



AVEVA Business Conduct Guidelines

March 2023



An introduction from the CEO

Dear colleagues,

The Business Conduct Guidelines are about behaviour and how we conduct ourselves at work. And while we strive toward shaping a sustainable future through our software, how we conduct business should also be sustainable and obtain results in the right way.

We are committed to aligning our strategy and operations with universally held principles on human rights, labour, environment, and anti-corruption. We believe that a principled approach to business and profits go hand in hand, as outlined in these guidelines.

Acting ethically, transparently, and responsibly is essential, and it is required of every AVEVA employee, contractor, freelancer and any person working on our premises. In short, if you're associated with AVEVA, we expect you to live up to our expected behaviours.

While these guidelines may not be exhaustive, and there may be situations where you need further advice, seek out our HR, Legal teams, or your line manager to get the help you require. If you need to report any issues, speak to them or access the [AVEVA Speak Up!](#) Policy.

It is for us all to contribute to a business environment that is sustainable, reliable, collaborative, respectful, safe, fair, and healthy for all. I know I can trust you to live your best selves when you represent AVEVA and, together, contribute toward a sustainable future with integrity.

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Human Rights and People Development

1. An Environment of Fairness

How we treat one another defines us. We value differences, and welcome differing opinions. We choose our words thoughtfully, never resorting to disparaging, discriminatory or sexual remarks.

We do:

- ✔ Treat all people fairly, with respect and dignity
- ✔ Value the thoughts and opinions of our colleagues
- ✔ Empathise with our customers
- ✔ Respect our competitors.

We do not:

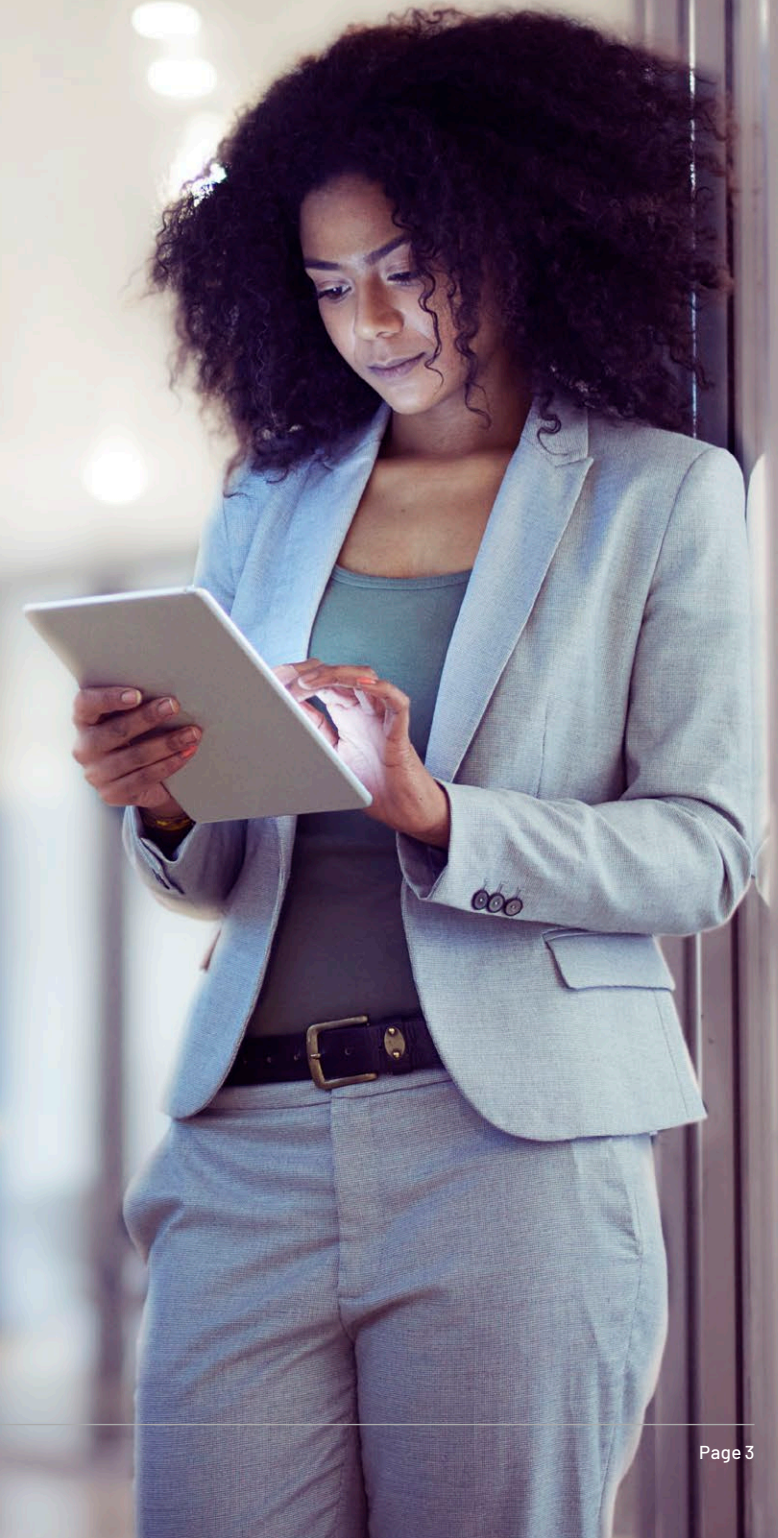
- ✘ Act out of ill-intent or malice
- ✘ Condone, allow or disregard any departure from respect, fairness and dignity.

