



QLIK

CODE OF BUSINESS CONDUCT

Effective January 16, 2012
Revised January 27, 2017
Revised February 2, 2018





MESSAGE FROM THE CEO

At Qlik our five Core Values are at the heart of all of our interactions with colleagues, customers, and partners. It is my hope that these values are the pillars to guide our conduct and communicate our passion for simplifying decisions for everyone, everywhere.

Intrinsic to our Core Values is our commitment to ethics – fair and ethical behavior in the conduct of our business, including compliance with all applicable laws and regulations. Beyond ethics and compliance, we share a passion for and belief in being a conscientious corporate citizen. Through our Corporate Responsibility program, we are committed to sustainability, philanthropy, and diversity and inclusion.

Our Code of Business Conduct reflects our values and sets up a framework to help guide us all in a business environment that becomes more complex every day.

Under no circumstances should any Qlik employee commit an unethical or illegal act under the pretense of being in Qlik's best interest. If you are ever unsure or feel that the Code is being violated, I ask you to speak up. Talk to your manager or reach out to our Legal Department. You may also share concerns anonymously through our Lighthouse Services hotline. Remember, our non-retaliation policy means that you don't need to be afraid of asking questions or reporting potential issues. Failing to comply with the Code could put you, your colleagues, and Qlik at risk, and accordingly, could result in disciplinary action and even dismissal.

If you have any questions about anything you read in this document, talk to your manager or reach out to Qlik's Legal Department.

Mike Capone, CEO

Our Core Values

Challenge!

- Challenge assumptions
- Innovate
- Embrace new ideas

Move fast!

- Discover, decide, do
- Be thorough and keep it simple
- Pause to gain clarity

Open and Straightforward

- Seek first to understand
- Be receptive to (and seek) feedback
- Provide feedback respectfully regardless of level and with positive intent

Take Responsibility

- Hold ourselves accountable for what we do and don't do
- Reach back to help others move forward
- Take responsibility for Qlik and the community at large to touch a billion lives for the better

Teamwork for Results

- Respect and embrace the opinions and perspectives of others to create a culture of inclusion
- Be humble enough to trust the expertise of others and seek support
- Make work fun



TABLE OF CONTENTS

- Introductory Information.....4**
 - Introduction4
 - Purpose4
 - Intersection with Qlik’s Core Values.....4
 - No Retaliation.....4
- Code of Conduct Principles and Requirements5**
 - Compliance with Applicable Laws, Rules and Regulations5
 - Integrity of Our Public Disclosures5
 - Confidentiality; No Misuse of Our Information6
 - Communications6
 - Social Media.....6
 - Competition and Fair Dealing.....7
 - Record-Keeping7
 - Conflicts of Interest8
 - Corporate Opportunities.....9
 - Improper Payments or Favors.....9
 - Doing Business with Governments9
 - Trade Restrictions and Anti-Boycott Laws9
 - Political Activity10
 - Privacy and Protection of Personal Information.....10
 - Insider Trading10
 - Protection and Proper Use of Qlik Assets.....11
 - Discrimination and Harassment11
 - Health and Safety.....11
 - Integrity in Business Relationships11
- Process and Procedures.....12**
 - Waivers of this Code12
 - Reporting Illegal or Unethical Behavior.....12
 - Compliance Procedures.....12
 - Investigation of Complaints.....13
 - Guidance for Managers.....13
 - Applicability of this Code to Consultants, Suppliers and Vendors13
 - Some Practical Guidance for All13
 - Glossary14



Introductory Information

INTRODUCTION

This Code of Business Conduct covers a wide range of business practices and procedures. It does not cover every ethical issue that may arise, but it sets out basic principles to guide the motives and actions of all employees and officers of Qlik Parent, Inc. and its subsidiaries (collectively, “Qlik” or the “Company”) and members of our Board. All members of our Board, officers and employees of Qlik must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. We also expect Qlik’s contractors and consultants to abide by our Code in connection with their work for Qlik.

