



Deutsches Forschungszentrum für Künstliche Intelligenz German Research Center for Artificial Intelligence



Code of Conduct



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1 Mission Statement

What we stand for: AI for people.

As the largest independent research centre for artificial intelligence (AI) worldwide, we offer excellent scientific services in all areas of AI, especially in the transfer between basic research and the application of new findings in business and society. We focus on social relevance and scientific excellence in the decisive future-oriented research and application areas of AI. We are convinced that AI technologies help to successfully address challenges facing society as a whole, such as man-made climate change, social injustice and the fight against dangerous diseases, and we are committed to these tasks with great energy. We initiate, realise and support numerous activities to place reliable and trustworthy AI from Germany and Europe at the forefront of international competition.

For DFKI¹, it is elementary to create "AI for people" and to develop innovations which improve the quality of life of people in society through smart applications and are of benefit to the general public. In doing so, we place particular emphasis on training and promoting young scientists.

This Code of Conduct describes the ethical and professional values we adhere to in our work in order to realise our vision. Our actions are based on the core values of respect, diversity, equal opportunities, openness, reliability, integrity, and commitment. We make these values the basis of our daily work.

The aim of this Code of Conduct is to make our principles and values transparent against the background of a fair, successful, and trusting cooperation with our employees², business partners and other third parties. According to our philosophy, successful and forward-looking cooperation can only be created if employees and partners alike recognise and comply with legal and moral rules and regulations.

The management is also explicitly committed to these principles and expects all DFKI employees to act accordingly.

Helmut Ditzer

Chief Financial Officer (CFO)

¹ German Research Centre for Artificial Intelligence GmbH, hereinafter DFKI.

Chief Executive Officer (CEO)

² For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is dispensed with in this document. All personal terms apply equally to all genders.





2 Scope and application

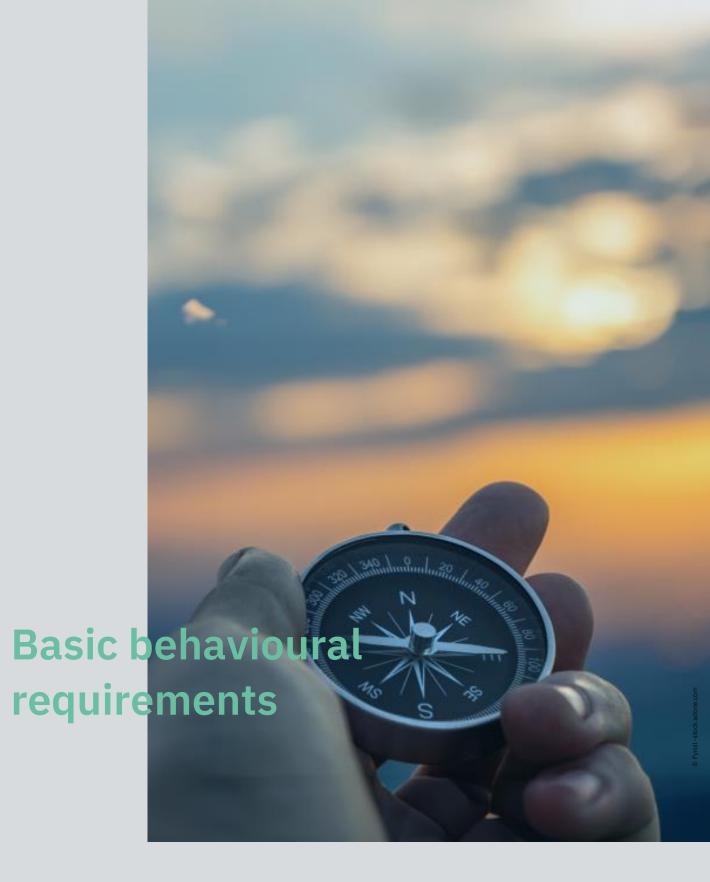
The Code of Conduct applies to the entire DFKI - regardless of hierarchy.

