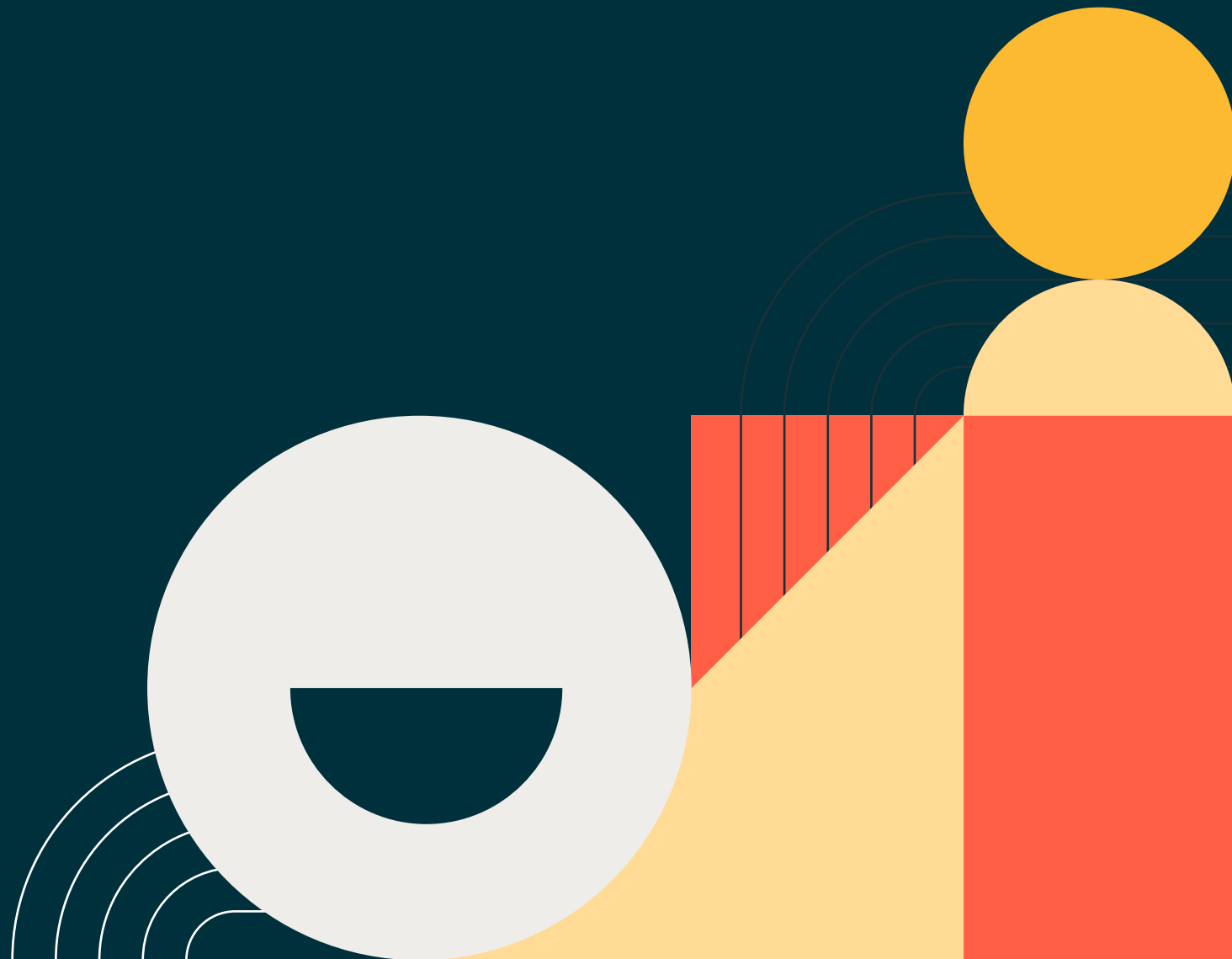databricks

Global Code
of Conduct

A letter from our CEO

Hi Bricksters,

I'm pleased to share Databricks' Global Code of Conduct. The code describes the guiding principles for our business and outlines the commitments we make to each other, our partners and our customers. Our Code of Conduct is super important because if we fail to act with integrity and respect, we put our future and our culture at risk.

