



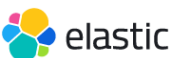
# Code of Business Conduct and Ethics

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# Our Code of Business Conduct & Ethics

## A message from our CEO

As Elasticians, we all share in a common mission — to help organizations, their employees, and their customers accelerate the results that matter. Through search-powered solutions, Elastic helps everyone find what they need faster.

We have a unique opportunity to build an enduring organization that makes the power of search ubiquitous, trusted and accessible to all. Our ability to shape this future and grow responsibly requires us to live by our Source Code and always act with integrity, professionalism, empathy, and transparency. Our Source Code is foundational to our success.

We designed our Code of Business Conduct and Ethics to support the values encompassed in our Source Code, and to guide our interactions with our community of users, customers, partners, shareholders, and fellow Elasticians. Each of us is responsible for understanding the Code of Business Conduct and Ethics and adhering to it daily. In doing so, we demonstrate our continued commitment to living our values and earning the trust of all our stakeholders.

Now, it is not possible for any code of conduct to cover every possible situation, nor should we expect it to do so. We entrust Elasticians with the freedom to make decisions that are consistent with the values and ethics of our company. Living by the Code of Business Conduct and Ethics means that we need to speak up when we see something that concerns us, and ask questions when we do not understand. You have my unflinching promise that we will not tolerate any retaliation for speaking up to uphold the principles in our Code of Business Conduct and Ethics.

Thanks for the shared commitment to the values we stand for!

Ash

## Welcome to the Elastic Code of Business Conduct & Ethics

We put in place this Elastic Code of Business Conduct and Ethics to provide all Elasticians, including our board members, officers, and employees, with standards of behavior designed to help us all act honestly, ethically, and in compliance with norms mandated by law and by our policies. Please familiarize yourself with the Code. Should you ever encounter an ethical or legal dilemma during your journey at Elastic, it is a critical tool to help you navigate through such issues.

Since this Code cannot cover every situation that you may encounter, contact us at [ethics@elastic.co](mailto:ethics@elastic.co) if you are uncertain how to proceed. We mean it: do not hesitate for a moment to give us an opportunity to steer you in the right direction and make the right decision. We expect everyone at Elastic to understand this Code and always adhere to its provisions, both in letter and in spirit. Failure to do so may lead to disciplinary action, including suspension or even separation from Elastic. Don't let this happen to you!

If you have a reason to believe that any provisions of the Code were or are being violated, you must report your concerns promptly (see "Reporting Ethical and Compliance Concerns" on the last page of this Code). Take a look at Ash's message on the prior page: you have his personal promise not to tolerate any retaliation against anyone who reports a violation in good faith.

## Our Culture & Values

This Code reflects our culture and values.

### 1 - We are a distributed company.

From our early experience in open source projects, we knew that great software and amazing ideas can come from anyone, anywhere. So Elastic was born a distributed company and has remained distributed by design. This means that our global software, systems, and workforce are set up to operate in a distributed fashion. Not only do the majority of Elasticians work from home, but we all have the tools and mindset that make a distributed company like ours successful.

### 2 - We value diversity.

Being a distributed company is about harnessing the inherent strengths of diversity. We think big when it comes to people. We don't believe geography should define opportunity, and we aren't held back by language barriers or cultural divides. We all have an accent. Celebrate it. Just come as you are. Different people approach and solve problems differently. We need that. We want every new employee to make Elastic even better. And we hope Elastic can return the favor.

### 3 - Inclusion is super important to us.

Our goal isn't to build a company of ambitious people that simply work well together, but a company that creates well together, imagines well together, and enjoys a culture of inclusion, so that no matter where someone is located, they feel connected. We would like each Elastician to feel supported when things get bumpy, empowered to think differently, push limits, and have a little fun in the process.

### 4 - Openness is in our DNA.

From open source to open code, openness is in our DNA here at Elastic. We embrace that openness, not only from the point of view of the code we write, but also the way we interact with our customers.

It's this culture of communication with our users that enables us to maintain our commitment to open source. Without them, we can't be us.

Please read this Code through the prism of our culture and always act consistently with our core values of integrity, professionalism, and empathy.

