



Code of Conduct

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Donna Dror

CEO

DocuSigned by:
Donna Dror
B9ABBB374E7449E...



Ea Luise Andersen

COO

DocuSigned by:
Ea Luise Andersen
A630F6E6D2B44CE...



Ibrahim Hussein

CPTO

DocuSigned by:
Ibrahim Hussein
229785F4BF2C4B9...

Message from our Managing Directors

To our valued Customers, Suppliers, Partners and Service Providers,

Consciously choosing responsible actions to contribute to a better world is the foundation upon which Usercentrics works to build value. For our stakeholders, for the persons behind “personal data” and for our society.

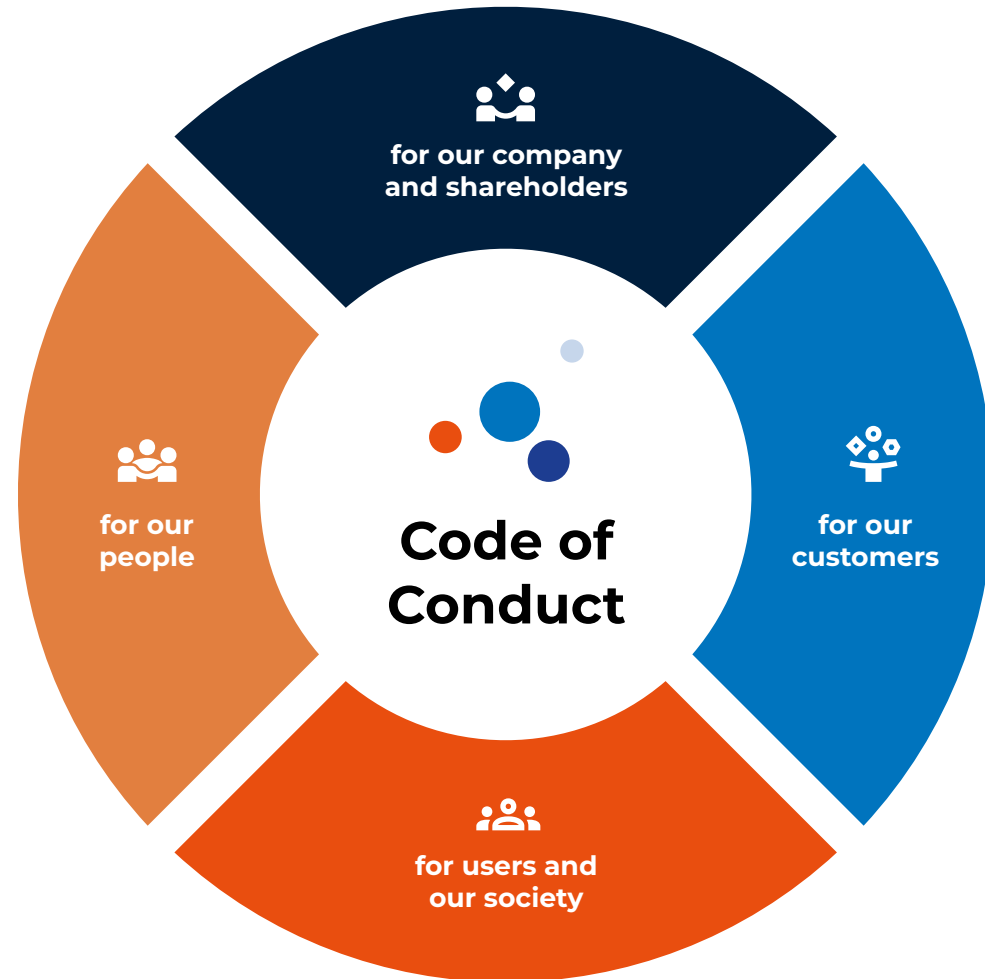
Environmental, social and governance (ESG) principles are deeply woven into our corporate culture, operations and business activities. Every day Usercentrics employees and managers work to meet and exceed our ESG commitments.

Purpose and scope

Usercentrics' success depends on building and nurturing our customers', partners' and shareholders' confidence in our integrity and our independence.

We actively work to remind ourselves of our mission, vision and values, as well as environmental, social and governance principles, to help ensure that we incorporate them daily in our ethics and operations.

This Code of Conduct forms the foundation of our ethics and motivations.



Regulations

Our Code of Conduct is based on requirements or minimum standards of national and international laws, regulations and conventions, such as:

- German Supply Chain Due Diligence Act
- EU Taxonomy
- UN Guiding Principles on Business and Human Rights

International Bill of Human Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights)

Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO)

In addition, we focus on and embrace our responsibility to uphold human rights by committing to the ten principles of the United Nations Global Compact. Its guiding principles are reflected in this Code of Conduct.