The Code of Conduct, as amended from time to time, applies to DFKI, all affiliated subsidiaries, locations, and places of work in Germany and abroad. It is binding for all employees, regardless of their position, and also explicitly applies to managers and the executive board. It is a self-commitment to ethically impeccable behaviour, provides an overview of our understanding of values and our behavioural requirements and is substantiated by internal regulations and guidelines as required.

We expect all employees to comply with the Code of Conduct and to ensure that violations of it are addressed and reported. In particular, we expect all managers to live and communicate clearly the principles conveyed by this Code and to take responsibility for ensuring compliance.

Regular and focussed training measures are carried out on the topics mentioned in the Code of Conduct.

Violations of the Code of Conduct by employees are a breach of duty towards DFKI as an employer and can lead to consequences under labour and civil law, up to and including a warning, termination without notice and, if applicable, claims for damages against the employee.





3 Basic behavioural requirements

Our fundamental behavioural requirements are based on compliance with the law as an elementary pillar.

Both DFKI as a research centre and employer as well as all employees must behave in a legally compliant manner, whether internally or externally. Only in this way is it possible for us to take into account the different requirements of our activities in scientific research on the one hand and in industrial projects on the other.

3.1 Legal compliance

We abide by the law.

We comply with the applicable law and internal company regulations and thus protect the company and ourselves from damage. We are a non-profit research centre and thus see it as our responsibility to act as a role model in observing compliance with laws, regulations, and guidelines and to represent this to the outside world.

All managers must be familiar with the basic laws, regulations, and internal rules relevant to their area of responsibility. Failure to comply with regulations may also result in disciplinary action, irrespective of the consequences provided for by law.

3.2 Respect, appreciation, integrity

We treat each other with respect and appreciation.

We promote and expect appreciative and respectful interaction with each other. All employees respect the personal dignity, privacy, and personal rights of each individual. At DFKI, people of different ethnic origins, cultures, religions, ages, disabilities, skin colour, sexual identity, world views and genders work together. The working environment must be free of discrimination.

Integrity, compliance with human rights and national laws, the right to freedom of association, the prohibition of child labour, the prohibition of discrimination as well as appropriate, transparent wages and working hours, health protection and safety in the workplace as well as environmental protection are a matter of course for us.



3.3 Open and trusting interaction with each other

We pay attention to a trusting and pleasant working atmosphere and communicate openly and honestly.

All employees should be able to speak out without hesitation. Managers must encourage staff to speak openly and promote trusting discussion of critical issues.

We are aware that in today's working world, especially in academia, competition is often fierce and many therefore feel a strong pressure to perform. We therefore pay attention to the personal boundaries of each individual and contribute to a conducive working environment based on trust and mutual respect.

3.4 Good scientific practice and striving for quality

We observe the fundamental principles and standards of good scientific practice.

We stand for professionalism, honesty and fairness and attach importance to integrating these values into research and service. The quality of our work results is always our focus. DFKI's mission to conduct long-term basic research at the highest level for the benefit of humankind is inextricably linked to the fact that all employees strive to achieve high-quality work results in their field.

We comply with the guidelines for ensuring good scientific practice of the German Research Foundation (DFG) and thus make good scientific practice a fixed and binding component of our research and the basis of our scientific activities. These regulations apply to all scientific work in which DFKI employees are involved and are an important part of the training of young scientists.

3.5 Work-life balance

We create conditions that support the compatibility of work and private life.

We promote a physically and mentally healthy work culture that is based on trust and respect and takes individual abilities and needs into account. We support the compatibility of work and private life and create an appropriate working environment in which family and leisure time for personal development outside of work are positively valued.



3.6 Responsibility for DFKI's reputation

We pay attention to the reputation of our company.

The reputation of DFKI is significantly influenced by the appearance, actions, and behaviour of each individual employee. Unlawful or inappropriate behaviour by even one employee can cause considerable damage to the company. As employees, we are required to pay attention to, maintain, and promote the reputation of DFKI. Managers have a role model function in this context.

