

# Qlik Partner | Program

## Code of Conduct

Effective Date: 1 January 2024

Qlik is committed to the highest ethical standards, including compliance with applicable laws and regulations, and believes this commitment is critical to our success when providing our products and services (collectively, “Qlik Offerings”). Qlik values its relationships with its partners and believes that our collective success is supported by a shared commitment to ethical business practices, sustainability, and diversity and inclusion. To that end, all Qlik partners are expected to comply with the principles set out in this Partner Code of Conduct (the “Code”).

This Code applies to all Qlik Partners, which includes but is not limited to, agents, resellers, partners and distributors, as well as their respective employees and contractors doing business on Qlik’s behalf (which includes, but is not limited to, their permanent and temporary employees, independent contractors, suppliers, agents and/or downstream partners).

## 1. CONDUCT BUSINESS IN COMPLIANCE WITH LAWS

**Compliance with all Laws.** Following the law is the foundation on which Qlik’s ethical standards are built. Partners must share this responsibility with Qlik by also complying with applicable laws, rules, and regulations.

Qlik does recognize that many Partners operate in different international environments which may be less or more restrictive than this Code. Nonetheless, all Qlik Partners are expected to adhere to the principles in the Code in their dealings with Qlik and when conducting any business on Qlik’s behalf, even if such conduct would otherwise be “legal” under applicable law. If you operate in a country where local laws are more restrictive than this Code, then you are expected to comply with those laws.

**Anti-bribery/Corruption.** Qlik is committed to conducting its business free from any form of bribery and corruption and requires its partners to uphold these standards as well. The law prohibits, among other things, offering, accepting, or giving anything of value to another party for the purpose of inducing them to behave unethically. This applies in particular to dealings with government officials, but also applies to private party dealings as well. Even the appearance or attempt of the aforementioned improper behavior may cause harm or be illegal. Partners are expected to comply with all applicable legislation concerning bribes, kickbacks (including facilitation payments) and corruption, notably the US Foreign Corrupt Practices Act 1977 and the UK Bribery Act 2010, as well as any other applicable local legislation. Partners must have policies and procedures in place to actively ensure compliance with these laws.

**Gifts & Entertainment.** The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain an unfair advantage with customers or prospects. No gift or entertainment should ever be offered, provided, or accepted by you unless it:

- is not a cash or cash equivalent gift;
- is consistent with customary business practices;
- is not excessive in value;
- is not, and cannot be construed as, a bribe or payoff; and
- does not violate this Code, laws or regulations.

In particular, Partners should not give money or anything of value, directly or indirectly, to government officials or political candidates in order to improperly obtain or retain business. “Government official” is interpreted widely, and can include, but is not limited to, any person holding an executive, legislative, judicial or administrative public office, or a person or company doing business on their behalf, or any government employee (including those of international organizations like the UN or World Bank).

**Doing Business with Governments.** A portion of Qlik's business involves contracts with governments and government agencies. Each government or government agency has its own procedures, rules, and ethical standards for contractors. Partners are responsible for learning and complying with the rules of customers who may be a government or non-government customers may be improper or even illegal when dealing with the government. The penalties for failing to adhere to these rules and laws are severe, such as substantial fines, imprisonment, and prohibition from doing business with the government.

**Trade Compliance.** As a global company, Qlik must comply with laws and regulations that govern the sale, transfer, and use of its technology (collectively, "Trade Compliance Laws"). Trade Compliance Laws may prohibit or restrict, among other things, business dealings with certain countries, and/or transactions with persons or entities identified on lists such as those identified on the US Office of Foreign Assets Control Specially Designated Nationals list (available at <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>).

Partners are responsible for understanding how the relevant Trade Compliance Laws apply to their business and implement policies and procedures in place to ensure that no Qlik products, services, information, data and/or materials will be imported or exported, directly or indirectly, in violation of, or used for any purpose prohibited by, any Trade Compliance Laws. In particular, Partners must not participate in any economic boycott not sanctioned by the US government.

**Competition/Anti-Trust.** Qlik is committed to rigorously observing laws which protect consumers and fair market practices, such as competition and antitrust laws (collectively, "Competition Laws"). Competition Laws generally prohibit behavior, actions, or agreements that unreasonably restrain trade, unfairly reduce competition, or create collusion between parties to set prices or divide markets to the detriment of consumers. Such agreements and behaviors are not tolerated by Qlik and should not be tolerated by its Partners.