Our Code of Conduct applies to all employees of Usercentrics. Ethical and legally impeccable conduct is the responsibility of each individual: managing directors, managers and all individual contributor employees. It also applies to external consultants and persons who are functionally equivalent to employees, such as temporary workers, freelancers and/or people hired through agencies.

Our story

The growth of Usercentrics from a startup to a leading consent technology innovator in the internet economy is due to a focus on user choice. Usercentrics has pioneered consent management platforms since 2012, with solutions based on unrivaled data privacy technology. We work for a better internet for everyone.

Our vision is to build a world where user privacy enables a thriving digital ecosystem. We do this by creating technology that makes it easy for any type of organization with an online presence to protect data privacy while growing their data-driven business.

We believe that consent is a basic human right. We believe that successful data-driven business models today and in the future must place the importance of privacy compliance and consented data into the center of their enterprise.

Founder

“The story of Usercentrics is the story of trying to make something right, giving user’s the choice of consent that is their right, through innovating technology that can make the internet a better place for everyone.”

Mischa Rürup,
Co-Founder of Usercentrics

Our values



**Be
Brave**

We have courage to face risks and speak openly because we always support each other.



**Better
Together**

We listen, make safe spaces, and trust each other to get the job done or ask for help because we all have the same goals.



**Lead By
Example**

We can all build and use leadership skills, so we take initiative and value everyone's potential, abilities, and experience.



**Innovate
With Purpose**

We solve real world problems so that successful data-driven business and user privacy enable a thriving digital ecosystem.



**Passion
For Privacy**

We drive innovation by building sustainable technology and long-term relationships with privacy as our vision and mission.



**Come As
You Are**

We are different and global at all levels, so we commit to equity, embracing and working through differences, and are always listening and learning.



**Give
Back**

We share what we have, and grow with intention, purpose, and care.

Social

We specifically regard protecting human rights as an obligation.

We strive to do so in line with internationally accepted human rights principles.

We act according to ethical principles. We work to create and grow a climate of mutual trust and appreciation by respecting others' individuality and dedicating ourselves to creating equity.

Child labor

Usercentrics neither directly nor indirectly employs any underage person, minor or child. Child labor violates children's fundamental rights to education, health, protection and participation in society. Child labor practices can have negative mental, social, and health development consequences.

We have appropriate guidelines, due diligence processes and monitoring in place to prevent child labor.

Forced labor

Usercentrics has zero tolerance for any form of forced or compulsory labor, modern slavery, human trafficking or comparable human rights violation.

We have appropriate processes in place to ensure that all work that is carried out by our direct and/or indirect employees is by choice, with no restriction on workers' freedom of movement.

Additionally, none of our workforce shall be subjected to unacceptable treatment, such as psychological, sexual or corporal cruelty or punishment, or any other type of personal harassment.

We have trained and sensitized our personnel to recognize abuse, coercion and exploitation.

Freedom of association and the right to collective bargaining

In accordance with applicable local laws, we respect workers' right to:

- freedom of association
- join trade unions
- appeal to workforce representatives
- membership in works councils

Workers must be able to communicate openly and without fear of harassment or reprisals.

Therefore, we have cultivated open communications, and engage in active and constructive cooperation with employees and industry associations to ensure fair remuneration.



Occupational health and safety

We work to ensure that we provide a safe workplace for our employees. In particular, this includes assessing and documenting health hazards to employees. Safe working procedures are in place for our work spaces, including proper construction of buildings, and also regular maintenance of machines and equipment that may be used.

We ensure that our employees are equipped with appropriate personal protective equipment if needed. Safety information is available to our employees for training purposes and to protect against safety risks.

Furthermore, we take additional measures for accident prevention and workplace health promotion to support employees' physical and mental health.



Minimum and living wage

Everyone who works has the right to just and favorable remuneration to ensure that they and their families can live with dignity.

We make sure that we remunerate our employees at least in accordance with the legal provisions applicable in the region(s) of our operations, and, if available, in accordance with the minimum wage or collective agreements. If no minimum wage exists, we ensure that we at least pay a living wage that ensures a dignified existence.

Wage deductions can only be made within the framework of the statutory provisions or collective agreements.

We ensure that our employees know about their rights and employment conditions via clear and understandable format and language.



Maximum working hours

We make sure that we comply with all conditions of applicable laws and existing collective agreements, including maximum specified working hours by respective country, as well as rest periods, overtime, and sickness regulations in any form.

We have created policies, trained leaders and employees, and we encourage a work environment that aims to minimize negative physical and mental health influences on our workforce.



Non-discrimination

Consent is at the core of our business and our culture. We want everyone at Usercentrics to #ComeAsYouAre. Trust is a gift, and we work to establish and maintain Usercentrics as a safe space. From there we work to grow and make it an environment where everyone can thrive.

