



## CODE OF BUSINESS CONDUCT

At Informatica, we conduct our business with the highest degree of honesty and ethical behavior. We are committed to one another and to our customers, partners, vendors, and shareholders – all of whom are integral to our business. We operate with integrity, decency and fair play, and we are ethical in our communications, speaking with openness, honesty and courage. We're accountable for our words and actions and strive to build a challenging work environment that rewards teamwork, innovation and success, while respecting individuality and recognizing diverse lifestyles and work styles.

Informatica's Code of Business Conduct applies to Informatica Inc. and its subsidiaries (collectively, "Informatica" or the "Company"), and provides an overview of our fundamental policies on business conduct. It is by no means exhaustive, but summarizes some of our most important policies, which are based on standards that underlie our business ethics, professional integrity, and our foundational values and standards that apply to all Informatica representatives, wherever you may be based.

Additionally, please familiarize yourself with the specific policies that apply to individual areas of responsibility at Informatica, and to different countries or regions, as well as the Employee Handbook (if applicable to you).

As a representative of Informatica, you are expected to read this Code of Business Conduct carefully and thoroughly, and to understand and comply with the standards and policies contained or described herein. After reading the Code of Business Conduct, if you have any questions, please ask your manager.

In addition, should you become aware of violations of these policies, your responsibility is to communicate the information promptly as outlined in this document. Understanding, communicating, and working together to create a positive workplace environment are what make our policies effective and make Informatica an outstanding place to work.

Thank you,

Amit Walia  
Chief Executive Officer

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## COMPLIANCE IS SERIOUS BUSINESS

Informatica's policies about business conduct reflect the kind of company we strive to be and are fully consistent with Informatica's values. The successes we've achieved are rooted in our values, and they serve as our north star to help keep us centered and focused on what matters most – you! They reflect our shared purpose to achieve a higher standard of excellence for our company, our customers, and ourselves. These are our **DATA** values.

**Do Good** - Foster an inclusive culture where we treat each other with respect, fairness, and dignity.

**Act as one team** - Connect, communicate, and collaborate as one diverse team.

**Think customer-first** - Accelerate customer outcomes in everything we build and how we deliver.

**Aspire and Innovate** - Continuously and fearlessly innovate through curiosity and learning.

We expect all Informatica officers, employees, and, where applicable, directors, to respect and adhere to these policies and Informatica's values. The various policies applicable to Informatica employees can be found on Informatica's internal website (Life@). It is also important to point out that many Informatica policies reflect legal or regulatory requirements. Policy violations can create significant liability for Informatica, its directors, officers, and employees. Liabilities not only may result in monetary damages but may even threaten our ability to continue to do business, and in some cases, could result in personal liability or criminal charges for those involved.

## REPORTING POSSIBLE VIOLATIONS

Ethical business conduct is at the core of Informatica's business practices. As an Informatica employee, your responsibility is to respect and adhere to these practices and Informatica's foundational values.

Part of your job and your ethical responsibility at Informatica is to help Informatica enforce this Code of Business Conduct. You should be alert to possible violations and you are required to promptly report and fully cooperate in any internal or external investigations into possible violations. Such self-policing is encouraged and expected.

If you know of or suspect any conduct that you believe in good faith to be inconsistent with the Code of Business Conduct, with Informatica's policies (including its financial accounting policies), or with the requirements of the law, you are obligated to report it to Informatica's General Counsel/Chief Legal Officer or other appropriate Informatica representatives. Informatica has also made arrangements for employees to report such matters to an independent third party, EthicsPoint, which allows employees to make anonymous reports. To make a report, you may (a) call the Hotline at **1-877-295-7941**, or (b) submit a report to EthicsPoint's Informatica website at <http://informatica.ethicspoint.com>. If calling from outside the United States, consult <http://informatica.ethicspoint.com> for local dialing instructions and toll-free numbers, where available. All reports will be promptly investigated by appropriate personnel.

