

**workiva**

**w/Life**

Code of Conduct

# Code of Conduct Use and Purpose

The Code of Conduct outlines the policies and principles that guide us in our daily work together at Workiva. It explains what to expect on a company level and what is expected of each of us.

Workiva employees are expected to read and follow the Code of Conduct - both in spirit and letter - always bearing in mind that each of us has a personal responsibility to incorporate the conduct detailed, in addition to ensuring others to do the same. The Code of Conduct applies to all of us, unless otherwise stated in writing.

The policies, procedures, and practices described in the Code of Conduct should not be taken for granted and are subject to change based on Workiva business practices, legislation or regulation. While we will attempt to give you ample notice when a policy or benefit change is made, there are circumstances under which advance notice may not be possible.

The Code of Conduct contains the employment policies and practices of Workiva in effect at the time of publication. All previously issued communications and any inconsistent policy statements are superseded. Workiva reserves the right to revise, modify, delete, or add to any and all policies, procedures, workplace practices, and guidelines stated in this, or in any other document, except for the policy of at-will employment. However, no oral statements or representations can in any way change or alter the provisions of the Code of Conduct.

No waiver of the Code of Conduct for any executive officer or director may be made without the approval of the Board of Directors or a Committee thereof.

Investigation of potential violation and enforcement of the Code of Conduct is handled in accordance with Workiva's Inappropriate Acts Review Procedures. Allegations of violation are generally reviewed by the General Counsel and the VP of Human Resources. Fraud related complaints are routed to the Chief Accounting Officer, VP and Corporate Controller and Chairman of the Audit Committee. Those parties will determine the appropriate processes necessary for investigation and remediation (if applicable). Complaints involving allegations of fraud or financial misstatements are reviewed with the Audit Committee at least once per quarter. In addition, the overall process for reviewing and addressing compliance issues is reviewed with the Board of Directors at least once per year. Violations of the Code of Conduct may result in disciplinary action, up to and including, termination.



# Welcome to Workiva

This is our company



# Mission, Values and Leadership Principles

Our Mission, Values and Leadership Principles are at the core of everything we do. We believe in creating a work environment and employment practices that support our Mission and Values, and how we do that is through our Leadership Principles.

## **Workiva Mission:**

Build trust in the global economy with transparent data and connected reporting.

## **Workiva Values:**

- Customer Success: Always delight our customers.
- Integrity: Do the right thing, every time.
- Trust: Rely on each other.
- Collaboration: Share resources and work together.
- Innovation: Keep creating solutions and finding better ways.
- Inclusion: Support a diverse community where we all belong.
- Accountability: Be responsible for your success and failure.

## **Workiva Leadership Principles:**

- Act with urgency - Deliver results as efficiently as possible.
- Trust each other - Align your words with your actions.
- Empower your team - Leverage the skills and knowledge of your colleagues.
- Be empathetic - Acknowledge each other's feelings.
- Stay positive - Maintain a can-do attitude to find solutions together.
- Practice humility - Be an active listener.
- Embrace change - Adopt new ideas and better processes.
- Keep improving - Embrace learning and feedback as professional development.
- Foster inclusion - Encourage a workplace that values different backgrounds and perspectives.
- Constantly communicate - Over communicate with everyone.
- Be direct - Be clear and honest in your communications.
- Maintain composure - Don't allow emotions to guide your decisions.
- Be accountable - Take ownership of your success and failure.
- Celebrate success - Recognize wins with your colleagues.



