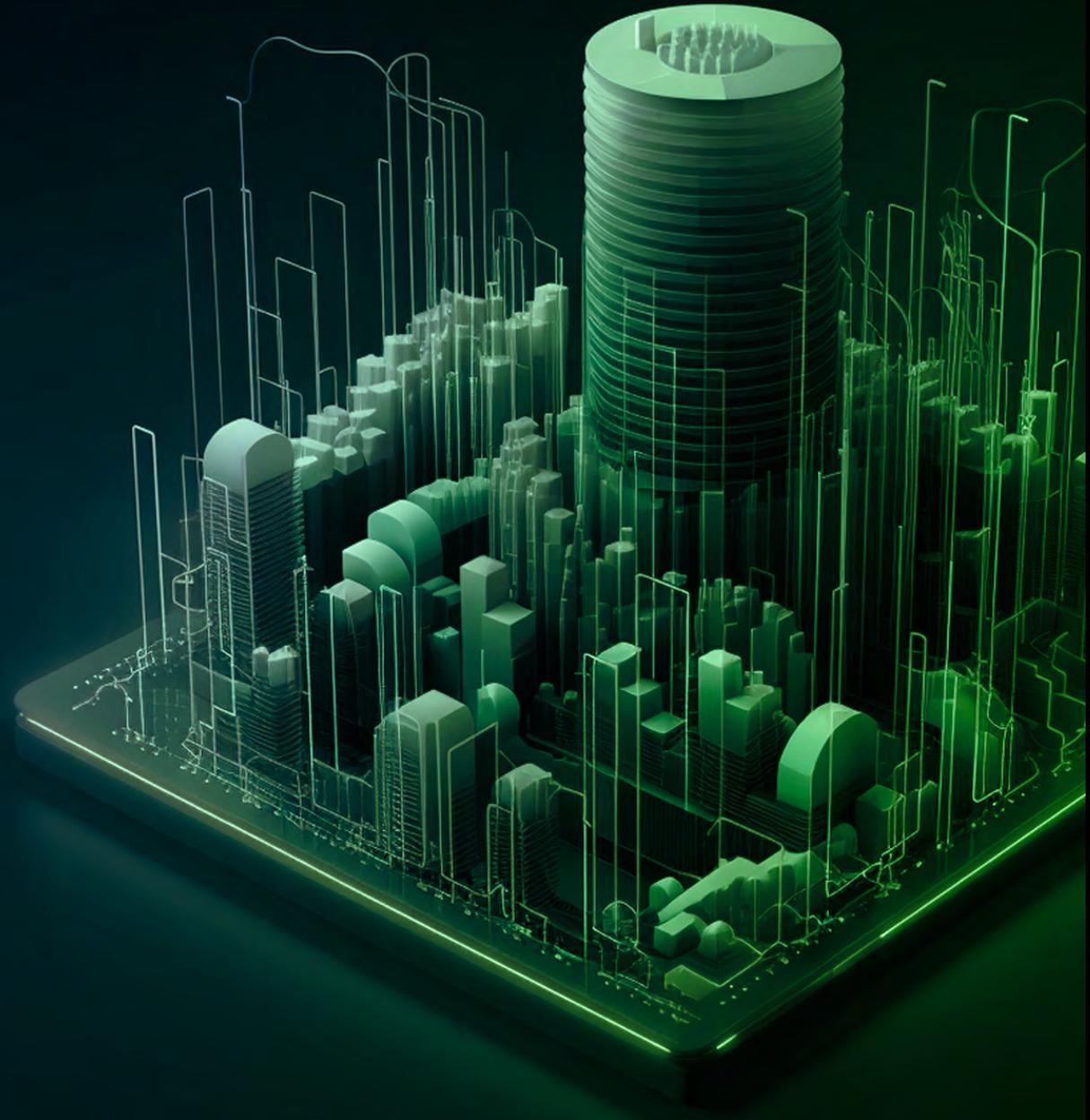




CODE OF CONDUCT

for Suppliers and Business Partners



EXASOL GROUP

Consisting of

Exasol AG

Exasol Europa Vertriebs GmbH

Exasol France SAS

Exasol UK Ltd.

Exasol Schweiz AG

Exasol Inc.

