MathWorks Code of Business Conduct

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A Message from Jack Little

At MathWorks, we express who we are as an organization through our guiding principle, our mission, and our core values. Developed over time, each represents a philosophy or goal that is intrinsically important to the organization.

Our guiding principle is “Do the Right Thing.” This means doing what is best for our staff members, customers, business partners, and communities for the long term, and believing that “right” answers exist. Our mission and core values express what “doing the right thing” means in our day-to-day work.

Our mission articulates our goals as a company and how we go about achieving them. Our core values set out the principles that define who we are and how we work together.

The MathWorks Code of Business Conduct reflects our commitment to ourselves, our communities, and those with whom we do business to act in a manner consistent with the highest standards of conduct and ethical standards. The Code provides a shared framework and lays out clear expectations for how we at MathWorks want to conduct ourselves.

Jack Little, CEO

MathWorks®

Company Mission

Technology
Our goal is to change the world by accelerating the pace of discovery, innovation, development, and learning in engineering and science.

We work to provide the ultimate computing environment for technical computation, visualization, design, simulation, and implementation. We use this environment to provide innovative solutions in a wide range of application areas.

Business
We strive to be the leading worldwide developer and supplier of technical computing software. Our business activities are characterized by quality, innovation, and timeliness; competitive awareness; ethical business practices; and outstanding service to our customers.

Human
We cultivate an enjoyable, vibrant, participatory, and rational work environment that nurtures individual growth, empowerment, and responsibility; fosters inclusion, engagement, and community; encourages initiative and creativity; values teamwork; shares success; and rewards excellence.

Social
We actively support our local and professional communities through initiatives that advance STEM education, foster staff volunteerism, build environmental sustainability, and aid global relief efforts.

MathWorks®

Company Core Values

Core values are the essential and enduring principles of MathWorks that are integral to our success. These core values are unaffected by the trends of the day or changing market conditions. We explicitly state our core values because we want them understood and practiced throughout the organization.

Continuous Improvement and the Pursuit of Excellence
We relentlessly pursue continuous improvement and excellence in projects, products, processes, and services, and define success as getting the right things done well.

Respect and Invest
We believe in respect for the individual and care about investing in each other's growth, both for people at MathWorks and for those in our extended community.

Rational Workplace
We believe in building a rational workplace and in making intelligent decisions. In any given situation, we believe that there is a "right answer" and a best way to do things, and we strive to reach them.

Learning and Self-Improvement
We maintain curiosity toward the world and have a passion for lifelong learning. We believe in continuous self-improvement and in developing our own leadership skills.

Credibility and Integrity
We conduct ourselves with uncompromising integrity and honesty as individuals, as teams, and as a company. We strive to earn enduring credibility with others, which we believe is essential to long-term personal and business relationships.

Corporate Responsibility

Social Mission

MathWorks is committed to acting responsibly as a global corporate citizen. Our core values and conviction to “do the right thing” guide us in leveraging our unique company strengths for meaningful outcomes. We believe that investing in our Social Mission program helps us to lead in both our communities and the field of technical computing. As part of this commitment, MathWorks actively supports our communities and promotes social and environmental responsibility.

Human Rights

“Doing the right thing” means being committed to respecting fundamental human rights and freedoms. MathWorks acknowledges, supports, and respects the UN Guiding Principles on Business and Human Rights and does not condone or support any practice that violates the fundamental human rights of others, such as human trafficking, physical abuse of workers, or any form of forced or child labor. We also expect our staff members and business partners to support internationally recognized human rights and to comply with all applicable laws protecting these important rights.

Legal Compliance

MathWorks is committed to rigorously following applicable laws and regulations in the places where we do business. This includes strict compliance with local laws concerning working hours, wages and benefits, collective bargaining, and health and safety. Likewise, MathWorks expects our management, staff members, and those we do business with to comply with all applicable laws at all times.

Sustainability

MathWorks recognizes that a sustainable future requires action to address the effects of climate change. Because of this, MathWorks is committed to continuously improving energy efficiency, reducing waste, using renewable energy, supporting carbon removal projects, and working with our vendors to reduce their own carbon emissions. We have achieved net zero carbon for all US Scope 2 emissions through on-campus photovoltaic arrays and a long-term wind virtual power purchase agreement (VPPA). MathWorks is committed to reporting our global carbon footprint annually and has implemented an Environmental Management System modeled after ISO 14001. MathWorks works proactively to reduce our worldwide energy consumption, greenhouse gas emissions, waste, and water usage, and we are committed to rigorous compliance with all local, state, and federal environmental laws.