# Ethics and Conduct Team

[ethics@workiva.com](mailto:ethics@workiva.com)

**Brandon Ziegler**

Executive Vice President and Chief Legal Officer  
[brandon.ziegler@workiva.com](mailto:brandon.ziegler@workiva.com), 515-663-4496

**Max Eubank**

Vice President and Deputy General Counsel  
[max.eubank@workiva.com](mailto:max.eubank@workiva.com), 515-663-4420

**Jill Klindt**

Senior Vice President, Chief Financial Officer, Treasurer, and  
Chief Accounting Officer  
[jill.klindt@workiva.com](mailto:jill.klindt@workiva.com), 515-663-4433

[Click here for Workiva's Continuous Improvement System](#)

## Ethics Hotline

**Telephone:** 1-844-600-0063 (US)

**Website:** [www.lighthouse-services.com/workiva](http://www.lighthouse-services.com/workiva)

**Email:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)

## Human Resources

**Emily Forrester**

Vice President of Human Resources

## Accounting & Finance

**Adam Buchholz**

Vice President and Corporate Controller

## Security

**Jason Wille**

Vice President of Information Technology  
[helpdesk@workiva.com](mailto:helpdesk@workiva.com)



# Whistleblowing Procedure

Workiva is committed to high standards of ethical, moral, and legal business conduct. In line with this commitment, and Workiva's commitment to open communication, we provide an ethics hotline that is used for individuals to raise concerns with complete assurance that they will be protected from reprisals or victimization for whistleblowing.

## **Workiva aims to provide protections for you if you raise concerns regarding:**

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with Workiva policies, including its code of conduct; or activities that amount to serious improper conduct.

The whistleblowing procedure is intended to be used for serious and sensitive issues. Such issues, including those related to financial reporting and unethical or illegal conduct, may be reported directly to the Ethics and Conduct Team.

# No Retaliation for Whistleblowing

Workiva prohibits retaliation against any person who reports or participates in an investigation of a possible violation of our policies (whistleblowing).



# Employment at Workiva



# At-will Employment

Employment at Workiva is considered "at-will" and complies with state, federal and national laws where "at-will" status is not applicable. Employment may be terminated with or without cause and with or without notice at any time. Nothing in WLife, or in any other personnel document, creates or is intended to create a promise or representation of continued employment for any employee. No statements in any document shall limit the right to terminate employment at-will. Only the CEO of Workiva has the authority to enter into an agreement for Workiva employment for any specified period of time or to make an agreement for Workiva employment other than at-will and then, only in writing.

# Work Eligibility

We comply with laws and regulations when hiring individuals to work for Workiva.

# Meeting Performance Expectations

Workiva is committed to maintaining an environment where employees receive ongoing and transparent performance feedback that contributes to their personal and professional development. Feedback can be delivered verbally or in writing, and can come from management, peers, direct reports, or other stakeholders (internal or external).

If expectations of work performance are not being met, managers will take action to address the performance gaps and provide direction for improvement. Performance improvement actions can lead to a variety of outcomes up to and including termination of employment.

Workiva complies with all employment regulations that require specific disciplinary processes to be followed.



# Workplace Diversity

Workiva cultivates a work environment that encourages and expects fairness, teamwork and respect among all employees. We value diversity of backgrounds, beliefs and interests, and we recognize them as an important source of intellectual thought, varied perspective and innovation.

We are firmly committed to maintaining a work atmosphere in which people of diverse backgrounds, beliefs and interests may grow personally and professionally. Fostering a diverse and equitable workplace provides an inclusive environment for our employees, thereby increasing engagement, empowerment and satisfaction.

# Equal Opportunity Employer

Workiva is an equal opportunity employer. It is our strong belief that equal opportunity for all employees is central to the continuing success of our organization. We will not discriminate against an employee or applicant for employment because of race, religion or belief, sex, gender reassignment, national origin, ethnicity, color, age, disability, political affiliation, sexual orientation, marital status, veteran status, medical condition or other protected characteristic in hiring, promoting, demoting, training, benefits, transfers, terminations, recommendations, rates of pay or other forms of compensation. Opportunity is provided to all employees based on qualifications meeting job requirements.

Workiva is committed to providing equal employment opportunities to qualified individuals with disabilities and complies with all state, provincial, local, and federal regulatory requirements to do so, including but not limited to the Americans with Disabilities Act. Workiva will make reasonable accommodations to disabled applicants and employees if the reasonable accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship.



