

# INFORMATICA PARTNER CODE OF CONDUCT

## I. APPLICABILITY

This Partner Code of Conduct and Business Ethics ("Code") is applicable to you as an Informatica Partner, and to all personnel employed by or engaged to provide services to you (either "Partner" or "you") throughout the world. Informatica Inc and its subsidiaries ("Informatica") require that you comply with all laws, statutes, rules and regulations applicable to your business, wherever conducted, and with this Code. You must have a written code of business ethics and business conduct that at a minimum incorporates the core requirements of this Code and/or is at least as protective/restrictive as this code, and the laws applicable to your business, including laws applicable to business with governmental entities and laws applicable to dealing with government officials. You must make your code available to your employees, conduct periodic training programs for your employees, and conduct periodic reviews to ensure your employees are complying with your code of conduct and this Code. You must keep a record of such periodic training programs and maintain a current listing of those employees who either have or have not successfully completed such training. Participation in and successful completion of such training must be a prerequisite for continued employment at your organization.

## II. COMPLIANCE WITH LAWS, REGULATIONS, AND BUSINESS CONDUCT PRACTICES

Compliance means not only observing the law, but also conducting corporate business in a way that recognizes your ethical responsibilities and fulfills them. Where local laws are less restrictive than this Code, you must comply this Code, even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, you must always at a minimum comply with those laws.

Informatica expects you to adhere to high ethical standards and to avoid engaging in any activity that involves even the appearance of impropriety. Any inference or indicia of impropriety may be deemed by Informatica to be a violation of this Code.

### **No Improper Payments or Economic Boycotts**

You must not make or promise to make payments of money or give any gift, gratuity, contribution or anything of value, directly or indirectly, to any governmental or public organization or official, political party, or candidate for political office, or any Informatica director, officer, employee, customer, supplier or agent of a customer or supplier for the purpose of obtaining or retaining business or securing any improper advantage. Even a charitable contribution to a third party unrelated to any contemplated transaction or business relationship that is intended to or has the effect of influencing any such person(s) is deemed to be a violation of this code.

### **Financial Integrity**

You must accurately document all transactions related to your contract with Informatica in your financial books, records, statements, and in reports and other documents provided to Informatica.

Side agreements, i.e. those agreements/obligations outside of recorded/reported contracts, whether oral or written, are strictly prohibited. The handling and disbursement of funds related to Informatica business transactions must be pursuant to a duly authorized written Informatica contract.

Documents may not be altered or signed by those lacking authorized signatory authority. No contractual document may be unilaterally altered post signature without express written agreement.

No undisclosed or unrecorded fund or asset related to any Informatica transaction may be established or maintained for any purpose.

Your financial books, records, and statements shall properly document all assets and liabilities and accurately reflect all transactions related to Informatica products and services, and your business records must be retained in accordance with record retention policies and all applicable laws and regulations. All

## INFORMATICA PARTNER CODE OF CONDUCT

such records must be in auditable form and shall conform to any/all applicable laws, statutes, rules and regulations including but not limited to US GAAP (Generally Accepted Accounting Principles) and SEC (US Securities and Exchange Commission) requirements.

Informatica's policy is to report its financial results and other significant developments fully, fairly, accurately, timely, and understandably. Informatica expects you to comply with this policy, and with all applicable laws and regulations.

All approval requests for non-standard discounts must be accurate and commercially justified. A clear and concise record of any/all such justifications must be maintained. Margins derived from misleading and/or unjustified non-standard discounts are inappropriate and may not be used to pay or otherwise reward an Informatica customer, employee, or other third party.

Placing an order with Informatica without the existence of a corresponding end user agreement (also known as "pre-loading" or "channel stuffing") is not an acceptable Informatica business practice and is strictly prohibited. Any request by an Informatica employee to do so must be immediately reported to the Informatica Legal Department. You may not allow an order to be placed with Informatica for the distribution of Informatica products to an end user unless you have received an order from an end user for the products or unless you otherwise have a specific authorized agreement.

### **Business Courtesies that May Be Extended**

You must use discretion and care to ensure that expenditures on customers and on Informatica personnel or representatives are reasonable and in the ordinary and proper course of business and could not reasonably be construed as bribes or improper inducement or otherwise violate applicable laws and/or regulations.

In no event, should you offer or accept business meals or attend business functions with regard to Informatica business at establishments featuring "adult" entertainment, i.e. any establishment wherein entertainers perform in the nude or are otherwise subject to exploitation.

