

Global Code of Conduct



A Message from Daniel and Rob, our Co-CEOs

From our humble roots in an apartment in Romania in 2005 to today, UiPath has come a long way. But our commitment to doing business ethically and with integrity hasn't changed.

This Code of Conduct outlines our values and the policies that govern how we operate with our customers, partners, communities, and each other. Take the time to read it and understand how it applies to everything you do at UiPath.

With every decision and action, we have an opportunity—and an obligation—to represent our values and follow our Code of Conduct.

Thank you,
Daniel & Rob



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Policy Owner:
Brad Brubaker, Chief Legal Officer

Policy Champion:
Alina Vlaicu, Global Compliance Officer



Objective and Scope



To ensure that at all times all employees, freelancers, those employed by carriers or other contingent workers acting on behalf of UiPath or having access to UiPath systems including its subsidiaries and affiliates (“UiPath” or “Company”) act in good faith, with integrity and consistent with the Company’s values in order to maintain effective trust and credibility with our employees, customers, business partners and communities in which we operate.

The UiPath Code of Conduct is applicable to all employees, freelancers, those employed by carriers or other contingent workers acting on behalf of UiPath (“UiPathers”), as well as the Company’s business partners.

After carefully reviewing this Code, you must acknowledge that you have received, read, understand and agree to comply with this Code. The acknowledgment must be made within thirty (30) business days of your receipt of this Code and on an annual basis as the Company may require.

Our Values



Humble

Listen. Learn. Help others.



Bold

Challenge. Experiment. Explore.



Immersed

Consider. Reflect. Imagine.



Fast

Take action. Preempt. Transform.

Our Culture, Our Most Valuable Asset

01 **Open**

We support the open and respectful exchange of ideas – from both within and outside of the Company.

02 **Fearless**

We do not hide from our own failures or scorn the failures of others.

03 **Excellence**

We trust each other: to own our work, to always seek excellence, to reach beyond our past achievements.

04 **Authentic**

We believe in creating a safe, generous, accepting workplace where people can be their authentic, best selves.

05 **Talented**

We are a meritocracy.

06 **Collaborative**

We wholeheartedly share what we know – not just with each other, but with anyone who wants to explore and contribute.

07 **Progressive**

We prize introspection and action equally.

08 **Human Achievement**

We believe in our technology and its potential to accelerate human achievement.

Our Policies



Our Policies

People

Equal Employment Opportunity Provider

Our strongest asset is the people we attract, retain, and motivate. UiPath is a place where individuals from all backgrounds come together to rethink how the world works. As a proud Equal Opportunity Employer, we are committed to establishing and maintaining a work environment free of discrimination, retaliation, or harassment, and providing equal opportunities to all persons regardless of race, age, color, religion, sex, sexual orientation, gender identity and expression, national origin, disability, military and/or veteran status, or any other protected classes.

Statement Against Harassment, Discrimination & Retaliation

Coworkers, supervisors, managers, owners and third parties are prohibited from discriminatory, intimidating, harassing, or retaliatory behavior. The Company takes allegations of discrimination, intimidation, harassment, and retaliation very seriously and will promptly conduct an investigation and take appropriate corrective action when warranted, which may include discipline, up to and including termination. UiPathers are encouraged to promptly report any behavior that may violate this policy to the People team, the Legal team, or through the Compliance Hotline as described below under the “Speak Up” section.

Avoid Conflicts of Interest

UiPathers shall not engage in any conflicts of interest stemming from any personal activities or relationships that influence or may be perceived to influence one’s decision-making and ability to work in the best interests of UiPath. UiPathers must disclose, amongst other things, personal financial interests or investments, personal relationships, outside employment or engagements, membership in professional and political organizations, as well as excessive gifts or hospitalities.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, you should disclose such conflict at conflict.check@uipath.com. Members of the Board of Directors of UiPath Inc. and Executive Officers may reach out to the Chief Legal Officer or email public.company.compliance@uipath.com for disclosure and next steps.



Conflict of Interest disclosures and queries should be addressed with the Compliance team at: conflict.check@uipath.com

Our Policies

Integrity

Corporate Opportunities

UiPathers may not take personal advantage of opportunities for the Company that are presented to or discovered by UiPathers as a result of his or her position with the Company or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our UiPath line of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with UiPath in any way.

Anti-Money Laundering Compliance.

