

Code



of

Conduct

Code of Conduct
Our guide to doing the right thing.



Preface

This Code of Conduct is our guide to doing the right thing. It describes the expectations which we have from our employees and the principles that help us safeguard our reputation and earn a place in the business lives of our stakeholders.

This Code of Conduct reflects our company's values, particularly the most essential one - trust. Trust means that others can rely on us to speak truthfully, to honor our commitments, and to treat people fairly. We want to earn and keep the trust of our customers, our business partners, our employees and our shareholders.

Succeeding in business is tough, and sometimes aggressive goals can seem easier to meet when you do not play by the rules. One thing is certain—when gaining a business advantage means violating the rules, or ignoring our values, we won't do it. We can't afford to risk long-term success for short-term gain.

Target Audience

The primary audiences for this Code of Conduct are all LeanIX Employees worldwide (Full-Time, Part-Time, Temporary, Contracted), including Senior Management, Department Heads, Information Security, HR, Legal team and qualified external auditors.

**Our guide to doing
the right thing.**



Our Principles

All full-time and part-time employees of LeanIX as well as other temporary and contracted employees shall be bound by the provisions and guidelines specified as part of this Code of Conduct in addition to the terms specified in their contract during and after the termination of employment.

1 Make Software that is Easy to Use and Secure

We are a software company. Our key focus is to build products, that allow people to get access to information in an easy and efficient way. People and companies trust us with their information. We follow standards and use best practices to ensure that their data is safe and secure.

2 Market Responsibly

Marketing is designed to persuade people. If our ads are not credible, people won't trust us and won't buy our products. We make sure our ads comply with the law, and the statements in them are true.

3 Compliance with Law and International Human Rights

Observing the law and the legal system in every country where we operate is a fundamental principle for us. This includes all laws applicable to our business, including but not limited to those pertaining to child labor, modern slavery, and human trafficking. All employees must obey the laws and regulations of the legal system within which they are operating in addition to all LeanIX policies. Violation of the law must be avoided under all circumstances. Regardless of the sanctions that could be imposed by law, all employees, if proven in violation could face further investigation or be subject to disciplinary proceedings.

However, at LeanIX we believe that ensuring ethical business behaviors goes even beyond compliance with laws and regulations. We want respect for all human rights to be at the heart of everything we do, and such respect directly impacts our ability to deliver success. This is why our actions, our processes, and our policies, including this Code of Conduct and the principles herein set forth, are inspired and derived from the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, as well as by the Ten Principles of the UN Global Compact.



4 Responsibility towards Environment

We strive to conduct business in an environmentally responsible manner and are committed to minimize our environmental footprint. Employees must comply with all laws and regulations aimed at protecting the environment, conserving energy, water, and natural resources.

5 Respect in the Workplace

Treating people with fairness and respect goes hand-in-hand with trust. All employees must treat their colleagues with respect and courtesy and strictly refrain from any kind of discriminatory behavior, harassment, or victimization. This applies to all aspects of the workplace. We work as one team with people from different ethnic backgrounds, societies, religions, age groups, disabilities, races, sexual orientation, perceptions, and ideologies. We prize a diverse workplace and benefit from it as a business.

We embrace diversity, equity, and inclusion in the workplace, and we observe zero tolerance against any kind of discrimination or harassment. We're committed to providing equal employment opportunities and pay equity to all employees. We believe in the importance of preventing and eliminating any form of forced and compulsory labour or child labour, both in our company and by our subcontractors.

Do you want to learn more?

Please review our [UK Modern Slavery Statement](#)

6 Respect the Free Market

Free markets require vigorous competition. Countries around the world make it illegal to restrain competition. Antitrust (or competition) laws tell us what's legitimate and what's not as companies compete to get, keep, and build market share. For example, providing new products, improved quality, and superior value are all legitimate tools to increase market share. On the other hand, colluding with competitors on price and joining with others to boycott a supplier are not. Business practices like these interfere with the free market, limit innovation, restrict consumer choice, and damage trust.

Do you want to learn more?

Please review our [Competition and Antitrust Policy](#)

7 Compete Fairly

LeanIX competes hard—but fairly. This means we won't spy on our competitors or steal information they are trying to keep confidential. If someone else gives us information about our competitors, we won't use it if we think they obtained or disclosed it improperly. We won't spread false rumors about our competitors or disparage them. We will respect their intellectual property rights.

Do you want to learn more?