3.7 Appearance and communication in public

We do not express personal views on behalf of DFKI.

We are aware that we can also be perceived as part and representative of DFKI in private and therefore also take care to preserve DFKI's reputation and standing in public, especially at events, in e-mails and in publications on social media.

Intentionally business- or reputation-damaging statements, threats and insults, false statements of fact and statements endangering industrial peace, in particular statements of private views in the name of DFKI, will not be tolerated and will result in consequences under labour law.

3.8 Leadership culture

For us, leadership is synonymous with taking responsibility for the employees entrusted to us.

Particular responsibility is placed on our managers, from whom we expect the highest level of integrity, righteousness and professionalism as role models. They are expected to set a credible example of legally impeccable behaviour with integrity and at the same time ensure that employees are aware of and understand the Code of Conduct and the behavioural requirements described therein. Managers fulfil organisational and supervisory duties for their area of responsibility and prevent breaches of the rules and unacceptable behaviour within the scope of their activities. Our managers show appreciation for their employees and ensure an open working atmosphere and good working conditions in their areas of responsibility.

We cultivate an open error culture in which we understand errors as necessary elements of improvement processes. We do not want to make mistakes taboo but learn from them and focus on eliminating their sources.

We support our managers in carrying out the responsibilities assigned to them and offer them opportunities to further develop their leadership skills.



3.9 Ethics

AI for the benefit of humans.

In all our thoughts and actions at DFKI, we focus on the well-being of people as individuals and of humanity as a whole. Human rights serve as a basis; we regard people as subjects at all times, never as objects.

We are aware of our responsibility in dealing with research freedom and research risks and therefore promote a responsible approach to research. DFKI systematically incorporates ethical issues into its research activities and has had an ethics team since 2020, which can serve as a first point of contact for employees on all ethical issues. Details are regulated in the currently valid handbook on ethics.

Through our actions, we strive to actively advance the UN's global sustainability goals. We participate in research and development of AI for military purposes only within a narrowly defined framework. Details are regulated in the operational guideline Military Context.





4 Dealing with our business partners and other third parties

For a successful cooperation.

For us, business partners are both our research and cooperation partners in the funded research projects and our clients from all sectors; other third parties are all those with whom we have business relations.

We treat all our business partners and other third parties fairly and equally and expect them to comply with the law, similar to our own principles described in this Code of Conduct.

We always strive to carry out an exchange with all our partners that enables trust and integrity in the sense of successful cooperation and/or fair competition. This also includes the effort to clarify and settle any difficulties or disagreements amicably and professionally.

4.1 Correct dealings with institutions and authorities

In our dealings with institutions and authorities, we always act honestly and transparently.

We are essentially financed by the public sector. As a funding recipient, DFKI is therefore subject to the prohibition of betterment. In our research projects, we are subject to budgetary constraints and use the funds granted to us for the intended purpose, responsibly and effectively. We take care of our resources and use them carefully and economically. We comply with the regulations within the framework of grants. We comply with the regulations governing grants and the rules governing the awarding of public contracts.

4.2 Corruption and bribery

We do not tolerate bribery or corruption of any kind.

We reject bribery and corruption. We do not bribe and do not allow ourselves to be bribed. Nor do we allow ourselves to be unduly influenced but make decisions for objective and comprehensible reasons.

We do not promise or grant benefits to business partners or other third parties, either directly or indirectly, in order to influence their decisions or to obtain undue advantages. This principle also applies in the reverse case: soliciting and accepting benefits for the purpose of procuring an advantage for DFKI or for one's own benefit is also prohibited.



All business decisions are made exclusively in the interest of DFKI. Private interests must always be put aside.

We also act in accordance with our corporate principles in our contacts with employees of public authorities and publicly owned companies as well as public authorities. We avoid even the mere appearance of undue influence, for example through payments, benefits, or other advantages.

4.3 Gifts and invitations

4.3.1 Dealing with business partners

Gifts and invitations are permitted within reasonable limits.

