

AVA.

Ethics Charter.

AVA Information Systems GmbH.
January 2020.

AVA. Values and Ethics Charta.

Humans come first.

No matter how advanced and progressive our technologies, systems, methods, and algorithms may become, AVA is and will always be a deeply human endeavor.

With power comes responsibility.

Our decisions can be of existential relevance to our partners, customers, and users - to individuals, families, organizations, nations, and even the world. Our culture, as well as our processes, reflect this great responsibility.

Sustainably independent.

Economic success and social impact are two sides of the same equation. In order to achieve our goals, we need independent access to resources. This is best achieved by creating solutions, services, and products of both immediate and long term value and relevance to our users and customers and – as a result – by being profitable.

Privacy by design.

We are not amongst those claiming that the appropriate price for one's safety is one's privacy. Complying with the most strict regulation and legislation on data protection and privacy, AVA is setting new benchmarks in the world of big data and information.

Biased towards action.

In our post-factual age, story and presentation sometimes seem to have more value than substance. But when it

comes to personal and public safety, there is neither room for “failing forward” nor for a “fake it until you make it” mentality. We refuse to make promises we can not fulfill, so our partners, customers and users can rely on what we commit to.

Behaviors matter.

In a world that tightly connected, values matter more than ever. One unthoughtful act can destroy billions in shareholder value, inspire millions to try a new product, disrupt industries or even spark revolutions. We believe that aligning behaviors to sustainable, human values and conducting business with integrity are therefore the key to and deliver maximum performance and long-term value.

Neutrality.

By being objective and neutral at the same time, we refrain from taking sides of specific interest, group or faction. Therefore, we will supply unbiased and reliable information services to our users, regardless of whether these are security professionals, news broadcasters,, businesses, governments, institutions, or individuals.

AVA's Ethics Charta complies with a range of regulations, guidelines, and principles as drafted by the European Union, the Federal Republic of Germany, and the United Nations. These are also accessible under <https://ava.info/ethics>

AVA. AI for good.

Human agency and oversight.

We ensure that our AI systems empower human beings, allowing them to make informed decisions and fostering their fundamental rights. At the same time, proper oversight mechanisms are established through appropriate human-in-the-loop, -on-the-loop, and -in-command approaches.

Technical robustness and safety.

We ensure for our AI Systems to be resilient, secure, and safe, ensuring a fall back plan in case something goes wrong. In addition, we ensure our AI Systems to be accurate, reliable and reproducible. That way, we prevent unintentional harm.

Privacy and data governance.

Besides ensuring full respect for privacy and data protection, AVA's data governance mechanisms ensure and take into account the quality and integrity of data, while ensuring only legitimised access to data.

Transparency.

Traceability mechanisms ensure, that our AI systems and their decisions are explainable in a manner adapted to the stakeholder concerned. Humans are made aware, when interacting with our AI systems, and are appropriately informed of its capabilities and limitations.

Diversity, and non-discrimination.

Unfair bias must be avoided to prevent negative implications, such as the marginalization of vulnerable groups, the prejudice and discrimination. Fostering diversity, our AI systems are therefore accessible to all, regardless of any

disability, and involve relevant stakeholders throughout their entire life circle.

Societal and environmental well-being.

AVA's artificial intelligence systems should benefit all human beings, including future generations. Therefore we ensure, that operations are sustainable and environmentally friendly. Here, we take into account the environment, including other living beings, and the social and societal impact is always carefully considered.'

Accountability.

We put in place mechanisms to ensure responsibility and accountability for our AI systems and their outcomes. Auditability, which enables the assessment of algorithms, data and design processes plays a key role, especially in critical applications such as the ones run by or with AVA's AI Systems.

AVA's principles on artificial intelligence and data science adhere to the "Ethics guidelines for trustworthy AI" by the European Union. These are also accessible under <https://ava.info/ethics>

Compliance with the law.

At AVA, we comply with all applicable local, national and international laws and regulations wherever we do business.

Compliance with all applicable local, national and international laws and regulations wherever we do business is critically important to the success of our companies worldwide.

The violation of laws and regulations can have severe consequences, such as criminal convictions, fines and reputational damage.

All AVA managers are obligated to be familiar with the basic laws, regulations and corporate policies that are relevant to their areas of responsibility.

Comprehensive knowledge of applicable laws and corporate policy is especially important for those managers who, because of their specific functions or appointed positions, have a special responsibility for ensuring compliance. For example, Managing Directors, Managers in Compliance, Finance, Human Resources, Procurement, Legal, Audit, and Risk Management.