# Standards of Conduct

## Respect, Global, Inclusion, & Non-Discrimination

At Elastic, cultivating respect and global inclusion is an ever-evolving journey, not a destination. Each day, we treat others with respect and dignity, do not tolerate discrimination against anyone on any grounds, and make everyone feel comfortable and included. This means you should:

Come as you are, but always show respect for your fellow Elasticians and everyone else you interact with. Make a genuine effort to understand what drives them and never engage in harassment of any kind, including making comments that are rude, insensitive, or offensive;

Never assume malice. Put yourself in someone else's shoes. With Elasticians of so many languages, perspectives, and cultures, it's easy to lose something in translation;

Be open and honest, but also be courteous and respectful. Most of us work from home, but that fact does not relieve us from an obligation to collaborate with each other without any threats or intimidation; and

Act with empathy towards other Elasticians and the users of our offerings in alignment with our Source Code.

## Compliance with Laws & Regulations

We do business around the world and follow the laws and regulations wherever we operate. Make sure you are sufficiently familiar with the laws that apply to you as an Elastic employee to do your job in a compliant fashion. If any Elastician sees a potential conflict between local laws and the principles and values in this Code (which we expect will be extremely rare), please discuss your concerns with the Business Integrity Officer (VP, Business Integrity).

We have a training program in place to help you learn about the laws that you are likely to encounter while working for Elastic. Embrace it! We expect you to follow good judgment and common sense, but the training will give you actual knowledge of the basic legal rules and our internal policies, so that you can spot issues that you may want to discuss with our lawyers or compliance professionals. In short, participating attentively in the training will help protect you from getting in trouble.

## Conflicts of Interest

We expect you to avoid any activity that will conflict with Elastic's business interests. This simple principle may not be always easy to apply, but the best guidepost is this: when the interests overlap, always do what is best for Elastic and not what is best for you, your family, your friends, or any other third party.

Here are some examples of potential conflicts of interest:

- Financial Interests: Having a financial interest (e.g., ownership of stock or stock options, substantial debt, or partnership interest) in a competitor, customer, vendor, or business partner of Elastic. Accepting personal loans or guarantees from an individual or entity that does or seeks to do business with Elastic.
- Gifts, Hospitality, and Favors: Accepting lavish or frequent gifts, hospitality, or favors from current or prospective customers, vendors, or business partners that could influence, or appear to influence, business decisions in violation of Elastic's Anti-Bribery & Corruption Policy and Gifts & Hospitality Policy.

- Use of Elastic Property or Information: Using Elastic's intellectual property, confidential information, trade secrets, proprietary technology, or other non-public resources for personal benefit or for the benefit of a Related Party. Please refer to Elastic's Confidentiality Policy for guidance related to the use of Elastic confidential information.
- Creation of Intellectual Property or Contributing to Open Source Projects: Developing or contributing to Open Source projects that are directly competitive with Elastic's products or services. Creating intellectual property that Elastic could reasonably pursue as a business opportunity. Contributing to open source projects that are competitively used by Elastic's direct competitors, utilizing Elastic's internal know-how or trade secrets, or are undertaken without clearance from your manager. Accepting compensation or significant personal benefit from an external entity for open source contributions that are closely related to your work at Elastic.
- Relatives and Personal Relationships: Being in a position to influence a business decision involving a company or individual with whom a Related Party has a significant financial interest or employment relationship. Hiring, supervising, or making decisions about the compensation or promotion of a Related Party. Please refer to the Relationships at Work Policy for guidance specifically related to managing familial or romantic relationships in the workplace.
- Corporate Opportunities: Diverting to oneself or to others any business opportunity that is discovered through the use of Elastic property, information, or one's position, and that Elastic could reasonably pursue.
- External Research or Academic Work: Engaging in self-published work, receiving research grants, or participating in partnerships or collaborations with institutions or corporations that could conflict with Elastic's interests.
- Non-profit and Volunteer Work: Holding a significant role (e.g., board member) in non-profit organizations or engaging in volunteer work that could create a conflict with your duties at Elastic.
- External Publishing or Public Speaking Engagements: Without prior company approval, you may not engage in activities like: publishing or speaking on topics directly competitive with Elastic's core business or product roadmap (e.g., search, security, observability, AI, data analytics, etc.); presenting or writing about proprietary Elastic technology, Confidential Information, customer information, or trade secrets; responding to questions from the media; or engaging in external communications that could reasonably be interpreted as an official Elastic position or endorsement. Please refer to the External Communications and Social Media policies for guidance related to engaging in public forums.
- Outside Employment or Activities: Working for, consulting for, or serving on the board of directors of a competitor, customer, vendor, or business partner of Elastic. Working on projects during Elastic's business hours or using Elastic's equipment without prior approval. Engaging in any outside activity that requires significant time commitment and could interfere with the Employee's ability to perform their duties at Elastic effectively.

