

# Qlik Supplier Code of Conduct

Effective June 21, 2022

# Qlik Supplier Code of Conduct

Qlik is committed to the highest ethical standards, including compliance with applicable laws and regulations, and believes this commitment is critical to our success. Through its Code of Business Conduct, Qlik has established company standards that promote compliance with laws, ethical business practices, and sustainability. We expect entities and individuals supplying products and services to or for Qlik to share this same commitment. To that end, this Supplier Code of Conduct (the “Code”) sets forth the standards of conduct that Qlik expects of all its suppliers, vendors, consulting firms, independent contractors, staffing agencies, service providers, and all third-party companies that make up Qlik’s supply chain, including their employees, personnel and agents, and subcontractors (each a “Supplier”). Suppliers must adhere to this Code while conducting business with or on behalf of Qlik. For Suppliers with employees or staff who are contracted to work directly for Qlik, this Code must be reviewed with all such workers. Suppliers that fail to comply with this Code and any other applicable Qlik policy risk termination of their business relationship with Qlik.

## Compliance with Laws

### Compliance with all laws

Obeying the law is the foundation on which Qlik’s ethical standards are built. As a Qlik Supplier, any business conducted with and/or on behalf of Qlik must be done in compliance with applicable laws, rules and regulations including, but not limited to, those set forth in this section. Qlik is a global business and recognises that many of our Suppliers operate in different international environments. Nonetheless, all Qlik Suppliers are expected to adhere to the principles in the Code in their dealings with Qlik and conducting any business on Qlik’s behalf. If you operate in a country where local laws are more restrictive than this Code, then you are expected to comply with those laws. However, if you are subject to laws which are less restrictive than the principles of this Code, you are still expected to comply with this Code (even if your conduct would otherwise be “legal”).

### Anti-bribery/corruption/money laundering

Qlik is committed to conducting its business free from any form of bribery and corruption and expects its Suppliers to uphold these standards as well. The law prohibits, among other things, offering, accepting or giving anything of value to another party where this is to induce 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 of improper behavior may cause harm or be illegal. You are expected to comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, and all other legislation governing bribes and kickbacks (including facilitation payments),

money laundering and other prohibited business practices that are applicable in the jurisdictions in which you conduct business, and to have your own policies and procedures in place to actively ensure compliance.

### Trade compliance/controls

Qlik Suppliers must comply with all international and national laws, regulations, standards and controls that govern the export, re-export, transfer, provision, use and import of technology, products and services, and maintain compliance programs, policies and/or procedures that ensure compliance.

Suppliers shall ensure that technology, products and services supplied to Qlik are not provided from embargoed countries/regions including, but not limited to, Cuba, Iran, North Korea, Syria, Russia and Belarus. Suppliers should visit Qlik's Export Controls page on <https://www.qlik.com/us/legal/legal-policies/export-controls> for more details about Qlik's export control compliance program.

Additionally, Suppliers must ensure the furnishing of products and services to Qlik is not supported by entities and individuals with whom transactions are prohibited under applicable sanctions laws and export controls, including those listed on any applicable restricted party lists (e.g., U.S. Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) list, U.S. Bureau of Industry and Security (BIS) Entity List, U.S. Denied Persons List, European Union Consolidated Sanctions List, United Nations Security Council Sanctions). Supplier will not provide controlled technologies, products, or technical data to Qlik without providing notice of such controls as necessary for Qlik to maintain compliance with applicable laws.

In providing products and/or services to or on behalf of Qlik, Supplier must not participate in any economic boycott not sanctioned by the U.S. government.

### Anti-Competition/Antitrust

Qlik is committed to observing rigorously laws which protect consumers and fair market practices, such as anti-competition and antitrust laws, and Qlik expects the same of its Suppliers. These laws generally prohibit behavior or agreements that unreasonably restrain trade, unfairly reduce competition or collusion between companies 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 Suppliers. Competition and antitrust laws are present in most territories, and you are expected to comply with any that apply to you.

### Insider trading

In the course of business you may learn of confidential information that could impact Qlik's or another company's stock price, however laws exist prohibiting the trade of 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

You are expected to comply with all insider trading laws, and not “tip” others who might make an investment decision on the basis of this information for themselves or on another’s behalf.

### Data Protection

The storage and processing of data, in particular personal data, is subject to stringent regulations and Qlik takes its obligations to comply very seriously. You are expected to comply with all relevant laws concerning data protection and privacy, and to apply the same level of overall protection (relevant to the nature of the data and your processing) as afforded by Qlik’s own privacy policies and notices located at <https://www.qlik.com/us/legal/legal-policies>. These obligations include protecting any personal information entrusted to you, using it only for the purpose intended, and having adequate safeguards in place to ensure its security. You will also honour any contractual undertakings you have with Qlik relating to data protection and privacy, including but not limited to those set out in any data processing or similar agreement.