# How We Conduct Ourselves

Uphold High Standards

Responsible

Respectful



# Controlled Substances

Workiva maintains a smoke- and drug-free workplace policy. Workiva has no tolerance for any employee who reports to work while under the influence of drugs or alcohol or who becomes impaired by the use of drugs or alcohol at work. Smoking and vaping (the use of electronic nicotine delivery systems) is prohibited inside all Workiva workplaces.

Consumption of hard liquor is not allowed inside Workiva offices, and open bottles of beer or wine are allowed only during official organized events. We expect employees to use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others or violates the law.

**If you are in a Workiva office or conducting business on behalf of Workiva, regardless of location, you may not:**

- Use, have in your possession, purchase, sell, manufacture, distribute, transport, or dispense any controlled substance.
- Report to work, or become at work, impaired by the use of alcohol or any drug whenever such impairment might substantially interfere with job performance or pose a threat to the employee's safety or the safety of others, integrity of Workiva services to customers or risk damage to Workiva property.

An employee who is arrested and convicted for any offense related to drugs or alcohol is subject to disciplinary action that may include termination of employment.



## Harassment-Free Workplace

Workiva does not tolerate harassment in any form - verbal, physical or visual. The Workiva Ethics & Conduct Team is fully committed to investigating any incidents of harassment, including sexual harassment.

If you witness harassment, or are harassed yourself, no matter the severity, by a co-worker, a supervisor or an outside vendor, you need to report the incident to your supervisor or the Ethics & Conduct Team immediately. If another person's behavior causes you to be uncomfortable or offended, even if the behavior is not directed toward you, you need to report this behavior.

## Violence-Free Workplace

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work without authorization. Acts of violence by an employee or anyone else against an employee, supervisor, or member of management will not be tolerated. Any instance of violence must be reported to the employee's supervisor and/or the Workiva Ethics & Conduct Team. All complaints will be fully investigated.



# Avoid Conflicts of Interest

You are expected to use good judgment, adhere to high ethical standards, and to avoid situations that create an actual or potential conflict of interest between your interests and the interests of Workiva. A "conflict of interest" occurs when an individual's private interest interferes, or even appears to interfere, with the company's interest as a whole. Actions by members of your family, significant others, or other persons who live in your household also may result in actual or potential conflicts of interest. If you are unsure whether a certain transaction, activity, or relationship, including outside employment, constitutes a conflict of interest, you should discuss it with your supervisor. You must ask for approval from the General Counsel for any relationship or transaction that appears to be a conflict of interest. Conflicts could include, but are not limited to:

- Employment outside Workiva
- Creating software that is not for the benefit of Workiva
- Business-related interactions with a Workiva competitor
- Entering into contractual or financial obligations on the behalf of Workiva that would personally benefit you

If you question whether an event or transaction is a potential conflict, you should get approval from the General Counsel before proceeding.

Employees, officers and directors are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position. Employees, officers and directors owe a duty to Workiva to advance its legitimate interests when the opportunity to do so arises.



# Respectful Workplace

Respect each other, our customers and our communities.

We each share responsibility for observing Workiva standards of conduct. These standards emphasize personal and professional integrity in all activities at all times. You are to treat others with the same respect and consideration with which you expect to be treated. Employees should maintain open and ongoing communication with each other to create the basis for a successful work experience.

Each of us is responsible for working to resolve problems and conflicts by focusing on solutions and keeping issues work-related. If a conflict arises, you should always communicate directly with the person or persons with whom you have the conflict. In most cases, discussing a situation will resolve it. When you are not able to resolve a conflict and need assistance, you should contact Human Resources to discuss the appropriate manner in which to resolve the conflict.

It is understood and respected that personal relationships between co-workers may occur. When a relationship is formed with a co-worker, the relationship should not interfere with your work or with the work of others. You should maintain professionalism and not conduct yourself in a manner that would be offensive or make others uncomfortable. Managers may not be in any type of relationship with an employee they supervise.

