



SparxSystems CE: Code of Conduct for Business Relationships

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About SparxSystems Central Europe Software

Sparx Systems was founded in 1996 by Geoffrey Sparks in Australia (near Creswick, Victoria) and has over 25 years of development experience in the field of modelling tools. Its core product, Enterprise Architect, has won numerous awards since its commercial release in August 2000. Enterprise Architect serves as a modelling platform based on the Unified Modelling Language (UML) for the design and production of software systems, business process modelling, and the modelling of any process or system.

Sparx Systems is a contributing member of the Object Management Group (OMG), the responsible standardisation body for the graphical symbol language UML and other related specifications.

SparxSystems Central Europe Software GmbH (short: SparxSystems CE) has its headquarters in Vienna and has been active in Europe since May 2004. The company is the local contact for the entire German-speaking region and offers training, consulting and project support in addition to licence sales.

Our responsibility

We provide a safe, inclusive and motivating work environment and support the communities in which the company operates. We also maintain trustworthy, transparent and compliant business practices, making a positive global contribution.

We are aware of the responsibilities we have as a result of our operations. Therefore, we have established strict ethical principles for ourselves that guide us in our business.

We also expect our suppliers, including subcontractors, i.e. all companies that have a business relationship with a SparxSystems CE company or division, to base their actions on the same ethical principles. For this reason, SparxSystems CE has drawn up this Code of Conduct, which sets minimum standards for business relationships with the company or a division of the company.

Laws and ethical standards

SparxSystems CE complies with all laws applicable to the company. We support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practices. This applies in particular to:

Human rights and fair working conditions

Child labour

We do not employ children below the minimum legal working age in the respective country or jurisdiction. We set a minimum working age of 15 years, even if the employment of younger children is legally permitted under local regulations. Employees under the age of 18 perform work only in accordance with the legal requirements of their country of employment (e.g. regarding working hours and conditions) and in compliance with education and training requirements.

Forced labour

We do not use forced labour, bonded labour, involuntary labour or modern forms of slavery. Work must always be voluntary. Workers must be allowed to retain control of their identity documents (e.g. passport, work permit or any other personal legal document). We ensure that workers do not pay any fees or other payments to be employed throughout the recruitment and employment period. We are responsible for paying all legally binding fees and expenses (e.g. licences and levies) that may be incurred in relation to our employees.



Punishment, psychological and/or physical coercion and any other form of human trafficking are prohibited. Disciplinary policies and measures shall be clearly defined and communicated to workers.

Remuneration and working hours

We comply with all applicable national laws and mandatory industry standards on working hours, including overtime, breaks and paid holidays.

We pay our workers in accordance with the local minimum wage law and applicable collective agreements, and in line with industry standards. We pay workers on time and provide them with clear and understandable information about the basis on which they are paid (i.e. that they receive employment documents in a language they understand). Deductions from wages as a disciplinary measure are not permitted unless they are legally permissible.

Diversity and inclusion

We promote a work environment that enables inclusion and values the diversity of our employees.

We are committed to equal opportunities and do not discriminate or will not tolerate discrimination on the basis of gender, ethnic and national origin, race, colour, religion, age, disability, sexual orientation or identity or any other characteristic protected by law.

Occupational Health and Safety

SparxSystems CE complies with applicable occupational health and safety regulations and provides a safe and healthy working environment to maintain the safety and health of employees, protect third parties and prevent accidents, injuries and work-related illness. This includes regular risk assessments of workplaces and the implementation of appropriate hazard prevention and precautionary measures, including the provision of appropriate personal protective equipment. Workers must be adequately trained on occupational health and safety issues in a language they understand.

Data protection, information security and disclosure of information

SparxSystems CE complies with applicable laws and regulations on data protection, including the protection of personal data, e.g. the General Data Protection Regulation (GDPR). This applies in particular with regard to personal data of customers, consumers, employees and shareholders. Every supplier of SparxSystems CE observes all the aforementioned requirements when collecting, recording, storing (including hosting), processing, transferring, using or deleting personal data.

We protect confidential information and use it only in an appropriate manner. This means that we comply with all contractual requirements on data protection and information security and do not disclose information that is not known to the public.

Bribery and corruption

SparxSystems CE complies with all applicable national and international anti-corruption laws and regulations. SparxSystems CE does not offer, grant or accept money or other benefits (either directly or indirectly) to improperly influence official acts or to obtain an improper advantage with the aim of inducing or obtaining business. This also applies to so-called acceleration payments or other advantages granted to public officials for routine decisions that do not allow for discretion.

Trade Regulations

SparxSystems CE complies with all applicable export controls, sanctions and customs laws and regulations, including prohibitions and restrictions ("Trade Laws"). In particular, we ensure that the Company itself, its beneficial owner(s), any of its agents and any other subcontractors it uses are not included on any applicable sanctions list as a "Denied Party".



Money Laundering and Financial Records

SparxSystems CE complies with all applicable anti-money laundering laws and regulations. We maintain financial records and prepare reports in accordance with applicable laws and regulations.

Free Competition

SparxSystems CE complies with applicable competition and antitrust laws.

Conflicts of interest

A conflict of interest is a personal or financial interest, business or personal act or relationship, past or present employment or commitment that may impair the ability to perform duties and responsibilities objectively or impair independence and objectivity. Such conflicts of interest include critical relationships such as kinship or affinity, partnership, investment in a business partnership or competitor. SparxSystems CE shall promptly disclose any actual or potential conflict of interest in connection with its activities.

Environment

SparxSystems CE complies with all applicable environmental laws, regulations and standards and maintains an effective system for identifying and eliminating potential environmental hazards.

We take appropriate account of environmental and climate protection in our own operations, e.g. by setting and implementing climate protection targets.

Business continuity planning

SparxSystems CE takes precautionary measures in the event of disruptions to its business (e.g. natural disasters, terrorism, supply chain disruptions, communicable disease outbreaks - epidemics or pandemics, information security issues, cyber attacks). Precautionary measures include, in particular, business continuity plans to protect employees and the environment from the impact of any serious disruptions in business operations.

Dialogue with business partners

SparxSystems CE implements standards, such as ethical principles, for its own suppliers as part of the fulfilment of their contractual obligations, in line with the standards set out in this Code of Conduct.

Compliance with the Code of Conduct

SparxSystems CE strives for continuous improvement and sets measurable targets for this, e.g. in the areas of environment, working conditions or diversity, and reports on its progress in the area of sustainability. If a violation is identified, SparxSystems CE prepares a report on the incident and defines corrective measures.

The terms of this Code of Conduct reflect the values and commitments SparxSystems CE has to its customers, the communities in which we operate and the protection of the environment.

Continuous Improvement

SparxSystems CE encourages its customers, suppliers and employees to proactively submit innovative ideas that contribute to further social, economic or environmental improvements. We value the open exchange of new ideas and are willing to explore new opportunities together.

I hereby certify that SparxSystems CE complies with the aforementioned Code of Conduct.

Hans Bartmann

Managing Director | CEO

Vienna, 1.9.2021