Treating Others with Respect

Equal Opportunity
It is the policy of MathWorks to comply with all applicable federal, state and local laws governing nondiscrimination in employment and to ensure equal opportunity in all terms, conditions, and benefits of employment or potential employment.

MathWorks also prohibits discrimination and harassment against any staff member or applicant for employment because of race, color, national origin, ancestry, religion, age, disability, sex, sexual orientation, gender identity, gender expression, marital status, pregnancy, veteran status, genetic information, or other legally protected status.

MathWorks has established an EEO Compliance Program under Section 503 of the Rehabilitation Act of 1973 ("Section 503") and the Vietnam Era Veteran's Readjustment Assistance Act of 1974 ("VEVRAA"). All applicants and employees are treated without regard to their race, color, national origin, ancestry, religion, age, disability, sex, sexual orientation, gender identity, gender expression, marital status, pregnancy, veteran status, genetic information, or other legally protected status. MathWorks has established an audit and reporting system to allow for effective measurement of its equal employment opportunity activities.

To implement this policy, MathWorks will:

1. Recruit, hire, train and promote qualified persons in all job titles, without regard to race, color, national origin, ancestry, religion, age, disability, sex, sexual orientation, gender identity, gender expression, marital status, pregnancy, veteran status, genetic information, or other legally protected status;

2. Ensure that employment decisions are based only on valid job requirements; and

3. Ensure that all personnel actions and employment activities such as compensation, benefits, promotions, layoffs, return from layoff, MathWorks - sponsored programs, and tuition assistance will be administered without regard to race, color, national origin, ancestry, religion, age, disability, sex, sexual orientation, gender identity, gender expression, marital status, pregnancy, veteran status, genetic information, or other legally protected status.

Staff and applicants for employment will not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged or may engage in (1) filing a complaint, (2) opposing any act or practice made unlawful by, or exercising any other right protected by, any Federal, State or local law requiring equal opportunity, including Section 503 and the equal opportunity provisions of VEVRAA, or (3) assisting or participating in any investigation, compliance evaluation, hearing, or any other activity related to the administration of any Federal, State or local law requiring equal opportunity, including Section 503 and the equal opportunity provisions of VEVRAA.

It is the responsibility of each manager of the company to ensure implementation of these policies to avoid any discrimination in employment. All staff are expected to recognize these policies and cooperate with their implementation.

Any allegation of discrimination, harassment or retaliation will be taken seriously and will be investigated promptly and thoroughly by the Human Resources department and/or management. Both the investigation and the results will be treated as confidential on a need-to-know basis. If an investigation confirms that a violation of this policy has occurred, MathWorks will take corrective action, including discipline, up to and including immediate separation from employment, as is deemed appropriate according to the circumstances.

Non-Discrimination

MathWorks is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere which promotes equal employment opportunities and prohibits unlawful discriminatory practices. MathWorks expects that all relationships among persons in the office will be free of bias, prejudice and harassment.

MathWorks strongly encourages anyone who is aware of any discrimination in the workplace to bring that information forward to a manager or Human Resources. MathWorks will respond promptly and diligently to address all reports of discrimination.

In addition to prohibiting discrimination, both MathWorks policy and state and federal laws prohibit retaliation against any individual who in good faith makes a report of discrimination, participates in an investigation of such a report, or supports a person who is the victim of discrimination. MathWorks will promptly and diligently respond to any report of retaliation.

Anti-Harassment

Harassment or retaliation is a violation of MathWorks policy and may be a violation of state and/or federal law. MathWorks prohibits retaliation against any person who in good faith makes a report of harassment, participates in an investigation of alleged harassment, or supports a person who is the victim of harassment.

For purposes of this policy, harassment includes any conduct which targets a person or group of persons, is based upon a protected category and has the purpose or effect of creating an intimidating or hostile working environment or materially interfering with a person's employment opportunities or experience.