If a law conflicts with a policy in this Code, you must comply with the law. If you have any questions about these conflicts, you should ask your manager or the Qlik Legal Department how to handle the situation. However, this Code supersedes all other codes of conduct, policies, procedures, instructions, practices, rules or written or verbal representations to the extent that they are inconsistent with this Code. We are committed to reviewing and updating our policies and procedures as needed. This Code is subject to modification by our Board or a committee of the Board.

This Code does not alter the terms and conditions of your employment. Rather, it helps each of us to know what is expected of us to make sure we always act ethically.

PURPOSE

Our Code seeks to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in public communications made by Qlik;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting of violations of this Code to an appropriate person or persons identified in this Code; and
- Accountability for adherence to this Code.

INTERSECTION WITH QLIK’S CORE VALUES

Our five Core Values are the framework for our business. Qlik believes it is important for this Code to reflect our Core Values.

NO RETALIATION

Qlik prohibits retaliation against any employee who in good faith provides any information or otherwise assists in any investigation or proceeding regarding any matters of legal or regulatory concern, or violations of this Code. You can be assured that any actions that you take in good faith under this Code will be addressed without retaliation or punishment. If your situation requires that your identity be kept secret, your anonymity will be protected to the greatest extent possible. If you feel that you are being subjected to retaliation, you are urged to immediately inform your Culture and Talent Business Partner or the Legal Department. All complaints of retaliation will be investigated promptly, and we will take appropriate action to stop and remedy any such conduct. Any person found in violation of this policy is subject to disciplinary action, including discharge, and may be subject to legal and financial liability.



Code of Conduct Principles and Requirements

Core Value: Challenge!

- ***Challenge Assumptions***
- ***Innovate***
- ***Embrace New Ideas***

We truly believe that challenging yourself is the best way for our company to grow and prosper. However, we do not encourage you to take shortcuts. Qlik values being a good corporate citizen in our global world.

COMPLIANCE WITH APPLICABLE LAWS, RULES AND REGULATIONS

Obeying the law is the foundation on which Qlik's ethical standards are built. You must comply with applicable laws, rules and regulations. Although you are not expected to know the details of all of these laws, it is important to know enough to determine when to seek advice from your manager or the Qlik Legal Department. You are required to complete all required trainings that have been assigned to you in a timely manner in order to familiarize yourself with some of the laws, rules and regulations that apply to both you and the Company.

Qlik acknowledges and respects the diverse cultures, customs and business practices it encounters in the international marketplace. We will comply both with the applicable U.S. laws and regulations that govern our operations outside the United States, and the local laws wherever we do business.

Qlik is a global company. Many of our employees around the world are subject to U.S. laws, even if they don't work in the United States. Other countries where we have operations may apply their laws outside the borders of that country. If in doubt, ask.

INTEGRITY OF OUR PUBLIC DISCLOSURES

Qlik sometimes makes public communications, such as issuing press releases. In order to comply with the laws governing the disclosure of material non-public information about Qlik, we limit those employees authorized to speak for the company to certain designated officers. If you are not sure whether you are authorized to speak for the company, ask.

To the extent that you reasonably believe that questionable accounting or auditing conduct or practices have occurred or are occurring, you should report those concerns promptly in compliance with Qlik's Whistleblower Policy.



CONFIDENTIALITY; NO MISUSE OF OUR INFORMATION

You will learn, work with, and be entrusted with, confidential information relating to our operations and our customers, partners or suppliers. You must maintain the confidentiality of business and proprietary information entrusted to you by Qlik or its customers, partners or suppliers, except when disclosure is authorized by Qlik's established written policies or required by law or regulation. Confidential information includes any information of Qlik that has not been disclosed or made available to the general public and non-public information about our customers, partners or suppliers. Even within Qlik, confidential information should be shared with others only on a "need to know" basis. The obligation to not disclose confidential information continues even after employment ends. In connection with this obligation, it is a requirement that every employee execute a confidentiality and proprietary information agreement when he or she begins his or her employment with Qlik. If you did not sign such document, or don't remember signing it, contact your manager.

