



PALANTIR TECHNOLOGIES INC.

PALANTIR CODE OF CONDUCT

(Adopted on September 14, 2020; Effective upon the effectiveness of the registration statement relating to the Company's public listing)

The following Code of Conduct applies to all Palantir officers, directors, employees, contractors, and consultants.

Preface

From its founding, Palantir has been passionate about its mission and culture. Our purpose is to help our customers bring world-changing solutions to the most complex problems by removing the obstacles between analysts and answers. Palantir is committed to accomplishing this while also protecting privacy and civil liberties and upholding our core company values. This mission guides all the work of Palantir and our people, internally, with customers, and in our community interactions. We operate around the world, adapt quickly to unfamiliar situations, break new ground with our software platforms, and forge deep partnerships in the field with our customers. In all our actions, we hold ourselves and our partners to the highest ethical standards.

Palantir believes that our customers, whether government or private sector, deserve our best efforts. We demonstrate our value with powerful products and demonstrated results, not promises. Our employees focus on quality and integrity in both their professional conduct and in building and deploying Palantir's software. Palantir's mission is too important to accept anything less. Our culture of trust and excellence requires that all participants in our shared mission be held to the highest standards of conduct—conduct that is at all times legal, ethical, and professional.

What's the Purpose of this Code of Conduct?

Palantir is a mission-driven company, and staying true to this mission is critical to Palantir's ongoing success. The purpose of this Code is to empower our workforce by articulating a set of core commitments—to put in writing the standards of excellence to which we hold ourselves and each other. Numerous teams at Palantir work to assist us all in fulfilling these commitments, but the central responsibility to uphold these standards must be owned and practiced by every Palantirian. Each of us has both the obligation and tools to make good decisions, as well as a support structure to access help when faced with a difficult situation.

This Code sets out the shared values and principles that guide our work and describes how these concepts inform our actions and decisions. By outlining Palantir's standards for ethical conduct, we can more effectively pursue our mission while maintaining safeguards to prevent, detect, and address unethical activity.

This Code of Conduct is not meant to be a comprehensive set of rules and regulations. We have many specific Palantir policies and procedures, and these provide critical guidance to our operations. The Code enshrines our shared beliefs as a company, our shared commitment to act ethically and responsibly, and the broad standards to which we will hold each other in our work.

Where do I go with Questions?

If you have general questions about the Code of Conduct, reach out to the Legal Ninjas and/or the Privacy & Civil Liberties team. If you have questions about a specific situation or you would like guidance on how to apply the code to a specific situation, contact your lead, the People team, the Legal Ninjas, the Privacy & Civil Liberties team, or whomever in leadership you are most comfortable reaching out to. Key contact information is available here.

Palantir strictly prohibits retaliatory action against anyone who, in good faith, reports a potential Code violation or who assists in an investigation of a possible violation. Please contact the Legal Ninjas if you are worried about becoming or believe you are the subject of any such retaliation. If you are uncomfortable with directly reporting your concern to other Palantirians, you can contact the Palantir Whistleblower Hotline hosted by EthicsPoint, a third-party provider. Your report will then be forwarded anonymously to the Palantir Legal team. You can find more information in the Palantir Whistleblower Policy.

Palantir Code of Conduct

This section lays out the set of core commitments that define the culture of our business and should therefore also guide your conduct as an individual. This is not meant to be an exhaustive list, but by knowing and observing these values Palantirians will protect the core of who we are. Complying with specific Palantir policies and procedures is also essential.

I. Protect Privacy and Civil Liberties

Our commitment to advancing privacy and civil liberties runs to the very center of who we are and what we do as a company. Privacy protection is fundamental to our software design, and we consider a platform's potential impact on civil liberties at each step in its development and deployment. We want our actions to reflect this commitment. We will continue to invest to ensure that our products include not only the privacy and civil liberties protections mandated by law, but also additional, innovative protections that go above and beyond legal requirements to anticipate and address evolving societal norms and expectations.