Sexual harassment includes not only the foregoing forms of harassment but also any unwelcome conduct of a sexual nature where a person's submission to or rejection of such conduct is used as a basis for making any employment-related decision or action concerning that individual.

This policy applies not only to all MathWorks employees but also to our customers, vendors, guests and others with whom we interact in the workplace.

If an employee believes that they or anyone else at MathWorks (including third-parties) has been the subject of harassment or retaliation in violation of this policy, or if they are not sure whether conduct is in violation of this policy, they are strongly encouraged to immediately notify their manager or Human Resources so that The MathWorks may have the opportunity to timely investigate and address the matter as appropriate. Investigations will be conducted by qualified and impartial personnel. While all employees are encouraged to make such report, all managers are required to do so.

Upon receiving a report of potential harassment or retaliation, MathWorks will promptly investigate the matter and take all such other actions as are appropriate under the circumstances. MathWorks will maintain the highest degree of confidentiality possible under the circumstances.

Staff members may also contact the applicable regulatory agency in their jurisdiction.

Safety

Workplace Safety

Protecting the health and safety of our staff members, contractors, and others working in our facilities is a priority for MathWorks. We will conduct our business with credibility and integrity, consistent with our core values, and observe the occupational health and safety laws and regulations of the locations where we operate. We will continuously improve our health and occupational safety systems and procedures. You should observe all applicable workplace safety rules, use specified personal protective equipment to the extent required by your role, and use due care when performing your duties at all times and in all locations—including customer sites, your home, or other remote locations. In addition, you must immediately report workplace injuries, illnesses, or unsafe conditions to your manager. No staff member will be subjected to retaliation or reprisal for being injured on the job or reporting workplace injuries or unsafe conditions.

Distracted Driving

Staff members and others working on behalf of MathWorks (e.g., vendors, contractors) are prohibited from using mobile devices while driving on company business. This includes, but is not limited to, answering or making phone calls; reading or responding to emails, instant messages, and text messages; and performing web searches. Those driving on company business should safely pull off the road and come to a complete stop before accessing a mobile device.

Drugs and Alcohol

MathWorks is concerned about the safety and well-being of our staff members, and we encourage anyone who suffers from a dependency on alcohol, drugs, or other controlled substances to obtain counseling or other professional care. Information about referrals for such care and other resources is available from the MathWorks Employee Assistance Program.

Alcohol

People working for MathWorks in any capacity (staff, intern, contractor, or otherwise) may not consume alcohol while at work, on MathWorks property, at any MathWorks-sponsored event, or in any vehicle being operated for MathWorks purposes, subject to the following limited exceptions: People who are of legal drinking age may responsibly consume alcohol served in connection with business-related events or business-related meals such as department celebrations and social gatherings. On-campus events or meals that include alcohol should not be scheduled before 4:00 p.m. Responsible consumption means moderate consumption, which stops well short of intoxication or impairment.

People working for MathWorks may not be intoxicated while on MathWorks property, doing MathWorks-related work, attending any business-related event or function including business-related meals, or operating any vehicle for MathWorks purposes.

Drugs and Other Controlled Substances

MathWorks prohibits all staff members and others working on behalf of MathWorks from engaging in the manufacture, distribution, dispensation, possession, or use of illegal drugs or other controlled substances while on MathWorks property or otherwise in connection with any MathWorks-related activity. This includes marijuana, the possession, use, or distribution of which, in any amount, remains illegal as a matter of federal law.

People working for MathWorks may not be under the influence of any illegal drug or other controlled substance while on MathWorks property, doing MathWorks-related work, attending any business-related event or function including business-related meals, or operating any vehicle for MathWorks purposes.

Safeguarding Information

Confidentiality
Staff members have an obligation to protect Confidential Information from unauthorized disclosure, both internally and externally. “Confidential Information” refers to any information we intend to restrict to approved internal recipients or to protect from external access disclosure or distribution. This can include both MathWorks information as well as information belonging to our customers, vendors, partners, or other external stakeholders.

Confidential Information can include, but is not limited to, technical materials such as source code, software, and documentation, as well as business materials such as financial information, customer lists, and personal employee data.