## **Investigations**

As a general matter, the Board will oversee investigations of potential violations by directors or executive officers, and Informatica's General Counsel/Chief Legal Officer will oversee investigations of potential violations by other employees. However, it is imperative that the person reporting the violation not conduct an investigation on their own. Employees are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Employees should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, employees are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Informatica representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

## **No Retaliation**

Employees who report misconduct or suspected violations must be protected from retaliation. Reprisal, retribution, or retaliation by anyone within Informatica against any employee who has in good faith reported a violation or a suspected violation is strictly prohibited. This No Retaliation policy describes our provisions towards employees who file reports for any reason, including harmful, discriminatory or unethical behaviors, legal issues or policy violations. Whether accusations are true or false, we want to prevent victimization and other retaliatory behavior towards the employee. We believe it's important that employees aren't afraid to speak up about any issues; it's to Informatica's benefit to resolve them as soon as possible. We will follow all legal prohibitions for retaliation and grant employees the right to speak about misconduct. We don't want to silence complaints, and we encourage open communication.

## **Disclosure**

Nothing in this Code limits or prohibits employees from engaging for a lawful purpose in any "Protected Activity." "Protected Activity" means filing a charge or complaint, or otherwise communicating, cooperating or participating, with any state, federal or other governmental agency, including the United States Securities and Exchange Commission, the Equal Employment Opportunity Commission and the National Labor Relations Board. Notwithstanding any other policies in this Code (or elsewhere), employees are not required to obtain authorization from the Company prior to disclosing information to, or communicating with, such agencies, nor are employees obligated to advise the Company as to any such disclosures or communications. Notwithstanding, in making any such disclosures or communications, employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company confidential information to any parties other than the relevant government agencies. "Protected Activity" does not include the disclosure of any Company attorney-client privileged communications; any such disclosure, without the Company's written consent, violates Company policy.

## **YOUR RESPONSIBILITIES TO INFORMATICA AND ITS SHAREHOLDERS**

### **Honest and Ethical Conduct**

Informatica expects all directors, officers, and employees to act honestly and ethically and to exercise good judgment to uphold our standards of business conduct. We consider honest conduct to be conduct that is not merely free from fraud or deception but characterized by integrity. We consider ethical conduct to be conduct conforming to accepted professional standards of conduct. These standards apply while working on our premises, at offsite locations where our business is being conducted, at Informatica-sponsored business and social events, or at any other place where you are a representative of Informatica.

### **Dignity and Respect in the Workplace**

At Informatica we always treat people the way we want to be treated – with dignity and respect. We recognize that our coworkers, customers, vendors, suppliers, and partners all have rights, opinions, wishes, and competence. They also make mistakes, which are simply lessons to be learned. They have similar concerns and insecurities as we do, and we all share the common goal of wanting to perform our jobs successfully. Respect in the workplace breeds a healthy work environment, and a professional, respectful work culture encourages productivity and growth.

### **Fair Dealing**

The Company does not seek competitive advantages through illegal or unethical business practices. Each employee should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors, business partners and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

### **Conflicts of Interest**

Ethical conduct includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. A conflict of interest exists where the interests or benefits of one person or entity conflict with the interests or benefits of Informatica. Such a conflict may arise directly, or indirectly, as a result of the personal interests or activities of a family member or organization with which you or a family member are affiliated.

If you may be a party to a transaction or relationship that could reasonably be expected to give rise to a conflict of interest or the appearance of such a conflict you are required to disclose the circumstances in writing to the Corporate Compliance team as far as practicable in advance of entering into the potential transaction or relationship, and you will then be informed of any approval requirements. Members of the Informatica Inc. Board of Directors and designated Executive Officers should also refer to procedures outlined in the Related Person Transactions Policy.

Our responsibilities to Informatica, our shareholders, and each other do not prevent us from engaging in personal transactions and investments; they do, however, demand that we avoid situations where a conflict of interest might occur or appear to occur. Informatica is subject to

scrutiny from many different individuals and organizations. We should always strive to avoid even the appearance of impropriety.

