer of influenza vaccinations or eye-sight tests. UAI sponsors VDU glasses if a need is identified.

UAI HR dept offers various benefit programs, e.g. EGYM wellness pass, business bike, soccer and table tennis games, etc.

III. **Waste & Resource Management.**

In compliance with the German law, UAI separate waste into paper, plastic, bio-degradable and residual waste. Separate bins are provided in the kitchen area to facilitate waste separation.

Batteries are collected in a dedicated box and transferred to a special collection area.

Glass and plastic bottles are collected after use and returned for recycling with the help of our beverage supplier.

Electronic waste is collected separately in the Office management / IT area and deposited into special containers for recycling.

IV. **Noise.**

UAI uses open-plan offices and noise can become an issue in today's hybrid and online meeting culture.

In order to provide privacy to the individual as well as noise protection for the UAI team members separate booths for use for 1-4 persons have been installed in our office space. There are 6 single use options and 2 cabins for up to 4 persons available for remote meetings.

Conference rooms for larger groups are available on both office floors.

Our Responsibility as a Business Partner.

- **Compliance with Laws and Regulations.**

We are committed to full and strict compliance with all applicable laws, policies, and regulations. This also applies to international business relations. We are therefore committed to the highest ethical standards in all business transactions.

Background:

The laws, policies, and regulations include the prohibition of fraud, embezzlement, extortion, theft, or other intentional damage to the assets of our customers or third parties. Regulations concerning the welfare of people and the environment are also covered. Violations of these policies and regulations are not tolerable, and those who violate them will face appropriate consequences, ranging from labor law measures to civil claims for damages and criminal sanctions.

My Responsibilities:

*If you are concerned about the compliance with applicable laws or regulations, voice your concerns to your supervisor, the compliance officer, or the legal department.
If you have questions about applicable laws or regulations, speak to the legal department.*

- **Avoiding Conflicts of Interest.**

We take our decisions solely based on objective criteria and do not allow ourselves to be influenced by personal interests and relationships. UAI makes a point of avoiding conflicts between private and business interests, or even the appearance of such conflicts. Conflicts of interest may arise when employees engage in activities or have interests that interfere with the interests of our company. This is, among other things, the case if those activities or interests endanger objective business decisions or otherwise interfere with the performance of work-related duties. A conflict of interest can arise, for example, when an employee or a member of their family is granted improper personal benefits because of their position within the company.

A conflict of interest can cause financial damage to the company and significantly damage the company's image.

Background:

If an employee puts their personal interest, such as that arising from secondary employment or personal relationships, above that of the company, this can be disadvantageous to UAI.

My Responsibilities:

Immediately disclose any situation that constitutes a potential conflict of interest, creates the appearance of a conflict of interest, or has the potential to affect an objective decision to your supervisor or to the compliance officer. Ask yourself whether you are making your business decision in the interests of the company and free from other interests. If you have any questions or are unclear in specific conflict situations, speak to your supervisor, the compliance officer, or the legal department.

▪ **Gifts, Hospitality and Invitations.**

The granting and acceptance of non-cash benefits (gifts, invitations, or other benefits) is permitted only if they are within the socially accepted, customary framework. The regulations for this are particularly strict when dealing with public authorities. We have drawn up an internal guideline to assist employees in behaving appropriately when being offered non-cash benefits (gifts, invitations, or other benefits).

Background:

Accepting benefits beyond a reasonable scope that violate legal or internal specifications may be punishable by law or result in consequences under employment law, since the granting or acceptance of an advantage can be classified as taking a bribe or as bribery under the applicable criminal code.

My Responsibilities:

Research the criteria for accepting non-cash benefits for yourself, family members, or other third parties. Also learn how to deal with non-cash benefits by participating in the regularly offered compliance training. Participation in such training courses is recommended and mandatory for some employees. If it is unclear whether you may accept or grant non-cash benefits, consult the compliance officer beforehand. Also be mindful of invitations that include not only you but also your family members. If you have already accepted or granted non-cash benefits, report this to the compliance officer or your supervisor.

▪ Anti-Corruption Guidelines.

We strictly reject any form of corruption, including extortion and bribery. Corruption not only harms us, but also the countries in which we work. The same applies to granting, offering, requesting, promising, authorizing, or accepting any benefits outside the legally permissible scope, directly or indirectly, by any director, officer or other employee, agent or representative, regardless of whether it is for the benefit of the company, a third party, or the responsible person themselves. Compliance with, for example, the United Nations Global Compact and the legally applicable anti-corruption laws in all our business activities is essential for our fight against corruption. To ensure the integrity and accuracy of the recording and reporting of all business transactions, we have designed our record-keeping and internal accounting practices and procedures accordingly.

Background:

We see our company's products and services as the key to our success. For us, fair competition is imperative.

My Responsibilities:

Observe our internal anti-corruption processes and avoid contact with any form of potentially corrupt activity. Corrupt actions are illegal and sanctioned by imprisonment or fine according to the applicable Criminal Code. Ask yourself whether your business decision is legal and ethically correct, and whether it would stand up to third-party validation. If you have any questions or if you suspect corrupt acts in your environment, speak to your supervisor, the compliance officer or the legal department and ask for advice.