Staff members have an obligation to maintain the security of Confidential Information. You should:

- Never disclose Confidential Information unless the disclosure of such information is pursuant to a non-disclosure agreement reviewed and approved by Legal.
- Avoid discussing Confidential Information in public spaces or with friends and family.
- Treat Confidential Information securely and never send Confidential Information to your personal computer, cloud storage, or email address.

Intellectual Property
MathWorks intellectual property is at the heart of what we do, and it is critical that each staff member do their part in safeguarding that information. For additional information, refer to your employment agreement.

MathWorks is also committed to protecting the intellectual property rights of third parties. Unauthorized use of third-party copyright and other intellectual property rights, such as unauthorized copying of software or other materials, is illegal and a violation of MathWorks policy.

Insider Trading
Illegal insider trading occurs when a person with connections to a company uses material and non-public information concerning a public company to make decisions with respect to trading in that company’s securities or provides such information to others. Such information is referred to as “Insider Information,” which is anything that has not been publicly announced that a reasonable investor would consider important in making investment decisions. This could include things like knowledge of important acquisitions, divestitures, product launches, security breaches, or financial information. Insider trading prohibitions apply to virtually anyone if the information involved is Insider Information.

Although MathWorks is a private company and does not have publicly traded securities, many of our customers, vendors, and partners have publicly traded securities and MathWorks staff members may receive Insider Information in connection with their job responsibilities. You should never trade in the securities of any MathWorks customer, vendor, or partner on the basis of Insider Information nor should you encourage friends, family, or anyone else to trade on the basis of Insider Information you may possess.

Use of Information Technology

Email, internet access, and other electronic media and equipment are business tools that are provided by MathWorks to our staff to facilitate timely and efficient work. MathWorks staff are expected to use MathWorks email and internet systems in a way that is consistent with other MathWorks policies, including our sexual harassment and equal opportunity policies. The use of email and internet systems is reserved primarily for conducting business at MathWorks. Limited personal use of these systems is permitted but should not be excessive or interfere with business needs or normal operations. For additional information, refer to the MathWorks Acceptable Electronic Mail, Network, and Internet Use Policy.

Protecting Personal Information

MathWorks is committed to complying with applicable data protection and privacy laws including the European Union General Data Protection Regulation and the California Consumer Privacy Act and to properly handling personal information. Personal information generally means information that can be used to identify or locate an individual or private information concerning an individual and includes things such as names, addresses, and contact information.

MathWorks staff members play an important role in safeguarding personal data to protect our customers and business partners and ensure we operate in an environment of trust and integrity. You are required to follow all MathWorks policies when your work involves the collection, use, transfer, storage, or disposal of personal information. For more information, consult the MathWorks Privacy Policy.

Managing and Retaining Business Records

The integrity, reliability, and accuracy of MathWorks books, records, and financial statements are fundamental to our continued and future business success. You may not cause MathWorks to enter into a transaction with the intent to document or record such transaction in a deceptive or unlawful manner. In addition, you may not create any false or artificial documentation for any transaction entered into by MathWorks. It is equally important to know when to save information and when to periodically dispose of documents that are no longer useful or do not need to be retained. If litigation is pending or threatened, you must retain all pertinent documents in accordance with instructions received from the Legal team.

Engaging Externally

Government Contracts

Governments and contractors doing work under government contracts are some of our most important customers. Contracts involving work in the public sector are commonly subject to requirements that do not apply to our dealing with private customers. These requirements can include a variety of compliance and reporting obligations. Additionally, MathWorks and all of our staff members have an obligation not to try to exert improper influence to be awarded any government contract. MathWorks staff members should not do favors or give gifts to government employees, regardless of value. Doing so violates the requirements of this Code of Business Conduct.

Anti-Corruption

Our success as a company is dependent on maintaining the highest possible ethical standards consistent with our core value of Credibility and Integrity. The payment, offer, authorization, or receipt of bribes is a serious violation of this policy.

A bribe includes improper exchange of anything of value, including gifts, favors, or cash, and facilitating such an exchange through relatives, friends, or any other third party.

Anti-corruption and anti-bribery laws can be complex and vary from country to country, and violations can have a significant impact on MathWorks including serious criminal and civil penalties and significant damage to the reputation we have worked to develop. MathWorks will not tolerate any form of bribery or corruption on the part of our staff members.