Common examples of conflicts of interest for employees include:

**Outside Employment.** Employees should not engage in any business outside Informatica if it interferes with your performance or responsibilities to the Company. You should not accept simultaneous employment with an Informatica supplier, customer, developer, or competitor, or take part in any activity that enhances or supports a competitor's position.

**Outside Directorships and Advisory Roles.** It is a conflict of interest to serve as a director of a company in competition with Informatica. Although in some circumstances you may serve as a director or advisor (e.g., Technical or Business Advisory Board member) of an Informatica supplier, customer, developer, or other organization, you must first obtain approval from the Company's General Counsel/Chief Legal Officer and comply with all conditions placed on any such approval. Notwithstanding the foregoing, an executive officer of Informatica must also obtain the prior approval of the Company's Nominating and Corporate Governance Committee in order to serve as a director or advisor of another organization (other than non-profit or charitable organizations or subsidiaries of Informatica). If you serve as a director at the request of Informatica, you should not accept any remuneration for service.

**Business Interests.** You, and your direct family members may not have a personal or family business interest in customer, supplier, developer, other direct or indirect business partner or competitor of Informatica that could improperly influence your judgment, has the potential to cause the appearance of divided loyalty, or might result in personal benefit because of your role at Informatica. Business interests include employment, investment, ownership, or creditor interests. Before investing your time or money in the business interests of customers, suppliers, developers, other business partners or competitors, you must first ensure that these investments do not compromise your responsibilities to Informatica. Many factors should be considered in determining whether a conflict situation exists, including the size and nature of the investment; your ability to influence Informatica decisions; your access to the confidential information of Informatica or of the other company; and the nature of the relationship between Informatica and the other business. Typically, investments of less than two percent of the total outstanding shares of publicly traded companies do not create a conflict.

**Related Parties.** As a general rule, you should avoid conducting Informatica business with a family member, with a business in which a family member is associated in any significant role, or with other related parties. "Family members" include a child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law and any person (other than a tenant or employee) sharing the household of an employee. If you may be a party to a transaction or relationship that could reasonably be expected to give rise to a conflict of interest or the appearance of such a conflict you are required to disclose the circumstances in writing to the Corporate Compliance team and you will be informed of any approval requirements. Members of the Informatica Inc. Board of Directors and designated



Executive Officers should also refer to procedures outlined in the Related Person Transactions Policy. No preferential treatment should be given to the business that would not otherwise be given to another business, and you should formally recuse yourself from any decisions with these parties that might normally fall into your area of responsibility.

**Other Situations.** It would be impractical to list all possible situations where conflicts of interest might arise. If you have any questions or doubts about a proposed transaction or situation, ask your manager, your HR business representative, or an attorney in the Legal Department before entering into the relationship or situation in question. Inquiries can also be sent to the [CorporateCompliance@informatica.com](mailto:CorporateCompliance@informatica.com) email address.

### **Applicable Laws**

All Informatica directors, officers and employees must comply with all applicable laws, regulations, rules, and regulatory orders. No matter where you are located, in addition to all regulatory requirements applicable to your country you must also comply with (1) laws, regulations, rules, and regulatory orders of the United States, including those regarding anti-corruption and anti-bribery, such as the United States Foreign Corrupt Practices Act, and (2) the United Kingdom's Bribery Act. You should read and be aware of Informatica's Anti-Corruption Policy. Any questions as to the applicability of any law should be directed to the Company's General Counsel/Chief Legal Officer.

### **Corporate Opportunities**

Except as otherwise set forth in the Company's certificate of incorporation and bylaws, employees owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. Employees are prohibited from taking or directing a third party to take, a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. Employees are further prohibited from competing with the Company directly or indirectly during their employment with the Company and as otherwise provided in any written agreement with the Company.

Sometimes the line between personal and Company benefits is difficult to draw, and sometimes there are both personal and Company benefits in certain activities. Employees should discuss with their manager, HR business representative or an attorney in the Legal Department if they have any questions.

### **Equal Opportunity**

Informatica's values of ethics, integrity and honesty, and decency and fair play require an environment that is open, supportive, and interdependent. No action could be more contrary to our values than discrimination of any kind.