Core Value: Move Fast!

- ***Discover, Decide, Do***
- ***Be Thorough and Keep It Simple***
- ***Pause to Gain Clarity***

We believe in being "first" on a level playing field.

COMMUNICATIONS

Qlik functions most effectively by establishing and maintaining clear, honest, and open communications; listening carefully; and building our relationships on the basis of trust, respect, and mutual understanding. Qlik's advertising, sales and promotional literature seeks to be truthful, accurate and free from false claims.

As a company, we encourage communication using blogs, social networks, discussion forums, video and other social media, but it is important to remember that this Code applies to these forms of communication.

SOCIAL MEDIA

We embrace social media (defined here as *any and all forms of websites and applications that enable published communication and expression*) as an important tool of corporate and business engagement, and encourage our employees to use social media in a personal capacity as a way to reach out and share with friends and communities. We trust and expect you to use your best judgment and exercise personal responsibility whenever you participate in social media or other online activities.

Unless you have received authorization from the Marketing department and the Legal Department, you should not represent or suggest in any social media content that you are authorized to speak on Qlik's behalf, or that Qlik has reviewed and approved your content.

Any non-business use of social media during work hours should be incidental, occasional, and reasonable, and should not interfere with your work commitments. We prohibit any conduct that adversely affects your job performance or the performance of fellow employees, or otherwise adversely affects our members, customers, suppliers, business partners or our legitimate business interests. We will not tolerate inappropriate postings that include discriminatory remarks, harassment, violence, or similar unlawful conduct.

Never disclose confidential information online such as our trade secrets; internal reports, policies or procedures; identifiable information of individual employees, contractors, customers, actual or



prospective clients, business partners, or suppliers; business performance; financial forecasts or other material nonpublic information.

If you would like to post to social media but are unsure about the appropriateness of your content, please contact the Legal Department. If you become aware that our software, technologies and electronic communications are being used inappropriately, or that social media use is in violation of our policy, notify your manager, the lead for Global Communications in the Marketing Department, or the Legal Department.

COMPETITION AND FAIR DEALING

Qlik seeks to outperform its competition fairly and honestly. Qlik has an obligation, and is entitled, to keep up with developments in our industry, including obtaining information about our competitors, but only through honest, ethical and legal means. Using or disclosing, or encouraging others to use or disclose, other companies' proprietary, confidential or trade secret information, without the owner's prior consent, and any theft or misappropriation of such information is strictly prohibited. Qlik does not condone the use of any improper means, such as providing cash payments, misrepresenting oneself, spying, providing favors, or hiring a competitor's employees to acquire confidential information of third parties. Comparisons of our products or services with the products or services of competitors should be accurate and should be made only where facts support the statements and conclusions drawn. You should endeavor to respect the rights of and deal fairly with Qlik's customers, suppliers, competitors and employees.

We must also abide by the lawful obligations we have to our former employer(s). These obligations may include the non-disclosure of confidential information or solicitation of former colleagues to work at Qlik, or compliance with non-competition agreements. For any questions regarding these issues, please contact the Qlik Legal Department.

Fair competition laws, whether they be U.S. or non-U.S. based, generally prohibit agreements or activities that restrain trade, limit competition, lead to price fixing or create a monopoly. It is important to comply with such laws.

RECORD-KEEPING

Qlik requires honest and accurate recording and reporting of information in order to make responsible business decisions and to comply with the law. For example, employees who must report their hours worked should only report the true and actual number of hours worked whether for purposes of individual pay or for purposes of reporting such information to customers. Additionally, all Qlik employees in sales must provide truthful, accurate and complete paperwork relating to sales transactions. Falsification of business documentation whether or not it results in personal gain, is never permissible.

Any business expenses must be authorized and accurately documented and submitted in accordance with the Company's Global Travel and Expense Management Policy. You should consult your manager if you are not sure whether a certain expense is legitimate.

All of Qlik's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect Qlik's transactions and must conform both to applicable legal requirements and to Qlik's system of internal controls.