**Insider Trading.** In the course of business, Partners may learn of confidential information that could impact another company's stock price. However, laws exist prohibiting the trade of stock of a company based on material non-public information about that company (collectively, "Insider Trading Laws"). Material non-public information may include, but is not limited to:

- financial information;
- new product or business lines;
- anticipated mergers, acquisitions or divestitures; and/or
- management changes or business restructurings

Partners must comply with all applicable Insider Trading Laws, including those related to "tipping" others who might make an investment decision on the basis of such information for themselves or on another's behalf.

## 2. RESPECT HUMAN RIGHTS AND THE ENVIRONMENT

**Anti-Discrimination.** Qlik believes diversity is a tremendous asset and is firmly committed to providing equal opportunity in all aspects of employment while abiding by all laws that govern the fundamental rights of Our employees at work. Accordingly, Partners must not permit discrimination against their job applicants, employees, contractors, vendors, or business partners on the basis of age, race, ethnicity, creed, color, religion, national origin, gender, sexual orientation, physical or mental disability, or any other legally protected classification (collectively, "Protected Classes").

**Anti-Harassment.** All business conduct related to Qlik Offerings should be performed in a professional and respectful manner. Partners shall prohibit its employees from engaging in bullying, harassing, and discriminatory behavior (especially against those in a Protected Class) such as name calling, exclusion, sexual harassment, inappropriate or offensive physical contact, joke-telling, or physical or verbal bullying. These standards apply while working on Partner premises, at offsite locations, at Partner-sponsored business and social events, or at any other place where Partners may be conducting business relating to Qlik.

**Human Rights and Fair Labor Practices.** Partners shall not use any form of slave, forced, bonded, indentured, or involuntary labor, and shall comply with all applicable laws prohibiting involuntary labor practices, including the U.K. Modern Slavery Act 2015. Partners shall treat their workers fairly and with dignity and provide a workplace free of harassment and unlawful discrimination. Partners shall comply with all applicable local labor laws governing working hours and employee compensation in all locations in which they operate.

Partners shall not use child labor in violation of any applicable child labor law.

**Data Protection.** The collection, storage, and processing of data, and in particular, personal data, is increasingly subject to stringent regulations and Qlik takes its obligations to protect data very seriously. Partners are expected to comply with all relevant laws concerning privacy / data protection of personal data. These privacy obligations include, but are not limited to:

- maintaining adequate privacy notices;
- keeping confidential any personal information;
- using it only for the lawful purpose intended;
- deleting it once the purpose for which it was collected/processed has been fulfilled;
- only disclosing it (including internally) on a “need to know” basis to staff trained to handle personal data who are bound by adequate confidentiality obligations;
- respecting the rights of any relevant data subjects under local law;
- ensure adequate technical and contractual transfer mechanisms are in place prior to any transfer to a third party;
- complying with any reporting obligations in the event of a data breach; and
- and having adequate safeguards in place to ensure the security of personal data.

**Health and Safety.** Partners must provide their workers with a safe workplace by having reasonable policies and procedures to detect, prevent and handle potential risks to the health, safety, and security of their workers, and by following all applicable laws relating to health and safety in the workplace.

**Environment.** Partners shall operate in an environmentally responsible manner, strive to minimize any adverse impact on the environment, and comply with all applicable environmental laws, including reasonably assisting Qlik with any required environmental reporting.

**Artificial Intelligence (AI).** Qlik finds AI to offer exciting opportunities, but also recognizes the potential for discrimination and other harms that AI may produce. Therefore, Partners must use AI in compliance with applicable laws and this Code in relation to internal business operations and Qlik Offerings.

### 3. IMPLEMENT HONEST PRACTICES

**Accurate Record Keeping.** Qlik requires honest and accurate recording and reporting of information in order to make responsible business decisions and comply with the law. Partners must comply with the same standards, which includes maintaining complete and accurate records of Qlik Offering sales. False or misleading documentation, whether or not it results in personal gain, is never permissible under any circumstance.