2. An Environment of Diversity, Inclusion and Individual Development

Diversity strengthens us. Diversity of people and an environment of inclusion generates greater engagement, performance, and innovation. At AVEVA, our ambition is to offer equal opportunities to everyone, everywhere. We want all our employees to feel uniquely valued, and safe to contribute their best. This includes giving them equal access to the tools they need to grow, develop and realise their full potential. We encourage our customers and the rest of the business community to share these values.

We support:

- ✔ Equal opportunities for all employees with fair policies, placements and continuous learning
- ✔ Inclusive behaviours such as identifying and addressing our own biases
- ✔ The personal development of everyone's unique skills and talents
- ✔ Advocating for positive change internally and externally.



Human Rights and People Development

3. An Environment of Human Dignity

We actively support basic human rights and abhor violations such as modern slavery. We implement systems and controls to ensure human rights are preserved in our own business.

We do:

- ✔ Work for dignity, respect and fairness, everywhere, and for everyone.

We do not:

- ✘ Tolerate infringements of fundamental human rights.

4. An Environment of Respect

An inclusive and welcoming working environment free of harassment, victimisation and discrimination is essential, and a shared responsibility. We have zero tolerance for intimidation, bullying, sexual misconduct, or any other kind of inappropriate behaviour. We keep our policies inclusive and our reporting systems free from prejudice and intimidation. When necessary, we respond promptly to infringements in this area without apprehension or delay.

We do:

- ✔ Protect difference and expect respectful behaviour
- ✔ Foster a safe working environment free from extreme opinions
- ✔ Provide a safe channel to speak up and report inappropriate behaviour.

We do not:

- ✘ Allow intimidation, discrimination, or disrespect
- ✘ Tolerate degrading comments on race, sex, national origin, religion, political opinion, age, medical status, marital status, disability, pregnancy, sexual orientation, gender or gender identity.

Ethical Business Conduct

1. An Environment of Fair Competition

Fair competition matters. We share a common interest with our competitors and customers to build a reputable sector through business practices that strengthen collective trust and cultivate long-term viability. We refuse to engage in any anti-competitive activities and we comply with the relevant laws in the countries in which we operate.

We do:

- ✓ Act promptly when we receive sensitive information not intended for us. In such cases, we cease communication and report incidents to management or our legal department as soon as possible.

We do not:

- ✗ Collude with competitors
- ✗ Intentionally communicate using purposefully vague language that could be misleading from a competition-law standpoint.

2. An Environment of Fair Practices

We adhere to our [Anti-Bribery and Corruption](#) and our [Corporate Gifts and Hospitality](#) Policies.

3. An Environment with Reliable Parties

We comply with our Business Agent Policy, our Global Procurement Policy and our Anti-Slavery and Human Trafficking Policy.

4. An Environment of Fair Play

We comply with our Global Group Export Control Policy.