"Gifts and invitations" include any kind of gratuity or offer thereof, such as cash and non-cash gifts, merchandise and fuel vouchers, services, business courtesies, invitations to events, hospitality, holidays, train or plane tickets, discounts and other "things of value" to which there is no legal entitlement.

Gifts in the course of business are customary and permissible within reasonable limits. We can therefore accept freely given gifts up to a value of 50 euros. However, we may not suggest, solicit, or demand gifts and invitations for ourselves or for others. We only accept an invitation from business partners to meals or events if it is unsolicited, serves a business purpose, is not repeated inappropriately often and the invitation is in proportion to the occasion.

We are also permitted to give gifts and invitations to our business partners and other third parties up to a value limit of 50 euros. Since the DFKI is largely financed by public funds, gifts should only be offered in exceptional cases.

We respect cultural customs, which means that benefits - even of a higher value - may be granted and accepted if it is in line with the country's customary notions of hospitality or if it is customary due to social adequacy (e.g. professional position of the recipient). In cases of doubt, we will inform Compliance. Compliance will examine these cases carefully and objectively and take appropriate measures.

Gifts and invitations addressed to the private address may neither be given nor accepted.



4.3.2 Dealing with public officials

Restraint and special attention when dealing with public officials.

The term "public official" includes all employees of governments, ministries, public authorities, or corresponding institutions as well as international organisations and persons acting in an official capacity or on behalf of one of the aforementioned institutions. Other persons who perform public duties on behalf of an authority may also fall under the definition of public official (e.g. professors of public universities).

As the national and international laws on dealing with public officials are strict, donations are to be avoided as a matter of principle. Benefits are only permissible with the express approval of the employer. An exception applies to financially low-value attentions or gratuities that are customary according to custom and politeness or due to cultural practices. In cases of doubt, we will inform Compliance. Compliance will examine these cases carefully and objectively and take appropriate measures.

Public officials may be invited and entertained within narrow limits and on business occasions, provided that the invitation is customary and appropriate.

4.4 Donations and sponsorship

We do not participate in donations and sponsoring.

As we are largely funded by public grants, our actions are subject to the economical and economic use of funds. Donations and sponsoring by DFKI are therefore generally not possible.

As a non-profit organisation, DFKI is entitled to accept donations. Apart from the tax-effective donation receipt, the donor does not receive anything in return. Our research always follows independently and autonomously.



4.5 Fair competition and antitrust law

We are committed to fair competition as the basis of our business activities.

We stand for free and fair competition and comply with the applicable provisions of competition and antitrust law in this regard. We refrain from any activities that restrict fair competition. In particular, we do not enter into any agreements in this regard with business partners, other third parties or competitors and do not disclose any confidential information that would be likely to restrict or distort fair competition. We expect our business partners and other third parties to take responsibility for ensuring fair competition.

4.6 Selection of business partners and other third parties

We select all our business partners exclusively on the basis of suitability and objective criteria.

Only on the basis of suitability and objective criteria are the business partners and other third parties to be selected with whom we wish to cooperate. In addition, we carefully verify the identity of all our partners. It is our declared goal to only maintain business relationships with those partners whose business activities are in accordance with legal regulations and our standards. We do not do business with business partners and other third parties who are directly or indirectly involved in unethical or illegal conduct, such as money laundering, terrorist financing or human rights abuses. In cases of doubt, we will refrain from cooperation.

4.7 Protection of intellectual property

The protection of intellectual property is of essential business policy importance for us as a research centre.

We comply with the applicable laws on the protection of intellectual property (e.g. industrial property rights and copyright). Intellectual property, in particular the know-how generated in the course of research projects as well as know-how from third parties, must be adequately protected in accordance with the respective funding notifications, e.g. by means of confidentiality agreements in R&D contracts, cooperation agreements and contracts with industry. The transfer of know-how to third parties may under certain circumstances fall under export control regulations.