Please review our [Competition and Antitrust Policy](#)

8 Use and Protection of Company Assets

All employees are expected to treat the assets of the company whether tangible or intangible, with respect and care. All employees shall exercise due care and responsibility when handling company assets including physical and electronic assets. Physical assets such as company equipment must not be misused, or used inappropriately.

All kinds of intangible assets such as trademarks and copyright, as well as other elements for which LeanIX retains ownership such as information assets, are to be respected and used only within the rights accompanying the duties of each position.

Do you want to learn more?

Please review our [Acceptable Use Policy](#)

9 Bribery and Corruption

Bribery and corruption are considered criminal offenses in most countries and may result in substantial penalty for the company and its employees. A “bribe” in this context constitutes money or a favor, offered or given to a person in a position of trust, to influence that person’s view or conduct.

Employees are actively discouraged from accepting gifts from clients or partners and strictly prohibited from accepting bribes for the benefit of any external or internal party. Such behavior may invoke legal actions that will be damaging for all responsible parties.

Employees are encouraged to consult their respective department heads in case of any uncertainty or to consult the applicable resources listed below. Work honestly and with integrity.

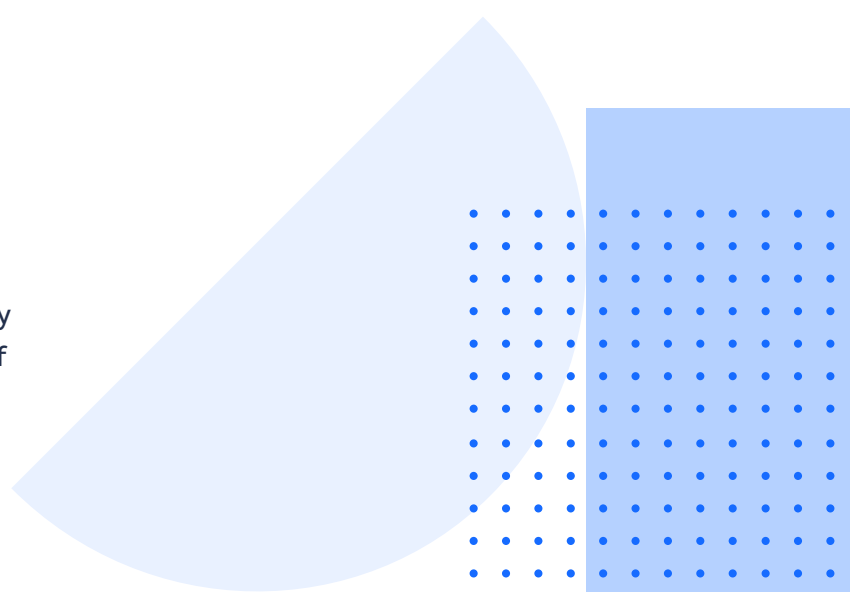
Do you want to learn more?

Please review our

- [Anti Bribery and Corruption Policy](#)
- [Anti Money Laundering and Counter Terrorism Policy](#)
- [Gifts and Hospitality Policy](#)

10 Keep Honest Books and Records

Financial statements paint a portrait of a business for investors. They describe a company in detail—its strengths, weaknesses, and trends. An accurate portrait gives people the information they need to make good investment decisions. Investors trust our company to be honest. Omissions and distortions harm that trust. Our statements must be complete, timely, accurate, and fair, and they must comply with appropriate accounting principles.



11 Responsibility towards Others

All employees must fulfil their job responsibilities with integrity and demonstrate respect towards the customers, stakeholders and community. Managers are expected to lead by example, making sure that their subordinates understand the Code of Conduct and there is no difference between what they follow and what is expected from their subordinates. Managers should create a workplace where employees feel comfortable coming forward with their issues and concerns. Mentoring and motivating employees is highly encouraged. All employees are expected to support their managers in helping achieve both their individual and business objectives.

12 Conflict of Interest

All employees are expected to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their job duties or be damaging to the company.

Employees should neither abuse their position, their knowledge of the confidential information or the property of LeanIX to their personal advantage nor give preferential treatment to any individual (internal or external) or company known to them.

Employees may find it useful to ask themselves:

- Have I informed myself adequately about LeanIX policies and guidelines as well as applicable laws?

