



The Exasol Code of Conduct

Leadership Commitment

Exasol's mission is to unlock better insights faster, more efficiently.

We strive to be a leading company helping customers on their analytics journey into an AI-driven world.

But we can't live up to our mission and vision without being a company that does its business responsibly and ethically with regards to our customers, our employees and third parties.

This is why we, as the Executive Board, have committed to a set of Values that embodies the best of this company and the people that make it successful. We live by these every day. We do it the Exasol way. This Code of Conduct shows our Values and illustrates what the Values mean in the context of integrity, good judgement, and decisions in our professional routines. It sets standards by which each of us commits to behave.

Ethical behavior is an individual responsibility. Behavior reflecting our Values, high ethical standards, and compliance with applicable laws is expected by each of us, regardless of position or location. That is our commitment to operating with integrity.

Please take your time to read, understand and comply with this document which outlines our commitments in this regard. It applies to all employees, no matter which Exasol entity you belong to, and us, the members of the Executive Board.

Let's take these commitments into our work each day and be proud of what we represent.

Joerg Tewes
Chief Executive Officer



Mathias Golombek
Chief Technology Officer



Jan-Dirk Henrich
Chief Financial Officer



Our Values

Our aspiration is to create a company culture that reflects the six values we care about most. We translated each value into actionable behaviors that we can teach, reinforce, measure, recognize, and engrain in our culture, as we grow. Here's what we're committing to.



Live Customer Centricity

We embody this value by dedication to understanding our internal and external customers deeply, anticipating their requirements, and continuously striving to exceed their expectations. We foster a culture where the customer's voice is heard and integrated into decision-making processes, ensuring that all actions align with delivering exceptional value to our customers.

What this looks like in practice:

As a people manager do you...

As an individual contributor do you...

- Know your customer's needs and wants?
- Anticipate your customer's needs?
- Honestly pursue customer feedback, not just solicit for compliments?
- "WOW" your customers?
- Know what would be better than what your customer is even imagining?
- Ask, "Is what I'm working on helping my customer?"
- Remove non-value steps?



Build Trust

We engage in active listening, communicate honestly, and demonstrate respect for each other. We evaluate ourselves honestly, even when it involves discomfort or embarrassment. We set high standards and continuously strive to maintain them. We recognize each other's contributions and give merit when due.

What this looks like in practice:

As a people manager do you...

- Earn the trust and respect of the team/stakeholders/customer and build positive working relationships by consistently making reasonable decisions, keeping commitments, treating others and their ideas with respect, and adhering to high ethical standards?
- provide an environment where team members have room to take smart risks and learn from mistakes while not losing sight of their accountability for results?
- Listen, communicate and delegate to help employees get the right things done?
- Promote transparency and proactively share information?

As an individual contributor do you...

- Earn the trust and respect of the team/stakeholders/customer and build positive working relationships by consistently making reasonable decisions, keeping commitments, treating others and their ideas with respect, and adhering to high ethical standards?
- Do what you say you will do or appropriately reset expectations?
- Honor commitments made to other teams/stakeholders/customers even if your own goals are in jeopardy?



Deliver Results

We believe in setting clear objectives, executing with precision, and consistently producing meaningful results. This value reflects our dedication to not only meeting but exceeding expectations by aiming high to raise standards through effective planning, excellence in execution, and documentation to ensure sustainability.

What this looks like in practice:

As a people manager do you...

- Continuously reinforce to yourself and to the team who the customer is, to execute and deliver the right results?
- Set and communicate smart team goals, expectations, and priorities; help employees stay focused, yet flexible to changing targets or when projects aren't progressing to get things done?
- Help others remove barriers/roadblocks towards meeting team goals?
- Recognize and celebrate successes, while keeping the team focused on delivering the right results?
- Raise the quality by demanding that your team delivers high quality products, services, and solutions?
- Teach and coach employees about setting their own high standards and exceeding customer expectations?
- Provide feedback to employees when work is of high quality and coach to continuously improve work?

As an individual contributor do you...

- Continuously reinforce to yourself and the team who the customer is, to execute and deliver the right results?
- Focus on the most important tasks, while adapting as needed to achieve results?
- Persevere through setbacks and overcome obstacles to deliver outstanding results?
- Continuously self-critique your work to make sure the quality is the best it can be?
- Accept and seek out coaching and feedback from your manager and others about improving the quality of your work?