It is our policy to address all concerns regarding our financial statements and our accounting, internal accounting controls or audit matters. If you have complaints or concerns regarding questionable accounting or auditing matters, you should promptly report the matter to our Chief Financial Officer and/or General Counsel. If you wish to submit these concerns or complaints anonymously, you can do so through our Lighthouse Services hotline.

Business records and communications (even emails and other electronic means of communication) often become public, and you should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that can be misunderstood. This policy applies equally to email, social media communications, Skype communications, internal memos and formal reports. Records should always be retained or destroyed according to Qlik's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult the Qlik's Legal Department.



Core Value: Open and Straightforward

- ***Seek First to Understand***
- ***Be Receptive to (and Seek) Feedback***
- ***Provide Feedback Respectfully Regardless of Level and with Positive Intent***

We believe it is vital to conduct our business free from illegal or questionable practices.

CONFLICTS OF INTEREST

A “conflict of interest” exists when a person’s private interests interfere or conflict in any way with the interests of Qlik. You should avoid situations that present potential conflicts of interest, either real or perceived, and should not engage in activities that would make it difficult or appear to make it difficult for you to perform your work objectively and effectively. In no way should you personally profit from transactions based on your relationship with Qlik if it harms Qlik, or if your personal gain is achieved at Qlik’s loss.

Examples of when a conflict of interest may arise include:

- **Business Relationships.** Any business relationship that you enter into outside your work at Qlik requires your good faith judgment and common sense. While you are an employee of Qlik, you are prohibited from accepting simultaneous employment with or otherwise working for any person or entity with which Qlik has a business relationship, without the prior written consent of Qlik’s Chief Executive Officer. You are not allowed to work for a competitor in any capacity. Full-time employees of Qlik are expected to devote substantially all of their business time and attention to their employment with Qlik. You should consult your applicable Qlik employee handbook for additional information regarding business relationships.
- **Outside Directorships and Advisory Boards.** Before agreeing to serve as a member of the board of directors or advisory board of another entity, it is important for you to consider the potential conflicts of interest that could result. No employee or director of Qlik should ever serve as a director or member of the advisory board for a company that directly competes with Qlik. You are required to obtain prior written approval from the Board (or a committee of the Board) or the Company’s Chief Executive Officer prior to serving on the board of directors or advisory board of any entity with which Qlik has a business relationship.
- **Personal Investments.** If you are considering investing in an entity with which Qlik has a business or competitive relationship, you should take great care to ensure that these investments do not compromise or appear to compromise your responsibilities to Qlik. Many factors should be considered in determining whether a conflict exists, including the size and nature of the investment, your ability to influence decisions of Qlik or of the other company, your access to confidential information of Qlik or of the other company, and the nature of the relationship between Qlik and the other company. If you are unsure, please contact the Qlik Legal Department.
- **Related Persons.** As a general rule, you should avoid conducting Qlik business with a Related Person without obtaining prior written approval from the Qlik Legal Department.

Transactions that will lead to a conflict of interest are prohibited, except in very narrow circumstances where the Board, a committee of the Board or the Chief Executive Officer has given informed written consent to the transaction. Whether a conflict of interest exists may not always be clear-cut, so if you have a question, you should consult with higher levels of management. If you become aware of a conflict or potential conflict, you should bring it to the attention of a manager or other appropriate personnel or consult the “Process and Procedures” section of this Code.



CORPORATE OPPORTUNITIES

You are prohibited from taking for yourself opportunities that are discovered through the use of corporate property, information or position. You may not use corporate property or information obtained through your position with Qlik for improper personal gain, and you may not compete with Qlik directly or indirectly. Furthermore, you owe a duty to Qlik to advance its legitimate interests when you discover opportunities that could help the company.

You must act within the scope of our responsibilities. Only specifically designated individuals shall have the authority to bind Qlik to contract terms, commit Qlik resources, or speak on behalf of the company.