Discrimination, harassment, slurs, or jokes based on a person's race, color, creed, religion, national origin, citizenship, age, sex, sexual orientation, gender identity/expression, marital status, mental





or physical disability, caste, or any other classification covered by law will not be tolerated. This is true for every Informatica employee and contractor and for our business partners. A more detailed discussion of these policies can be found in the Employee Handbook.

Any employee who is found to have discriminated against another employee is subject to discipline up to and including termination.

No individual will suffer any reprisals or retaliation for making complaints or reporting any incidents of discrimination or perceived discrimination in good faith, or for participating in any investigation of incidents of discrimination or perceived discrimination.

### **Insider Trading**

Under U.S. federal and state securities laws, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. Some employees may have knowledge of specific confidential information that is not disclosed outside the Company which could constitute material non-public information. Trading in the Company's securities while in the possession of material non-public information could constitute insider trading, violating the law. This situation and others are described in the Company's [Insider Trading Policy](#) for employees. It is every employee's responsibility to comply with securities laws and abide by the Insider Trading Policy, including pre-clearance obligations where applicable.

### **Modern Slavery and Human Trafficking**

Informatica has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery which could include slavery, servitude, human trafficking and forced labor taking place within the business and our supply chain. See also the Supplier Code of Conduct and Business Ethics for related requirements for Informatica Suppliers.

## **PROTECTING CONFIDENTIAL AND SENSITIVE INFORMATION**

Informatica's confidential and proprietary information is its most valuable asset and includes, among other things: product architectures, source code and programming techniques; product and marketing plans and road maps; names and lists of customers, resellers, and employees; financial information; and the contents of all internal collaboration tools (e.g., email, Teams). This information is company property and is protected under the law. In addition, our customers, suppliers, securityholders, and others trust us to protect their sensitive information. We regularly receive such sensitive information, and it is our obligation to protect it in the same fashion as we do with Informatica's confidential information. Every employee has the responsibility to safeguard all Confidential or Restricted information and to never disclose it without proper authorization. For more information on safeguarding information, employees should see Informatica's [Acceptable Use Policy](#).

### **Confidentiality and Intellectual Property Agreement (formerly known as the Employee Proprietary Information and Inventions Agreement)**

When you joined Informatica, you signed an agreement to protect and hold confidential our proprietary information. This agreement remains in effect for as long as you work for Informatica



and even after you leave the Company. You may not disclose Informatica's confidential information or a third party's sensitive information to anyone or use it to benefit anyone other than Informatica without Informatica's prior written consent. Abiding by this agreement is a fundamental condition of your employment, and you should take its provisions very seriously. Disclosing any of this information, without first having the appropriate permission to do so, is a violation of the agreement.

### **Disclosure of Confidential Information**

To further Informatica's business, we may sometimes need to disclose our proprietary information or a third party's sensitive information to potential business partners or customers. However, such disclosure should never be made without carefully considering its potential benefits and risks. If your manager and other appropriate Informatica management determine that disclosure of confidential information or a third party's sensitive information is necessary, you must then contact the Legal Department to ensure that an appropriate written nondisclosure agreement has been signed by all parties before any disclosure takes place. Never accept a third party's nondisclosure agreement without reviewing it with the Legal Department. Additionally, no financial information may be disclosed without the prior approval of the Chief Financial Officer or other appropriate Informatica Finance management.

Company confidential information is sometimes distributed to employees from executive officers or other appropriate Informatica management. Employees are not authorized to share this information externally, or to others within Informatica unless the intended recipient has a legitimate business need to know it and the disclosure complies with applicable Company policies, including the External Communications (Reg FD) Policy. Posting these communications on the Internet or emailing them to outside parties is prohibited. Only designated employees may refer to this information externally or speak with the press or financial analyst community regarding confidential matters. All inquiries from the press and financial analysts must be referred to the Chief Financial Officer or Chief Communications Officer.