If you are ever unsure of how to handle a situation or are concerned about a violation, please speak up by reaching out to your manager, the People team, or our Legal Compliance & Ethics team. You can also raise concerns at go/speakup.

Please familiarize yourself with our new Code of Conduct and help protect our company by always acting with integrity and respect.

Ali

Table of Contents

Introduction

Databricks is the pioneer of the lakehouse platform. We work with our customers and partners, and each other, on innovative solutions and solve the toughest data, AI, and analytics problems. It's up to each and every Brickster to help safeguard our work by acting responsibly and ethically every day. Behavior that is improper or breaks the law — even if unintentional — could have serious financial or reputational consequences that damage the image and brand that we have worked hard together to build.

The Code and Applicability

The Code of Conduct (the "Code") is the foundation of Databricks' Legal Compliance & Ethics program. It defines what Databricks, Inc., and its subsidiaries ("Databricks" or the "company") expect from employees, officers and directors. Our Legal Compliance & Ethics team ("LC&E") promotes and enforces the Code, but we expect all employees and contractors to behave responsibly and ethically, as described below, and all managers are responsible for role modelling ethical behavior, leading by example, and helping their teams find assistance.

In some circumstances, third parties can expose Databricks to serious legal, reputational, or other risks. Databricks also expects the parties it works with — partners, contractors, consultants, and vendors — to behave ethically and act consistently with the same compliance behaviors we expect of employees, as explained in our Third Party Code of Conduct.

Databricks Compliance & Ethics Behaviors

PLAY BY THE RULES ✓	ACT WITH INTEGRITY 🛡	SPEAK UP 💬
Abide by company policies, complete required trainings, and follow all other rules and standards we set — they help protect the company and employees	Follow the Code of Conduct, conduct business ethically, do the right thing, and model company values with internal teams, customers, and partners	Follow Report misconduct using our Speak Up program – and know we prohibit retaliation for making good-faith reports
Go/policies	Go/ethics	Go/speakup

Getting Help With the Code and Policies

Trust is a team effort. If you need assistance interpreting the Code or our policies, or to get in touch with LC&E, view the Resources tab. Throughout the Code, you may also see instructions to contact Legal or People. Visit go/legal or go/peopleops, or ask LC&E for additional information.

As Bricksters, we understand that there are rules that govern how we behave as a company and as individuals. These include both internal policies and procedures, as well as external laws and standards. If you ever have a question about any of these, seek help.

Compliance With Laws and Regulations

Databricks complies with all laws of the countries where we operate, and employees must too. While the Code is a guide for complying with relevant laws, it cannot cover all applicable laws, regulations, and legal requirements. If local laws and the Code differ, the stricter requirement should be followed. For assistance navigating differences or conflicts between the law and the Code, contact LC&E.

Compliance With Databricks Policies

Everyone in the Databricks ecosystem — employees, contractors, customers, partners, etc. — is expected to follow the rules we set as a company. In addition to the Code itself, many areas of the Code also are, or may in the future be, covered by other Databricks policies that provide more detail. Employees should know how to find them, follow them, and consult LC&E or the People team with questions about them. Databricks' employee handbooks also provide more information on requirements pertaining to employees' relationship with the company.

Integrity is a first principle in our business. Integrity means we act respectfully, we use data and information appropriately, we model business ethics in our relationships, and we behave responsibly in the market and the communities where we operate.

Respect for People

HARASSMENT & DISCRIMINATION

Databricks is committed to a respectful work environment free of harassment and discrimination, including based on a legally protected characteristic. Conduct that may foster an intimidating, offensive, or hostile work environment is strictly prohibited, including but not limited to unwelcome or unsolicited sexual advances, using discriminatory slurs or inappropriate remarks or jokes, or other unwelcome conduct that interferes with an employee's work performance. This policy applies to all work-related settings and activities, inside or outside Databricks' offices, including at business trips and social events. See Databricks' Discrimination, Harassment & Retaliation Prevention Policy for more information.