▪ Anti-Money Laundering.

We do not accept transactions with criminally acquired money that is to be brought into the regular economic cycle. It is also strictly prohibited to support any criminal activity, including terrorism, with legitimate funds/money.

Background:

Money laundering and terrorist financing is a criminal offense. Even acting carelessly and ignoring concrete indications can count as a criminal offense.

My Responsibilities:

All employees must observe the applicable laws and regulations on combating money laundering and terrorist financing. You must not knowingly engage in dealings with criminals or criminal suspects. If assets of criminal origin are concealed through legitimate business or if terrorism and other criminal activities are financially supported, you must inform your supervisor or the compliance officer. Indications of such criminal acts are exceptionally high cash payments, incoming payments from third parties who are not identifiably involved in the business relationship, incoming payments from tax havens, incomplete and incorrect contact information.

■ Dealing with Public Authorities.

In our contacts with public officials and mandate holders, we strictly comply with the law to avoid conflicts of interest and corruption.

Background:

Special legal conditions often apply when dealing with public officials or elected representatives as well as governments, authorities, and other public institutions, whereby even individual violations can have serious consequences.

My Responsibilities:

Remember the appropriate demeanour when dealing with public authorities. If you have any questions or if you suspect unlawful behavior in your environment, speak to your supervisor, the compliance officer, or the legal department.

Accounting and Financial Reporting/Taxes/Duties.

We strictly comply with the legal framework for proper accounting and financial reporting. Transparency and correctness are our top priorities. Therefore, all business transactions in our accounting and reporting must be recorded in a timely, correct, and complete manner in accordance with applicable accounting standards. All relevant documents must be stored in a revision-proof manner in accordance with the applicable laws and regulations. The veracity and accuracy of records are essential to business decisions.

Background:

Through proper accounting and correct financial reporting, UAI avoids damaging effects on the company. If irregularities occur, this may have serious consequences for the company and also for the persons responsible.

My Responsibilities:

Carry out your tasks with care and check your records for errors to be able to make significant incorrect assessments transparent in a timely manner.

▪ **Transparent and Fair Business.**

Restricting free competition on the basis of collusion, convenience, or taking advantage weakens competitiveness, inevitably leads to a loss of quality and, in the case of legal violations, to personal consequences.

Background:

Special legal conditions often apply when dealing with public officials or elected representatives as well as governments, authorities, and other public institutions, whereby even individual violations can have serious consequences.

My Responsibilities:

Clearly distance yourself from anti-competitive situations, as passive behavior - such as tolerating illegal price fixing - can already constitute a violation of competition law. Do not share sensitive information such as prices with competitors. Inform your supervisor, the compliance officer, or the legal department if there is or if you suspect anti-competitive actions. They will then support you in the further procedure. Regularly take part in the internally prescribed compliance training courses and speak to your supervisor, the compliance officer, or the legal department if you have any questions.

▪ **Export Control.**

We ensure compliance with all regulations governing the import and export of goods, services, and information. We avoid doing business with individuals, companies, and countries on sanctions lists.

Background:

Economic cross-border transactions are subject to prohibitions, restrictions, authorization reservations or other monitoring measures within the framework of export control. Goods, services, and information are affected by export control legislation.

My Responsibilities:

Comply with the applicable legal and company internal export regulations. If you have any questions, contact your supervisor, the export control officer, or the legal department.

Our Responsibility in the Workplace.

▪ Equal Opportunity and Equal Treatment.

When selecting new employees, we consider only their qualifications and skills. We ensure equality of opportunity throughout the hiring process and the entire period of employment. We stand for diversity and inclusion. We encourage and value all employees for their individual contribution to our company. Any kind of personal harassment such as bullying, sexual harassment, or indecent offers are strictly prohibited. Action will be taken against any form of violence, intimidation, or threats in the workplace. We treat our customers and suppliers as we treat one another, with respect. We respect diversity in each other and all others with whom we interact.

Background:

We do not tolerate any form of discrimination on the basis of ethnic or national affiliation, gender, religion, ideology, age, disability, sexual orientation, skin color, political views, social origin, or any other legally protected characteristics.

My Responsibilities:

Every employee is obliged to contribute to the achievement of these values in the company. Say goodbye to prejudice and approach your colleagues with an open mind and respect. Talk to your supervisor or to Human Resources if you suspect discrimination or disadvantage towards you or others. Also, think about your own actions. After all, even jokes that aren't meant to be taken seriously can be hurtful and inappropriate. Also never discriminate or harass a customer. Together, we create a respectful and open-minded working atmosphere so that every employee feels comfortable and valued.

▪ Fairness Pay.

UAI pays its employees an appropriate wage, which at least covers the employees' basic needs and enables them to have an adequate standard of living. UAI complies with all relevant laws on remuneration, including laws on minimum wage, overtime, and statutory social security benefits. Deductions from remuneration as a disciplinary measure are not permitted. Workers receive a timely and transparent payroll for each pay period. The use of temporary labour, the secondment of workers, and the outsourcing of work is carried out in compliance with local statutory regulations.