### **Handling the Confidential Information of Others**

Informatica has many kinds of business relationships with many companies and individuals. Sometimes, they will volunteer confidential information about their products or business plans to induce Informatica to enter into a business relationship. At other times, we may request that a third party provide confidential information to evaluate a potential business relationship with that party. Whatever the situation, we must take special care to handle the confidential information of others responsibly, as it may be a trade secret or protected intellectual property. At no time should you accept confidential or proprietary information that belongs to a competitor – regardless of its source. Also, at no time should you use any confidential or proprietary information that you may have received from a previous employer. If you have any question as to how to handle any matter related to confidential information of third parties, please contact the Legal Department.

### **Data Privacy**

You are responsible for protecting the confidentiality, integrity, and availability of personal data which is processed or controlled by Informatica. In the course of your duties, you may process data about Informatica business contacts, customer data (which we presume to include personal data), and data about Informatica personnel. You must observe all applicable data privacy standards, laws, rules, regulations, and statutes with respect to this data as well as all Informatica



policies related to personal data and data privacy. Informatica resources are available to help explain our obligations to employees, including our [Marketing and Sales Development Data Privacy Guidelines](#) for business contact data, our [Data Processing Agreement](#) and [Security Addendum](#) for customer data, and our [Data Protection by Design Policy and Guidelines](#) for all personal data we hold.

## **USING TECHNOLOGY AND OTHER INFORMATICA ASSETS**

Protecting Informatica’s assets is a key fiduciary responsibility of every employee. Care should be taken to ensure that assets, including company property or systems and customer data or sensitive information, are not misused, misappropriated, loaned to others, or sold or donated without appropriate authorization. The computers, mobile phones, and other devices Informatica provides are company property, as is the company’s email system, collaboration tools and Internet access. A certain amount of personal use is permitted, but company technology should mainly be used only for business purposes. Our Acceptable Use Policy, available to all employees, provides further details and region-specific guidance on personal use.

Since all of these assets and technology belong to Informatica, employees should understand that they have no expectation of privacy in their use. Informatica may monitor anything created, stored, set or received on company assets or technology, to the extent allowed by law. Do not use company assets or technology to violate the law or Informatica policies, or to create, store or send content that others might find offensive. It is also important to avoid any usage that might lead to loss or damage, such as a breach of Informatica’s Information Security protocols. For more information on using technology and other assets, employees should see Informatica’s [Acceptable Use Policy](#).

Common examples of using technology and other Informatica assets include:

### **Computers and Other Equipment**

Care for Informatica equipment and use it responsibly. If you use Informatica equipment at your home or off site, take precautions to protect it from theft or damage, just as if it were your own. If you leave Informatica employment, you must return all company-owned equipment.

### **Software**

All software used by employees to conduct Informatica business must be authorized and licensed copies. Making or using unauthorized copies constitutes copyright infringement and may expose you and Informatica to civil and criminal liability. Employees may see Informatica’s [Software Usage Policy](#) for detailed requirements.

### **Use of Email**

Email must be used appropriately. Irresponsible, careless, or insensitive statements in an email can be taken out of context and used against you and Informatica. Similarly, disparaging comments made against others could, under certain circumstances, constitute libel or a form of harassment. Follow simple rules of etiquette and common sense when preparing and sending emails.

## **Use of the Internet**

Employees are expected to use the internet responsibly and ethically, whether working onsite, remotely or in hybrid capacity. Internet access should primarily support business activities, and personal use should be limited and not interfere with work responsibilities. Internet use that is not strictly company related during business hours should be minimized.

Use of Informatica's equipment or networks to view, access, store, share, copy, upload or download any of the following will not be tolerated:

- Images, data or other information of an obscene, racial or sexually explicit nature; and
- Unauthorized copies of any work protected by copyright, including films, music, software, computer games and publications.

Failure to comply with this rule will result in disciplinary action, up to and including termination of employment.

## **MAINTAINING AND MANAGING RECORDS**

Keeping accurate books and records and retaining them for retrieval is an important part of our daily business. In fact, various laws require that records be accurate and that they be kept for minimum periods of time.