DIVERSITY & INCLUSION

Databricks is committed to promoting diversity, equity, and inclusion. The collective sum of Bricksters' individual differences, experiences, and talents is a significant part of our company culture. Databricks embraces and encourages the differences that make employees unique. We expect Bricksters to treat others with dignity and respect, and exhibit conduct that reflects inclusion in all work-related settings.

HEALTH & SAFETY

Databricks also does not tolerate threats, intimidation, bullying, physical or mental abuse, coercion, stalking, or actual or implied violence by anyone. Databricks also prohibits the possession of weapons of any kind in the workplace. See Databricks' Health & Safety Policy for more information.

HUMAN RIGHTS, ANTI-SLAVERY & HUMAN TRAFFICKING

Databricks supports and respects internationally recognized human rights and labor standards. We are committed to upholding the fundamental human rights of all individuals in our global network, and we expect the same of partners, vendors and others who work with Databricks. We do not engage in or condone child labor, forced, bonded, or indentured labor, involuntary prison labor, slavery, trafficking of persons, commercial sex acts, or physical punishment — and we comply with all U.S. and non-U.S. laws covering these topics. We pay applicable legal wages under humane conditions and expect partners and vendors to do the same. See Databricks' Anti-Slavery & Human Trafficking Policy and Modern Slavery Statement for more information.

Trust and Safety With Data and Information

Data and information are powerful tools, and Databricks is committed to protecting them. Although we strive for transparency where possible, we take our obligation to protect data seriously. Failure to do so could severely damage our business and reputation for trust. If you are unsure or have any questions about the topics in this section, reach out to LC&E or Security before you share information.

CONFIDENTIAL INFORMATION

Databricks' confidential and proprietary information is among our most valuable assets. We must also appropriately protect the information that others, including our customers and partners, as well as job applicants, share with us. Databricks' Data Classification and Handling Policy in our Global Security, Privacy & Data Protection Policies explains how we categorize and protect information. Employees should be familiar with and follow these policies, as well as any contractual confidentiality obligations (e.g., NDAs) when speaking with: (1) others at Databricks; (2) third parties, including customers, partners, and other market actors; and (3) personal contacts, including friends and family. Consult the above policies or contact Security or LC&E for more information.

> Examples of information that should be treated confidentially and with care include:
>
> - Financial information and projections, including sales bookings or pipelines
> - Source code and technical information
> - Product plans and roadmaps
> - Business strategies (e.g., planned acquisitions, investments, financing transactions, or management changes)
> - Personal information of or about any individuals
> - Nonpublic information about customers, partners, investors or other third parties.

INTELLECTUAL PROPERTY, BRAND & OTHER ASSETS

Intellectual property ("IP") includes many things, such as patents, trademarks, copyrights, branding, trade secrets, source and object code, marketing plans, training materials, know-how, and other confidential and proprietary information. Databricks' IP is among its most valuable assets, and everyone on the team contributes to creating, marketing, and protecting it. Unauthorized use of IP can harm its value and could be devastating to the business. Any suspected misuse of our IP should be reported immediately to our Legal Product & Privacy team.

Likewise, Databricks expects you to respect the IP rights of others. Inappropriate or unauthorized use or copying of another party's IP can expose you or Databricks to civil or criminal liability.

Business Ethics in Our Relationships

At Databricks, we conduct business in a legal and ethical manner at all times. All decisions that are part of our business operations are based on quality and merit, not inappropriate outside influences. Employees must therefore behave legally, ethically, and fairly in all of our business relationships, and failure to do so is a violation of this Code. If you are unsure whether a practice or behavior is ethical and consistent with Databricks' expectations, contact LC&E.

ETHICAL SALES & PARTNERSHIPS

Bricksters must be fair and transparent with customers and partners and earn their business and trust based on the superiority of our products, services, and support. Although we should be bold in sales, marketing, and business development activities, we never make misrepresentations to customers or partners, especially not to win business. In addition, we respect customer and partner information and IP (see above), follow required bidding and contracting practices, and abide by valid contractual commitments we make. If you have questions about these areas, contact LC&E.