In specific countries, industries or markets as well as with specific business partners, stricter rules than those described in this Code of Conduct may exist. In such cases, employees should assume that the stricter standard applies.

If there is any doubt whether a decision is legally sound, the appropriate person listed as contacts for AVA's Code of Conduct should be contacted for assistance and clarification.

Freedom to speak without fear of retaliation.

At AVA, we encourage our employees to speak up freely and without fear of retaliation. Retaliation against employees who raise good-faith concerns about misconduct occurring in the company is prohibited.

Being able to speak freely helps to prevent misconduct, and to detect and correct it, should it occur. We therefore value an open work environment where employees can approach their supervisors or management to raise issues or voice criticism without any concerns.

Managers are responsible for encouraging open dialogue and for supporting their employees and addressing their concerns in a fair and impartial manner.

Intimidation or retaliation against employees who in good faith provide reports of suspected or actual misconduct must not be tolerated. Reporting misconduct "in good faith" means that an individual believes that what he or she is asserting is true, whether a subsequent investigation proves that report to be true or not.

If employees feel uncomfortable raising concerns directly with their manager or another person locally, or if their attempts to do so are ineffectual, we encourage them to contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Mutual trust and respect.

At AVA, we treat each other in a mutually respectful and trusting manner and seek to create an environment that does not allow for discrimination.

Every individual is entitled to fair, dignified and respectful treatment. We are committed to equal opportunities and encourage a respectful and diverse workplace in which each individual's unique value is recognized and each person is treated with courtesy, honesty and dignity. Harassment, bullying or intimidation is prohibited.

All decisions with respect to recruiting, hiring, disciplinary measures and promotion as well as other conditions of employment must be administered free from any illegal discriminatory practices.

We do not tolerate discrimination against employees or applicants for employment because of race, national or ethnic origin, gender, pregnancy, marital or parental status, age, disability, religion or belief, sexual orientation or any other characteristic specified under applicable anti-discrimination law or company policy

If employees feel uncomfortable raising concerns directly with their manager or another person locally, or if their attempts to do so are ineffectual, we encourage them to contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Conflicts of interest.

At AVA, we disclose potential or actual conflicts of interest in the workplace in a timely manner for proper review and resolution.

In our daily business we may be faced with situations in which a decision that is in the best interest of the company competes with our personal interests. Also, sometimes there seem to be conflicting perspectives on what is actually in the best interest of the company.

A conflict of interest can make it difficult for an individual to make impartial decisions that are in the best interest of the company.

Employees with a real or potential conflict of interest must disclose it to their manager or their company's senior management for prompt resolution.

If employees feel uncomfortable raising concerns directly with their manager or another person locally, or if their attempts to do so are ineffectual, we encourage them to contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Protection of company assets & anti-fraud.

At AVA, we deal with company property, products and resources responsibly.

We value the responsible use and handling of any tangible or intangible company assets, such as products, work materials, IT equipment, or intellectual property.

Company assets should be used only for their intended business purposes and not for improper personal, illegal or other unauthorized purposes.

Every form of fraud is prohibited, regardless of whether company assets or third-party assets are affected. Adequate control measures should be in place to prevent any form of fraudulent activity, such as fraud, embezzlement, theft, misappropriation, tax evasion or money laundering.

If employees feel uncomfortable raising concerns directly with their manager or another person locally, or if their attempts to do so are ineffectual, we encourage them to contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Interactions with Business Partners.

At AVA, we act with integrity in our dealings with others, and also expect our business partners to obey the law.

Our business partners (e.g., customers, suppliers, agents and consultants) expect that they can rely on AVA as a partner that conforms to the law. This demands that we know our contractual obligations to our business partners.

We in turn take care that our business partners' practices are based on respect for the law.

National and international laws regulate the import, export or domestic trade of goods, technology, services, the handling of specific products, as well as capital movements and payments. Adequate procedures must be used to ensure that transactions with third parties do not violate current economic embargoes or regulations of trade, import or export controls, or regulations for the prevention of terrorism financing.

If employees at AVA or our business partners feel uncomfortable raising concerns directly, we encourage them to contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Governmental and regulatory body relations.

At AVA, we maintain proper and legally irreproachable relations with all government regulators and agencies.

Business relationships with governmental bodies are often subject to particularly strict requirements. In all our dealings with government and regulatory agencies and officials, we conduct ourselves in an honest and transparent manner and act in compliance with applicable laws.