In any case, business courtesies offered cannot be construed as intended to influence the judgment of the recipient so as to secure unfair preferential treatment or gain improper advantage. A general guideline for evaluating whether a business courtesy is appropriate is whether public disclosure would be embarrassing to you, to Informatica, or to the recipient.

### **Business Courtesies that May Be Received**

You are responsible for ensuring that acceptance of any business courtesies, gifts, or entertainment is proper and could not reasonably be construed as an attempt by the offering party to secure favorable treatment or otherwise violate applicable laws and/or regulations.

### **Antitrust and Competition Laws**

Informatica is committed to observing the applicable antitrust or competition laws of all countries. Although these laws vary from country to country, they generally prohibit agreements or actions that reduce competition without benefiting consumers. They seek to protect the competitive process so that consumers receive the benefits of vigorous competition. Violations of antitrust or competition laws may result in severe penalties, including large fines and jail terms. You must comply with applicable laws at all times.

You must not agree with any competitors to fix, set, limit, increase, decrease or control prices; structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging); boycott suppliers or customers; divide or allocate territories, markets or customers or limit the production or sale of products or product lines. Such agreements are against public policy, the laws of many countries worldwide and are against Informatica policy. You must not engage in discussions of such matters with Informatica, with

## INFORMATICA PARTNER CODE OF CONDUCT

other Informatica partners or representatives of other companies. In addition, you must refrain from discussions with competitors about (1) prices, (2) costs, (3) profits or profit margins, (4) production volumes, or (5) bids or quotes for a specific customers business.

Certain sales tactics or other arrangements with customers or suppliers may also raise antitrust and competition law risks if they unfairly restrain or prevent competition (a) by your competitors or (b) among your customers. Examples of sales arrangements that have been found to violate the antitrust laws include pricing below cost, exclusive dealing contracts, bundled or tie-in sales, agreements with customers about resale prices, and charging different prices to competing customers.

You should be aware that, despite your location, the antitrust laws of the United States are applicable to you because these laws apply to business operations and transactions related to imports to, or exports from, the United States.

Unfair methods of competition and deceptive practices are also prohibited. Examples of these include making false, exaggerated, or misleading statements about your or Informatica products or services, falsely disparaging an Informatica competitor or its products or services, making product or service claims without facts to substantiate them, or using Informatica trademarks in a way that confuses the customer as to the source of the product or service.

### **Safeguarding Informatica's Premises and Physical Property**

Informatica systems and equipment (including printers, phones and computers) may be used by you only when required to work on-site with secured or proprietary materials. Personal use of Informatica property may be grounds for immediate termination of your contract with Informatica. Some guidelines for use include:

- (1) Telephone calls must be strictly related to the reason you are on premises, and not for non-business-related communications. Personal phone calls and calls to other customers using Informatica property are strictly forbidden.
- (2) Computer use is strictly restricted to the computer assigned. You must not use or try to use other individual's passwords, or any files and systems not required for your engagement with Informatica.
- (3) Offensive communication such as racial or ethnic slurs are strictly prohibited.

### **Intellectual Property and Obligations of Confidentiality**

You are responsible for protecting Informatica intellectual property rights. An important element of such protection is maintaining the confidentiality of Informatica trade secrets and proprietary information. In the course of working with or for Informatica, you may not use proprietary information, patented technology or copyrighted software, documentation, or other materials of third parties without authorization.

You may not transfer, publish, use or disclose our proprietary information other than as necessary in the ordinary course of business or as directed or authorized by Informatica. You must observe all applicable data privacy standards, laws, rules, regulations and statutes. Materials that contain confidential information or that are protected by privacy standards should be stored securely and shared only internally and only with those employees with a business need to know.

Confidential information includes but is not limited to: source code, software, and other inventions or developments (regardless of the stage of development) developed or licensed by or for Informatica, marketing and sales plans, product development ideas, concepts and plans, competitive analyses, non-public pricing and other non-public financial information, data or materials, potential contracts or acquisitions, business and financial plans or forecasts, internal business processes and practices, and prospect, customer, and employee information.

## INFORMATICA PARTNER CODE OF CONDUCT

### **Securities and Insider Trading Laws**

You are expected to comply fully with applicable United States and any and all other insider trading and securities laws governing transactions in the securities of Informatica. Securities include common stocks, bonds, derivatives (e.g. options, futures, and swaps), and other financial instruments.