IMPROPER PAYMENTS OR FAVORS

The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships, not to gain unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by you unless it:

- is not a cash or cash equivalent gift;
- is consistent with customary business practices, including Qlik-approved programs;
- is not excessive in value;
- cannot be construed as a bribe or payoff;
- would not embarrass the Company should public disclosure be made; and
- does not violate any laws or regulations.

Please discuss with your manager or the Qlik Legal Department any gifts or proposed gifts that you are not certain are appropriate. Any gift-giving should be fully visible to management. It is critical that all expense report records accurately reflect gifts provided to any individual, government official or otherwise, in order to comply with tax and other legal reporting requirements.

Qlik strictly prohibits giving money or anything of value, directly or indirectly, to government officials or foreign political candidates in order to obtain or retain business. Please refer to Qlik's Anti-Corruption Policy and contact Qlik's Legal Department with any questions.

DOING BUSINESS WITH GOVERNMENTS

A portion of our business involves contracts with governments and government agencies. Each government or government agency has its own procedures, rules and ethical standards for contractors. Activities that may be appropriate when dealing with non-government customers may be improper or even illegal when dealing with the government. The penalties for failing to adhere to these laws are severe and include substantial fines and imprisonment, and could result in Qlik being prohibited from doing business with the government. Each employee that works with a government or government agency is responsible to learn and comply with the rules of such customer.

TRADE RESTRICTIONS AND ANTI-BOYCOTT LAWS

As a global company, Qlik must ensure compliance with laws that govern the shipment or transfer of its technology. The United States and other countries restrict the export of certain goods, software and technology to certain persons and jurisdictions.

The regulations under the Office of Foreign Asset Control (OFAC) of the U.S. Treasury Department also apply to Qlik's operations. These regulations prohibit us from transferring, paying, receiving or otherwise dealing in property or an interest in property belonging to or under the control of a person or entity identified on an OFAC List. Even presenting data to a non-U.S. party in the United States may constitute an export. The U.S. Treasury Department maintains such list and it is updated regularly. In order to comply with OFAC, we must identify individuals and entities with which we do, or want to do, business, including customers, vendors, suppliers, contractors or other third parties and screen them against the OFAC List. Please consult with the Qlik Legal Department for any questions in this area.

Qlik also complies with U.S. anti-boycott laws which prohibit participation in international boycotts that are not sanctioned by the U.S. government.



POLITICAL ACTIVITY

Personal political activity is just that, personal. Qlik does not restrict personal political activity, but no employee or director is permitted to use any company assets, space or time for the pursuit of personal political activity. You are not authorized to speak or contribute on behalf of Qlik without the approval of the Legal Department. Likewise, if you participate in any political activity that could appear as if you are acting or speaking for Qlik, you should always make it clear that your views and actions are your own and do not imply the Company's support or endorsement.

If you interact with government officials on Qlik's behalf, be particularly careful about gifts, meals, and entertainment. Laws and regulations governing what companies like Qlik can give government officials are very strict. Qlik is committed to observing the standards of conduct set forth in the United States Foreign Corrupt Practices Act and the applicable anti-corruption laws of the countries in which we operate. Please consult our Anti-Corruption Policy for more details.

Any political contributions by Qlik must be made in accordance with the applicable law, approved by the Board, a committee of the Board or the Chief Executive Officer and be properly recorded and reported in compliance with local law.

Core Value: Take Responsibility

- ***Hold Ourselves Accountable for What We Do and What We Don't Do***
- ***Reach Back to Help Others Move Forward***
- ***Take Responsibility for Qlik and the Community At Large to Touch a Billion Lives for the Better***

These are fundamental "fair play" principles that are fundamental to our company.

PRIVACY AND PROTECTION OF PERSONAL INFORMATION

Qlik's employees, customers, business partners, suppliers, vendors and contractors, among others, provide us with personal information in the course of doing business with us. We protect this information and only access it for our legitimate business purposes. In order to protect that personal information from inadvertent disclosure:

- don't access such personal information unless you are authorized;
- don't disclose such personal information outside of Qlik without proper authorization;
- keep any such personal information secure; and
- if you become aware of any improper access or use of personal information, act and report such information in accordance with this Code.