Dealings with governmental entities may occur in the ordinary course of business (obtaining licenses or approvals or entering into contracts), while engaging in political lobbying, or when responding to governmental or regulatory requests or inquiries of any nature (e.g., subpoenas, investigations, legal proceedings).

It is recommended that employees who receive any kind of governmental inquiry immediately contact their company's senior management and legal counsel for assistance provided by AVA management prior to taking further action in order to ensure compliance with all legal requirements.

If employees feel uncomfortable raising concerns directly, we encourage them to contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Anti-corruption and anti-bribery.

At AVA, we condemn all forms of corruption and bribery.

At AVA, offering or accepting a bribe, in any form, to or from any person in either the public or private sectors, is prohibited.

Reasonable and bona fide hospitality and promotional or other business expenditures, that seek to maintain cordial relations or present products or services, are recognized as a legitimate part of doing business.

Such advantages may, however, only be given or accepted if they serve a legitimate business purpose and do not serve to obtain or grant an improper advantage.

The advantage may not have an unreasonably high value and may not exceed the limits of customary business practice or the recipient's normal standard of living. Generally, public officials should not be offered any advantages.

Caution should be taken when requests or offers are made for sponsorship or a "charitable contribution" to ensure that it is not a request for or offer of bribery in disguise.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Fair competition.

At AVA, we comply with applicable antitrust and competition laws and consult expert company counsel on antitrust and competition issues.

In virtually all countries, laws prohibit relationships or arrangements with competitors, suppliers, distributors or dealers that may interfere with competition in the marketplace.

Such legal prohibitions apply to a wide range of activities, including price fixing, allocations of customers or sales territories between competitors, anti-competitive boycotts and other unfair methods of competition.

We are committed to fair competition and compliance with these laws.

Also, we encourage employees and our partners to make AVA management aware of unfair competition or market behavior by other market players.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Independence of intelligence gathering, data analysis, and distribution.

At AVA, we protect our independence and neutrality.

The independence and neutrality of our intelligence and information gathering, data analysis, and distribution is the foundation of activities.

We are aware of and treat with care the responsibility that we, as distributors of potentially critical information and sometimes even opinion makers, have toward the public, societies, organizations, and individuals.

We do not exert political or any other form of inappropriate influence on intelligence and information gathering, modeling of algorithms, alerting, reporting and do not succumb to external political or economic influence.

We protect our independence, objectivity and neutrality, particularly when it comes to the interpretation of incidents, reports, and risks.

Analysts and editorial staff are committed to respecting the privacy and adhere to the highest standards in regards to responsible treatment of information, opinion and images.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Intellectual property protection.

At AVA, we respect and protect all forms of intellectual property and protected content.

As an information and data analysis company, the protection of intellectual property is of particular importance for our business.

Protected intellectual property includes any products of the human mind irrespective of their commercial value. This includes, but is not limited to, literary works, films, television and radio programs, visual works and software that is protected under relevant laws (copyright, trademark, patent) or by trade secret.

Intellectual property infringement includes, but is not limited to, the display, distribution or performance of copyrighted material without permission and the creation and distribution of unauthorized copies of protected intellectual property.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Data privacy and protection.

At AVA, we collect, retain, use and transmit personal data and information in compliance with applicable law and policy.

When we collect, retain, use or transmit personal data (e.g., names, addresses, phone numbers, dates of birth, health information) relating to employees, or customers or other third parties, we do so with great care and sensitivity and in compliance with applicable law and policy.

Personnel involved in the collection, retention, use, or transmission of personal data receive advice and support from the responsible legal departments and corporate data protection officers.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Financial integrity.

At AVA, we conduct our business and manage recordkeeping and financial reporting with integrity and transparency.

All transactions and records relating to our business must be maintained and handled accurately and appropriately. All transactions, assets and liabilities must be properly documented and recorded in accordance with AVA's financial reporting guidelines and legal requirements.

Maintaining recordkeeping integrity requires applying high standards of accuracy, completeness and accountability in all business dealings.

Financial accounts, documents, contracts, and other company information may not knowingly include incorrect or misleading entries. Any balance sheet manipulation is prohibited.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Information technology use and security.

At AVA, we make proper use of information technology and help protect our systems and equipment against internal and external threats.

In our daily business we use information technology and process data on a regular basis. This requires appropriate security practices (password protection, approved technology and licensed software) to protect intellectual property and personal data. Ignoring appropriate security practices can lead to serious consequences, such as data loss, identity theft or copyright infringement.