These are just a few examples of situations that may present a real or perceived conflict of interest. You are expected to be transparent and proactive in disclosing any situation that could reasonably be perceived as a conflict of interest. Early disclosure allows for proper assessment and resolution, preventing potential issues from escalating. Disclosures should be made to Elastic's Business Integrity Office as soon as practicable upon learning of the potential conflict, to avoid violating this Code or the Conflict of Interest Policy.

## Outside Work & Use of Elastic Assets

Our most important assets are the Elasticians who dedicate their skills and talents to the success of our company. Our future depends on your commitment to the company, and we cannot succeed unless you devote your professional time, talents, and energy to Elastic. We expect this commitment

from all Elasticians, and while we encourage you to follow your passions and interests outside of work, we also ask that you participate in these activities in a way that does not negatively interfere with your job.

We all must use Elastic's assets with care and to advance Elastic's business. Elastic property includes, but is not limited to, physical assets (such as computers and, when you work from one of our offices, other equipment, facilities, and supplies), email and other communication platforms, Elastic electronic message boards, discussion forums and Github repositories, and file storage or systems. Intellectual property is another key asset and includes Elastic's patents, copyrights, trademarks, inventions, technology, and trade secrets. Our intellectual property has a great deal of value and must be protected. Do not allow unauthorized third parties to use our intellectual property, such as our logos and trademarks. Our confidential information (such as business records and other proprietary or nonpublic information, including information about Elastic, its customers, employees and other users, as well as information about unannounced or unreleased Elastic software) is yet another valuable asset and must not be disclosed publicly or to third parties. Be mindful when engaging in public forums so that you do not disclose Elastic confidential information. Please see Section 13 for further details on Confidential Information.

While we do not permit any use of our property, equipment and/or information for non-Elastic business purposes, you can use Elastic's computers and related services for limited personal purposes, if it is incidental and does not interfere with the business use, and if it does not violate any provisions of this Code or other Elastic policies. But it goes without saying that it is never acceptable to use Elastic's assets for creating, accessing, storing, or transmitting illegal, unethical, offensive, obscene, or otherwise inappropriate materials.

You should not have an expectation of privacy concerning the information contained on equipment, computers, and services provided by Elastic, since we may access them at any time (for example to conduct internal investigations).

## Insider Trading

Most Elasticians are also Elastic shareholders. As employees of Elastic may know or have access to information that has not been revealed publicly. A great deal of this information may be considered important by investors when making investment or trading decisions. This type of information is known as "material nonpublic information".

Material nonpublic information includes, but is not limited to:

- Information that Elastic is about to win or lose a large contract;
- Information that Elastic is about to announce a major change in strategy or an important new product;
- Information about significant corporate events such as a pending or proposed merger or acquisition, joint venture or tender offer, a significant investment, the acquisition or disposition of a significant business or asset, or a change in control of Elastic;
- Information about quarter-end or year-end financial data; or



- Information about developments in lawsuits or regulations, combined with internal assessments or analyses of how those developments will significantly impact Elastic's business, financial condition, or results of operations

None of us at Elastic is permitted to use material nonpublic information to trade Elastic securities, and we also can't disclose material nonpublic information to anyone other than those Elasticians who are authorized to know this information.

In addition, if you learn any material nonpublic information about an Elastic customer, vendor, or other business partner, you may not trade that company's shares until the information becomes public.