UiPathers are prohibited from engaging in any activity that facilitates money laundering or the funding of terrorist or criminal activities in connection with the Company's business. Money laundering is the act of concealing or disguising the existence, illegal origins, and/or illegal application of criminally derived income so that such income appears to have legitimate origins or constitute legitimate assets. While money-laundering involves giving "dirty" money the appearance of legitimacy, terrorist financing generally involves using legally earned income to finance illegal activities. The Company expects all UiPathers to comply with all applicable anti-money laundering and countering the financing of terrorism laws and regulations.

Compliance with the Law

All UiPathers, as well as its business partners, are expected at all times to strictly obey all applicable laws and regulations.

Anti-Bribery & Anti-Corruption

UiPathers and those individuals or entities acting on UiPath's behalf shall at all times comply with all applicable anticorruption and anti-bribery laws. Under no circumstances shall any UiPather or any person or entity acting on UiPath's behalf give, receive or promise anything of material value (e.g. bribes or kickbacks) in order to influence a business outcome or obtain treatment in favor of UiPath.

Remember it is not only about the value, but also about the intention. Therefore, Gifts and Hospitalities must serve a bona fide purpose and be modest. Gifts and entertainment relating to government officials are addressed in our Global Anti-Bribery Policy. Corruption disrupts business relationships and erodes the trust of our partners. If you have any concerns about whether gifts or entertainment offered or received by you are appropriate under the Code or Company policies, you are expected to request permission from your supervisor and the Compliance team before making such an expense.

Our Policies

Integrity

Export Controls

UiPath's reach is global. The privilege of doing business globally also comes with export control obligations. UiPath is committed to doing the right thing and it appreciates that this means integrating export control checks and validations in the end-to-end processes: from product creation and development, until product delivery and use thereafter.

The consequences for not complying with the export control checks could be devastating for UiPath, with administrative, criminal, and reputational repercussions.

The end-use, the end-user, the technical characteristics, the ultimate destination and compliance with the country of export legislation should be the concern of every employee.



For more information you can reach out to exportcontrol@uipath.com



Fair Competition

UiPath business activities must be conducted in full compliance with the applicable competition / antitrust rules and regulations. UiPath shall apply its Commercial Policy in a consistent, fair and non-discriminatory manner to all of its customers and partners. UiPathers shall at all times engage in fair dealings. UiPathers shall not engage in any form of anticompetitive practices, as defined by such applicable law, including by way of side agreements with competitors that could limit competition, such as, but not limited to: price fixing with direct competitors and partners; dividing territories, markets or customers; participating in any form of bid rigging (e.g., fixing the outcome of a tender); sharing or discussing non-public information such as UiPath strategies, business plans, budgets, forecasts, financial and operating information, pricing, production and inventory, customers, or other commercially sensitive information with competitors, regardless of how innocent or casual the exchange; or applying discriminatory treatment to similar trading partners.

Fair Dealing

UiPathers are expected to deal fairly with our customers, suppliers, employees and anyone else with whom they have contact in the course of performing their jobs. Statements regarding the Company's services must not be untrue, misleading, deceptive or fraudulent. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from employees of other companies is prohibited.

Our Policies

Information Security

Confidentiality & Information Security

UiPathers must at all times hold in strictest confidence, and not use (except for the benefit of the Company) or disclose to any person, firm or corporation (without written authorization) any Confidential Information of the Company.

“Confidential Information” means any non-public information that relates to the actual or anticipated business, research, or development of the Company, or to the Company’s technical data, trade secrets or know-how, including, but not limited to, research, business plans, product plans, products, services, customer lists and customers, markets, software, developments, inventions, processes, source code, technology, designs, drawings, engineering, hardware configuration information, marketing, finances, or other business information obtained either directly or indirectly in writing, orally, or by drawings or observation of parts or equipment. Failure to safeguard such information may significantly harm UiPath and its competitiveness in the marketplace.

Data Privacy

UiPathers must collect, share or otherwise process Personal Data only if there is a legal basis for processing, such as: consent, contract performance, legitimate interest or a legal obligation to do so. UiPathers must safeguard the Personal Data of other employees, applicants, employees of customers or partners and of all other individuals whose Personal Data is processed by UiPath. “Personal Data” relates to information allowing an individual to be identified, directly or combined with other data, which includes names,

addresses, images, online behaviour, IP or contact information. UiPathers must not collect more data than strictly necessary and access should be limited to those who are authorized and have a need for access to such data. Personal Data shall be deleted if it is no longer needed for the purposes it was initially collected.