To that end, we commit ourselves to the following:

A. Preserve and Promote Democracy

We will not hinder the ability of a people to establish and participate in a free and fair democratic process as part of their fundamental right of self-determination, particularly through the expression of protected speech.

B. Protect the Vulnerable

We will not create or perpetuate the unfair treatment and/or stigmatization of individuals or groups, particularly when such unfair action is based on race, color, national origin, religion, sex, gender identity, disability, age, ancestry, marital status, citizenship, or sexual orientation.

C. Respect Human Dignity

We will not build products that exploit or disenfranchise disadvantaged and/or disempowered populations and/or undermine the rights and livelihoods of workers.

D. Discover and Disseminate Truth

We will not undermine the free exchange of accurate information among individuals and organizations, including through the use of data sets and/or analysis workflows that create or perpetuate distortions or through enabling the creation and utilization of false information and/or false identities.

E. Encourage Reasonable and Responsible Data Use

We will not enable any workflow that infringes disproportionately and/or unnecessarily on an individual's right to control information about themselves and their right to a private life free from unwanted interference.

F. Secure the Free Flow of Information

We will not undermine the security and integrity of the global information infrastructure, including through the enabling of illegal cyber-attacks, hacking, or interception of secure communications.

G. Prevent Misuse

Palantir's very namesake acknowledges that technology is not ethically neutral and can be used for good or harm. We therefore identify with an ever-present responsibility to strive to ensure that our software is used for good. We recognize that in some cases our software deployed for specific purposes could be misused in support of outcomes that contravene these commitments. We are therefore committed to mitigating the risk of such misuse through every means at our disposal, including but not limited to contract provisions, customer vetting, incorporation of privacy enhancing technologies and other technical capabilities that facilitate responsible data usage, on-site engineering support and auditing, collaboration with third-party oversight organizations, full cooperation with investigatory and judicial bodies, and termination of customer relationships.

II. Follow the Law

While the law does not solely determine what actions are right and wrong, we are committed to following the law in the jurisdictions in which we operate.

A. Comply with the Law

At Palantir, we take our responsibility to comply with laws and regulations seriously. We must follow applicable laws, rules, and regulations at all times. We don't expect everyone to know every aspect of every applicable law, each of us should understand the major laws and regulations that apply to our work and know when to ask for help. Each Palantirian should develop their own sense of what to look out for; the items listed here are some areas of particular concern, but our commitment to comply with the law applies across the board.

B. Never Bribe

Palantir is committed to following—and requiring those who work with us to follow—applicable anticorruption law, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. These laws prohibit offering or giving anything of value to government officials or any other third party with whom we conduct business in order to obtain or retain business, or to otherwise seek a commercial advantage. Palantir strictly prohibits bribery of any kind, regardless of whether we are dealing with public or private entities and officials. We must be careful when giving gifts, paying for entertainment, or incurring any business or personal expenses for others. We want to avoid even any perception of corruption in conducting our business. In particular, Palantir's contracting efforts with government should always be free from the reality or perception that any favorable treatment was sought, received, or given in exchange for entertainment, gifts, or any items of value. We can also be held accountable for the misconduct of third

parties that are working on behalf of Palantir, so it is vital that we exercise appropriate diligence and oversight over any such third parties. We must be able to account for the transactions and assets of the company, and our books and records must be maintained accurately and honestly. All Palantirians must read and follow Palantir's Anti-Corruption Policy at all times.

C. Never Engage in Insider Trading

At Palantir, we value transparency throughout the company. We may hear confidential information about Palantir or about other companies during the course of our work or in other conversations. Sharing this information externally, or using this information to buy or sell securities, or to help others buy or sell securities, could be insider trading. Insider trading violates both this Code and the law. Palantir securities may not be traded during company designated blackout periods. All Palantirians must read and follow Palantir's Insider Trading Policy.

