Whistleblower Policy

PURPOSE

Qlik is committed to honest and ethical conduct. In line with this commitment and Qlik’s commitment to open and straightforward communication, this policy aims to provide an avenue for employees, officers and members of the Board of Directors to raise concerns while being protected from reprisals or retaliation for whistle blowing in good faith.

POLICY

What is Whistleblowing?

A whistleblower is a person who raises a concern about wrongdoing occurring in an organization or body of people, usually this person would be from that same organization. The concerns may be classified in several ways. The most common are allegations of fraud, ethics violations or serious concerns about human resource matters, such as interactions between employees. If something does not feel right, all employees should feel empowered to speak.

To Whom does this Policy Apply?

This Policy applies to members of our Board, officers, employees (including part time and temporary employees) and contractors of Qlik Parent, Inc. and its subsidiaries (collectively, “Qlik”).

What does this Policy Cover?

This Policy is intended to cover serious concerns that could have a significant impact on Qlik. Examples include matters which:

- May lead to incorrect financial reporting
- Are unlawful
- Are not in line with company policy, including the Code of Business Conduct; or
- Otherwise amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee’s manager, Culture & Talent (HR) Business Partner or the Chief Legal Officer and are not addressed by this Policy. Employment-related concerns should continue to be reported through normal channels such as your manager, your local Culture & Talent Business Partner, or to the Chief People Officer. We encourage you to have direct and open communications with your manager and/or C&T Business Partner as this enables Qlik to properly and thoroughly investigate and address concerns.

Responsibility for Reporting Concerns

It is the responsibility of all employees, officers and board members to comply with Qlik’s Code of Business Conduct and applicable law and to report violations or suspected violations in accordance with this Whistleblower Policy.

NO RETALIATION

Any individual, who in good faith reports a possible violation or complaint under this Policy, even if the report is mistaken, or who assists in the investigation of a reported violation, will be protected by Qlik. Retaliation, harassment or victimization in any form against these individuals will not be tolerated. Any act of retaliation should be reported immediately and will be disciplined appropriately.
REPORTING AN ALLEGATION THROUGH THE HOTLINE

Reporting Mechanism

Qlik has a dedicated reporting service (the “Hotline”) available 24 hours a day, 7 days a week through which concerns and complaints can be submitted. When using the Hotline, you may choose to remain anonymous except in the rare cases when local law prohibits it. Keep in mind that it may be more difficult to investigate and address your concerns if you remain anonymous.

Complaints submitted through the Hotline or other methods listed below are submitted to Qlik or its designee and may or may not be investigated at the sole discretion of Qlik.

Confidentiality

Whenever you report a concern or issue, we make every effort to keep your identity confidential. This may not always be possible, though, due to the nature of the issue, the need to conduct a more thorough investigation, or legal requirements.

How to Report an Allegation

The Hotline is intended to be used for serious and sensitive issues, which should be reported in one of the following ways:

By Telephone:

Employees outside North America:

- Call the Worldwide hotline on: +1 (800) 603-2869. After dialling, it is possible to select the service to be available in a variety of languages.

Employees inside North America

The following hotline numbers are toll-free and for North America caller only.

- English speaking USA and Canada: (877) 472-2110 (not available from Mexico)
- Spanish speaking North America: (800) 216-1288 (from Mexico user must dial 001-800-216-1288)

You may report an issue in your native language when calling the worldwide number. When you call into the hotline, let the operator know you need a translator for your native language.

Alternatively, you can choose to submit reports without speaking with an operator in the following ways:

- E-mail: reports@lighthouse-services.com
- Fax alternative for written documents: (+1) 215-689-3885
- Web: https://www.lighthouse-services.com/qlik (click on Submit Incident Report).

Please note that any information submitted to the reporting mechanisms above means that it will be transmitted to our vendor (Lighthouse), which is based in the USA. Use of the reporting mechanisms means that the user consents to the transfer of that data outside of their region (e.g., from the EU to the USA). Qlik has in place a suitable measure for the protection of personal data with Lighthouse, including a data privacy agreement in compliance with applicable data privacy law.
The following should be considered and/or included when making a complaint.

- Express your concern early
- Demonstrate that there are sufficient grounds for concern
- Be prepared to describe the allegation in detail (parties involved, timeline, location)

Allegations not made in good faith may result in disciplinary action, up to and including termination.

**What Happens Next?**

Qlik takes all reports of violations of law, Qlik policies, and ethical conduct seriously. We promptly and thoroughly investigate all reports. Whenever a complaint is filed, it is assigned to an investigator to review the facts and the Legal Department partners with the Culture & Talent organization to ensure the investigation follows Qlik standards and applicable law.

Everyone at Qlik must cooperate fully with any Qlik investigation. This includes answering questions truthfully, sharing all relevant information, and protecting potential evidence. Anyone accused of wrongdoing will get fair and objective treatment. Any subsequent corrective action taken will depend on the nature of the concern and may result in disciplinary action, up to and including termination of employment.

Whether making a report to Qlik personnel or through the Hotline, the complainant will be given the opportunity to receive updates on actions taken regarding:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response; and
- Informing the complainant about the status of an investigation, if any.

The amount of contact between the complainant and the person investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the complainant remains accessible for follow-up. Subject to legal constraints, the complainant will receive information about the outcome of any investigations.

Qlik reserves the right to modify or amend this Policy at any time as it may deem necessary.