Communications & Use of Social Media

Social Media is changing the way we work, offering a new model to engage with customers, team members, and the world at large. We believe this kind of interaction can help build stronger, more successful business relationships.

Only the Social Media team and its approved delegates are permitted to use the Corporate Social Media channels in the name and on behalf of UiPath. If you choose to talk about UiPath on your personal social media account, make sure to never disclose confidential information, to present truthful representations of facts, and to disclose that you are presenting your own opinion and not an official position of the company. Do not make statements or answer to questions on matters outside your field of expertise. If you are asked to participate in any interview or to provide any public statements, please contact the PR team before making any commitments or statements.



If you encounter content that exceeds your field of expertise, please refer them to pr@uipath.com



Our Policies

Information Security (Continued)

Financial Disclosures

UiPath is required to maintain accurate financial books and records reflecting the true nature of UiPath's operations and finances. Falsification of company business documents is expressly prohibited. Any employee who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor, the Compliance Officer, the Audit Committee of the Board, or by raising the concern on the Compliance Hotline as described below under the "Speak Up" section.

Disclosure of Inside Information

As a UiPather, you may be privy to confidential information of UiPath or its customers or partners that may provide you or anyone to whom you disclose such information an unfair financial advantage as it pertains to the purchasing or selling of equity in such companies. The use of such inside information with respect to purchasing or selling equity is unlawful and may lead to civil and/or criminal liability.

Use of Company Equipment

UiPathers are expected at all times to protect and maintain Company assets and to use its resources for legitimate business functions.

Sustainability

UiPath is committed to promoting environmentally conscious behaviors in our day-to-day interactions and to taking steps to minimize our impact on the environment. We strive to create a healthier and more sustainable future for all by supporting the development of innovative solutions that address environmental challenges both at UiPath and with our customers.

Health and Safety

We monitor our facilities and protect against hazards that may cause serious physical harm in accordance with all local laws.

All partners, including suppliers, shall be bound to maintain facilities where health and safety practices are conducted in accordance with the law and represents a priority.

Policy Assurance



Policy Assurance

This Code of Conduct is not intended to address every potential legal, regulatory or ethical issue that you will face while working for or on behalf of UiPath. It is, however, intended to serve as a starting point for helping you in these matters and you are expected to comply with these standards.

When acting for or on behalf of UiPath you are at all times expected to conduct yourself in a legally and ethically compliant manner consistent with this Code of Conduct and UiPath's values, policies, procedures, guidelines and practices. When in doubt you are encouraged to communicate with a member of management, the People team or the Legal & Compliance team.

The Ethics and Compliance Standards are endorsed by UiPath CEO and Board of Directors. Regular reports will be shared with them on matters related to this Code of Conduct.

Any waivers of this Code for executive officers or directors may be authorized only by our Board or a committee of the Board and will be disclosed to stockholders as required by applicable laws, rules and regulations.

Speak Up



Speak Up

If you become aware of any circumstances that you have a good faith reason to believe are inconsistent with or in violation of this Code of Conduct, you have a responsibility to report such conduct as follows:

1. First discuss with someone in your management chain or contact your People team Business Partner or the Compliance team at legal.compliance@uipath.com. If you wish to report anonymously and/or do not wish to address the concern with your managers or the People or Compliance teams, you can use the means provided by the independent vendor as follows:



Web app: uipath.ethicspoint.com

Phone app: uipathmobile.ethicspoint.com



Hotline: There are dedicated lines for each country where UiPath maintains a presence. Access uipath.ethicspoint.com and select the country in which you are located. This action will display the hotline number for your country.



Managers responsibilities

Managers are also responsible for reporting promptly to the People team or the Compliance team if they become aware of any situation that can be a breach of this Code of Conduct. Failure to do so may result in discipline, up to and including, termination.

Disciplinary Action

Any violation of this Code of Conduct or any other UiPath policy or procedure may result in discipline, up to and including, termination.

No retaliation will be taken against you for reporting a suspected violation of this Code of Conduct that you believe in good faith to be true or for participating in an investigation.

UiPath cannot guarantee complete confidentiality of reported claims, given that the Company may need to disclose certain information on a need-to-know basis in order to appropriately respond to the complaint. However, matters and investigations will be kept confidential to the greatest extent possible, and in accordance with applicable laws.

All necessary internal information concerning UiPath policies and guidelines is available on Inside UiPath.

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