Ethical Business Conduct

5. An Environment of Fair Disclosure and Dealings

Conflicts of interest arise when our personal interest interferes with our duties at AVEVA. These situations may unconsciously influence even the most ethical person's judgement, and often just an appearance of a conflict may cause their integrity to be questioned. We must be cognisant of any potential conflicts of interest and avoid them.

We do:

- ✓ Disclose to our management any potential conflict of interest that might influence our judgement; should such a conflict of interest arise, we remove ourselves from the decision-making process
- ✓ Disclose when we are involved with, or have a financial stake, in any organisation that may be our competitor, customer or supplier, as well as how our position allows us to influence that business relationship
- ✓ Disclose to our legal department any dealings that may benefit Schneider Electric or other related parties and comply with our [Related Party Transaction Policy](#).

We do not:

- ✗ Conceal any information on any conflict of interests
- ✗ Allow our decisions or actions to be influenced by favouritism, nepotism or preferential treatment
- ✗ Render assistance to a competitor or be employed by one
- ✗ Accept remuneration from any organisation or business that has a present business relationship or conflict with AVEVA
- ✗ Give any benefit to Schneider Electric or other related parties not approved in line with the [Related Party Transaction Policy](#)
- ✗ Allow relationships or familial relationships between employees in the same reporting line. Decision making may be challenged or compromised if this were to occur. Relationships where there is no direct reporting line, no audit concerns or no improper influence are personal, and not subject to this policy.

Ethical Business Conduct

6. An Environment of Fair Use of Assets

We owe it to ourselves to operate as efficiently and effectively as possible. Misused assets hurt us all. Our resources and assets are meant solely to help us achieve our business goals and therefore, we must consciously use them for their intended professional purpose. We all take care to protect our assets against degradation, alteration, fraud or theft of any kind.

We do:

- ✓ Respect and protect company assets to ensure that they are not lost, damaged, misused or wasted, loaned to others, transferred, sold or donated without authorisation
- ✓ Recognise that all company assets and documents belong to AVEVA.

We do not:

- ✗ Use company assets for personal purposes; limited use is accepted, if this does not incur any unreasonable costs or interfere with our professional responsibilities
- ✗ Use assets belonging to a third party (pictures, videos, etc.) without ensuring that we have the right to use them
- ✗ Sell, transfer or dispose of any company assets without proper authorisation and documentation.

Ethical Business Conduct

7. An Environment of Reliable AVEVA Representatives

We are all custodians of our brand. It is through our actions that the image of the company is built. We're aware that in our communications, both formally and in informal forums and discussions, we continue to represent the company. Therefore, we must choose our actions responsibly and our words wisely.

We do:

- ✔ Use the official communication material and follow the brand rules and guidelines
- ✔ Protect the company's reputation by constantly having its best interest in mind
- ✔ Act cautiously while exchanging information on social networks and web forums, keeping in mind that what's on the web is never entirely private and remembering that "the Internet never forgets".

We do not:

- ✘ Interact with the press or engage in public speaking without prior internal approval from the CMO
- ✘ Engage in activities that could reflect negatively on the company
- ✘ Express our personal opinions about AVEVA through official communication
- ✘ Disparage the company and our colleagues on external forums.



Digitally Trusted & Secure – Advanced Cyber Citizenship

1. An Environment of Cybersecurity and Data Protection

We are aware of the criticality of our digital ecosystem for our users, customers and partners. Our processes, people and technology all contribute to building, reinforcing and solidifying our digital trust. We consciously partner with the best-in-class technology providers, who inform us of potential risks and empower us to naturally integrate best practices into our everyday work. We always act with cybersecurity and data protection in our minds.

We do:

- ✓ Treat cybersecurity as integral to our strategy
- ✓ Build cyber-resilience across our whole digital ecosystem
- ✓ Design and develop our offers with comprehensive cybersecurity and data protection approach
- ✓ Support our customers to improve their cybersecurity posture
- ✓ Stay cautious of compromising our internal networks or devices with data, files or applications from external sources. When in doubt, contact our GIS department.
- ✓ Encourage a “See something, say something” mindset toward risky behaviour and cyber issues
- ✓ Comply with our [Global Data Protection Policy](#).