Code of Conduct for Suppliers and Business Partners of Exasol Group

Introduction

At Exasol we strive to be the **analytics platform trusted by the world's most ambitious organizations**. But we can't fulfil our vision without acting with and being committed to integrity and social responsibility. This includes, of course, acting in compliance with the applicable laws and regulations everywhere and anytime, but also goes beyond that.

Exasol expects all suppliers and business partners, i.e. consultants, contractors, sales and technology partners etc., (together with suppliers "**Business Partners**") to have, or to make, a similar commitment. This Code of Conduct for Suppliers and Business Partners ("**Code**") outlines Exasol's expectations for how its Business Partners conduct business. Business Partners are required (1) to act in compliance with this Code and applicable laws and regulations and (2) to impose substantially similar obligations to those set forth herein on their own Business Partners.

This Code is based on the rules and regulations defined in the

- [UN Global Compact](#)
- [UN Declaration of Human Rights](#)
- [Fundamental ILO Conventions](#)

These are seen as fundamental commitments by organizations worldwide and central to our own values. In addition, this Code takes into account the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (*Lieferkettensorgfaltspflichtengesetz, LkSG*). The following pages explain in detail what this entails.



1. Ethics and Integrity

Exasol is committed to upholding the highest ethical standards and complying with all applicable laws, rules, and regulations. Exasol requires Business Partners to do the same, and at a minimum, to adhere to the following:

Anti-Bribery and Anti-Corruption

Business Partners must fully comply with all applicable anti-bribery and anti-corruption laws including but not limited to relevant acts such as the U.S. Foreign Corrupt Practices Act or the UK Bribery Act.

Gifts and Entertainment

Business Partners must not offer or accept any gift or anything else of value to obtain improper advantages or influence for the Business Partner, for Exasol (including Exasol employees and/or their family members and associates), or for any third party. Gifts include but are not limited to benefits, fees, commissions, dividends, cash, gratuities, services, or any inducements.

Non-Retaliation for Reports of Concern

Exasol expects Business Partners to have a policy and process in place for reporting of workplace concerns. The policy and process should be transparent and understandable and must provide protection from retaliation, for both reporters and for those participating in any related investigations.

Trade and Sanctions

Business Partners must comply with all applicable trade and sanctions laws and regulations.

2. Data Privacy and Security

Exasol requires its Business Partners to protect the privacy of individuals, including but not limited to employees, customers, other trade partners, and the security of confidential assets and information.

Confidential Assets and Information

Business Partners must protect Exasol's and its clients' confidential assets and information. Business Partners must design and maintain processes to provide appropriate protections for this information.

Personal Information and Privacy

Exasol requires Business Partners to protect personal information in compliance with all applicable laws and regulations. Personal information provided by or on behalf of Exasol must only be used, accessed, and disclosed as permitted by the Business Partner agreement and in compliance with all applicable laws and regulations.

3. Inclusion and Diversity

Exasol fosters an inclusive culture and believes that diversity should be celebrated, and discrimination of any form should not be tolerated.

Non-Discrimination and Workplace Diversity

Business Partners must comply with all applicable laws and regulations relating to discrimination in hiring, employment practices, and harassment and retaliation.

Business Partners must operate workplaces free of unequal treatment in employment, discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, health status, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religion or beliefs, or union affiliation. Unequal treatment includes the payment of unequal remuneration for work of equal value.

Diversity in Supply Chain

Exasol's long-standing commitment to advancing diversity and inclusion includes actively promoting relationships with diverse and under-represented businesses in Exasol's strategic sourcing and procurement processes. Exasol searches for Business Partners that similarly value diversity in Business Partners' own supply chain and that support Exasol's goals with respect to supplier and business partner diversity. Exasol expects Business Partners to: (i) utilize search and assessment processes that are both unbiased and transparent, (ii) ensure that Business Partners' procurement teams proactively provide diverse businesses with fair access to bids, and (iii) where practicable, actively seek out and provide opportunities for diverse suppliers to participate in business opportunities.

4. Employment, Working Conditions, and Human Rights

As a participant in the United Nations Global Compact, Exasol supports the Ten Principles on human rights, labor, environment, and anti-corruption; the Universal Declaration of Human Rights; the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work; and the UN Guiding Principles on Business and Human Rights. Exasol strives to adhere to the principles set forth in these standards and expects its Business Partners to do the same.