- Are the actions I intend to take legal and are they in accordance with the applicable LeanIX policies and guidelines?
- Do I have a personal moral objection with the intended action? Am I acting in a fair and honest manner?
- Could I justify my actions to my colleagues, family and friends?
- Have I effectively considered alternatives?
- Have I consulted my work colleagues and managers?
- How would I feel if my actions were made public next day?

Any situation, voluntary or involuntary, that might be perceived as conflict of interest must be reported.

Do you want to learn more?

Please review our [Anti Bribery and Corruption Policy](#)

13 Information and Communication Tools

Employees are responsible to ensure that the information and communication tools are utilized professionally and in agreement with laws, regulations, and guidelines.

Telephone, internet, and e-mail correspondence is considered to be business related correspondence and should be primarily used for business purposes only. Access to dissemination of information, which might be illegal, immoral, offensive, or degrading in nature is forbidden.

Do you want to learn more?

Please review our [Acceptable Use Policy](#)

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Data Protection

We must not reveal any confidential information about our customers, employees or business partners unless required by law. The privacy of every individual must be respected and protected. Business secrets must not be divulged. No employee may pass on any confidential information or business secrets of LeanIX to any third party (including family members or friends) nor use such information or secrets for any inadmissible purpose.

The above obligations shall continue to apply following any termination of employment with LeanIX. All information assets containing confidential information must be returned to LeanIX upon termination of employment.

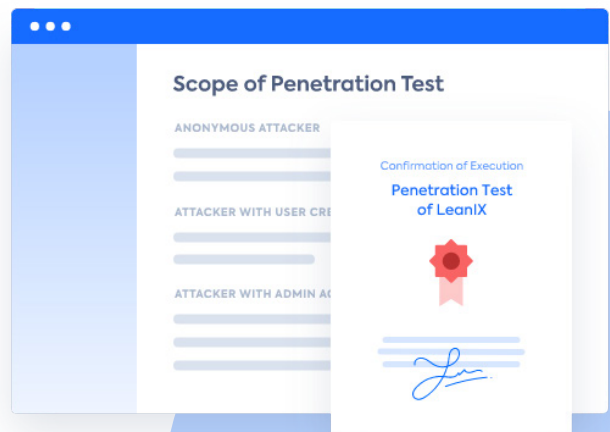
Do you want to learn more?

Please review our [Data Protection Policy](#)

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Policies and Procedures

All employees are required to understand, adhere to and follow all the established policies, procedures and guidelines of LeanIX. LeanIX provides regular training and access to adequate informative materials to make sure that understanding and awareness of such policies is always up to date.



We believe that security must be part of the foundation, so we rely on secure hosting partners and regular penetration testing. In addition, we have a dedicated security team focused on the highest levels of security and compliance.

See Something, Say Something

If you're unsure about what to do or concerned about a potential violation of this Code of Conduct or one of our policies, never hesitate to speak up. LeanIX urges all its employees to bring to light any violation or suspected violation of the principles and values expressed in this Code of Conduct. Such reporting can be addressed:

- to your immediate superior, to Human Resources, or to the Legal team;
- via the Whistleblowing Service provided by LeanIX. Please consider that the Whistleblowing Service is provided by an external partner, to ensure anonymity, and that the communication channel is encrypted and anonymous.

Reports will be investigated in a professional and confidential manner. In particular, please rest assured that all such communications are treated confidentially and will not result in any disciplinary action against the person who raises a complaint / issue / concern.

Do you want to learn more?

Please review our:

- [Whistleblowing Service](#)
- [Vendor Due Diligence and Monitoring Policy](#)

Observance

All employees are asked to review and confirm their acceptance of the principles of this Code of Conduct on a yearly basis. LeanIX management is required to monitor and ensure such compliance, and to investigate and address any suspected or reported violation.

LeanIX will not tolerate any evidenced violation of LeanIX Code of Conduct. Any such violation will lead to disciplinary action which may include reprimand, detraction of benefits for a definite or indefinite time, demotion, suspension, or termination for more serious offences. Legal action may have to be pursued in cases of corruption, theft, embezzlement, or other unlawful behavior.

Disciplinary action may be taken not just against the individuals violating this Code of Conduct, but also against any other employees who consciously allow such violation or who try to influence or retaliate against the subordinate for reporting such acts.

LeanIX also makes sure that the same values expressed in this Code of Conduct are shared and followed by any subcontractor that it might rely on for the provision of its product and services. The legal team is responsible for ensuring that adequate commitments are in place and to monitor subcontractors' compliance with applicable laws and regulations.