Take Ownership

We exhibit ownership mentality, prioritizing long-term objectives over short-term gains. We act in the best interests of the entire organization, transcending our own team's boundaries. We are responsible, take initiative, accept new challenges and are resourceful in all aspects of our work. Be a "mini-CEO" of your desk and beyond.

What this looks like in practice:

As a people manager do you...

- Create a vision for your team that aligns with the customer experience?
- Foster an environment of autonomy where employees prioritize and make decisions?
- Think about the impact of your decisions on other teams, sites, and the customer over time?
- Coach and mentor your team to understand the big picture, how their role supports the overall objectives of Exasol, and how it ties to others?

As an individual contributor do you...

- Ask questions?
- Consider future outcomes (scalable, long-term value, etc.)?
- Give feedback – coach and develop others (peers, associates, manager)?
- Speak up in meetings – question, challenge respectfully?
- Understand your role and relationship with other roles?
- Understand the impact of your work on others?
- Partner with peers across the network?



Love to grow

We cultivate a mindset of continuous personal and business growth. We strive to be perpetual learners, dedicated to self-improvement and embracing a growth mindset. We stay curious about uncharted opportunities and take proactive steps to explore them.

What this looks like in practice:

As a people manager do you...

- Give your team members time to explore and learn?
- Encourage your team members to take risks and support them in doing so?
- Focus on how you arrived at the results rather than the results themselves?
- Encourage rotations to provide new opportunities for your team members to learn new skills?

As an individual contributor do you...

- Take time to read, watch a tech talk, or actively mentor someone else?
- Ask your peers, manager, and customers for feedback on your performance?
- Pick up work outside your area of expertise to stretch and grow?
- Take time to understand your systems end to end?
- Actively seek out advice from others?



Embrace Diversity

We embrace and celebrate the unique backgrounds and perspectives of every individual. We strive to create an environment where all voices are valued, and barriers are broken. We commit to fostering equality, recognizing biases, and embracing the power of differences as a crucial source of success and value. Together, we build a culture where everyone can thrive, embracing who they are, bound only by a common commitment to our company values and goals.

What this looks like in practice:

As a people manager do you...

- Ensure that differences in perspectives and feelings on a given topic or problem are heard, reflected upon and included in the decision-making process?
- Act with fairness and transparency in decisions related to hiring, promotions, and performance evaluation, considering the unique challenges individuals may face?
- Actively look for opportunities to increase diversity in your team(s) and the leadership positions you are responsible for hiring and managing?
- Try to identify hidden or obvious biases in your team members' way of leading discussions and making decisions?

As an individual contributor do you...

- Recognize and mitigate unconscious bias in your own behaviour?
- Try to perceive other people's contributions on the background of THEIR culture and values and not your own?
- Treat others with respect and empathy recognizing and building on the unique contributions that each person brings to the table?
- Connect and Collaborate with the full breadth of peers across the network and not only those with close cultural affinity?
- Consider Multiple Pathways to Success?

Compliance commitments

The following commitments reflect and further specify our Values regarding ethical business conduct. They will underpin our approach to compliance and risk management and ensure that we leave no stone unturned to meet these requirements. The following commitments are what we expect all Exasol employees to stay true to throughout our daily work.

The Code of Conduct is based on international standards protecting human rights and fundamental freedoms, which are seen as fundamental commitments by organizations worldwide and central to our own values. Those standards are:

- **UN Global Compact**
- **UN Universal Declaration of Human Rights**
- **European Convention on Human Rights and Fundamental Freedoms**
- **International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work**
- **Rio Declaration on Environment and Development**
- **United Nations Convention against Corruption**

01 Committing to laws

We are committed to conduct our business in full compliance with all applicable laws and regulations and to achieve a high standard of corporate and social responsibility. Each of us is responsible for being familiar with this Code of Conduct and for seeking guidance when we need advice regarding either the principles of this Code, Exasol policies and the laws that should be followed or the conduct that is acceptable.



02 Committing to our people

We believe that we should all enjoy equal opportunities and equal rights. When it comes to decisions in recruitment, promotion or training, we understand what counts is competence, experience and performance. We know that successful teams are diverse teams. We respect and value the differences between each other. We never tolerate any kind of discrimination, bullying or harassment, be it based on gender, age, disability, ethnic origin, religion, sexual orientation or ethnic or social origin.