INSIDER TRADING

At Qlik, we may learn of confidential information that could impact another company's stock price. You may not trade stock of a company when you know of material confidential information about that company. Material confidential information may include:

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



We also do not “tip” others who might make an investment decision on the basis of this information for themselves or on our behalf. It is not only unethical, but also illegal. Any questions as to whether information is material or has been adequately disclosed should be directed to Qlik’s Legal Department.

PROTECTION AND PROPER USE OF QLIK ASSETS

You should endeavor to protect Qlik’s assets and ensure their efficient use. Any suspected incident of fraud or theft should be reported immediately for investigation. Qlik equipment and systems should not be used for non-Qlik business, though limited incidental personal use is permitted.

Your obligation to protect Qlik’s assets includes protecting its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of such information would violate Qlik policy and could also be illegal and result in civil or even criminal penalties.

When your employment with Qlik ends, you are required to return to Qlik all Qlik property and confidential and proprietary information.

Core Value: Teamwork for Results

- ***Respect and Embrace the Opinions the Opinions and Perspectives of Others to Create a Culture of Inclusion***
- ***Be Humble Enough to Trust the Expertise of Others and Seek Support***
- ***Make Work Fun***

We are better together as a team and need to respect and help each other.

DISCRIMINATION AND HARASSMENT

The diversity of Qlik’s employees is a tremendous asset. Qlik is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Our policy is to treat applicants and employees without regard to protected categories such as age, race, creed, color, religion, national origin, gender, sexual orientation, physical or mental disability, or any other legally protected classification; and to provide challenging opportunities for individual growth and advancement free of discrimination and harassment. Qlik prohibits its employees from engaging in harassing or discriminatory behavior such as name calling, exclusion, sexual harassment, inappropriate or offensive physical contact, joke-telling, or physical or verbal bullying.

HEALTH AND SAFETY

Qlik strives to provide its employees with a safe and healthy work environment. You are responsible for helping to maintain a safe and healthy workplace for all employees by following safety and health rules and reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior are not permitted. Employees should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.

INTEGRITY IN BUSINESS RELATIONSHIPS

Qlik partners with many other companies, including suppliers, customers, vendors and others. Employees of the company represent Qlik in these relationships and it is important to apply the requirements of this Code to those activities.



Process and Procedures

WAIVERS OF THIS CODE

Waivers of this Code may only be granted by Qlik's Chief Executive Officer, Chief Financial Officer or General Counsel; provided, however, that any waiver of this Code for executive officers or directors may be granted only by the Board or a Board committee.

REPORTING ILLEGAL OR UNETHICAL BEHAVIOR

If you observe illegal or unethical behavior or when in doubt about the best course of action in a particular situation, we encourage you to consult with one or more of the following resources:

- Your manager;
- Culture & Talent;
- The Qlik Legal Department; or
- The Qlik Hotline as set forth in our Whistleblower Policy.

You are expected to cooperate in internal investigations and provide complete, accurate and truthful information.

Qlik has selected a third party compliance vendor, Lighthouse Services, to provide you with a simple, risk-free way to confidentially (and, at your choice, anonymously) report actual or suspected activities that may involve financial misconduct or violations of the Code. Lighthouse's webpage is hosted on its secure servers and is not part of Qlik's website or intranet.

You may file a report through Lighthouse Services by going to their website (<https://www.lighthouse-services.com/qlik>) and clicking on "Submit Incident Report," by email at reports@lighthouse-services.com, or by phone at +1 (800) 603-2869.