Background:

We do not tolerate any violation of the minimum wages existing under applicable law. Every employee has the right to receive a fair wage that secures their existence.

▪ **Working Hours.**

dSPACE complies with the statutory requirements and/or national requirements applicable to the company in the business sector.

Background:

We do not tolerate any violation against existing (legal) regulations concerning working hours.

My Responsibilities:

Every employee is obliged to adhere to applicable regulations on working hours. This serves your own health and ensures that you have sufficient rest periods. Also respect the rest periods of your colleagues. For example, appointments should be scheduled so that colleagues can take a lunch break. If you have any questions regarding working hours, please contact Human Resources or the legal department.

▪ **Occupational Safety and Health Protection.**

Our work areas are regularly checked for risks and optimized to avoid hazards. All employees are familiarized with the regulations applicable to their area and receive regular training on the subject of occupational safety. Personal Protective Equipment (PPE) is provided by UAI.

Background:

We guarantee a safe and hygienic work environment in compliance with the established international and national standards.

My Responsibilities:

Read and understand the internal and legal regulations on occupational health and safety and take part in regular training. Comply with these regulations and contact the internally appointed officers if you have any uncertainties or questions. Also contact these officers or your supervisor if you notice violations of the relevant regulations. As a supervisor, it is your special duty to ensure the sustained promotion of the physical and mental well-being of your employees. Make sure that your employees participate in safety and health training.

▪ Data Protection.

We collect, gather, process, use, and store personal data only in accordance with the legal requirements.

Background:

The legal basis for the processing of personal data is the General Data Protection Regulation (DS-GVO) of the European Union.

My Responsibilities:

Collect, store, and process personal data with extreme caution. The internal and external transfer of personal data may take place only with legal permission. If you have any questions or are unsure, please contact the information security officer, the data protection officer, or the legal department.

▪ Information Security.

The UAI GmbH regulations for handling information and IT devices are defined in the corresponding information security guidelines. Our employees are regularly trained according to the applicable guidelines.

Background:

These guidelines are intended to protect confidentiality, integrity, availability, and proof of information as well as to safeguard the rights and interests of UAI and all natural and legal entities that have a business relationship with UAI or work for the company.

My Responsibilities:

Read the information security guidelines carefully and speak to your supervisor or the information security officer if you have any questions. Confidential information must be stored securely and must not be left out where others can see. Adhere strictly to the need-to-know principle and do not talk about confidential information where other people can overhear.

▪ Information, Knowledge and Intellectual Property.

We are aware of the value of proprietary know-how and protect it very carefully. We acknowledge the intellectual property of competitors, business partners, and other third parties.

Background:

Unauthorized disclosure of such knowledge can cause significant damage to the company and may result in employment, civil, and criminal consequences for the employee involved.

My Responsibilities:

Observe and comply with the internal information security guidelines. Always be handle information sensibly and observe internal labels of confidentiality levels. Great caution is also required against Internet scammers. Be sceptical of e-mails from unknown senders or if there is an unusual number of spelling and grammatical mistakes in the text or the e-mail address. Compliance trainings are also offered for this purpose. If you suspect a violation or are involved in a suspicious incident (uncertainty about the credibility of e-mails or transaction instructions), speak to your supervisor, the compliance officer, or the information security officer.

▪ **Corporate Property.**

Facilities, systems, materials and other equipment owned and held by UAI or a third party must be treated with care and appropriately in order to avoid loss or damage.

Background:

Our corporate property is used to achieve our corporate goals and could be used contrary to corporate regulations.

My Responsibilities:

I comply with company regulations and handle corporate property with care and ensure that my colleagues do the same.

▪ **Right of Association and Right to Collective Bargaining.**

We recognize the fundamental right of every employee to join employee organizations and form employee representation.

Background:

Long-term, economic, and technological competitiveness can be ensured only in cooperation with the employees.

My Responsibilities:

Speak to your supervisor or to Human Resources if you feel that the right of association and/or the right to collective bargaining without threat or intimidation is being violated.

▪ **Whistle Blowing.**

UAI does not tolerate harassment retaliation, intimidation, or victimization against whistle blowers. In addition, the law in some countries provides special protection for people who raise concerns.

My Responsibilities:

Consider your own actions and adjust them if necessary. Talk to your supervisor or the compliance officer if you become aware that a whistleblower is in any way being discriminated. As a supervisor, you are not allowed to sanction whistleblowers for serious concerns, and you must also prevent discrimination by your employees. Create a work environment that is safe for all employees to voice their concerns.

Contact.

If you have any questions about the Code of Conduct, or if you become aware of a possible violation of the Code of Conduct or a serious breach of the rules, contact the UAI Compliance Manager at compliance@understand.ai

UAI offers you a whistleblower hotline for anonymous tips. If you choose to provide your name, the compliance team can contact you regarding further information or with an update about the resolution.

- UAI Whistleblower system.

values.dspace.com

(leads to dSPACE Whistleblower System)

- UAI Compliance.

www.understand.ai/compliance