So remember: while in possession of material nonpublic information (whether that information is about Elastic or one of its customers, vendors, or business partners), Elasticians are prohibited from trading shares or other securities, disclosing such information to anyone, or even suggesting to anyone that it might be a good time to buy or sell Elastic or other shares. Failure to comply with this Code and our Insider Trading Policy, could result in insider trading violations under U.S. federal securities laws which can result in both civil and criminal penalties, including: damages in a private lawsuit, disgorging any profits made or losses avoided, imprisonment, criminal fines, civil fines, a bar against serving as an officer or director of a public company, and an injunction against future violations.

Make sure you read the Insider Trading Policy and the Frequently Asked Questions Regarding the Insider Trading Policy for more details. When in doubt, consult with the Chief Legal Officer before making any trades or sharing any information, or, if the Chief Legal Officer is not available, consult with the Chief Financial Officer.

## **Global Trade and Export & Import of Elastic's Products**

Financial and trade restrictions, as well as export, import and anti-boycott laws, govern Elastic's business worldwide. Global trade laws, for instance, regulate (and in some cases, prohibit) the export, re-export, and import of Elastic's technology to selected countries, organizations, companies, and individuals. The United States and many other countries maintain strict controls on trading with certain countries, organizations, companies, and individuals that they consider unfriendly or dangerous.

These laws and regulations are very detailed and complicated, but this is what all Elasticians need to know:

- Elastic will not do any business with persons or entities in "comprehensively sanctioned countries", or those listed on any government denied party lists. For more information and an updated list of comprehensively sanctioned countries, please visit the [Elastic Trade Compliance page](#);
- Elastic will not participate in any unsanctioned boycotts of foreign states;
- Export is not only limited to goods physically crossing the borders, but can also include software downloads or services provided from one country to another;

- Oral presentations containing technical information made to foreigners in the United States may be viewed as transfers of U.S. technology and subject to export controls;
- As detailed in Elastic's Short-Term Transfer Policy, working from a U.S. sanctioned country on an Elastic laptop, or any personal devices that contain Elastic confidential or proprietary company information, or transferring any Elastic information to or from such a country (such as accessing Elastic files, or systems while there) may violate these laws;
- Elastic products typically use or contain encryption, and this requires an additional level of analysis as to whether an export license or other type of authorization is required; and
- Elastic also requires our distributors and end customers to comply with these regulations.

Global trade laws impact not only international sales transactions, but also affect product development, web settings, finance, customer support, etc. We expect all Elasticians engaged in these activities to have working knowledge of these rules, to be familiar with our International Trade Policy, and to reach out to Elastic's Legal Department with any questions.

## Anti-Corruption & Bribery

At Elastic, we are unwavering in our commitment to conducting business with integrity and without corruption. The rules against bribery are clear: Do not offer or give anything of value to anyone, anywhere, to improperly obtain or retain any business, or to improperly secure a favorable business or other decision from a government or public official.

To ensure everyone's understanding, here is a glossary:

- "anything of value" means just that: not only the money, but anything that a reasonable person would consider as having value. This can include gifts, hospitality, travel, political donations, charitable donations, or even employment;
- "anyone" means any person, whether a government official or not;
- "improperly" means for a wrong reason and without a legal basis. For example, submitting a genuine invoice for services legitimately rendered and approved is perfectly proper. However, it would be improper and strictly prohibited to pay a consultant a large sum that is not tied to any verifiable services, with the unspoken understanding that a portion of that money will be passed on to a government official to secure a contract; and
- "Government or public official" refers to anyone acting on behalf of any government. This seems intuitive, but under some laws, it can also cover members of a royal family, candidates for public office, officials of political parties, employees of government-owned or government-controlled companies, and even employees of publicly-operated or publicly-funded international organizations. In addition, under certain anti-bribery laws, spouses and immediate family members of any of these persons are also treated as government officials.

In short, if you are motivated by a wrong reason or ulterior motive, then any payment or offer of anything of value to obtain a business advantage will be a bribe under this Code and is likely to be a bribe under criminal laws in most countries. This will be true even if a third party (for example a

channel partner) paid the bribe at your request or with your knowledge or tacit approval. In addition to paying or offering a bribe, you are also prohibited from asking for or accepting anything that would be considered a bribe.