Because of the dissemination speed, easy replication and practical indestructibility of digital information, great care needs to be exercised in what is e-mailed, recorded as voicemail, attached or downloaded.

We commit ourselves to using workplace-related IT systems for legitimate business purposes and not for personal uses that are unreasonable or improper, or for unethical or illegal activities.

All employees need to be aware that workplace-related IT systems in all forms constitute company property.

We have an obligation to take proper measures to protect IT systems against internal and external misuse or threats (such as misusing assigned passwords or downloading inappropriate materials from the internet). We should seek the advice of IT personnel whenever we have a question or concern

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Confidentiality and public relations.

At AVA, we protect confidential information from unauthorized disclosure and use. We protect the reputation of our company in our public statements.

Confidential information is information that is intended for the named recipient(s) only, not for internal dissemination or external release. It may involve records, reports, contracts, financial and personnel data, investigations, lawsuits, creative work, intellectual property, or new business plans or products, and may appear in many different forms (digital, physical, etc.).

Discussing confidential information in public places or engaging in unauthorized sharing of company or customer information with third parties – for example, with the media or the competition – constitutes a breach of confidentiality and may constitute a violation of applicable antitrust laws.

Employees with access to especially sensitive information (financial, human resources, legal, new product development, insider information on other companies, etc.) must observe strict confidentiality even with colleagues, and should seek legal advice before disclosing any such information to third parties. In such instances, it is important to evaluate whether to enter into confidentiality agreements.

When using social media we are aware of our responsibility to our company's reputation. We do not share confidential or sensitive company information and respect the privacy of our colleagues and business partners.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Human rights, health, and environment.

At AVA, the respect for human rights and the protection of health and the environment, are integral parts of our corporate responsibility. Also, ensuring fair working conditions is an integral part of our corporate culture.

We respect the dignity and individual rights of employees and third parties with whom we have business relations.

We uphold both the right to freedom of association and the right to engage in collective bargaining in accordance with applicable laws and regulations. We condemn forced or child labor and any form of exploitation or discrimination and strictly comply with applicable laws.

We strive for environmentally responsible procurement and use of natural resources (energy, water, materials and land) in the production and distribution of our products and the performance of our services.

We will provide a healthy and safe workplace for our employees by complying with all applicable health and safety laws and standards. Managers in particular must ensure that appropriate health, safety and security practices and safeguards are in place to comply with applicable laws and management standards.

We comply with legal requirements for the protection of fair working conditions, including those regulating compensation, working hours, and privacy.

Whenever in doubt, please contact the appropriate person listed as contact for AVA's Code of Conduct for assistance and clarification.

Decision-making guide in case of uncertainty or doubt.

If you are ever uncertain about whether a particular action or decision is in accordance with the given requirements, then consider asking yourself the following questions:

Is my action or decision legal and consistent with company policies?

Can I make an impartial decision that is in the best interest of the company and free from any competing personal interests?

Can I make the decision in good conscience?

Would I feel comfortable if my action or decision were made public? Would my decision hold up to scrutiny by a third party?

Am I confident that my action or decision will not hurt our company's reputation?

If you can confidently answer yes to each of these questions, it is likely that your action or decision is appropriate. Should you have any doubts regarding one of these questions, then do not act or make a decision without first seeking qualified advice from AVA Management.

Your contact at AVA in regards to our values, code of conduct or our ethics charter.

At AVA, you will always find an open door if you need advice, want to discuss a concern about potential misconduct or want to provide suggestions for improving compliance procedures.

Many concerns about workplace conduct can be resolved by raising them constructively with the persons directly involved or by seeking assistance from local contact persons. Other issues, such as illegal business practices, might be better addressed with somebody outside your local environment.

Retaliation against employees who raise concerns in good faith about suspected misconduct is prohibited (see “Freedom to speak without fear of retaliation”).

Employees who experience retaliation should contact AVA Management. The following resources are available both for employees and for third parties.

You can contact a person in your immediate working environment to discuss questions regarding the Code of Conduct or to report violations; for instance:

- Your supervisor.
- The senior management of your company.
- The Human Resources, Legal, Finance or Audit departments, or, if applicable, your employee representatives.

If you are uncomfortable addressing your concern locally, or if your local queries have been ineffective, you may also contact the the AVA Ethics Board, in particular the person chairing the board. A key responsibility of AVA’s Ethics Board is to support requests relating to the Code of Conduct and to ensure that reports of violations are investigated.

Investigations are conducted with the greatest possible regard for confidentiality and in compliance with data protection requirements.