

TABLEAU SOFTWARE, LLC
ANTI-CORRUPTION POLICY

This Anti-Corruption Policy provides guidance to help you understand and comply with anti-corruption laws during your employment or work with Tableau. There are a number of laws prohibiting corrupt acts, notably the U.S. Foreign Corrupt Practices Act (“FCPA”) and the U.K. Bribery Act (“UKBA”). This Policy outlines Tableau’s rules to prevent corruption worldwide, consistent with these laws and our own values, and applies to all directors, officers, employees, and independent contractors. We expect partners, vendors, and agents to also comply with this Policy.

There are no exceptions to this policy, even if our competitors engage in improper behavior, or corruption is an accepted practice in a country where we operate. You are required to adhere to both the spirit and the letter of this policy with respect to our business anywhere in the world.

Anti-Corruption

- You may not offer, provide or authorize cash payments (such as bribes or kickbacks) or anything else of value directly or indirectly to any person to improperly benefit Tableau. This applies to anyone, including foreign officials, as well as private individuals or corporations. A foreign official is any officer or employee of a government department or agency, at any level.
- You may not request, agree to receive, or accept money or anything else of value from any person to improperly benefit Tableau.
- Merely offering a bribe is enough to violate this policy, it does not need to be accepted. It also does not matter whether you use company money or personal funds for a bribe.
- You have a duty to prevent bribes or kickbacks involving Tableau if you become aware they might occur, even if you are not directly involved.

Accounting Requirements

You must comply with all of Tableau’s internal controls, especially those designed to ensure accurate and complete books and records, as well as those that prevent corruption, self-dealing, embezzlement, fraud, money laundering, or other improper activities.

Violations of accounting standards can occur if you conceal bribes or falsify other transactions or expenses, even if they are not related to a bribe, in Tableau’s ledgers or other records. Even small misreported amounts may be a violation.

Conflicts of Interest

Conflicts of interest can be a violation of anti-corruption laws. You must disclose any actual or potential conflicts of interest to Tableau’s Compliance Officer. Examples of conflicts of interest:

- Any Tableau employee or contractor who is a government official or customer responsible for regulating or providing business to Tableau.
- Contracting with a vendor that is wholly or partially owned by you, a member of your family, a personal friend, or other Tableau employee/contractor.
- Tableau retains a relative of a government official or customer as an employee or contractor in exchange for a regulatory approval or business opportunity.

Expediting Payments

This policy prohibits all corrupt payments or benefits, including so-called grease, speed or facilitating payments provided to government officials in their personal capacity to expedite or secure routine government actions. It is permitted to pay a government agency’s *official* fees, such as to expedite passports, licenses, or other services, provided that the fees are paid to the government, an official receipt is provided, and the expense is accurately recorded in Tableau’s books.

Partners and Intermediaries

It is still a violation of this Policy if a bribe or improper payment is routed through a third party, such as a consultant, lobbyist, vendor or reseller. Several FCPA and other anti-corruption lawsuits have been triggered by companies working with third parties who used their fees, commissions, discounts, markups, or private funds to finance bribes to government officials.

You and Tableau can be held liable even if you do not expressly authorize a third party to engage in corruption. You must notify the Compliance Officer if you learn of any Tableau partner or vendor that engages in corrupt or other improper practices. All payments to partners or vendors must be accurately reported in our books and records in accordance with accounting requirements.

Gifts, Travel, & Entertainment

Reasonably priced gifts, meals or entertainment and other benefits provided for non-corrupt business promotion or goodwill purposes are generally acceptable. For example, a plastic pen, a t-shirt or coffee mug of moderate value with Tableau's logo will not be a violation (e.g., less than \$100 value would likely be considered a reasonably priced gift). However, an expensive item of clothing, a car, or a vacation will raise concerns, especially if provided to a government official or other person who is responsible for making decisions in relation to Tableau's business. Cash or cash equivalent gifts are always prohibited.

In addition to complying with the FCPA and UKBA, you must ensure that the provision of a gift or other benefit does not violate local laws or policies that apply in the country where the recipient is located. Some countries impose express limits on the value of gifts/benefits that a recipient can accept; other countries ban such gifts/benefits altogether even if given with no corrupt or improper intention.

Charitable Contributions

All charitable gifts or grants that are donated on behalf of Tableau must be provided through the Tableau Foundation. You can provide grantee suggestions by emailing the Tableau Foundation at foundation@tableau.com. As part of this process, ensure that any entity affiliation or connection with foreign officials are disclosed and the purpose of giving is proper (i.e. not conditioned on the retention of business or receipt of future business or any business advantage).

Tax Evasion

Tax evasion, defined as a purposeful, illegal attempt to evade the assessment or the payment of tax imposed by law, is a violation of this policy. It is also considered a criminal offense under many federal and state statutes. Examples include, reporting sales in a separate country or jurisdiction with the intent to lower taxes, inflating payroll deductions, misrepresenting the type of goods or services sold with the intent to evade taxes, etc. You have an obligation to report any tax evasion by an employee or other individual or entity (including partners, vendors, customers, and other third parties) to Tableau's Compliance Officer (contact information below) or Tableau's hotline. Even small misreported amounts may be considered a violation.

Violations and Consequences

A violation of this policy will result in appropriate disciplinary action, including demotion, reassignment, additional training, probation, suspension, or even termination. If criminal penalties under the FCPA and UKBA apply, the government could impose further sanctions including imprisonment of up to 20 years and unlimited monetary fines.

The U.S. and U.K. governments enforce these rules against individuals and entities around the world. There have been instances where non-U.S. individuals have been extradited to the United States to face charges under the FCPA and other U.S. laws. This policy applies to *all* world-wide directors, officers, employees, and individuals serving as independent contractors of Tableau regardless of nationality or residency.

Training and Materials

All designated personnel must undergo anti-corruption training provided by Tableau. The nature, content, and frequency of that training will be determined by Tableau based on the risks associated with your specific role. We encourage all of our business partners to provide training to their personnel as well.

Reporting/Questions

You have an affirmative obligation to report all violations of this policy to Keenan Conder, Tableau's Compliance Officer. His contact information is 206.634.5737, complianceofficer@tableau.com. Reports may also be submitted anonymously by using Tableau's hotline number 855-522-7041 or online at www.tableau.ethicspoint.com.

Please refer to Tableau's Code of Business Conduct and Ethics and our Policy for Reporting Complaints Regarding Accounting and Auditing Matters for further information regarding reporting concerns. We welcome any comments or questions that you may have regarding the substance and implementation of this policy. Please direct such communications to the Compliance Officer.