Export Compliance

MathWorks maintains an Export Compliance Program to ensure our products and services are delivered throughout the world in compliance with all U.S. export regulations (such as Export Administration Regulations/EAR, the International Traffic in Arms Regulations/ITAR, and OFAC Regulations), along with export regulations of all the countries where we do business. The purpose of the program is to prevent the sale and export of products and services to countries, companies, or individuals on governmental denied parties lists; review transactions for export restrictions and apply for export licenses where required; and provide company-wide export compliance training.

Each staff member is expected not to knowingly violate or attempt to violate the conditions or requirements of the Export Compliance Program or U.S. export laws. Those involved in such actions are personally liable and may be subject to criminal and/or civil penalties.

If you have questions, need guidance, or have specific concerns, send an email to Export Compliance or speak to someone on the Export Compliance Team in Operations.

Conflict of Interest

A conflict of interest exists when a staff member's personal interests are inconsistent with those of MathWorks and create conflict between the staff members' interests and the best interests of MathWorks. Staff members should not take part in, appear to take part in, or exert influence on any decision where the staff member's own interests are, or may appear to be, in conflict with the interests of MathWorks.

Staff members should not use their position for undue personal benefit or to benefit relatives, friends, or other close associates.

Many actual or potential conflicts of interest can be resolved in an ethical way that is acceptable for both the individual and MathWorks. If you are in a situation where you believe there is a conflict of interest or believe a situation could create a conflict of interest or the appearance of a conflict of interest, you should immediately inform your manager to discuss solutions to address the issue.

Fair Competition

MathWorks is committed to competing on the basis of our strong product offerings and not through the use of anti-competitive practices. Competition laws (also referred to as anti-trust laws) are designed to protect competition and prohibit business behaviors that have the effect of preventing, restricting, or distorting competition. MathWorks staff members are required to comply with anti-trust laws at all times. You must not engage in anti-competitive practices, including:

- Agreeing with a competitor, directly or indirectly, to fix prices
- Structuring bids on a project to direct the contract to a competitor
- Boycotting suppliers or customers
- Dividing or allocating markets or customers with a competitor

In addition, in all discussions with competitors, you should refrain from discussions about prices, costs, profits, margins, or bids for customers' business. If you have any question about whether or not a course of action has anti-trust implications, you should discuss the issue with your manager.

Gifts and Gratuities

MathWorks staff members should not permit any influence that could conflict with the best interests of the company or prejudice the company's reputation. Any MathWorks staff member who is offered or receives payment or gift of any significant value should return it to the giver in a tactful and dignified manner, advising the giver of the MathWorks policy prohibiting its acceptance. Certain common vendor business practices may be considered appropriate in certain circumstances. For more information, refer to the MathWorks Gifts and Gratuities policy.

Association with vendor representatives at luncheons, dinners, or business organization meetings is helpful in establishing better business understanding and not unethical, so long as attendance at such an event does not impose any obligation on MathWorks or the staff member attending.

Social Media

Social media offers MathWorks a view into conversations among people who are important to us, as well as the opportunity to engage with those audiences. As a MathWorks staff person engaging on social media, you should apply our core values (e.g., operate transparently, respectfully, and with integrity). You should never represent yourself as speaking on behalf of MathWorks unless authorized to do so. Also, when you are using social media, company policies, including those regarding confidentiality, still apply. Confidential information should not be shared on social media. For more information, refer to the MathWorks Social Media Policy.

Political Activities

MathWorks believes in investing in the local communities in which we operate, and as part of that, we encourage our staff members to participate in the political process in their individual capacities. We encourage you to engage in political activities consistent with your conscience and beliefs, but any political activities you engage in should be done on your own time, without the use of MathWorks resources, and should not be done in a way that suggests MathWorks endorses any such activity. MathWorks may engage in lobbying activities on behalf of issues that affect MathWorks, either individually or through organizations we are a part of. Any such lobbying activities shall be undertaken in compliance with applicable laws and regulations.

MathWorks®
Accelerating the pace of engineering and science

Reporting Concerns or Violations

Every staff member has a responsibility to help maintain the standards set forth in this Code of Business Conduct. You can do your part by being proactive when ethical questions arise so they can be addressed appropriately.

To get answers to your questions or report any possible violations of this Code of Business Conduct, please speak with your manager or contact your HR Business Partner.

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