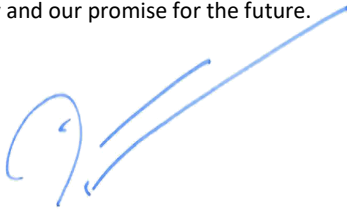


# Code of Conduct

**INTEGRITY. QUALITY. TRANSPARENCY. OPEN INNOVATION.**

**SUSTAINABILITY.**

**Message from the Managing Director** | While we conduct our business within the framework of applicable laws and regulations, for us, compliance with the law is not enough. We strive for more than that. Through our Code of Conduct, we envision a work environment all can take pride in, a company others respect and admire and a world made better by our actions. Together, we are laying the foundation for the values-based culture that will carry us forward to even higher levels of success. Together, we are upholding the reputation of one of the world's leading open source data science companies – and strengthening it for tomorrow. This Code of Conduct applies to the daily activities of employees of Open Analytics and members of its Board of Directors. It does not restrict our individuality or give specific instructions for every situation, but it serves as a daily reminder of the standards that are expected of me, of you, of every one at Open Analytics. Each of us has a personal responsibility to read the Code of Conduct, understand what it means and apply it consistently. Those in our company who lead others hold a special position of responsibility to set the example of what it means to “live by the Code.” The Code celebrates our diverse cultures, talents and experiences and unites us into a stronger, more innovative and cohesive team and forms the foundation of our proud legacy and our promise for the future.



Tobias Verbeke, Managing Director

**Reporting rights and obligations** | If you become aware of a circumstance or action that violates, or appears to violate, the Code of Conduct, company policy or applicable law, contact your supervisor or management as soon as possible. You have a further personal right and responsibility to report any circumstance or action that violates, or appears to violate, the Code of Conduct, company policy or applicable law. You must use these reporting rights responsibly and must report issues only where you reasonably believe there has been a violation, and not where the report is intended to be harassing, is based on personal opinion only or is otherwise trivial. You can raise a question or concern or make such a report to your supervisor, to management, to the human resources or to the legal department. Violations of this Code of Conduct will be addressed promptly and effectively. In conjunction with the company's HR guidance and local laws, violations may result in disciplinary action up to and including employment separation. Open Analytics will not take any action against you as a result of raising an ethical issue in good faith. Also, Open Analytics does not tolerate any reprisal by any individual against an employee for raising a concern or making a report in good faith.

**Our vision** | Open source the world one step at a time and supported by data science. | **Our mission** | Open Analytics supports its customers in all aspects of data science and at all levels of complexity. It is our aim to bring unique expertise and experience to answer meaningful research questions based on evidence and in a data-driven way. Our methodologies are inspired by the latest academic research and we use cutting edge technology and industry best practices to develop tailor-made solutions that address our customers' needs. We exclusively use open source technology to address data science challenges and collaborate with our customers on projects that contribute to sustainable development. | **Our core values** | **INTEGRITY** | honesty and equity in relations with stakeholders, accurate and independent advice, critical reasoning and unbiased interpretation | **QUALITY** | scientific excellence in methodology and reporting, software engineering craftsmanship in algorithms and infrastructure, highest standards in code quality and user experience design | **TRANSPARENCY** | reproducibility of results and full access to source code of deliverables, open sharing and knowledge transfer to customers | **OPEN INNOVATION** | push the boundaries of knowledge and technology, monitor the latest academic developments and technologies and adapt to the changing needs of our customers, exclusive usage of open source technology when building solutions, release products publicly under an open source license.

**Our responsibilities towards stakeholders and the environment** | Open Analytics hereby declares:

- **legal compliance** | to comply with the laws and regulations of the applicable legal systems;
- **human rights and labour practices** | to ensure respect of all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations, heightened attention shall be paid to ensuring respect of human rights of specifically vulnerable rights holders or groups of rights holders such as women, children or migrant workers, or of (indigenous) communities | **prohibition of forced labour** | to neither use nor contribute to slavery, servitude, forced or compulsory labour and human trafficking; | **prohibition of child labour** | to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14, to employ no workers under the age of 18 for hazardous work according to ILO Convention 182; | **non-discrimination and respect for employees** | to promote equal opportunities and treatment of employees, irrespective of skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age and to refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative; | **working hours, wages & benefits for employees** | to recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining; to neither disadvantage nor prefer members of employee organisations or trade unions; to adhere to all applicable working-hours regulations globally; to pay fair wages for labour and adhere to all applicable wage and compensation laws globally; in the event of cross-border personnel deployment, to adhere to all applicable legal requirements, especially with regard to minimum wages; | **health & safety of employees** | to act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions; to provide training to ensure employees are educated in health & safety issues; to establish a reasonable occupational health & safety management system; | **grievance mechanism** | to provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct;
- **environmental protection** | to act in accordance with the applicable statutory and international standards regarding the environment; to minimise environmental pollution and make continuous improvements in environmental protection; to establish a reasonable environmental management system;
- **fair operating practices | anti-corruption and bribery** | to tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage, including to renounce from giving or accepting improper facilitation payments; | **fair competition, anti-trust laws and intellectual property rights** | to act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors, and to respect the intellectual property rights of others; | **conflicts of interest** | to avoid and/or disclose internally and to Open Analytics all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof; | **anti-money laundering, terrorism financing** | to not directly or indirectly facilitate money laundering or terrorism financing; | **data privacy** | to process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes; | **export control and customs** | to comply with the applicable export control and customs regulations;
- **responsible minerals sourcing** | to take reasonable efforts to avoid in its products the use of raw materials which originate from conflict-affected and high-risk areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects;
- **supply chain** | to use reasonable efforts to make its suppliers comply with the principles of this Code of Conduct and to comply with the principles of non-discrimination with regard to supplier selection and treatment.