We provide a professional environment that follows applicable labor laws and also promotes physical and social well-being. Our facilities comply with applicable safety regulations. We respect the rights of all employees under guidance of applicable international standards (such as the UN Global Compact and the ILO Declaration). This includes the freedom of association and the right to collective bargaining.

03 Committing to our environment and the society

We are conscious of the responsibility we share for present and future generations and see sustainable business operations as a prerequisite for long-term success. It is our responsibility to incorporate sustainability criteria into our daily business and base our business model on sustainable growth that is aligned with the interests of all our stakeholders. By doing this we are focused on creating long-term value and weigh our actions in terms of their impact on the environment, the health and safety of our communities and the public.

04 Committing to our assets

We respect that all our assets must be safeguarded. Assets include not only our equipment (like desktops, laptops, phones, software etc.), but also our intellectual property, strategy, business knowledge and data. Everyone is responsible for protecting and using them correctly.

We agree to use Exasol's assets for legitimate and authorized business purposes only.

We respect confidential information and data, that we might have access to during our work, as something that needs to be protected and treated lawfully. We agree that this also applies if we leave Exasol.

Our accounting and financial records are also part of our main assets. Therefore, we commit to keep them accurate, reliable, complete and timely and always follow all applicable laws, regulations and standards for financial book building and record keeping.



05 Committing to the right way

We believe that there is never a wrong time to do the right thing and so we behave ethically towards everyone.

We do not tolerate any form of bribery, corruption or inducement to act improperly. More details can be found in our **ExaPol15 Anti-Corruption Policy**.

We also avoid and eliminate conflicts of interest following the set out rules and definitions and are aware of our internal guidelines with regards to gifts and benefits (**ExaGdl01 Anti-Corruption Guideline/Handling of gifts, benefits and conflicts of interest**).

In competition, we present ourselves vigorously but always fairly. We follow all applicable competition and antitrust laws. In addition, we will not condone, facilitate, or support money laundering and we respect global trade controls and sanctions.

Wherever we, as employees of Exasol, are in the world, we always behave as ambassadors for Exasol and we respect local culture and laws at all times.

As a serious business partner, Exasol acts with integrity in all situations and expects its customers, supplier and other partners, to comply with the law and ethical business principles in the same way, please see our **Code of Conduct for Suppliers and Business Partners**.

06 Committing to data privacy, confidentiality and information security

We respect and protect personal data (either entrusted to us by clients or partners or the data about our employees) and we comply with all data protection laws. Our **Data Protection Manual** provides an overview and guidance on data protection requirements and documents our internal processes.

If we have information about Exasol (or a customer, partner or supplier) which is not available outside the company, we do not share this information or conduct any transactions based on this information.

This also applies with regards to insider information as defined in the capital market regulations. We therefore follow our **ExaPol19 Insider Trading / Ad-hoc Announcements Policy**.

We uphold an adequate standard of information security behavior and culture to ensure the confidentiality, integrity and availability, verifiability and traceability of data and information that needs to be protected. We take up responsibility and actively support the corresponding processes according to our roles and live up to the standards laid out in **corporate policies on Information Security**.



07 Committing to openness

At Exasol we promote a culture of openness, accountability and responsibility. We want everyone to be able to raise concerns. If you believe that a violation of this Code of Conduct, other Exasol policies or applicable law has taken place or will take place, please tell us immediately. Here at Exasol, we can raise any concern without worrying about a negative reaction. All concerns will be taken seriously.

How can you raise concerns?

- Through the usual reporting lines as appropriate
- Via an e-mail to compliance@exasol.com
- To the Compliance Responsible (see under **Compliance – Legal, Section 3**) directly.
- Through our Whistleblowing Procedure, which includes an independent and confidential reporting system.

Please be assured, that the Executive Board clearly committed to ensure that there will be no retaliation measures against anybody that is raising concerns as pointed out in the **Whistleblowing Procedure**.

You can find further information about our whole Compliance Management System at **Compliance - Legal**.

Let's commit and never hesitate to seek guidance!

This Code of Conduct shall be our compass in our daily situations. If you need a version in another language than English or if you have any questions or have a need for guidance, please refer to compliance@exasol.com.