We report inventions that arise in the course of our research activities immediately, properly and completely to our supervisor or the legal department and fill out the invention disclosure form. Service inventions also include inventions in which DFKI employees have collaborated. After receipt of the invention disclosure, DFKI will check whether it claims the invention. Inventions that are claimed are remunerated in accordance with the legal requirements and internal regulations.



4.8 Money laundering

We comply with all legal regulations to combat money laundering and the financing of terrorism.

All employees are prohibited from taking measures, either alone or in cooperation with third parties, that violate money laundering regulations. Money laundering is understood to mean, in particular, the smuggling (e.g. by exchange or transfer) of funds or other assets originating from criminal offences into the legal financial and economic cycle.

We are strongly committed to complying with all laws relating to the prevention, detection and reporting of money laundering activities and conduct our business only with counterparties that are engaged in legitimate business activities and use legitimate financial resources. We immediately allocate incoming payments to the corresponding services and book them. We ensure transparent and open payment flows. Particularly in the case of new business partners, we look out for warning signs in connection with money laundering. These include, for example, unusual payment channels, trust accounts and unclear beneficial owners.

4.9 Procurement

When awarding contracts, we act fairly and objectively and observe the general principles for awarding contracts.

We work with trustworthy and efficient suppliers and service providers and select them carefully according to objective criteria. We do not unilaterally favour a supplier or service provider without objective reason and avoid any conflict of interest. We do not purchase any products or services without having informed ourselves in advance about the market and alternative suppliers.

We are guided by the values of integrity and fairness in all procurement processes and expect the same from our business partners, clients, and suppliers.



4.10 Export control

We ensure compliance with all regulations of foreign trade and customs law.

In the context of export control, cross-border trade is subject to prohibitions, restrictions, authorisation reservations or other monitoring measures. Not only goods but also technologies and software are affected by the export control regulations. In addition to the actual export, temporary exports are also covered, for example the taking of objects and technical drawings on business trips, as well as technical transfers, for example via e-mail or cloud.

DFKI is obliged to observe the country- and person-specific embargo regulations of the Federal Office of Economics and Export Control (BAFA).

Trade prohibitions (embargoes) and trade restrictions may result from the nature or intended use of the products or services, the country of origin or use, or the person of the business partner. Certain goods can be used for both civilian and military purposes (dual-use) and the trade or export of such goods may be subject to authorisation.

In cases of export or transfer of tangible and intangible research results and economic goods or in cases of technical or advisory support, we inform ourselves about the legal requirements and comply with the regulations on export control. Projects and transactions with persons or companies on sanctions lists are generally prohibited.





5 Avoiding conflicts of interest

Personal interests must not unduly influence our professional judgement.

Conflicts of interest can arise when a person's self-interest conflicts with the business interests of the company. Even the appearance of a conflict of interest is problematic if it creates the impression that a person's objectivity or independence may be compromised. Conflicts of interest are therefore to be avoided as a matter of principle.

A conflict of interest may arise if a DFKI employee is also involved in a third-party company (as a shareholder, managing director/board member, owner, founder) or acts in a dual role in a joint project.

There may also be a conflict of interest in the employment of relatives or other close persons in the direct area of responsibility.

5.1 Secondary activities

We inform the Human Resources Department if secondary employment is taken up.

The exercise of a secondary employment for remuneration - even during leave - is subject to notification and approval. Therefore, we inform the Human Resources Department in writing before taking up any secondary employment. There is no obligation to report social commitment and voluntary work in associations or other institutions, as long as the work for DFKI is not affected.

As a matter of principle, we do not take on any secondary employment if its temporal scope impairs the fulfilment of our duties towards DFKI or if there is a risk of a conflict of interests.

5.2 Participation in third party companies

In case of participation in a company, we inform the Human Resources Department.

In case of participation in other companies (as a shareholder, owner, founder; with the exception of commitments that serve the purpose of financial investment - capital participation of less than 5%), we inform the HR department immediately about the participation. This applies in particular to the spin-off of a company from DFKI and also to the direct or indirect participation in a business or research partner of DFKI if we are involved with the respective company in an official capacity or will exercise a mandate in this company.