Informatica's record retention policy and procedures are established around the world in compliance with local laws. Periodically disposing of documents that are no longer useful and do not need to be retained is just as important as knowing when to save information. If litigation is pending or threatened, all pertinent documents should be retained, per Informatica's [Records and Data Life Cycle Management Policy](#), available for all employees to review.

## **PAYMENT AND APPROVAL PRACTICES**

### **Accounting Practices**

Informatica's responsibilities to its shareholders, as well as its obligations under applicable law, require that all transactions be fully and accurately recorded in the Company's books and records. False or misleading entries, unrecorded funds or assets, unapproved purchases, or commitments or payments without appropriate supporting documentation and approval are strictly prohibited. Additionally, all documentation supporting a transaction should fully and accurately describe the nature of the transaction and be processed in a timely fashion.

### **Political Contributions**

Informatica's funds or assets must not be used for, or be contributed to, political campaigns or political practices under any circumstances, directly or through intermediaries (such as political action committees, non-profit advocacy organizations or industry associations) anywhere in the world without the prior written approval of the Company's General Counsel/Chief Legal Officer.

## **Sales Representatives, Agents, and Consultants**

The bulk of Informatica's business is done through Informatica sales professionals. In addition, Informatica frequently engages consultants, channel sales partners, and other third parties to provide services and to act on its behalf. Our relationships with all third parties must always be proper, lawful, and documented, wherever in the world they occur.

Commissions, fees, and discounts and any other terms related to the transaction, must always be set out in a written agreement and must reflect the value to Informatica of the service being provided. They should never exceed amounts that are reasonable and customary in our industry. The service to be provided must be legal and proper and must be provided according to the terms of the written agreement. In addition, we deal honestly and ethically with our customers. Never misrepresent our products or services to customers or potential customers, and don't do anything unethical or illegal to win business.

The transaction and the written agreement must follow the appropriate approval path – being reviewed and approved by both the Legal and Finance Departments. Employees may see the [Signature Authority Policy](#) for details. Side agreements, side arrangements or any other scheme to circumvent the agreement approval process or sales compensation plan are strictly prohibited and will subject any involved employee to disciplinary action, including termination. Payments must never be made in cash and may only be made against an accurate and complete invoice.

## **EXPORT CONTROLS**

Many countries, including the United States, maintain controls on the destinations to which technology and products, including software, may be exported. Relevant laws also may restrict disclosures to foreign nationals and financial transactions with certain countries and individuals, regardless of location. Informatica is further prohibited from taking any action in support of a boycott not sanctioned by the United States government. For more information, employees should see Informatica's [Sanctions, Export Control & Anti-boycott Policy](#).

## **RESPONSIBILITIES TO OUR CUSTOMERS AND SUPPLIERS**

### **Payments or Gifts to Others (Non-Government)**

Informatica employees should not give gifts to a private party for an improper purpose, i.e. where the gift creates a conflict of interest or is intended to cause the recipient to not act in good faith or otherwise abuse a position of trust. Informatica employees may, however, provide inexpensive and reasonable gifts to private parties when following all requirements, including applicable pre-approval requirements, of the Anti-corruption Policy, available to all employees. Such gifts should always be appropriate to the circumstances and should never be of a kind that could create an appearance of impropriety. The nature and cost of any gift given by an Informatica employee must be accurately recorded in Informatica's books and records. For more information on payments or gifts to private parties, employees should see Informatica's [Anti-Corruption Policy](#).

## **Receipt of Gifts from Others**

Informatica employees should not accept gifts from any persons for an improper purpose, i.e., where the gift creates or appears to create a conflict of interest or is intended to cause the employee to not act in good faith or otherwise abuse a position of trust. Informatica employees may, however, receive inexpensive and reasonable gifts from any persons who have a business relationship with Informatica (e.g., customers, suppliers, partners) when following all requirements, including applicable pre-approval requirements, of the Anti-corruption Policy, available to all employees.