There are no exceptions to this prohibition on bribery, regardless of local practices in any place where we do business. Even if others are engaging (or seeming to engage) in corrupt behavior, Elastic and all Elasticians must comply with both the spirit and the letter of this standard of conduct everywhere in the world. You will be terribly wrong and will cause yourself and Elastic tremendous harm if you think that paying a bribe to get business is ever justified. We don't want any business that is not fairly won! And if you are aware of any behavior that could be viewed as a bribe, report it promptly. For more detailed information, please refer to our dedicated Elastic Anti-bribery and Corruption Policy.

## **Gifts & Hospitality**

Providing gifts and paying for hospitality are common ways to show appreciation or build relationships in business. However, these courtesies could be considered bribes if done for the wrong reasons, such as gaining an unfair advantage for Elastic. Business courtesies are permissible when they are genuinely designed to show appreciation or establish cordial business relationships, and only if they meet these important criteria:

- They receive the required written approval from a manager, with additional levels of approval necessary for certain situations, such as those involving government officials, travel, or exceeding specific value thresholds, as detailed in our Gifts & Hospitality Policy;
- They are consistent with customary business practice;
- They are appropriate for the circumstance, the nature of the business relationship with the recipient, and the recipient's role;
- They are in good taste and do not involve activities that could be seen as sexually-oriented or inappropriately enriching outside parties through gambling, as further detailed in our Elastic Gifts & Hospitality Policy;
- They do not influence the recipient's objectivity or create any obligation for them to do something inappropriate in return (like award business in exchange for gifts and hospitality);
- They are not in cash or cash equivalents, unless specifically allowed and documented as per the Elastic Gifts & Hospitality Policy; and
- They are consistent with the recipient's internal policies — always make sure you ask!

So, giving Elastic swag, hosting celebratory dinners, and sending holiday gift baskets or tickets to a local concert or sports event could all be fine, as long as they meet all of the criteria above.

The same rules apply when Elasticians receive gifts or hospitality. These rules also extend to our family and friends if they give or receive gifts because they are associated with an Elastician and this relationship is the motivation for the gift.

Finally, it is never acceptable to ask a vendor, partner, or customer for any gift or hospitality for yourself or someone else! For comprehensive details, including specific thresholds and approval processes, please refer to our dedicated Elastic Gifts & Hospitality Policy.

## **Working with Public Sector Clients**

Elastic counts many public sector entities among its clients. If you are involved in this line of work, then you should make sure that you are familiar with the special bidding, pricing, disclosure, and certification rules for public sector clients. This is because conduct that may be appropriate when dealing with commercial customers may get you and Elastic into legal trouble when dealing with government entities. For example, government procurement rules strictly regulate — and often forbid — acceptance by public servants of gifts and entertainment that would be appropriate for commercial clients and prospects. This is just one of many special rules, so make sure that you know the specific public sector requirements and always contact our Legal Department when you are not sure how to proceed.

## **Recordkeeping**

All of us must do our part to ensure that Elastic's business records are accurate and detailed. Doing so is necessary not only to comply with the laws, regulations, and accounting standards applicable to us as a public company, but also to make sound business decisions based on honest financial records. Always record your transactions to reflect their actual nature and avoid any language that may be misleading. And never make any entries that you know are not truthful. This is as important for a minor travel reimbursement request as it is for a major corporate transaction. Fraud is fraud, and we will not tolerate it at any level!

Honest and detailed records also protect Elastic from being used by others to commit bribery, tax evasion, or money laundering. Don't participate in any transactions or make any entries that hide actual conduct or disguise actual expenditures, proceeds, or assets.

## **Antitrust & Competition**

We compete fairly, and Elasticians must not discuss or make any arrangements with our competitors that could be seen as:

- Fixing or controlling prices (including agreeing with our channel partners about prices to charge our end customers);
- Agreeing to bid in a way that allows a selected bidder to win;
- Boycotting specific vendors or customers;
- Precluding partners, vendors, or customers from employing each other's employees or from competing with each other; or
- Allocating products, territories, or markets between ourselves and our competitors.