We do not invest in companies if this leads or could lead to a conflict of loyalty with DFKI.



As the majority shareholder of a third-party company, we do not enter into any contractual relationships with DFKI if we act in a dual role in this case.

5.3 Employment of relatives or other close persons

In case of employment of relatives or other close persons, we inform the Human Resources Department.

Relatives or other persons close to an employee may in principle be employed by DFKI as long as there is no possibility of a conflict of interest or the appearance of such a conflict. A conflict of interest or the appearance of a conflict of interest can generally exist in the employment of the following persons:

- Spouse
- Life partner/cohabiting partner
- Parents, parents-in-law, stepparents
- Children, children-in-law, stepchildren
- Siblings, half-siblings, step-siblings
- Other persons living in a domestic community
- Other persons with whom there is a close personal and/or economic relationship.

Therefore, such situations must be reported to the Human Resources Department so that measures can be taken to protect DFKI and the employees involved. The Human Resources Department must also be informed if it is unclear whether a conflict of interest exists.





6 Responsibility in the workplace

We want to live up to our responsibility in the workplace.

DFKI has taken appropriate measures to ensure health and safety in the workplace in order to protect and maintain the health of employees. Individuals in need of protection, such as people with disabilities, receive special protection.

6.1 Occupational safety and health

Protecting the health and safety of our employees in their workplace is of paramount importance to us.

We are committed to providing a safe and healthy working environment for all our employees. We comply with the applicable occupational health and safety regulations. We regularly conduct hazard/risk assessments with regard to potential stresses and hazards, on the basis of which appropriate protective measures are determined. We support employees with health problems in their reintegration into the work process.

All employees are obliged to act in a safety-conscious manner and to contribute to maintaining or improving safety in the workplace.

To ensure occupational health and safety, each DFKI site has a management representative for occupational health and safety, company safety officers, an (external) occupational safety specialist and a company doctor.

6.2 Data protection and data security

Compliance with data protection regulations is of particular importance to us.

We are aware of the high sensitivity of the data entrusted to us by our employees and partners and protect it by handling it with care and trust. We comply with the applicable data protection regulations, including the provisions on the protection of personal data. Personal data is only collected or processed if it is absolutely necessary for the fulfilment of the corresponding work tasks or if it is required by law. In principle, the processing of personal data must comply with the principles of purpose limitation, transparency, proportionality as well as data avoidance and data thriftiness. We are committed to maintaining the secrecy and confidentiality of personal data to which we have access in order to perform our tasks.



A high technical standard and effective implementation of IT security measures ensure that data is protected against unauthorised access. The right of those concerned to information, blocking and deletion of data is safeguarded.

Details are regulated in DFKI's data protection and data security concept "Technical and Organisational Measures (TOM) for Commissioned Data Processing in the DFKI IT Network". Further site-specific user instructions are available from the infrastructure group responsible for each site.

6.3 Handling of information and confidentiality

We protect information because it is valuable.

We treat all business matters of which we become aware in the course of our activities as strictly confidential. Particularly confidential information in general business transactions as well as knowledge within the scope of research projects and industrial projects are not intended for internal dissemination or disclosure to the public, but are only made accessible to the respective authorised, limited group of persons. We use confidential information exclusively for business purposes.

We protect business documents, work records and files from unauthorised access and ensure that no third party can access data files when we are not at our workplace. We conduct conversations with confidential content in such a way that unauthorised third parties do not gain knowledge of them. This applies in particular to telephone conversations via telephone loudspeakers and video conferences.

6.4 IT security

We use the IT systems to fulfil our business tasks and protect these systems from misuse.

We are committed to the responsible use of IT systems and services, and to the economical use of resources. We use the IT resources provided to fulfil our business tasks and do not use them for purposes that are inappropriate or unauthorised, or for unethical or illegal activities.