**Honest Marketing and Use of Intellectual Property.** Qlik's intellectual property rights ("IP Rights") are central to the integrity of its business model and marketing efforts. To assist with protecting Qlik's IP Rights, Partners must not:

- Engage in any misleading or deceptive practices;
- Violate Qlik's guidelines with respect to Qlik's trademarks or Qlik Offerings, including any visual guidelines or partner brand policies;
- Continue using any Qlik logo, trademark, or design if instructed to stop by Qlik;
- Apply trademarks, logos or designs resembling those of Qlik on any goods or services which are likely to cause confusion to customers as to the origin of such goods or services; and/or
- Use the Qlik Offerings other than as expressly permitted by Qlik in the applicable agreement.

**Product Roadmaps and Future Availability.** Partners must not commit to the future availability or details (such as pricing) of any future functionality or feature of a Qlik product or services. To the extent a Partner does communicate information (in marketing or otherwise) to customers or potential customers, this must always be consistent with any applicable Qlik approved guidelines/authority.

**Conflicts of Interest.** Qlik expects its relationships with Partners to be free from conflicts of interest. This includes anything which would cast doubt on a Partner's ability to act with total objectivity with regards to the sale or distribution of Qlik products and/or services. An example would be where a Partner's personal financial interests are at odds with those of its engagement with Qlik.

**No Side Arrangements.** Qlik expects written agreements relating to Qlik Offerings to be final and prohibits Side Agreements). "Side Arrangements" are generally modifications (written, electronic, or verbal) to contractual terms and conditions that are either undocumented or documented separately from the contractual document mutually executed by the authorized agent of each party. Partners shall not permit Side Arrangements regarding Qlik Offerings and shall implement controls and training to prevent such Side Arrangements from occurring.

**Requirement of a Bona-fide End-user.** Qlik believes in honest and transparent business dealings, and all Partner orders placed with Qlik must be in relation to an identifiable, bona-fide third party end-user order of Qlik Offerings.

**Confidentiality.** While working with Qlik, Partners may have access to confidential information, such as pricing, product, marketing, and services information. Partners must safeguard this information by not transferring, publishing, using, or disclosing it other than as permissible by law or the applicable terms governing a Partner's relationship with Qlik.

**Influence and Finders Fees.** Qlik may pay influence and finders fees ("Referrals") to eligible Partners that fulfil the requirements of the Referral process, as solely determined by Qlik, for an applicable opportunity. Partners must not request or accept any referral, influence, or finder fees related to Qlik Offerings from any party other than Qlik, as intended by the Referral process. Additionally, Partners may not require a Qlik prospect, customer, or other partner to identify their entity in Qlik's systems as the

referrer of Qlik Offerings in a transaction for which Partner was not identified by Qlik as participating in the transaction.

**Independent Contractors.** Qlik values its Partner relationships. However, each Partner must accurately represent in its practices and to the public that the Partner is an independent contractor, whose relationship with Qlik is established exclusively by the partner agreement between the parties. Partners must never represent or imply themselves to be agents, affiliates, representatives, or employees of Qlik.

#### 4. OBSERVE THIS CODE; CERTIFICATION

Qlik has in place its own systems and internal code of business conduct to ensure the above principles are complied with. Partners must ensure that adequate procedures and policies promote due diligence on their own business operations, supply chain, partners, and customers to ensure compliance with the principles specified in this Code.

Qlik may require a Partner to certify in writing its compliance with this Code and its principles, and Qlik reserves the right to appoint a third-party representative to audit such compliance.

#### 5. REPORT VIOLATIONS; INVESTIGATIONS

Partners must immediately report any conduct that is believed, in good faith, to be an actual, apparent, or potential violation of this Code to its most senior Qlik contact and to Qlik's Legal Department at [partner.compliance@qlik.com](mailto:partner.compliance@qlik.com).

Each Partner must cooperate with any investigation by Qlik regarding any suspected or actual breach of these principles. Any violations of this Code by a Partner or its employees, agents, directors, or representatives must be promptly remedied by the Partner. In the event of a material violation, in addition to Qlik's rights under any agreements or law, Qlik may immediately terminate any applicable partner agreement and/or cancel any outstanding fees payable to such Partner, pursuant to any applicable laws and without any liability to Qlik.