## Human Rights and Fair Labor Practices

Qlik Suppliers must comply with all laws and regulations that govern the employment relationship and share Qlik’s commitment to the upholding of human rights, by ensuring they:

- Maintain a workforce and workplace free from harassment, unlawful discrimination, and retaliation.
- Treat their workers with dignity and respect.
- Adopt and maintain policies and practices that promote diversity, equity and inclusion in the workplace and supply chain.
- Prohibit the use of child labor. A child for the purposes of this standard is anyone under the age of 15, under the age for completing compulsory education, or under the legal minimum working age for employment, whichever requirement is most restrictive. Qlik supports the use of legitimate workplace apprenticeship programs, which comply with all laws and regulations. Workers under the age of 18 should be protected from any hazardous work likely to jeopardize their health and safety.
- Prohibit the use of forced/involuntary/indentured or prison labor in their organization and supply chain, comply with all laws aimed at eradicating modern slavery, and ensure all workers will not be required to forfeit their identity-related and personal documents (including travel documents) as a condition of employment.
- Provide clear and written conditions of employment when hiring and avoid the use of misleading or fraudulent conduct during the hiring process.
- Comply with all applicable minimum wage and overtime, working hour, rest day and other wage and hour regulations, and provide wage statements that comply with applicable law.
- Provide fair compensation for time worked.

- Provide and maintain safe and healthy working conditions in compliance with applicable health and safety policies and laws.
- Use appropriately trained recruiters to support their compliance efforts and prohibit charging of recruitment fees to workers.
- Respect their workers' rights to freedom of association and collective bargaining in accordance with applicable local law and/or international standards and prohibit any retaliation or reprisal for exercising this right.

## Ethical Business Practices

### Accurate 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. The same standards are expected of Suppliers. This includes you maintaining complete and accurate records of sales of products and services to Qlik. False or misleading documentation, whether or not it results in personal gain, is never permissible.

### Protection and Proper Use of Qlik Assets and Intellectual Property

Qlik is entrusting you with the use of its assets and information. You must 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 are Company property and should not be used for non-Qlik business.

Suppliers must at all times respect Qlik's intellectual property rights and stop using any Qlik proprietary information if instructed by Qlik. You should always act in accordance with any visual guidelines provided by Qlik and must not use on any other goods or services any trademarks, logos or designs resembling those of Qlik which are likely to cause confusion to customers and third parties. 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.

Suppliers entrusted with Qlik assets will be provided and required to comply with the Qlik Acceptable Use Policy, the Handling of Customer Data Policy, and other related IT Security policies, which set forth Qlik's requirements for maintaining passwords, confidentiality, security and privacy.

Qlik retains the right to monitor its assets, systems and work environments in compliance with all applicable law. We monitor to promote safety and security, prevent criminal activity, conduct investigations of potential misconduct, manage information systems, and for other business reasons.

### Conflicts of Interest

Qlik expects its relationships with Suppliers to be free from conflicts of interest. This includes anything which would cast doubt on your ability to act with total objectivity with regards to the services provided to or for Qlik. Examples would be where your personal financial interests are at odds with those of your engagement with Qlik, or where you act on confidential information obtained by Qlik in a manner not authorized by Qlik. If you feel that any actual or potential conflict of interest (or even the appearance of one) has arisen or may arise, you must report this to your procurement contact at Qlik.

### Environmental responsibility

Environmental stewardship is material to Qlik's role as a global corporate citizen. We value and understand the importance of minimizing our environment impact and recognize climate change as a global threat. While Qlik does not have manufacturing operations or specialized infrastructure requirements, energy efficiency remains an important pillar of responsible business for Qlik. Qlik's commitment to environmental responsibility and sustainability is nurtured through our Corporate Responsibility program available on [www.qlik.org](http://www.qlik.org). We encourage our Suppliers to join us in advancing similar sustainability efforts by complying with all applicable environmental laws, regulations and standards, and adopting policies and practices to reduce environmental impact in their organizations and supply chain.

### Accessibility

Qlik is committed to making our products and services available to everyone. We work to improve opportunities and access for people of all abilities. We encourage our Suppliers to do the same, and deliver products and services that are accessible to everyone, taking into consideration any applicable accessibility standards such as the Web Content Accessibility Guidelines (WCAG) maintained by the Worldwide Web Consortium.

## Certification

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

## Questions or Concerns

Qlik encourages its Suppliers to raise concerns with and seek guidance from Qlik as needed. Doing so will help Qlik and its Suppliers maintain ethical practices by proactively addressing potential issues.

Suppliers are required to report any actions that have or may violate this Code or any law applicable to doing business with Qlik to their Procurement contact or by contacting [Suppliers@Qlik.com](mailto:Suppliers@Qlik.com).

Each Supplier must cooperate with any investigation by Qlik regarding any suspected or actual breach of these principles.



## About Qlik

Qlik's vision is a data-literate world, where everyone can use data and analytics to improve decision-making and solve their most challenging problems. Our cloud-based Qlik Active Intelligence Platform delivers end-to-end, real-time data integration and analytics cloud solutions to close the gaps between data, insights and action. By transforming data into Active Intelligence, businesses can drive better decisions, improve revenue and profitability, and optimize customer relationships. Qlik does business in more than 100 countries and serves over 38,000 active customers around the world.

[qlik.com](https://www.qlik.com)

© 2022 QlikTech International AB. All rights reserved. All company and/or product names may be trade names, trademarks and/or registered trademarks of the respective owners with which they are associated.