We are committed to taking all necessary measures to ensure the security of IT systems against internal and external misuse and threats (e.g. misuse of assigned passwords or inappropriate downloading of material from the internet). Since digital information can be quickly disseminated and easily duplicated, and is virtually indestructible, we pay close attention to the content of e-mails, attachments, downloaded files and stored voice messages.

We do not use private e-mail addresses in a business context. We are aware that the IT resources available at the workplace do not belong to us but are company property.



Private use of the IT infrastructure, in particular of e-mail and other Internet services, is permitted as long as this does not or only insignificantly affect operational matters and a declaration of commitment ("Declaration on the Use of the IT Infrastructure of DFKI") has been submitted.

Details are regulated in the company agreement on the principles of IT use (§ 9.2) and the data protection and data security concept "Technical and organisational measures (TOM) for commissioned data processing in the DFKI IT network". Further site-specific user information is available from the relevant infrastructure group.

6.5 Protection of company property

We treat company property with care and sustainability.

DFKI's corporate values include not only tangible assets and material property, but also intellectual property and work results. We use the intellectual and tangible property as well as the resources of DFKI solely for business purposes. Each and every one of us is responsible for the proper and careful handling of company property. We also protect all company property from unauthorised knowledge and unauthorised access by third parties and against loss, damage, misuse, theft, embezzlement, or destruction. Under no circumstances do we use it for illegal purposes.

In the use of our funds, we observe the principles of economic efficiency, economy, and expediency.

6.6 Use of social media

We do not tolerate inflammatory, offensive or discriminatory posts on social media.

We also treat each other respectfully, openly, and honestly when using social media and reject any form of discrimination. We comply with legal requirements such as data protection, copyright, and trademark law and explicitly also the limits of freedom of expression. In particular, we do not disclose confidential or sensitive information.

Statements intentionally damaging to the business or reputation, threats and insults, false statements of fact and statements endangering the peace of the company will not be tolerated and will result in consequences under labour law.



environment



7 Responsibility towards society and the environment

AI for people.

As a research centre in the field of artificial intelligence, it is elementary for DFKI to create "AI for people". As a non-profit research centre, our primary goal is to develop innovations that can benefit the general public. In this context, research ethics considerations are of great importance to us. In addition to our innovations and developments, we also fulfil our responsibility for society and the common good by promoting young scientists.

7.1 Respect for human rights

We have the highest respect for the dignity and personal rights of all employees, business partners and other third parties.

We respect, protect and promote the observance of internationally recognised human rights and are fully committed to the principle that every human being is to be treated with dignity, fairness and respect. We respect the personal dignity, privacy, and personal rights of every individual. We protect and grant the right to freedom of opinion and expression, and we do not tolerate unacceptable treatment of employees, such as physical and psychological hardship, sexual and personal harassment, or discrimination. This applies not only to cooperation within DFKI, but also to the behaviour of and towards business partners. We are guided by the principles of the Universal Declaration of Human Rights and the United Nations Global Compact.

7.2 Prohibition of child labour

We do not tolerate child labour, forced labour or exploitation of workers.

We reject any use of child, forced and compulsory labour as well as any form of modern slavery and human trafficking and observe the regulations on the protection of minors. Any form of exploitation of children is prohibited. We are guided by the provisions of the UN Convention on the Rights of the Child, the core labour standards of the International Labour Organisation (ILO) and/or national legislation. In principle, the standard with the strictest requirements is to be applied. We also expect this from our business partners.



7.3 Equal opportunities, diversity, and prohibition of discrimination

Promoting diversity and equal opportunities is of strategic importance to us.

Diversity is essential for DFKI, for the well-being of our employees and for the success of AI research. We place equal opportunities at the centre of our work and ensure that diversity and inclusion are practised at all levels of the company. We respect all people regardless of status, gender, origin, skin colour, religion, world view, age, health impairment or sexual orientation and support different life situations and life plans. We evaluate our employees solely on the basis of their performance and competences and actively support gender-equal career paths from junior staff development to management positions.