D. Promote Free Competition

At Palantir, we believe that our products can succeed on the open market and without resorting to anti-competitive practices. We may not share sensitive information (such as pricing, costs, distribution, customers) with competitors or make statements that suggest that Palantir seeks to harm our competitors or improperly leverage our successes.

Palantir will not use our position as a government vendor to improperly obtain additional work with the government. Any non-public information we obtain in the course of a government contract will not be used in the process of applying for further contracts.

E. Provide Whistleblower Protection

Palantir protects whistleblowers. We have a strict no-retaliation policy that prohibits any negative action from being taken against a whistleblower. For more information, please see Palantir's Whistleblower Policy.

III. Respect Our Customers

A. Maintain Mission Focus

At Palantir, we seek to build software that helps our customers solve their hardest data problems. In doing so, we strive to improve the lives of the many people who interact with or are otherwise served by those customer institutions. We believe this mission is meaningful and worthy of our passion and dedication.

While we will not always agree with a customer's every action and decision, we are committed to examining the impact of our work in the context of the organization's overall mission and to engage where we believe our specific work does good.

B. Protect Customers and their Assets

Our customers welcome us into trusted positions and grant us the privilege of partnering with them. We are committed to treating our customers with the utmost respect and keeping their physical and information assets secure.

C. Follow Customer Rules and Regulations

We are also committed to following our customers' rules and regulations and using our talent, skills, and resources to support them in the fulfillment of their missions.

D. Resolve Conflicts Constructively

If situations arise where our values appear to be different from those of an existing or prospective customer, we will raise the issues in a constructive and timely way. Where appropriate, we will also provide avenues for addressing issues and concerns with broader groups of Palantirians. If we cannot reconcile differences between our work with a customer and the values described in this Code, then we are willing to modify, limit, or discontinue the relationship.

IV. Maintain a Safe and Positive Environment

Operating by these values requires us to create and maintain a positive working environment. Consequently, we take care of each other and we are proud of our work, our people, and our accomplishments. At Palantir, we don't put our own personal interests before those of the company, our co-workers, or our customers.

A. Cultivate a Safe Workplace

Palantir is committed to a supportive work environment that enables us to reach our full potential. We maintain a culture that relentlessly eliminates harassment, intimidation, bias, and discrimination. Palantir's Policy Against Harassment prohibits harassment of all kinds, whether verbal, physical, or by other means, and requires that:

1. Anyone at Palantir who learns of any incident of possible discrimination or harassment should immediately report it to their lead or the People Team.
2. It is the responsibility of everyone at Palantir to conscientiously follow this policy.
3. Palantir will fully investigate any incident of harassment and take appropriate corrective actions.

Palantir does not tolerate any violence or threats of violence in the workplace. Verbal, online, and physical intimidation are strictly prohibited.

Palantir is also committed to the responsible use and protection of the data entrusted to us by our employees. For more information, see the Employee Privacy and Security Statement and the Acceptable Use Policy.

B. Respect Diversity and Combat Bias

We recognize that our individual perspectives are limited by life experiences and (often) a degree of privilege. Consequently, we are committed to building as diverse a community as possible and fostering open and safe communication within that community to create the most value in our work.

Biases (both conscious and unconscious) can influence our decision-making abilities and lead to harmful outcomes for Palantir, ourselves, and others. The best idea wins at Palantir. We believe that personal biases can prevent us from accurately evaluating an idea on its merit, so we must seek to understand and overcome our biases.

C. Promote Equal Opportunities

At Palantir, we seek to recruit and retain a diverse pool of applicants. Having a diverse set of viewpoints is the best way to avoid groupthink and stasis.

Palantir is an equal opportunity employer. Individual merit and qualifications directly related to job performance are the only factors for employment at Palantir. We do not discriminate based on age, race, color, national origin, religion, sex, gender identity, disability, age, ancestry, marital status, citizenship, veteran status, sexual orientation, or any other characteristic protected by federal, state, or local laws. Palantir follows all applicable affirmative action requirements and equal employment opportunity obligations as set out in our Equal Employment Opportunity And Policy Against Discrimination.