COMPLIANCE PROCEDURES

If you violate the standards in this Code, you may be subject to disciplinary action, up to and including termination of employment. If you observe or become aware of a situation in which you believe this Code has been violated by any other person, you are encouraged to report such occurrence. ***If you are in a situation that you believe may violate or lead to a violation of this Code, follow the process and guidelines below.***

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know if a violation has occurred. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- ***Always ask first, act later.*** If you are unsure of what to do in any situation, seek guidance.
- ***Make sure you have all the facts.*** In order to reach the right solution, we must be as fully informed as possible.
- ***Ask yourself:*** What specifically am I being asked to do? Does it seem unethical or improper? These questions will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- ***Clarify your responsibility and role.*** In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- ***Discuss the problem with your manager.*** This is the basic guidance for all situations. In many cases, your manager will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your manager's responsibility to help solve problems.



- **Seek help from Qlik resources.** In the rare case where it may not be appropriate to discuss an issue with your manager, you do not feel comfortable approaching your manager with your question, or you are still concerned after speaking with your manager, discuss it with your Culture & Talent Business Partner or the Qlik Legal Department.
- **Use this Code as a guide to direct you to the proper process or policy.** Please use this Code as a resource. For example, your concern or problem might be one that is best addressed by using the procedures set forth in the Whistleblower Policy.

INVESTIGATION OF COMPLAINTS

The matters covered in this Code of Business Conduct are of the utmost importance to Qlik and are essential to the Company's ability to conduct its business in accordance with its stated values.

All reports of alleged violations under this Code of Business Conduct will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, or as required by applicable law. If, at the conclusion of our investigation, it is determined that a violation of this Code of Business Conduct has occurred, we will take prompt remedial action commensurate with the severity of the offense. This action may include disciplinary action against the accused party, up to and including termination of employment. Reasonable and necessary steps will also be taken to prevent any further violations of the policy at issue. Where laws have been violated, Qlik will cooperate fully with the appropriate authorities. Where the company has suffered a loss, it may pursue its remedies against the individuals or entities responsible.

GUIDANCE FOR MANAGERS

Many times in this Code we suggest that an employee contact his or her manager for guidance. Each manager is expected to:

- Act at all times in compliance with this Code and other company policies;
- Encourage use of this Code by all employees where applicable;
- Create a working environment that encourages employees to ask questions and address concerns;
- Take any requests, concerns and complaints seriously and direct the appropriate actions to be taken; and
- Be sure to follow-up with the employee and address the concern raised. It is the responsibility of the manager to ensure that any concern is elevated within the organization as appropriate.

APPLICABILITY OF THIS CODE TO CONSULTANTS, SUPPLIERS AND VENDORS

Qlik expects that each consultant, supplier and vendor with access to and activities at our facilities will be made aware of this Code, be provided with access to this Code and have the ability to ask questions. Qlik requires compliance with this Code by all such consultants, suppliers and vendors.

SOME PRACTICAL GUIDANCE FOR ALL

This Code provides a general statement of the expectations of Qlik regarding the ethical standards that each director, officer and employee should adhere to while acting on behalf of Qlik. The key to compliance with this Code is consistently exercising good judgment. This means following the spirit of this Code and the law when this Code and the law do not provide specific guidance. When in doubt, you should seek guidance from your manager and you should ask yourself:

- Am I following the spirit, as well as the letter, of both the law and this Code?
- Would I want my action reported on TV or the front page of the local press?
- How would I view my actions if another person were taking them?
- Are my actions being motivated by personal interest or some other motivation besides the best interests of Qlik?
- Will there be any direct or indirect negative consequence for Qlik?



GLOSSARY

“Board” means the Board of Directors of Qlik Parent, Inc.

“Bribe” means giving or offering to give “anything of value” to a government official, directly or indirectly, to influence a decision in Qlik’s favor. That decision may be related to the company’s products, services or compliance with laws and regulations. The phrase “anything of value” includes cash, gifts, meals, entertaining, company products, offers of employment or consulting or other business opportunities.

“Code” means this Code of Business Conduct.

“Qlik” means Qlik Parent, Inc. and its subsidiary companies.

“Related Persons” means a spouse, parent, sibling, grandparent, child, grandchild, relative by marriage, or same or opposite sex domestic partner, any other family member that is financially dependent on you, and any company, partnership or other entity owned and controlled by any such relative.