These are just a few examples of conduct that would violate laws against restraints on competition. And illegal arrangements do not have to be in formal written contracts. Even an informal understanding, discussion, or exchange of information on these subjects could be considered a crime. Imagine, a casual conversation at an industry association meeting or a trade show could be interpreted as conduct seeking to reduce competition! So don't participate in such conversations and leave the meeting if you feel that a discussion is veering into topics that could be interpreted as anti-competitive.

Although the spirit of antitrust laws is relatively straightforward, their application to particular situations can be quite complex. When questionable situations arise, promptly reach out to our Legal Department for advice and assistance.

## **Honest Conduct & Fair Dealing**

We only want to increase our sales through honest competition and legitimate marketing efforts. This means that no one at Elastic should deliberately give misleading descriptions of our products, services or business practices to anyone. We do not want any untruths or concealment in communications.

Elasticians cannot employ trickery, manipulation, or misrepresentation to obtain any information that could be used in our business. If you are gathering competitive information, do not act in a way that could be viewed as unfair or questionable. If anyone mistakenly sends you information that you are not entitled to have (for example an email that was intended for someone else), you do not have a right to use it, and you must promptly destroy it and inform the sender.

## **Confidentiality**

Confidential information is any information about Elastic or its customers or business partners that is not generally known to the public. Some examples of confidential information include:

- Financial data and projections;
- Trade secrets, patent applications, inventions, product plans, roadmaps, and marketing plans
- Customer, user, or prospect lists;
- Business strategies, plans for acquisitions, or other business combinations, divestitures, major contracts, expansion plans, financing transactions, and management changes;
- Personal information about employees; or
- Nonpublic information of customers, business partners, and others.

All of us at Elastic must protect confidential information. Confidential Information should be shared between Elasticians only on a "need-to-know" basis with colleagues who have the authorization to access it. Confidential Information must not be shared with third parties or disclosed publicly. Before you send Elastic's confidential information to any of its business partners, or prospective business partners, make sure that there is a written non-disclosure agreement or other agreement with a similar contractual duty of confidentiality in place with that business partner.

Always use good judgment before disclosing confidential information. Be especially careful when participating in Internet discussion groups, chat rooms, bulletin boards, or other electronic media. Do not speak on behalf of Elastic unless we have authorized you to do so. If you receive any media inquiries, you should forward them to [PR-Team@elastic.co](mailto:PR-Team@elastic.co).

## Privacy and Data Protection

Elastic collects and retains personal data that is necessary for the effective operation of its business, or as required by law. Personal data is any information related to an identified or identifiable natural person.). This includes obvious data (such as a name or email address), as well as less obvious data that directly or indirectly relates to a natural person, such as a user ID, an IP address (or other online identifier), location data, or any other information that is specific to an individual.

In order to do their jobs, Elasticians may need to have access to the personal data of their coworkers, as well as customers, partners, suppliers, etc. Remember, however, that you are only permitted to access personal data that is strictly necessary for the performance of your duties, and you should only use personal data for the business purpose for which it was collected. These rules apply to the sharing of personal data with Elastic colleagues or with any third parties. Do not use or disclose personal data for unrelated business purposes or for your own or others' benefit, and when using or disclosing personal data, make sure that you comply with Elastic's data privacy policies and procedures.

Finally, unless specifically instructed otherwise by Elastic, you should neither input any personal data into AI or GenAI applications, nor seek to extract any personal data from such applications.

## Information Security

All of us at Elastic have a shared responsibility for maintaining the safety and security of the company's information and the information entrusted to us by our business partners. Although we have a dedicated information security team, they need cooperation and commitment from all Elasticians to keep our IT systems secure. You must review and be familiar with information security policies, complete new hire and annual security awareness training, and comply with all the security procedures we have put in place. In particular, make sure you safeguard your login credentials, and never access our systems in a way that is not in full compliance with Elastic's security policies and procedures.