Palantir will make all reasonable accommodations for disabled employees to meet and where possible exceed our obligations under laws protecting the rights of the disabled.

D. Communicate Responsibly

While we encourage constructive criticism and feedback, Palantir prohibits written or verbal derogatory remarks about colleagues, partners, customers, or other third parties.

V. Avoid Conflicts of Interest

Conflicts of interest occur when personal interests interfere with the best interests of Palantir. We are obligated to do what's best for Palantir and for our customers. At Palantir, we seek to avoid situations that create even the appearance of a conflict of interest. When we perceive a real or potential conflict of interest, it is essential to discuss the situation with one's lead or the Legal Ninjas before proceeding.

A. Learn How to Spot Potential Conflicts of Interest

In our work, we may face circumstances where competing loyalties present a motivation to pursue benefits for ourselves or for others, like friends or family, at the expense of Palantir or our customers. The following questions can help identify if there is a potential conflict of interest present:

1. If the public knew about this relationship or situation, would Palantir be harmed?
2. If my lead or others at Palantir knew about this relationship or situation, would it reflect badly upon me?
3. Does this relationship or situation make it difficult for me to do objective and effective work for Palantir?
4. Does this relationship or situation require me to act in a way contrary to the values stated in this Code?

B. Avoid Conflicts in Government Contracts and Access to Nonpublic Information

Palantir commits to abide by all applicable government procurement laws that prevent conflicts of interest. All Palantirians must follow Palantir's Organizational Conflict of Interest (OCI) Policy and adhere to all OCI Mitigation Plans.

As a government contractor, we may have access to "nonpublic information." We will not use this information for any purpose unrelated to contract award or performance.

C. Avoid Conflicts in Personal Investments

Conflicts of interest can arise when a Palantirian has a significant personal investment in a customer, supplier, partner, or competitor of Palantir. If the investment is in a competitor, a conflict of interest exists. If the investment is in a customer, supplier, or partner of Palantir, and the Palantirian could take action that benefits his or her investment at the expense of Palantir, a conflict of interest exists.

We understand that as Palantir grows, the number of customers and competitors increases. If a potential investment seems like it might cause a conflict of interest, it is important to vet the investment as appropriate, to mitigate, if possible, any conflict of interest in conjunction with the Legal Ninjas, and to avoid the investment if necessary.

D. Avoid Conflicts in Personal Relationships

If a relative, significant other, or close friend is a customer, supplier, partner, or competitor of Palantir, a conflict of interest could arise. In these cases, Palantirians should work with their leads or the People Team to make sure no problems arise.

Palantir encourages close bonds between colleagues, and understands that some dating relationships are bound to result. If these relationships create a conflict of interest, changes to the work relationship between the couple may be necessary.

E. Avoid Conflicts in Pursuing Outside Opportunities

Business opportunities that arise in the course of work at Palantir belong first to Palantir. Employment with a customer, supplier, partner, or competitor of Palantir, even if as a consultant or advisor or in an unpaid role, may sometimes create a conflict of interest. Palantirians should avoid taking jobs with or maintaining any personal business relationships with direct competitors of Palantir.

Participation in the development of outside inventions that compete with Palantir might create a conflict of interest and may be against the terms of the Palantir employment agreement.

F. Avoid Conflicts in Receiving Gifts and Entertainment

Palantir prohibits employees from accepting significant gifts from customers, suppliers, partners, or competitors. Meals and entertainment can be appropriate parts of business relationships. Larger gifts, however, can create the appearance (or reality) of a conflict of interest, and cannot be accepted without approval from one's lead. Cash or equivalent gifts are prohibited. In addition to following Palantir's Anti-Corruption Policy described above, all Palantirians must follow Palantir's policies regarding giving and receiving gifts in the course of our business.