United States federal and state securities laws and regulations prohibit you from using material, non-public information (also called "inside information") for personal advantage and from disclosing this information to any other person before it is broadly available. You expose yourself and your Informatica contacts to civil and criminal liability if you or members of your immediate family trade in securities while you possess inside information or if you provide any person or entity with such information for their use in securities trading.

Material information is any information that a reasonable investor would consider important in a decision to buy, hold, or sell securities. It includes any information that could reasonably be expected to cause a change in the price of securities of Informatica or the securities of another company to which the information relates. Such information may include financial performance or significant changes in financial performance or liquidity (including forecasts); potential or ongoing major mergers, information concerning Informatica products or technology, potential acquisitions, joint ventures, or divestiture; award or cancellation of a major contract; changes in key management; changes in auditors, knowledge of a qualification in an auditor's opinion or report or any change in the ability to rely on prior auditor reports; actual or threatened significant litigation or investigations; and gain or loss of a substantial customer or supplier.

If you possess material, non-public information, you may not trade in Informatica securities or the securities of another company to which the information pertains. You may not engage in any other action to take advantage of or pass on to others (i.e., "tip") material information gained through your relationship with Informatica until it has been disclosed to the general public, through a press release or otherwise; the press has disseminated it; and investors have had time to evaluate it. These restrictions also apply to spouses, friends, co-workers and family members.

### **Compliance with Export Laws**

United States Export Control Laws govern all exports, re-export, and use of U.S.-origin commodities and technical data, wherever located. Informatica requires that you comply fully with all U.S. and applicable foreign and multilateral export laws. Failure to comply could result in the loss or restriction of your or Informatica export privileges. Violation of these laws may also result in fines and imprisonment. You are responsible for understanding how the Export Control Laws apply and for conforming to these laws to ensure no data, information, program and/or materials resulting from services (or direct product thereof) will be exported, directly or indirectly, in violation of these laws, or will be used for any purpose prohibited by these laws.

### **Conflicts of Interest**

The term "conflict of interest" describes any circumstance that could cast doubt on your ability to act with total objectivity with regard to the distribution of Informatica products and services. Informatica wants its Partners loyalty to be free from any conflicts of interest. Conflict of interest situations may arise in many ways. If you feel that you have an actual or potential conflict with Informatica or any of its employees you must report all pertinent details to Informatica.

## INFORMATICA PARTNER CODE OF CONDUCT

### **Compliance with Environmental Legislation**

You will conduct your operations in full compliance with the letter and spirit of applicable environmental laws, and will provide the training, oversight and resources necessary to do so. Informatica expects you to seek, whenever feasible, to recover, recycle, reclaim and reuse resources, minimize waste discharge and strive to minimize or eliminate any detrimental effects from the waste you do discharge. Further you will seek to minimize wastage of resources and energy wherever possible and reduce your carbon footprint accordingly.

### **Business and Employment Relationships**

Informatica affirms the principle of equal employment and business opportunities without regard to any protected characteristic, including but not limited to: race, religion, national origin, color, gender, gender identity, age, disability, pregnancy, marital status, national origin/ancestry, military status, or sexual orientation. Informatica policy prohibits harassment in any form, and Informatica expects that you practice and promote a work environment free from harassment, as appropriate under local laws.

In particular, Informatica expects that:

- You do not employ, engage or otherwise use any child labour;
- You do not use forced labour in any form (prison, indentured, bonded, human trafficking or otherwise) and staff are not required to lodge deposits on starting work;
- You comply with all applicable environment, safety and health regulations and provide a safe and healthy workplace
- within the customs and practices of the countries in which you operate, you do not discriminate against any worker on any ground (including race, religion, disability or gender); and you do not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or unusual disciplinary practices in the workplace;
- You pay each employee at least the minimum wage as recognized under applicable law, or the prevailing industry wage, (whichever is the higher) and provide each employee with all legally mandated benefits; and
- you comply with the laws on working hours and employment rights in the countries in which it operates.

### **III. GENERAL CONTRACTING ISSUES**

Informatica expects you and your employees to compete fairly and ethically for all business opportunities. Your employees who are involved in the sale or licensing of products/services, the negotiation of agreements, or the delivery of services to customers are expected to understand and honor the terms of contractual agreements. You must ensure that all statements, communications, and representations to customers are accurate and truthful as they relate to Informatica. You may not under any circumstances misrepresent or exaggerate the features, functionality or effectiveness of any Informatica product or service.