We do not:

- ✗ View cyber risk and data protection as separate to enterprise-wide risk
- ✗ Use our skills, technologies or systems in a manner that could be harmful to the interests of our employees, customers or stakeholders
- ✗ Share the personal data of our employees, customers or third parties except as is permitted by the [Global Data Protection Policy](#).



Digitally Trusted & Secure – Advanced Cyber Citizenship

2. An Environment of Data Safety & Respect

We believe in the importance of strong governance to ensure resilient data-handling and storage processes, and in strict compliance with laws, regulations and standards. We make it a point to source, process and share data in a responsible manner, in line with our social responsibility and ethics. Thereby ensuring that anyone with access to data can use it with a fair balance of privacy and autonomy.

We do:

- ✓ Hold privacy and the protection of individual information as a key priority
- ✓ Treat data from employees, customers, products and solutions securely
- ✓ Exercise extreme care while analysing data belonging to other individuals or companies
- ✓ Honestly disclose the type of analysis we are applying to data.

We do not:

- ✗ Misuse our knowledge to violate human rights and civil liberties
- ✗ Share data internally or externally without considering criticality and sensitivity
- ✗ Access confidential information that does not belong to us.

3. An Environment of Sustainable, Positive Artificial Intelligence

We are aware of the implied responsibilities of developing AI. We monitor the latest developments in areas such as AI bias, explainability and authenticity.

We do:

- ✓ Educate our specialist teams on implications of Artificial Intelligence usage
- ✓ Adopt best-in-class frameworks to enhance understanding and transparency of AI-led actions.

We do not:

- ✗ Deploy algorithms that impair unbiased decision making.

Act for the Environment

1. A Sustainable, Positive Environment

We have a big part to play in making the world a better place. Our Software helps make industry more efficient in the way they design and operate their assets. Our global presence allows us to have a greater reach and impact on lesser-privileged communities. We believe in contributing through specific and different initiatives like AVEVA Action for Good. We are committed that AVEVA and our employees be forces for good. We see value in exploring the UN Sustainable Development Goals and the part we can all play in making them real. Through charity and donations, teaching, and lending our individual time, we support local organisations and stimulate communities. We provide training to empower grass roots development and investment.

We do:

- ✓ Engage communities with reliable, short and long-term commitments
- ✓ Maintain policies that encourage employees to dedicate some of their work time to volunteering
- ✓ When appropriate, support communities directly that have encountered natural disasters.

We do not:

- ✗ Force any employee or third party to participate in, or donate towards a cause
- ✗ Consider the environment secondary to our business priorities
- ✗ Engage in efforts that are not aligned with the UN Sustainable Development Goals.

Act for the Environment

2. A Fair, Reliable, Political Environment

We believe that representations of our interests should be conducted in a transparent and fair manner, allowing our third parties and stakeholders to understand our activities, positions and statements.

We do:

- ✓ Reserve lobbying and representation activities for authorised employees
- ✓ Exert our representation activities in a transparent way
- ✓ Report our lobbying activities where requested
- ✓ Publish regular position papers on key subjects
- ✓ Strictly adhere to our [Anti-Bribery and Corruption](#) and [Corporate Gifts & Hospitality](#) Policies, with complete transparency in the public domain.

We do not:

- ✗ Participate in lobbying or representation when not internally authorised
- ✗ Engage in political activity or political representations
- ✗ Make any payment to political parties in relation to our public representation.

Act for the Environment

3. A Fair, Collaborative Environment

We uphold the right to form associations, and recognise the right of collective bargaining. We take all the requisite steps to improve labour-management relations.

We do:

- ✓ Respect the right of workers to form and join representation groups and unions
- ✓ Foster and encourage constructive dialogue
- ✓ Provide workers the material conditions to perform these representation activities.

We do not:

- ✗ Interfere with the work of representation.

In Conclusion

Follow not only our Business Conduct Guidelines, our policies and the local laws and regulations that apply to your work, but also your conscience. When something does not feel right, report your concerns.

If you do something that goes against our values or our policies, then there could be repercussions on us as a business and you personally. This could include disciplinary action and even dismissal, subject to local labour laws and requirements. This is not something we would do lightly and our preference, and intent in supplying these guidelines, is to facilitate you acting in appropriate and positive ways.



AVEVA

We'll take you there™