## **Payments or Gifts to Government Officials**

The rules and regulations that apply to the offering gifts to government employees, officials, and representatives of the United States and foreign governments are complex. You must comply strictly with these laws and regulations and you must never offer a payment or gift if doing so violates a law or regulation, will cause embarrassment for the Company, or will reflect negatively on the Company's reputation. For more information on the limitations on payments or gifts to government officials, employees should see Informatica's [Anti-Corruption Policy](#).

## **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, lobbying activities may only be conducted by authorized Informatica personnel and the third-party representatives they engage. Staff may not be paid contingent fees or participate in the referral fee program on any transaction involving a public sector end user (including public higher education, healthcare, tax, and/or utilities). Authorized personnel must strictly adhere to all applicable lobbyist registrations requirements and update all such registrations as required by applicable law. Individuals are responsible for understanding when your activities may be legally considered lobbying in a particular jurisdiction and can contact the Corporate Compliance team with any questions they may have in that regard.

## **Publication Copyright Protection**

Informatica subscribes to many publications that help employees do their jobs better, such as newsletters, reference works, and magazines in digital and printed form. These works are generally protected by copyright law, and their unauthorized copying and distribution constitutes copyright infringement. Works published on the Internet, such as technical papers or product information, are also generally protected by copyright. Never make copies of publications or significant parts of them without first obtaining the consent of the publisher. When in doubt, consult the Legal Department.

At times, Informatica employees may wish to use music, film, or video clips in presentations, promotional materials, or at trade shows or Company events. These works are protected by copyright law, and their unauthorized use constitutes copyright infringement. Do not use them for a business purpose without first obtaining the necessary rights from the copyright owners or their representatives. These rights usually require several weeks to obtain and may require the payment of a fee. Please contact the Legal Department for assistance well in advance.



## Free and Fair Competition

Most countries have well-developed bodies of law designed to encourage and protect free and fair competition. Informatica is committed to obeying these laws. The consequences of not doing so can be severe for all of us.

These laws often regulate Informatica's relationships with its independent distributors and resellers, including pricing practices, discounting, credit terms, promotional allowances, exclusive dealerships or distributorships, restrictions on carrying competing products, termination, and many other practices.

They also govern, usually quite strictly, relationships between Informatica and its competitors. As a general rule, contacts with competitors should be limited and should always avoid subjects such as customers, suppliers, costs and prices, or other terms and conditions of sale. You should consult the Legal Department before joining any trade association of competitors.

Although the spirit of these laws, known as "antitrust," "competition," or "consumer protection" laws, is straightforward, their application to particular situations can be quite complex. To ensure that Informatica complies fully with these laws, each of us should have a basic knowledge of them and should involve our Legal Department early on when questionable situations arise.

## Selecting Suppliers and Partners

Informatica's suppliers and partners must be chosen with great care, and treated with respect. The confidential information of a supplier or partner is entitled to the same protection as that of any other third party and must not be received before an appropriate nondisclosure agreement has been signed. A supplier's or partner's performance should never be discussed with anyone outside Informatica. A supplier to Informatica is free to sell its products or services to Informatica's competitors, except where they have been designed, fabricated, or developed to Informatica's specifications.

## Sustainable & Ethical Procurement and Management Practices

The [Supplier Code of Conduct](#) is applicable to all Informatica Suppliers, and our Partner Code of Conduct applies to all partners. Informatica will take all reasonable steps to ensure that suppliers and partners we engage comply with the high standards we hold for our valued third-party suppliers and partners. Additionally, all Informatica employees will follow all Informatica policies and other guidance around appropriate selection, onboarding, engagement and payment of our third-party suppliers and partners.

## Environmental Impact

Likewise, Informatica conducts our operations in full compliance with the letter and spirit of applicable environmental laws, and we provide the training, oversight and resources necessary to do so. Informatica seeks, whenever feasible, to recover, recycle, reclaim and reuse resources, minimize waste discharge and strive to minimize or eliminate any detrimental effects from the waste we do discharge and reduce our carbon footprint accordingly. Informatica's "Zero Waste" program includes support for a variety of recycling initiatives, including E-Waste (computers and monitors), fluorescent lamps, batteries, cardboard and paper, compost and toner in many

locations. Informatica also proactively supports programs to reduce the amount of fossil fuels that are consumed by our employees by providing electric charging stations for employee vehicles at some office locations that are free of charge to the employee.