It is important to remember that you also represent Workiva while outside of the office. When you attend dinners or community events and are wearing Workiva apparel, how you act is a reflection on Workiva. You should be respectful to others outside the office in the same manner you would while in the office.



# No Solicitation

Workiva does not permit solicitation, money collection or the sale of merchandise by one employee to another while either employee is on work time. "Work time" means all time on Workiva premises, when traveling to or from a Workiva facility, or on company business (other than meal periods and break times).

Workiva likewise restricts the distribution of non-work related literature, petitions or advertisements. Distribution of political or for-profit business literature, petitions or advertisements is prohibited. Distribution of not-for-profit or charitable organization information may be permitted with proper approval. A distribution request may be made to the Workiva Communications team.

Finally, soliciting or distributing any literature by a non-employee is prohibited on all Workiva property without approval.



# Financial Integrity & Responsibility

Spending Money  
Signing Contracts



# Financial Integrity

Workiva is required to maintain and report financial information accurately, timely, completely and understandably. As a public company, the integrity of our records and public disclosure depends upon the accuracy and completeness of the information supporting the entries in our books of account. The making of false or misleading entries, whether they relate to financial results or otherwise, is strictly prohibited.

**It is important that:**

- No entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- Transactions be supported by appropriate documentation;
- The terms of commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- Employees comply with our system of internal controls; and
- No cash or other assets be maintained for any purpose in any unrecorded or “off-the-books” funds.



# Internal Controls

Financial integrity and fiscal responsibility is at the heart of Workiva professional conduct. Everyone has a role in making sure company money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we hire a new vendor, expense something to Workiva, sign a new business contract or enter into any deals on Workiva's behalf. To make sure we get this right, we maintain a system of internal controls to reinforce our compliance with legal, accounting, tax and other regulatory requirements in every location in which we operate.

Stay in full compliance with our system of internal controls and contact the Accounting, Finance or Legal teams with any questions.

# Spending and Reimbursements

Be responsible when you spend money on Workiva behalf and when submitting an expense for reimbursement. Expenses will be reimbursed in accordance with the Expense Reimbursement Policy. All employees are to receive approval from their manager before spending money on Workiva's behalf. All purchases must be directly related to company business and supported by appropriate documentation. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with the director of your business team.

Directors and managers are responsible for all money spent and expenses incurred by their teams, and are held accountable for carefully reviewing all spending and reimbursements of their team.



# Signing a Contract

**Never sign any contract or enter into a business transaction on Workiva behalf unless:**

1. You are authorized to do so under our Signature Authority Policy;
2. The contract has been approved by the Legal team; and
3. A purchase order has been approved and is in compliance with the Purchasing Policy.

You may never consider making any undocumented agreement, or "side agreements," oral or written, as this is absolutely not permitted by Workiva.

The Security team must perform a risk assessment on any application or service which will be accessing or storing customer or other sensitive information. The risk level assigned will determine the level of authorization needed to proceed.

# Fair Dealing

You must deal fairly with Workiva's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom you have contact in the course of company business. You must not take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.



# Accuracy of Records and Reports

It is important that anyone relying on records and reports - management, supervisors and other decision makers, stockholders, customers and auditors - have complete, accurate and timely information. Anyone involved in preparing financial or accounting records or reports or in certifying the accuracy of those records or reports should make an inquiry or review adequate to establish a good faith belief in their accuracy.

Even if you are not directly involved in financial reporting or accounting, you may be involved with financial records or reports of some kind - for example, a certification voucher, time sheet, invoice, or expense report. Workiva expects all employees to use all reasonable efforts to ensure that every business record or report with which you deal is accurate, complete and reliable funds.



# SEC Reporting and Other Public Communications

Workiva's financial and accounting records also are relied upon to produce public communications and reports for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the United States Securities and Exchange Commission, or the SEC.