We strive to create a diverse, equitable, and inclusive environment where everyone feels valued, respected, and empowered to reach their full potential. We believe that our different backgrounds, experiences, and perspectives are our greatest strengths. We are committed to building with them as we foster innovation and drive our success.

We recognize that this is an ongoing journey. We commit to listening and to continuous learning, growth, and improvement. By embracing DEI principles, we will create a more just and equitable society, and we are proud to play our part in making this vision a reality.

We have established a committed DEI taskforce that includes our CEO.

We are #BetterTogether.

Governance

Legal and regulatory compliance is enormously important for us to earn and maintain the trust of our customers, partners, investors, suppliers, employees, and the public. It is reflected in our vision and mission and is part of our DNA.

At Usercentrics, we are clearly committed to complying with all applicable legal, regulatory, and external requirements and standards, especially those applicable to the operation of a SaaS and Legal Tech/Privacy Tech company.

Conflicts of interest

We do business in an open and transparent way, and compete fairly and in line with applicable antitrust and competition laws. We always try to avoid any kind of conflicts of interest.

All of our actions must be based on sound business judgment and not motivated by personal interest or gain.

We have established reporting lines to immediately report all actual or potential conflicts of interest with respect to business or personal relationships within Usercentrics.

Prevention of money laundering, terrorist financing, sanction breaches or illegal activities

We conduct our business activities in full compliance with all applicable economic and trade sanctions, as well as with laws and regulations targeted at fighting money laundering and financing of terrorism. We do not associate ourselves with any criminal activities.

We have educated our employees and have implemented processes with the goal to avoid situations where money laundering, terrorist financing, sanction breaches, or other illegal activities may occur.

IT security

Information Technology (IT) Security and Information Security (IS) are of paramount importance to Usercentrics, as we are a Legal Tech company. Following the principles of IT and Information Security are the foundation and backbone of our business. Effective precautions against IT risks are an important part of IT management, and as well as a priority that leadership is tasked with, and each individual's vigilance and behavior.

Data protection and confidentiality

Whenever Usercentrics is entrusted with personal information about individuals, we ensure appropriate protection against unauthorized or unlawful processing, loss, alteration, misuse, disclosure, or other transmission.

To make sure that all personal data are protected, we have implemented appropriate documentation for data processing, and adequate training for employees.

We treat any kind of information that is designated or recognized as confidential as such. We do not divulge confidential information within or outside of Usercentrics unless divulging it is necessary for performing the work of Usercentrics, is protected by a confidentiality agreement, and/or has been made publicly available by Usercentrics before.

Bribery and corruption

We do not actively or passively engage in bribery or corruption, and have established tools, mechanisms, and policies within the company to prevent and fight bribery and corruption.

The highest standards of integrity are applied to all business activities. We pursue a zero-tolerance policy regarding bribery, corruption, extortion, and embezzlement.

No gratuitous benefits are offered in the context of business award decisions. We do not provide or receive socially inappropriate benefits or gifts.

We work to always avoid collusion of private and business interests.

Processes for monitoring and implementing norms, as well as this Code of Conduct, have been established in order to ensure compliance with anti-corruption laws.

We educate and regularly train our employees on the different forms and possibilities for direct and indirect influence and corruption.

Addressing grievances and misconduct

We have established a whistleblowing process, appropriate grievance channels, and remediation mechanisms to enable employees to report concerns and potential compliance violations — anonymously if desired — without fear of retaliation. This also includes any obligations addressed in this Code of Conduct. Reports by whistleblowers will be investigated and followed up appropriately.

We encourage our employees to speak up if they observe potential misconduct and work to support a transparent corporate culture of mutual trust.

Environment

We take our responsibilities for environmental and climate protection seriously, and comply with all environmental prohibitions listed in applicable supply chain acts.

We continuously strive toward reducing our environmental footprint in conducting our business operations.

Sustainability and efficiency of resources

We have implemented appropriate environmental policies and management practices in order to track, measure, document, and reduce resource consumption and its resulting greenhouse gas emissions.

In the event that our operations cause any harm to air, water, or soil, we will make continuous efforts to our impact in all activities.

We have implemented an environmental and climate protection management programme and comprehensive climate change mitigation and adaptation initiatives with a high level of ambition.

We are working to enhance awareness of the changing climate and its impact and seek to reduce the vulnerability of society and nature by building up resilience to the current and anticipated effects of climate change.

We actively seek to reduce discharges and pollutants directly or via third parties we work with, as well as to find ways to improve our impact on air, water, soil, and marine resources.

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Usercentrics GmbH

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Follow us



Telephone: +49 89 21 54 01 20

Contacts for questions regarding our Code of Conduct for further information:

legal@usercentrics.com