## Political Donations & Lobbying

Elastic does not directly or indirectly participate in party politics or make payments to political parties or individual politicians. Elastic's assets — including company funds, employees' work time, and company premises and equipment — must not be used for, or be contributed to, any political campaigns or other political activities under any circumstances in any country. We recognize that many Elasticians are very engaged in their communities and actively participate in social and political life — which is great! But since we have Elasticians representing so many diverse perspectives, just

make sure that you conduct any political activities as an individual, and not as an employee or representative of Elastic.

We share Elastic's views with governments and others on matters affecting our business interests and those of our shareholders, employees and others involved in or affected by our activities. If you would like to contribute to this dialogue, please contact our Legal Department and never approach any government or its representatives on behalf of Elastic before we approve such contact.

## **Quality of Public Disclosures**

Elastic has a responsibility to provide full and accurate information, in all material respects, in our public disclosures about our financial condition and the results of our business operations. We are committed to providing full, fair, accurate, timely, and understandable disclosures in our reports and documents filed with or submitted to the United States Securities and Exchange Commission and our other public communications, and Elastic has adopted market standard procedures to monitor such disclosures.

## **Business Conduct Values**

Elastic understands that our customers and business partners expect us to manage our business ethically, transparently, and responsibly. The following set of Business Conduct Values apply to Elastic and all of our personnel worldwide.

## **Ethics & Compliance**

### **Ethical Dealings**

We will always operate with honesty and integrity and will observe the highest ethical principles. We will avoid even the appearance or perception of conflicts of interest. We will be especially careful about extending business courtesies and will remember that it is never appropriate to give a gift or gratuity with the intent to influence a business or governmental decision or outcome. We will follow both the letter and the spirit of our policies regulating gifts and entertainment.

### **Compliance with Laws and Regulations**

We will comply with all laws and regulations applicable to us in all locations where we do business.

### **Bribery and Corruption**

We will be familiar and will strictly comply with all applicable laws and regulations on bribery, corruption, and prohibited business practices. We will not corruptly offer, promise, or make or agree to make any payments or gifts of money or anything of value, directly or indirectly, to anyone for the purpose of influencing decisions. Our business dealings will be accurately reflected in our books and records, and we will implement procedures designed to prevent bribery, corruption, kickbacks, and embezzlement.

## **Human Rights, Employment & Labor**

**Human Rights:** We will treat all of our workers in a manner that is consistent with the United Nations Universal Declaration of Human Rights. We will support and respect the protection of internationally proclaimed human rights and will not tolerate any human rights abuses within our organization or our supply chain.

**Responsible Sourcing of Minerals:** We adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas and ensure compliance with any related laws applicable to us.

**Freedom of Association and Collective Bargaining:** We respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions, and to bargain collectively. We are committed to fostering open communication between management and employees.

**Compliance with Labor Laws:** We will fully comply with all labor laws, including all applicable laws intended to prevent modern slavery, and we will not use forced or involuntary labor of any type (e.g. slave, bonded, indentured, or involuntary prison labor). All work arrangements between us and our employees are voluntary, and our employees are free to terminate their employment at any time. We will not employ anyone if we have seen red flags that a prospective employee may be a victim of human trafficking. We will not use child labor. "Child" refers to any person under the minimum age for employment in any jurisdiction where we do business. We support, however, the use of legitimate workplace apprenticeship programs which comply with all the laws and regulations applicable to such apprenticeship programs in all locations where we do business.

**Wages and Benefits:** We will comply with all applicable laws and regulations governing working hours and compensation and will provide legally mandated benefits. We will not exceed prevailing local work hours and will appropriately compensate overtime in line with applicable law. We will not force our employees to work more than the time allowable by applicable law.

**No Discrimination:** We are committed to fostering an inclusive workplace and do not tolerate discrimination in hiring or any other employment practice on the grounds of race, religion, national or ethnic origin, color, sex (including gender expression or identity, sexual orientation, and pregnancy), age, marital status, veteran status, genetic information, disability, or any other basis protected by any applicable law or regulation.

**Respect and Dignity:** We will treat all our employees with respect and will not use or tolerate any corporal punishment, threats of violence, or other forms of coercion or harassment.

**Health and Safety:** We will provide our employees who work from one of our offices with a safe and healthy workplace with clean facilities meeting acceptable standards of workplace hygiene and emergency preparedness. We will effectively implement programs that encompass life safety, incident investigation, chemical safety, and ergonomics.

