



CODE OF BUSINESS CONDUCT

At Informatica, we conduct our business with the highest degree of honesty and ethical behavior, and we are committed to one another and to our customers, partners, vendors, and securityholders – all of whom are integral to our business. We operate with integrity, decency and fair play, and we are ethical in our communications and actions, 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 Holdco Inc., Informatica LLC, Informatica Ireland EMEA UC, and their respective affiliates and subsidiaries (collectively, "Informatica"), 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, 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, please ask your manager questions if you have any.

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,

Anil Chakravarthy
Chief Executive Officer
December 2018

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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. This is how **We DATA**.

Do Good - we have an integrated focus on our customers, our partners, our community and the world.

Act as one team - we work with integrity, holding each other accountable every day, and work collaboratively across functions as a high-performing family.

Think customer-first - we are fiercely dedicated to thoroughly serving our customers and delivering on our promises. We empower our customers to make an impact on the world, because we believe their success is our success.

Aspire for the future - we show openness and agility, and are forward-thinking, now and in our future innovations.

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 OF POLICIES

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 fully cooperate in any internal or external investigations into possible violations. Such self-policing is encouraged and expected. 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. In short, retaliation of this kind will not be tolerated at Informatica.

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's office 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.

YOUR RESPONSIBILITIES TO INFORMATICA AND ITS SECURITYHOLDERS

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.

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.

You must disclose to the Company's General Counsel or Chief Financial Officer any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest or the appearance of such a conflict. Before entering into any transaction or relationship involving any actual or potential conflict of interest, employees should obtain prior approval from the General Counsel or Chief Financial Officer, and directors and executive officers should obtain prior approval from the Audit Committee of Informatica Holdco Inc.

Our responsibilities to Informatica, our securityholders, 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. It is a conflict of interest to serve as a director of a company in competition with Informatica. Although you may serve as a director of an Informatica supplier, customer, developer, or other organization, you must first obtain approval from the Company's General Counsel or Chief Financial Officer, and any remuneration you receive should be of an amount reflective of your responsibilities. Notwithstanding the foregoing, an executive officer of Informatica must also obtain the prior approval of the Audit Committee of Informatica Holdco Inc. in order to serve as a director 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 may not have a personal or family business interest in customer, supplier, developer, other 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 investment, ownership, or creditor interests. Before investing 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. If such a transaction is unavoidable, you must obtain prior approval from the Company's General Counsel or Chief Financial Officer and engage an Informatica purchasing agent to negotiate arm's length terms. No preferential treatment should be given to the business that would not otherwise be given to another business.

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.

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, you must comply with 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, the United Kingdom's Bribery Act. You should read and be aware of Informatica's Anti-Corruption Policy and Guidelines.

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, 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.

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 codes, and programming techniques; product and marketing plans and road maps; names and lists of customers, resellers, and employees; financial information; and internal email communications. 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 sensitive information and to never disclose it without proper authorization. For more information on safeguarding confidential and sensitive information, please see Informatica's Information Security Handbook and 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 this 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 they have a legitimate business need to know it. 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. For more information on sharing information externally, please see Informatica's Corporate Communications Policy.

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 personal data which is processed or controlled by Informatica. You must observe all applicable data privacy standards, laws, rules, regulations and statutes as well as all Informatica policies related to personal data and data privacy.

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 and Internet access. A certain amount of personal use is permitted, but company technology should mainly be used only for business purposes.

Since all of these assets and technology belongs 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 IT security protocols. For more information on using technology and other assets, please see Informatica's Information Security Handbook and 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 immediately 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. See Informatica's Software Acceptable Use 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

Internet access is provided for business purposes. Please keep in mind that personal use of that access should be kept within reasonable limits. 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 policies 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 Data Retention Policy.

PAYMENT AND APPROVAL PRACTICES

Accounting Practices

Informatica's responsibilities to its securityholders, 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 or Chief Financial 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. 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, please see Informatica's Sanctions and Export Control Policy.

RESPONSIBILITIES TO OUR CUSTOMERS AND SUPPLIERS

Payments or Gifts to or from Others (Non-Government)

Informatica employees should not give gifts to, or accept gifts from, 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 gifts, having a maximum value of US\$100, to private parties. Sometimes local customs may dictate that Informatica employees exchange more valuable gifts with suppliers or customers. In those instances, Informatica employees must first obtain written approval from the employee's supervisor. 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 or from private parties, please see Informatica's Anti-Corruption Compliance Policy and Guidelines.

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, please see Informatica's Anti-Corruption Compliance Policy and Guidelines.

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

Informatica’s suppliers must be chosen with the same care, and treated with the same respect, as our distributors and resellers. The confidential information of a supplier 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 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 Procurement Practices

The Supplier Code of Conduct and Business Ethics is applicable to all Informatica Suppliers, and to all personnel employed by or engaged by the Supplier to provide services along with their agents, contractor’s and representatives throughout the world. Supplier is further defined as any individual, business, company or incorporated or unincorporated body which provides or seeks to provide any goods or performs any services for Informatica LLC and/or its subsidiaries. Suppliers will conduct their 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 Suppliers 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, Suppliers will seek to minimize waste of resources and energy wherever possible and reduce their carbon footprint accordingly.

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. 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 **We 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

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 Informatica Holdco Inc., 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 Board of Directors of Informatica Holdco Inc. must be approved in writing by the Board of Directors and promptly disclosed pursuant to 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.

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.