## INFORMATICA PARTNER CODE OF CONDUCT

### **Dealing with Government**

Informatica's standards and the applicable laws for dealing with government employees and officials are even more stringent than standards for commercial Informatica employees.

You must strictly observe the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with government. If you deal with any governmental entity, including public international organizations, you are responsible for learning and complying with all rules that apply to government contracting and interactions with government officials and employees, including but not limited to the following requirements

- You must not attempt to obtain, directly or indirectly, from any source, procurement-sensitive government information that is not publicly available or otherwise authorized for disclosure by the government, confidential internal government information, such as pre-award source selection information, or any proprietary information of a competitor, including, for example, bid or proposal information, during the course of a procurement or in any other circumstances where there is reason to believe the release of such information is unauthorized.
- You must ensure the submission of accurate invoices to the government and comply with all laws regarding invoicing and payments.
- In dealing with government employees and officials, you shall not give or offer, either directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of value to any government official or employee or relations thereof. You shall establish appropriate internal controls and advance approval mechanisms over any such payments or gifts to or on behalf of government officials to ensure compliance with local country and U.S. laws.
- You shall not provide, attempt to provide, offer, or solicit an illicit payment or reward (often known as a "kickback", directly or indirectly, to obtain or reward favorable treatment in connection with any transaction.
- You shall not pay or enter any agreement to pay, directly or indirectly, a contingent fee to any party for the purposes of obtaining a government contract or influencing government action.
- If you are selling or offering to sell commercial products to the United States Government, you should be familiar with and ensure compliance with the laws and regulations concerning the sales of commercial products and sales to government, and, if applicable to you, the Multiple Award Schedule (MAS) contracting regulations of the General Services Administration (GSA).

### **Lobbying of Government Officials**

Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, however, the legal definition of "lobbying" can also cover procurement and business development activity.

Lobbying activities are highly regulated. As such, you may not lobby a government representative on behalf of Informatica without our express written authorization. Government relations consultants/lobbyists retained by you may not be used by, for or on behalf of Informatica without Informatica's prior written approval. You may not be paid contingent fees or participate in the influence/referral fee program on any transaction involving a public sector end user (including public Higher Education, Healthcare, Tax, and/or Utilities).

## INFORMATICA PARTNER CODE OF CONDUCT

You are responsible for understanding when your activities may legally be considered lobbying in a particular jurisdiction and complying with the applicable laws.

### IV. REPORTING VIOLATIONS

You are required to report to Informatica any conduct, including conduct of any Informatica employee, that you believe in good faith to be an actual, apparent or potential violation of this Code. Prompt reporting of violations is in the best interest of everyone. Reports will be handled as confidentially as possible.

Informatica maintains an "open door" policy with regard to your questions, including any questions related to business conduct and ethics. Informatica will not tolerate retaliation against anyone who reports a violation of this Code in good faith. To report an incident, you may contact your local Informatica legal counsel.

You may also call Informatica's Compliance and Ethics Helpline at 1-877-295-7941, toll-free, 24 hours a day, seven days a week. You may anonymously report an incident online at any time through the Informatica Incident Reporting Website, which is available at: <http://Informatica.ethicspoint.com>. Please note that certain restrictions might apply to Helpline reports in the European Union. A third-party, not Informatica, manages both the Helpline and Incident Reporting Website. The Helpline is staffed 24 hours a day, seven days a week, and the Incident Reporting Website is available for your use at any time.

### V. ENFORCEMENT

The Partner Code of Conduct and Business Ethics places you and Informatica in the forefront with those corporations throughout the world that emphasize the importance of honest business conduct and solid business ethics. Our standards can be met only with your cooperation. Informatica trusts that you will recognize that you must adhere to the standards of this Code. Any violation of this Code will constitute the basis for the immediate termination of your distribution and/or partner agreements with Informatica and the cancellation of any pending fees payable to you, pursuant to applicable laws and without any liability to Informatica. You hereby agree to fully indemnify and defend Informatica, its agents, officers, employees and directors against any and all fees, fines, costs, liens, judgments or expenses incurred by any such person(s) as a result of a violation of these provisions. You will comply with any requests for information pertaining to any alleged violation.

### VI. EDUCATION

You will ensure that all of your employees, agents, officers and directors are aware of the contents of this Code. Regular training pertaining to the content of this Code shall be provided to all relevant employees. All employees engaged in the active representation of Informatica technology and services shall maintain complete and up to date knowledge of all applicable Informatica products as may be required by Informatica.