Employees involved in the preparation of these reports must use all reasonable efforts to comply with our disclosure controls and procedures, which are designed to promote full, fair, accurate, timely and understandable disclosure and to fairly present our financial condition and results of operations in our SEC reports and other public communications. In addition:

- You may not knowingly take or authorize any action that would cause Workiva's financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules and regulations;
- You are expected to cooperate fully with requests from our finance and accounting personnel, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete; and
- You should not knowingly make, or cause someone else to make, any false or misleading statement in any of these reports or knowingly omit, or cause someone else to omit, any information necessary to make the disclosure in these reports accurate in all material respects.



# Obey the Law

You must respect and obey the laws of the jurisdictions in which we operate. It is the personal responsibility of each employee to adhere to the standards and restrictions imposed by those laws, rules and regulations. It is important that you seek advice from supervisors, the legal department or other appropriate personnel if you have questions regarding the laws, rules and regulations that apply to the Company's business.



## Maintain a Clear Criminal Record

Workiva customers require the company to conduct background checks on all Workiva employees. Workiva will decline to employ any individual with a felony conviction or a conviction for theft or fraud. Workiva will review convictions for misdemeanors to determine whether they would compromise our reputation for safety and security.

Any individual convicted of a crime during employment at Workiva must report convictions to Human Resources. Workiva will review the conviction and determine disciplinary action, which may include suspension or termination of employment.

## Customer Confidential and Material Non-Public Information

Because of the type of financial solutions Workiva offers to its customers, there is a possibility that you may have direct or indirect access to a company's "material non-public information," which is Customer Confidential Information. "Material" generally means information that would be considered relevant to an investor who is investing in a particular stock, or a current shareholder making a decision to sell stock. "Non-public" is defined as information that has yet to be disclosed to the general public. Relying on material non-public information or "insider tips" when buying or selling stocks is considered "Insider Dealing or Trading" and is strictly prohibited by the SEC Guidelines.



# Customer Confidentiality and Securities Trading Policy

Persons in possession of Confidential Customer Information, including material non-public information, must not disclose that information to anyone, except as necessary for conducting company business. You may not buy stocks, bonds or any type of securities of any current or prospective Workiva customer (see the Workiva No Trade List on Connect). You must follow the Workiva trading policies when selling the stock of companies on the Workiva No Trade List. Failure to follow this policy will subject you to appropriate disciplinary actions including termination of employment, and you may be subject to legal and regulatory actions or proceedings. If you know anyone that has violated this policy you have a duty to report it to Workiva's General Counsel as soon as possible.

## Insider Trading Policy

Trading in Workiva stock (or the stock of any other company) while in possession of material non-public information is strictly prohibited and is illegal. Material non-public information is information that has not been released to the public and which a reasonable investor would find useful in determining whether to buy, hold or sell stock. Examples of this "inside information" include financial results, sales results, mergers & acquisitions or other major business plans, customer wins or losses, or changes in senior management. Additionally, you cannot give inside information to anyone else, including your family or friends (this is called "tipping"). Consequences for violations are severe and include jail time. See the Insider Trading Policy for more information.



# No Bribery

Like all businesses, Workiva is subject to various laws that prohibit bribery in virtually every kind of commercial setting. The rule for us at Workiva is simple - don't bribe anybody, anytime, for any reason.

You should also be careful when you give gifts and pay for meals, entertainment or other business courtesies on behalf of Workiva. We want to avoid the possibility that the gift, entertainment or other business courtesy could be perceived as a bribe, so it's always best to provide business courtesies infrequently and, when you do, keep the value nominal.

Never give gifts to thank government officials for doing their jobs. Offering gifts, entertainment or other business courtesies that could be perceived as bribes becomes especially problematic if you're dealing with a government official. "Government officials" include any federal, state or municipal government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties. This includes officials from any jurisdiction or government organization. Several laws around the world, including the U.S. Foreign Corrupt Practices Act the UK Bribery Act, and the Canadian Corruption of Foreign Public Officials Act specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, loans, investment opportunities, travel, political or charitable contributions and job offers for government officials' relatives.

Before offering any gifts or business courtesies to a government official, you should contact Workiva's Ethics & Conduct Team to obtain pre-approval.