G. Corporate Opportunities

We may not take advantage of opportunities discovered through our jobs at Palantir for personal gain, or for the personal gain of those close to us, such as a roommate, close friend, relative, or significant other, unless the opportunity is disclosed to and pre-approved by the Legal Ninjas. These opportunities include, for example, inventing products or services, or writing books relating to our work or our customers.

VI. Act with Integrity

A. Balance Freedom and Responsibility

Palantir gives us a great degree of freedom to work. In exchange, we must exercise responsibility and good judgment in what we do with this freedom. This requires that we act with the utmost integrity in our interactions with each other, with our customers, and with the world at large. Questions can be referred to one's team lead, the Privacy and Civil Liberties Team, or the Legal Ninja team.

B. Maintain and Promote Financial Integrity

Conduct Open and Honest Accounting

At Palantir, we abide by all generally accepted accounting rules. But financial integrity goes beyond accurate reporting; everyone at Palantir must help to ensure that our funds are spent appropriately, that our records are complete and correct, and that our internal policies are followed.

Spend Wisely

Requests for reimbursements or expenditures on Palantir's behalf must be reasonable, directly related to Palantir's mission, and appropriately documented. Palantirians must keep track of the business purpose and submit any required forms on time.

Follow Contracts Processes

All vendor and supplier relationships require a signed contract. Only authorized signatories may sign any contract on behalf of Palantir.

Report and Record Accurately

Interference with or falsification of Palantir's financial records is unacceptable. If anyone suspects financial irregularities, they must immediately report their suspicions to the Legal Ninjas. Palantirians must follow all guidelines from IT about retention of records and follow the Legal Ninjas' directions regarding retention of documents relevant to ongoing legal matters.

Palantirians are expected to act responsibly and exercise sound judgment with respect to Palantir's finances and financial reporting. Investors rely on accurate and fair financial and business information to understand our financial results. Palantirians must execute financial transactions only with authorization and in compliance with Palantir's policies. Palantirians are also expected to honestly and accurately record and report all financial transactions and business information, comply with Palantir's system of internal controls, and follow applicable laws, regulations, and accounting practices.

Palantir files reports and other documents with regulatory authorities, including the U.S. Securities and Exchange Commission. In addition, from time to time we make other public communications, such as press releases. Depending upon our position with Palantir, we may each be called upon to provide information to help assure that our public reports and communications are complete, fair, accurate, and understandable. Every Palantirian must use all reasonable efforts to provide complete, accurate, objective, relevant, timely, and understandable answers to inquiries related to our public disclosures.

Palantirians involved in preparing public reports and communications must use all reasonable efforts to comply with our disclosure controls and procedures. If anyone believes that any disclosure is materially misleading or becomes aware of any material information that they believe should be disclosed to the public, it is that person's responsibility to bring this information to the attention of the legal team. If

any Palantirian ever believes that questionable accounting or auditing conduct or practices have occurred or are occurring, they should follow the procedures set forth in the Whistleblower Policy to report this conduct to their lead, Palantir's Chief Legal and Business Affairs Officer or Chief Financial Officer, or through EthicsPoint, Palantir's third-party whistleblower hotline.

C. Maintain Confidentiality

Respect Palantir's Commitment to Confidentiality

In order to maintain Palantir's competitiveness, we must not reveal confidential internal information to the press or to competitors.

We must also properly store, protect, and appropriately dispose of confidential information belonging to Palantir and other parties with whom we have non-disclosure agreements, including trade secrets and other confidential intellectual property.

Protect Information

It is our responsibility to make sure that confidential information stays confidential. Unless explicitly authorized, do not disclose confidential information outside of Palantir. If authorized to disclose, we must still be careful and distribute confidential information only on a "need to know" basis and under a valid Non-Disclosure Agreement.

Palantir welcomes visitors to our offices, but it's up to us to make sure that confidential information is not revealed during these visits. We must use our common sense in external conversations about our work at Palantir.