We reject any form of discrimination. This refers in particular to discrimination against employees on the basis of ethnic origin, gender, religion or world view, disability, age or sexual identity. No form of sexism, racism, discrimination, mobbing, or sexual harassment is tolerated.

7.4 Fair working conditions and equitable pay

The health, safety and well-being of our employees is a top priority.

We offer our employees fair and safe working conditions and demand the same from our business partners and other third parties. We create a working environment in which everyone can perform to the best of their ability while maintaining their physical and mental health. We are committed to respecting the personal dignity, privacy, and personal rights of each individual and not to tolerate any unacceptable treatment of our employees.

We also focus on equal opportunities in the remuneration of our employees and treat all employees equally - regardless of gender, age, skin colour, culture, ethical origin, sexual identity, disability, religious affiliation, or ideology.

This means that we remunerate the work of our employees in accordance with the applicable legal, company, social security, and tax regulations. Unauthorised salary deductions and deductions as disciplinary measures are not permitted. All employees receive a monthly pay slip.



7.5 Environmental protection and sustainability

Dealing responsibly with the environment and climate protection is part of our self-image.

We place great value on innovation and sustainability and therefore always strive to protect natural resources and find environmentally friendly, sustainable solutions for all aspects of our work. We are aware of our responsibility for the environment. Protecting and preserving the natural environment in its diversity is a global challenge. We work with this awareness in mind. In addition, each of us is responsible for reducing our environmental impact by acting in an environmentally conscious manner in our daily work.



8 Whistleblowing

We take every hint seriously and protect our whistle-blowers.

In order to fulfil our commitment to ethical conduct and to continue to be perceived as a research centre of integrity and trust, we rely on employees to report violations of the provisions of this Code of Conduct or (potential) violations of rules or laws. Reports can be made by post, e-mail, telephone, or in person to the manager or the Compliance Department. In addition, the central whistle-blower system is available for all reports at sicher-melden.de/dfki. All reports are treated in the strictest confidence and can also be made anonymously.

Employees who report a (possible) violation in good faith do not have to fear any disadvantages and are specially protected. If necessary, an objective investigation will be conducted in order to take appropriate countermeasures. Employees are expected to cooperate fully with investigations. Failure to cooperate in the course of an investigation may constitute a breach of contractual obligations. The right to refuse to testify is unrestricted, i.e. employees may refuse to testify if the testimony would incriminate themselves.

Employees should first also consider personal contact with their manager. Problems can often be solved sustainably in this way.



9 Deciding and acting

Are my actions in line with the Code of Conduct?

All employees are responsible for their own actions and must independently assess the consequences. When considering whether a decision is in line with the principles of DFKI's Code of Conduct, the following questions must be answered:

Have I considered all the relevant issues in my decision and have I considered them correctly?

- Is what I intend to do in accordance with the law?
- Do my actions comply with the values and guidelines of DFKI?
- Can I objectively justify my decision to a third party?
- Is my decision free of personal interests?
- Do I still think my decision is right when my company has to represent it in public?
- Would I accept my own decision as a person concerned?

If all these questions can be answered with a definite "yes", my behaviour is most likely in line with our principles. If there are any remaining questions or doubts, I contact my supervisor or the Compliance Department.



10 Support and assistance

If you have any questions about the Code of Conduct and internal policies, please contact Compliance at any time.

As this Code of Conduct cannot fully cover all issues relating to compliance, all employees are encouraged to contact their manager or the Compliance Department if they have any questions or concerns. All enquiries will be treated confidentially.

German Research Center for Artificial Intelligence GmbH (DFKI) Compliance Department Trippstadter Street 122 67663 Kaiserslautern

Phone: +49 631 20575-5666 E-mail: <u>Compliance@dfki.de</u>



11 Entry into force

Time of publication is decisive.

The Code of Conduct shall enter into force upon its publication and shall be published in German and English.

The document in English has been translated from German. In the event of contradictions or inconsistencies between the German and English content of this document, the German version shall always apply.