CONFLICTS OF INTEREST

Part of ensuring fairness and transparency is avoiding situations where personal interests and the company's interest could conflict, or appear to conflict, due to a familial relationship, outside employment or investments, such as:

- Making business or employment decisions due to a family or personal financial interest

- Engaging in any activity that competes with the company

- Using company assets, relationships, or data to promote a side business or other personal activity, or taking advantage of an opportunity the company may wish to pursue

- Letting outside activities or employment interfere with your job performance or duties to Databricks

- Working for, advising or sitting on the board of, having a significant financial interest in, or receiving a fee or other personal benefit from a current or potential vendor, customer, or competitor (or having an immediate family member who does)

Employees must promptly disclose any possible conflicts for review ahead of time and may not proceed without clearance from LC&E. Visit go/disclose for specific guidance on what does and doesn't require disclosure and to complete our online disclosure form.

Databricks understands that employees may have other outside activities (e.g., volunteer work, advisory boards, etc.) that do not conflict with Databricks' interests. Employees can engage in these activities, as long as they will not impact or interfere with job performance or responsibilities, or use company data and other resources other than incidentally in compliance with our Acceptable Use Policy. Managers may find guidance on evaluating potential conflicts of interest at go/manager.

BUSINESS GIFTS, MEALS & ENTERTAINMENT

Giving or receiving gifts, meals, travel, and entertainment that are extravagant or lack a legitimate business purpose can expose the company to legal or reputational risk, as they may be considered bribes or create a conflict or appearance of impropriety. For these reasons, Databricks generally does not permit giving, receiving or exchanging gifts with parties with whom we have a business relationship or would like to do business (including customers, prospects, partners, or vendors) other than:

1. Reasonable gifts of company-branded or logoed items

2. Items that are part of approved marketing campaigns or events

3. With respect to receiving gifts only, other reasonable gifts our employees may receive consistent with ordinary business practices (e.g., around holidays, deal gifts)

If offered, you should decline any gifts that violate these rules. Contact LC&E with any questions.

Meals and entertainment can be important for client development or incidental to business meetings and are therefore permissible as long as there is a Databricks person in attendance, there is a legitimate business purpose for the hospitality, they are reasonable and professional, and comply with our Global Expense Policy. Use the following guidelines to determine if gifts and entertainment are reasonable:

- Gifts, meals and entertainment should not be provided frequently to the same parties

- They should not be excessive

- They are never to be used to influence action by others or create obligations between parties

- They must never be against the law

- They must comply with all other company policies (including approval and documentation requirements in our Global Expense Policy)

THIRD PARTY COMPLIANCE

Databricks chooses its vendors and partners objectively, based on the merits of their products, services, prices, and business practices. Employees who hire or oversee these parties are expected to follow all rules for selection, due diligence, and management of these parties, as defined by the relevant Databricks teams.

In addition to complying with our Third Party Code of Conduct, all third parties we work with are expected to cooperate with our onboarding and due diligence procedures, which are meant to identify security, legal, reputational, and other important risks.

If you have questions about vendor-related procedures, reach out to Procurement or consult our Procurement Policy. For questions on partner-specific rules, contact partnerops@databricks.com.

Integrity in the Marketplace

LEGAL COMPLIANCE

Business ethics also means complying with relevant laws and standards relating to fraud and other forms of financial manipulation, bribery, corruption, kickbacks, anticompetitive conduct, and other misconduct. Violations in these areas can have serious consequences for you and the company. Consult the policies referenced below or reach out to LC&E for more information on requirements.

Bribery & Corruption
Bribery and corruption are prohibited. This means you, and any Databricks partner, vendor or third party you work with, must never give or receive a bribe from anyone, anywhere, for any reason relating to Databricks. Bribery occurs when a payment, gift, favor, or anything else of value is given or offered to someone to improperly influence them to grant a business advantage. Improper influence (as opposed to proper influence, e.g., through approved sales and marketing activities) occurs when the value offered is meant to induce the recipient to misuse their decision-making authority and grant a favorable outcome.