## Environment

### Compliance with Environmental Laws & Regulations

At a minimum, we will comply with all applicable environmental laws, regulations, and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial



wastewater treatment and discharge, and air emissions controls. We will obtain and keep current all required environmental permits, approvals, and registrations and will comply with their reporting obligations.

### **Environmental Protection**

We are committed to mitigating environmental risks and responsibly managing our environmental impacts. Our decision-making processes will take into consideration potential adverse effects on the environment and the communities in which we operate.

## Waivers and Amendments

Any waiver of any provision of this Code for a member of the Board of Directors or an executive officer, including our Chief Executive Officer, Chief Financial Officer, and other executive and senior financial officers, must be approved in writing by the Board of Directors or its designated committee and promptly disclosed, along with the reasons for the waiver, to the extent required by law or regulation. Any waiver of any provision of this Code with respect to any other person must be approved in writing by the Chief Legal Officer or, if the Chief Legal Officer is not available, the Chief Financial Officer, who will consult with the Business Integrity Officer (VP, Business Integrity). Waivers of this Code for a member of the Board of Directors or an executive officer will be disclosed on Elastic's website.

We are committed to periodically reviewing and updating the Code to reflect the changing legal and business environment. All amendments must be approved in writing by the Board of Directors or its designated committee and disclosed on Elastic's website, or as otherwise may be required by law or regulation.

## Reporting Ethical & Compliance Concerns

If you have observed potential violations of this Code or would like to ask questions, present ideas, or raise concerns pertaining to ethics or compliance at Elastic, you must promptly take one of the following steps:

- Send an email to the Business Integrity Team at [ethics@elastic.co](mailto:ethics@elastic.co);
- Report ethical, legal, or regulatory concerns via the Ethics and Compliance Hotline by phone or via the [web-reporting tool](https://www.elastic.co/legal/ethics-and-compliance) available at <https://www.elastic.co/legal/ethics-and-compliance>. You may choose to identify yourself or remain anonymous where permitted by law. Our Hotline is available to anyone inside or outside Elastic;
- If the actual or suspected misconduct or irregularity pertains to the functioning of an executive director of Elastic, report concerns directly to the Lead Independent Director of Elastic at the address of Elastic's registered office at Keizersgracht 281, 1016 ED Amsterdam, the Netherlands;
- In addition, if your complaint relates to accounting, internal controls or auditing matters, you may contact the Chairperson of our Audit Committee by sending an email to [ethics@elastic.co](mailto:ethics@elastic.co) or by writing to Elastic N.V., Keizersgracht 281, 1016 ED Amsterdam, the Netherlands, Attn: Chairperson of Audit Committee. We will forward all such communications to the Chairperson of our Audit Committee.

Employees can also consult Elastic's Business Integrity Officer (currently the VP, Business Integrity) in confidence about suspicions of possible misconduct. The contact information for the Business Integrity Officer (VP, Business Integrity) is available in Workday. If requested by the employee, the Business Integrity Officer will escalate the matter by submitting a formal report.

Elastic is committed to conducting fair, timely, and effective investigations of alleged misconduct. No matter how you raise your concern, it will be reviewed and assigned to qualified personnel for investigation if warranted. This may include professionals from Business Integrity or Employee Success, as well as other subject matter experts, such as Internal Audit. Matters that meet certain criteria may be escalated to the Chief Legal Officer, Chief Human Resources Officer, Chief Financial Officer, or Chair of the Audit Committee of the Board of Directors. The Audit Committee is regularly updated on the outcome of investigations. You will receive notification that your report has been received, as well as updates on how it will be dealt with, the expected timeframe of any investigation, and - where possible, due to privacy and other obligations - the results of the investigation.

And remember, you have Elastic's unwavering commitment to protect all who have in good faith reported a complaint, or who assist in any related investigation, against any reprisal, threats, discrimination, harassment, retribution, or retaliation.

Finally, you always have a right to contact law enforcement or regulatory authorities, and nothing in this Code limits any Elastician from making a good faith report or complaint to the appropriate authorities.