# Protecting Workiva and Yourself

Confidentiality & Privacy

Data Protection

Physical Security

Use & Protection of Workiva Property



# Confidentiality & Privacy

Simply stated, if you question whether or not it is okay to share certain information with another person, whether inside or outside of Workiva, it is probably considered "Proprietary Information," and the sharing of the information may not be permissible. "Proprietary Information" includes all non-public information that might be of use to competitors or harmful to Workiva, its employees, or its customers, if disclosed. If you are not sure whether you are permitted to share certain information, check with your manager or the Ethics and Conduct Team before sharing the information.

Employees are entrusted with highly confidential information from the company, fellow employees, vendors and our customers. It is up to each one of us to ensure the protection of that information. Each of us has the responsibility to follow the company's information protection policies, including Information Security, Acceptable Use, Third Party Security, Privacy, and Information Classification.

In addition to protecting Workiva's Proprietary Information, if you are in possession of sensitive information from a competitor or your former employer, Workiva does not want this information. If an opportunity arises to take advantage of a competitor's or former employer's sensitive information, don't do it. Notify the Ethics and Conduct Team or the Security team if you come in possession of a competitor's sensitive information so that a proper course of action can be taken.



# Data Protection

Employees are responsible for protecting company and customer data and information and following the Information Security Policies to ensure data and information is fully secured. Personal devices connected to Workiva systems are subject to tracking, inspection and remote wiping at the discretion of the company to ensure that data remains confidential. All personal devices must meet the same security requirements as company-owned devices. You are not to store customer or company data on a personal desktop or laptop, removable media or other personal device without authorization from the Information Technology team.

As an additional security measure, Workiva follows strict encryption standards for confidential data and information. Further, all company and customer data should be used only for legitimate business purposes.

## Data Requiring Encryption

There are several types of information that require encryption at rest (storage) or in motion (transmission) to protect confidentiality and integrity. This is not all-inclusive, and when in doubt, any information not approved for public release should be stored in encrypted form. The following is a list of examples:

- Passwords
- Customer pre-release financial information, or other sensitive proprietary customer information
- Lists of customers and their contact information
- Personal information about Workiva employees or their compensation
- Personal health information about anyone covered by Workiva insurance
- Information that, if released, could harm Workiva, its employees or its customers
- Any information with a classification of restricted



# Physical Security

Employees work from a variety of locations including Workiva offices of different sizes and home offices. Within Workiva offices, there are clearly defined "public," "private," and "restricted" spaces. More detail about the definition of these spaces can be found in the Physical Security Policy.

Workiva offices are protected with badging systems that require badging in and out of all spaces. Individuals are not permitted to enter a private or restricted space without proper authorization, and we do not permit others to piggy-back on the entry into any space.

Visitors to Workiva offices must obtain the appropriate badge at the location's reception desk in accordance with the Physical Security Policy. Visitors are not permitted to use Workiva fitness equipment at any time.

Some Workiva offices are protected by outside security companies and/or cameras.



# Use & Protection of Workiva Property

You may be authorized to purchase equipment on Workiva's behalf in accordance with the Workiva Purchasing Policy. If you are unsure whether you are allowed to purchase on Workiva's behalf, talk to your manager or the Accounting team.

When items (assets) are purchased for Workiva, they are entered into an inventory system and are given an identification tag. Employees must follow purchasing procedures ie: creating purchase orders.

Everyone has a responsibility to protect the equipment provided to him or her to complete his or her work. You should make sure that the equipment assigned to you is in your possession. Each item provided to you is assigned to you in the Workiva inventory system and you are responsible for each of these items.

Information stored on Workiva property is accessible by Workiva. You should understand that any information stored on Workiva equipment is the property of Workiva and may be accessed or disclosed to people inside and outside the company. Workiva may monitor, access and disclose employee communications housed on corporate email, voicemail, computer files and other materials with or without notice to the employee in response to a complaint, subpoena or warrant.



# Workiva

This is our company