Although we prohibit all bribery in our business relations, bribing government officials is even more serious and can result in significant regulatory actions and penalties for our company. Databricks does not permit providing gifts to government officials unless part of approved marketing campaigns or events and should not pay for travel expenses for government officials. Customary meals during business meetings, not exceeding the relevant monetary limit(s) Public Sector customers are allowed to accept, may be appropriate in some cases provided they are reasonable, infrequent and not offered with any intention to improperly influence a customer. See Databricks' Global Anti-Bribery/Anti-Corruption Policy for more information. If you feel something of value is necessary to provide to a government official, seek guidance from go/asklegal (Compliance and Ethics) before making any such gesture.

A government official is any elected official, royal family member, or any person who works for or as an agent of a government (whether national, state or local), a government-owned, or a government- or state-controlled entity. This might include employees or agents of state-run universities and hospitals, telecommunications services, and even some financial institutions. Government officials can also include employees of public international organizations like the United Nations or World Bank, political party officials or candidates for office.

Similarly, Databricks employees must also never give or accept kickbacks to or from any customer, partner, vendor, or anyone else. A kickback is a form of corruption in which two parties agree to pay, rebate, or return a portion of sales, profits, or contract value to one of the parties in exchange for making the deal. Kickbacks are corrupt, illegal, and prohibited under our Code.

Global Trade Compliance, Sanctions & Market Restrictions
Databricks complies with applicable global trade laws and controls that may limit where, how, and to whom we can send, sell or receive products, services and information. These include:

- Government-imposed trade embargoes and restrictions, export controls, and economic sanctions that govern imports and exports to and from the U.S., including exports to non-U.S. persons and exports that may include U.S.-origin components, technology or data

- Anti-boycott laws that prohibit us from participating in or cooperating with an international boycott not approved or sanctioned by the U.S. government

Whether trade restrictions apply can be complex depending on the type of product, service, or business activity. Databricks therefore maintains processes and protections, such as screening procedures, contractual commitments from third parties, and others to help us remain compliant.

At the same time, Databricks is prohibited from procuring goods or services from and selling goods or services to any individuals or entities or in territories subject to a trade embargo or economic sanctions. Consult our Embargoed Country Guidance on go/ethics for information on current restrictions, and immediately escalate any business activities that touch a prohibited territory to LC&E.

Fair Competition
Databricks is committed to outperforming our competition fairly and legally. We comply with all antitrust and fair competition laws, and avoid behaviors that could risk violating these laws.

Examples of anticompetitive behaviors to avoid include:

- Making unlawful price–fixing agreements with competitors or resellers

- Agreeing with competitors — in writing or otherwise — to fix other terms of sale, coordinate bidding activities or boycotts, or allocate customers or territories

- Improperly using or disclosing to the company any proprietary information or trade secrets of any former or concurrent employer or other person or entity

- Making untruthful or unfair statements about competitors' products or services

You must never talk about any matters relating to our competitive position — including about our business, customers, hiring, or pricing strategies — with our competitors, even in informal settings like conferences. Limited benchmarking discussions can be appropriate, but only with guidance from LC&E.

Truthful Sales, Advertising & Marketing

All of our advertising must be truthful and not deceptive. Databricks employees must be certain not to make false or misleading statements about Databricks' products, services, and certifications, and that statements made can be substantiated with reasonable supporting data. These rules apply to business or personal social media, or other external communications referencing competitor products, as well as any social media "influencers" or anyone who may endorse Databricks' products. See our Brickster Communications Guidelines for more information.

Public Sector Compliance & Working With Governments

Special rules apply to our dealings with governments and public sector organizations of any kind — U.S. or foreign, federal, state, or local. As a U.S. entity that is also a federal contractor, Databricks is also subject to various requirements around lobbying, organizational conflicts of interest, hiring government personnel, procurement integrity, accuracy in billing and delivery, controlled and classified information, and other matters.

Failure to comply with applicable requirements or laws can lead to serious legal, financial and reputational harm, and potential prohibition on future business with governments or state institutions. Public Sector sales teams should work closely with our Legal Public Sector teams on all business involving the government, including sales to or for the benefit of government customers through resellers or higher tier prime contractors or subcontractors. Contact Legal with any questions about working with Public Sector customers.