Modern Slavery / Human Trafficking

Exasol does not tolerate slavery, forced labor, or human trafficking in any form at any stage of its supply chain. Business Partners must similarly prohibit all forms of forced labor, child labor, and human trafficking. Exasol requires Business Partners to fully comply with the applicable legal requirements of human rights, slavery, forced labor and human trafficking laws and regulations, as well as requirements related to supply chain due diligence, such as those outlined in the German Act on Corporate Due Diligence Obligations in Supply Chains. Exasol requires Business Partners to enact practices to ensure compliance with such relevant laws and regulations.

Child Labor

Exasol does not tolerate child labor in any form at any stage of its supply chain. The term "child," unless otherwise specified by applicable laws regarding minimum working age, refers to any person employed below the age of 15 or below the age for completing compulsory education. Workers under the age of 18 should also not be engaged to perform hazardous work.

Human Rights

Exasol is committed to respecting human rights in Exasol's internal operations and requires the same from Business Partners. Exasol does not tolerate human rights violations in any form at any stage of its supply chain. Exasol requires Business Partners to enact practices to maintain a respectful and safe workplace. Exasol requires Business Partners to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying, or harassment of any kind.

Freedom of Association

Exasol requires Business Partners to respect workers' rights with respect to freedom of association, including the right to form or join labor or trade unions or to join workers' councils in accordance with local laws. Workers must be free to engage in these activities without retaliation, harassment, or intimidation.

Employment Laws

Business Partners must comply with all applicable wage and labor laws and regulations. Exasol requires Business Partners to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch, and outsourced labor shall be in accordance with all applicable laws and regulations.

Hiring or Use of Private or Public Security Forces

Business Partners that hire or use private or public security forces for protection must provide sufficient instruction and oversight to avoid torture, cruel, inhumane, or degrading treatment, damages to life or limb of individuals, and the impairment of workers' freedom of association.

5. Wellbeing, Health, and Safety

Exasol expects Business Partners to implement sound health and safety practices across business operations.

Health and Safety

Business Partners must comply with all applicable health and safety laws and regulations. Exasol requires Business Partners to adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workplace for all workers, including employees and/or contractors and other third parties.

6. Environmental Sustainability

Exasol is committed to reducing the impact of its operations on the natural environment and working with its Business Partners to do the same.

Environmental Footprint

Business Partners must comply with all applicable environmental laws and regulations. Exasol requires Business Partners to address supplier and business partners' environmental risks and impacts. Exasol expects Business Partners to measure, manage, and address energy usage and greenhouse gas (GHG) emissions. Where applicable, Exasol also expects its Business Partners to measure, manage, and reduce water or other natural resources and waste in its operations. In addition, Business Partners and their supply chain must comply with applicable laws and international conventions with respect to the use, handling, and disposal of hazardous waste, persistent organic pollutants, mercury, and similar substances.

Reporting Violations

Business Partners are required to immediately report any (potential) compliance violation or violation of this Code via Exasol's compliance mailbox compliance@exasol.com or via mail to Exasol AG, Compliance, Neumeyerstraße 22-26, 90411 Nuremberg, Germany.

Whatever channel is used, Exasol will ensure that the comments and concerns will be heard and addressed. Reports will be handled as confidentially as possible. Reprisal, threats, retribution, or retaliation against any person who has in good faith reported a violation or a suspected violation of law, or against any person who is assisting in any investigation or process with respect to such a violation, is prohibited.

Exasol reserves the right to update or change the Code requirements.

Date of initial adoption: August, 19, 2021

Date of last review/update: December 1, 2023

Consequences of Non-Compliance and Risk Management

If Business Partners do not accept this Code or do not comply with it or work with/engage third parties who do not comply with, they are disqualified as an accepted supplier or business partner of Exasol. In addition, Exasol expects Business Partners to have a certain level of risk management with regard to their own compliance with requirements of this Code and those along their supply chain.

Exasol trusts its Business Partners in ensuring they comply with the above-mentioned standards. Still, Exasol reserves the right to monitor whether this Code is respected through adequate measures (e.g. supplier self-declaration, certifications, audits). In the case of violation of this Code or law, Exasol may suspend or terminate its relationship with the Business Partner.