Earn the Trust of our Partners and Customers

We absolutely must safeguard the confidential information entrusted to us by our partners and customers. We must not accept confidential information from other companies until all sides have signed a valid Non-Disclosure Agreement.

Respect Competitors and Former Employers

Palantir respects competing companies. We want to compete fairly, and so we categorically will not take advantage of confidential information belonging to a competitor or to the former employer of a fellow Palantirian. If any Palantirian comes across a competitor's confidential information, they must contact the Legal Ninjas immediately.

Appropriately Represent Palantir's Public Image

How Palantir presents itself to the public is determined by our Board of Directors, Chief Executive Officer, Directors, and the Communications team. Anyone representing Palantir in a public situation must follow Palantir's Regulation FD & External Communications Policy. No one without specific permission may speak on behalf of Palantir or make public statements directly related to Palantir's business, customers, or competitors.

At the same time, Palantirians must recognize that they represent Palantir unofficially in every public statement they make. As a rule, we should not make public statements that have the potential to cause harm to Palantir, regardless of whether we claim to speak on behalf of the company. Even well-intentioned public comments can harm Palantir or our customers. If Palantirians make public statements

that are not related to Palantir's business, customers, or competitors, they must make sure that they appropriately represent themselves.

"Protected Activities" Aren't Prohibited

Nothing in this Code limits or prohibits Palantirians from engaging for a lawful purpose in any "Protected Activity," which means filing a charge or complaint, or otherwise communicating, cooperating or participating, with any state, federal or other governmental agency with jurisdiction over Palantir, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission and the National Labor Relations Board. Notwithstanding any other policies in this Code (or elsewhere), Palantirians don't have to obtain authorization from Palantir before lawfully disclosing information to, or communicating with, such agencies, and employees also do not need to advise Palantir as to any such disclosures or communications. But, in making any such disclosures or communications, Palantirians must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Palantir confidential information to anyone other than the relevant government agencies. Protected Activities don't include the disclosure of any Company attorney-client privileged communications; any disclosure of this kind without Palantir's written consent is a violation of Palantir's policy.

D. Protect our Assets

Safeguard Intellectual Property

Palantir's patents, copyrights, trade secrets, business strategy, and trademarks are among our most valuable assets. If we aren't careful with how we protect these intellectual property rights, we could inadvertently lose them or create significant challenges for Palantir. If we see anything that looks like an unauthorized use of our trademarks, logo, or other intellectual property, it is important that we let the Legal Ninjas know.

In the same way, Palantir respects the intellectual property rights of others and follows all requirements of open source licenses. Unauthorized use of intellectual property belonging to others could lead to criminal and civil penalties against you and Palantir. We must check with the Legal Ninjas if we have any questions about the proper use of any non-Palantir content (e.g. open source materials), since such use could alter the licensing of our products.

Maintain Network Security

Palantir's network and network-connected hardware must be protected from outside attack, and negligent exposure. We must follow all network security policies and maintain close awareness of our devices in at all times, including in transit. Any concerns or suspicions that our network security has been breached, whether by hacking, loss of a laptop or phone, or having a password compromised, should be reported to IT Operations immediately. For more information, consult Palantir's InfoSec Policies.

Protect Internal Personal Data

Palantir collects and stores personal information for all Palantirians, but this data is kept secure and access is restricted in accordance with internal policy and applicable laws. We must ensure that we treat the personal data of our employees, visitors, contractors, and any other personal data under our direct control with the same care for privacy and security that we maintain for our customer's data.

For more information on the use of our assets, please see the Acceptable Use Policy.

E. Waivers of this Code

Any amendment or waiver of any part of this Code must be approved in writing by our Board or Directors or, if appropriate, its delegates, and promptly disclosed according to applicable laws and regulations. Any waiver or modification of this Code for our Chief Executive Officer, Chief Financial Officer, Controller, or anyone else with similar functions at Palantir will be promptly disclosed to stockholders as required by applicable law or NYSE rules.