FINANCIAL INTEGRITY & RECORDKEEPING

To operate a successful business, Databricks must maintain accurate corporate records and internal financial processes and controls. All employees must therefore follow any established recordkeeping and document retention requirements, as well as our financial processes, and provide only accurate information in company business systems and during financial reviews. Employees must never intentionally evade or undermine our processes, whether by altering or falsifying documents, misleading or failing to provide accurate information to Finance, Legal, or company-designated auditors, refusing to cooperate in company audits or investigations, or creating records or communications of any kind that mischaracterize or conceal the truth. In addition, Databricks prohibits employees creating or participating in the creation of "slush funds," making "off-the-books" payments, or similar improper financial practices, and any requests by any third party to do so should be immediately reported to LC&E.

ENGAGING IN POLITICAL ACTIVITIES

Employees have the right to participate in the political process on an individual basis, such as by personal contributions or volunteer activities. However, we do not use Databricks funds or assets on behalf of a political party or candidate except as expressly approved by Databricks. Employees who engage in any political activities must do so on their own time, without using Databricks resources, and without creating any impression their activities are supported by Databricks.

RESPECTING THE ENVIRONMENT

Databricks is committed to conducting its business in an environmentally responsible way that minimizes adverse impacts. We expect our third parties to collaborate with us, when requested, to help reduce any environmental impacts that could arise from our business relationships.

CORPORATE COMMUNICATIONS & CONTACTS WITH MEDIA

Databricks intentionally and selectively discloses certain information to the public. Employees may not speak on behalf of Databricks unless authorized to do so by virtue of their role, or if authorized to make a statement by the Public Relations or Investor Relations team. Employees should otherwise not engage with outside sources like the press, investors, or analysts, and requests for comment should be immediately referred to our Communications team.

To promote healthy conversation about Databricks internally and externally, our Databricks Communications team maintains our Brickster Communications Guidelines. These guidelines provide best practices to share ideas and information while mitigating risks to our company. For any questions about these guidelines or our communications practices, and to refer press inquiries, contact comms@databricks.com.

You are our best asset to help us identify misconduct. To that end, you must promptly report suspected or actual violations of laws, rules, regulations, or this Code. We have several channels for reporting issues, including LC&E, the People Team at peopleops@databricks.com or er@databricks.com (for confidential matters), and our Speak Up program (go/speakup), which permits anonymous reporting where permitted by law. Your manager should also be a resource to help you navigate workplace challenges.

Non–Retaliation Policy

Databricks does not tolerate retaliation against anyone who reports a good–faith concern or suspected violation, or against anyone who participates in an internal investigation. Please immediately report to LC&E or People any acts that may be retaliatory.

Investigating Misconduct and Consequences of Violating the Code

A violation of this Code or the law is serious. Databricks thoroughly and fairly investigates reports, so if asked (and unless prohibited by local law), you must cooperate with our investigations, answer questions by providing truthful and accurate information, and preserve and allow access to relevant documents.

Anyone found to have violated the Code or other policies will be subject to appropriate disciplinary action, which can range from additional training and coaching up to and including termination of employment.

Subpoenas, Government and Law Enforcement Inquiries

Immediately refer all legal subpoenas, requests for documents, interviews, or other information, and any other government inquiries you receive to LC&E or our Legal Employment & Litigation team. These requests may come from litigation counterparties, law enforcement, regulatory agencies, or similar. Our Legal teams will ensure all responses are appropriate and avoid disclosure of trade secrets, confidential information, or privileged information or materials.

Resources and Contacts

Databricks Legal Compliance & Ethics

Contact legal–compliance@databricks.com:

- For any questions about the Code or our compliance policies or training

- For information about our internal disclosure or third party screening requirements

- To report a possible Code violation

Important Go/links for Employees

- Go/ethics: Compliance & Ethics page with links to compliance forms, for FAQS and other resources

- Go/legal: Additional information, including contacts, for other Legal teams referenced in the Code

- Go/peopleops: Additional information, including contact information, for our People team

- Go/policies: Contains all global policies and other helpful and frequently requested resources

- Go/disclose: Conflicts of interest and value to government officials disclosure forms and criteria

- Go/speakup: Information on our speak up program