## **CORPORATE PHILANTHROPY**

Guided by our **DATA** values, we take corporate citizenship seriously at Informatica. Informatica cares about people—our employees, customers, partners, and those who need help in the neighborhoods we live in as well as the global community. Informatica Involved, our corporate social responsibility program, shows our commitment to improve people’s lives as our employees generously give their time, talent, and treasure to those in need.

## **ACCOUNTING AND AUDITING MATTERS**

Employees are responsible for the accurate and complete reporting of financial information within their respective areas and for the timely notification to senior management of financial and non-financial information that may be material to the Company to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with government agencies or releases to the general public.

Each employee involved in the Company’s disclosure process must familiarize themselves with the disclosure requirements applicable to the Company and the business and financial operations of the Company, and must not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company’s independent auditors, governmental regulators and self-regulatory organizations.

Employees must maintain all of the Company’s books, records, accounts and financial statements in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely. Furthermore, employees must ensure that all books, records, accounts and financial statements conform both to applicable legal requirements and to the Company’s system of internal controls. Employees must carefully and properly account for all assets of the Company. Employees may not establish any undisclosed or unrecorded account or fund for any purpose. Employees shall not make any false or misleading entries in the Company’s books or records for any reason or disburse any corporate funds or other corporate property without adequate supporting documentation and authorization. Employees shall not misclassify transactions related to accounts, business units or accounting periods. Each employee bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

All complaints regarding Informatica’s accounting, internal accounting controls and auditing matters will be reported to the Audit Committee of the Board of Directors of the Company, and will be promptly addressed by Informatica’s Legal Department, except as the Audit Committee may otherwise request. Informatica has also arranged for employees to report complaints regarding Informatica’s accounting, internal accounting controls and auditing matters through EthicsPoint, which allows employees to make anonymous reports. In order to make a report regarding the company’s accounting, internal accounting controls or auditing matters, you may (a) call the Ethics Hotline at 1-877-295-7941, or (b) submit a report to EthicsPoint’s Informatica website at <http://informatica.ethicspoint.com>. For those employees located





outside of the United States, specific dialing instructions by location are available on EthicsPoint's Informatica website at <http://informatica.ethicspoint.com>.

Reprisals, threats or retaliation against any person who has reported a violation or a suspected violation of Informatica's accounting policies, or against any person who is assisting in resolving the matter, are prohibited.

## **DISCIPLINARY ACTIONS**

The matters and policies covered in this Code of Business Conduct are of the utmost importance to Informatica, its shareholders, and its business partners. We expect all of our officers, employees, contingent workers, independent contractors and, where applicable, directors to adhere to these rules in carrying out their duties for Informatica.

Informatica will take appropriate action against those persons whose actions violate any Informatica policies. Disciplinary actions may include immediate termination of employment or business relationship, at Informatica's discretion. Where the company has suffered a loss, it will pursue its remedies against the individuals or entities responsible. Where laws have been violated, Informatica will cooperate fully with the appropriate authorities. Employees in the United States should be aware that this Code of Business Conduct does not alter an employee's at-will relationship with Informatica as described in the applicable Employee Handbook. Employees outside of the United States should be aware that this Code of Business Conduct does not form a part of any employment contract.

## **WAIVERS AND AMENDMENTS**

Any waiver of any provision of this Code of Business Conduct for an executive officer or a member of the Company's Board must be approved in writing by the Board of Directors or an authorized committee of the Board of Directors and promptly disclosed if required by applicable laws and regulations. Any waiver of any provision of this Code of Business Conduct with respect to any other employee, contingent workers or independent contractors must be approved in writing by our General Counsel/Chief Legal Officer.

We are committed to continuously reviewing and updating our policies and procedures. Therefore, this Code of Business Conduct is subject to modification from time to time.