



# TANIUM CODE OF CONDUCT

## Tanium Code of Conduct

### Introduction

Everyone who works for Tanium is expected to act ethically, lawfully, and in the best interests of the company. This Tanium Code of Conduct (the “Code”) is intended to help you meet that expectation by providing guidelines on how to conduct yourself when interacting with customers, business partners, and co-workers and when otherwise conducting business on behalf of Tanium. The Code applies to all Tanium Personnel, which includes employees of Tanium, Inc. and its affiliates or subsidiaries, our Board of Directors with regards to their work for Tanium, and anyone else who is performing work on Tanium’s behalf or doing business with the company, such as contractors, consultants, suppliers, and resellers.

The Code does not cover every issue that may arise, but instead provides general guidance on certain topics and references to other applicable company policies. Tanium Personnel should refer to Tanium’s other policies and procedures for further details on implementing the principles set forth in the Code. If you have any questions about the Tanium Code, any of Tanium policies, or whether specific conduct complies with Tanium’s expectations, you should contact your manager, any other Tanium manager, Human Resources, or the Legal department. Any suspected violation of the Code, Tanium policies, or applicable laws should be reported immediately, as discussed below.

The Code applies to Tanium’s global operations. To the extent that any part of the Code conflicts with local laws, only the parts of this Code permitted by applicable laws will apply. Tanium policies applicable to your local jurisdiction take precedence to the extent they conflict with this Code.

The Code is subject to change and may be amended, supplemented or superseded by other Tanium policies.

### Ethical Behavior

All Tanium Personnel are expected to act with the highest standards of integrity and ethical behavior, which is generally characterized as conduct that is lawful, professional, honest, and free from fraud or deception.

### Reporting Concerns

If you become aware of or suspect any violation of the Tanium Code, another Tanium policy, or any law, you must promptly report it to your manager, another manager, Human Resources, or the Legal department. In addition, you may submit a confidential report to our third-party hosted website at [www.tanium.ethicspoint.com](http://www.tanium.ethicspoint.com), or by calling (844) 931-2069 in the United States or, for employees outside the United States, the phone numbers listed at [www.tanium.ethicspoint.com](http://www.tanium.ethicspoint.com). You may make an anonymous report if permitted by applicable local laws. Tanium will investigate reports of possible violations and expects Tanium Personnel to fully cooperate with any investigation. Tanium will not

## TANIUM CODE OF CONDUCT

retaliate against anyone for making a good faith report of a potential violation or for participating in an investigation. To the extent permitted by local law, if your conduct is found to have violated this Code, Tanium policies, or the law, you may be subject to discipline, up to and including termination of your employment or other relationship with Tanium. Refer to the Tanium Whistleblower & Complaint Policy for details.

### Respectful and Inclusive Workplace / Equal Opportunity

Tanium provides equal employment opportunity for all employees and job applicants, and does not unlawfully discriminate based on race, color, religion, sex, sexual orientation, nationality, national origin, ancestry, citizenship, age, medical condition, genetic information, mental or physical disability, veteran status, marital status or any other basis protected by federal, state or local law. Tanium also prohibits Tanium Personnel from unlawfully harassing or mistreating other Tanium Personnel, customers, or any other individuals in the workplace or in a work-related situation based on any legally protected characteristic. In addition, reasonable accommodations will be provided for the known physical and mental limitations of qualified disabled employees and job applicants, except where an undue hardship would result.

If you become aware of any incident of discrimination or harassment, report the matter to your manager, any other Tanium manager, Human Resources, or the Legal department. For additional details and information, refer to Tanium's Anti-Harassment and Anti-Discrimination Policy.

### Conflicts of Interest

A conflict of interest exists when your own personal interest conflicts, or may potentially conflict, with Tanium's interests and could impair your ability to act in Tanium's best interests when conducting Tanium business. If a conflict of interest exists, you must disclose the conflict to your manager and Human Resources, obtain guidance on how to address the conflict, and obtain approval before moving forward.

While not all conflicts of interest are prohibited, they must be properly disclosed so that someone who does not share your personal interest can decide if the conflict is acceptable or whether any action should be taken to account for the hazards that may arise from the conflict. Keep in mind that even if a potential conflict does not actually impair your objectivity, the mere appearance of a conflict of interest may impede your work for Tanium and must be disclosed. If in doubt, discuss the potential conflict with your manager, another manager in your reporting chain, Human Resources, or the Legal department.

Some examples of conflicts of interest are:

- If you or a family member may benefit from your position with Tanium.
- If you have a personal relationship with a customer, vendor, competitor, business partner, or another employee, including romantic relationships between Tanium Personnel.
- External business relationships, such as performing work for another company, serving on a Board of Directors, or personal investments in other entities.
- Receiving or giving gifts or entertainment to customer or potential customers of Tanium.
- Transactions involving Tanium and one of its directors, officers, or executives (or family members of such individuals).

## TANIUM CODE OF CONDUCT

This is not an exhaustive list, as conflicts of interest may arise in a wide variety of circumstances. For more information, refer to Tanium's Conflict of Interest Policy and Government Contracting Handbook.

### Protecting Tanium Information and Other Assets

It is critically important that all Tanium Personnel safeguard and protect Tanium property. This includes not only tangible assets such as our source code and the equipment we use, but also our intangible assets such as confidential information about product plans, sales and financial information, company strategy, and customer details. You must also be careful not to waste Tanium's financial assets through the unapproved spending of company money on travel, entertainment and other business-related expenses. The following is an overview of the expectations regarding asset protection and the more detailed policies which provide further guidance on these subjects.

- Do not disclose Tanium's confidential information except for business purposes and only if you have proper authorization and safeguards in place (e.g., a non-disclosure agreement) to do so. Confidential information includes, without limitation, proprietary data, trade secrets and know-how such as software and product designs, product plans, inventions and designs, customer lists, employee data (other than your own), financial information, budgets, pricing, business plans, or other business information. You must also protect the confidential information of third parties that Tanium receives under non-disclosure agreements. Refer to the Tanium Information Security Policy for more information. In addition, your agreements with Tanium, such as the Employee Invention Assignment and Confidentiality Agreement or your employment agreement, set forth additional obligations on this subject.
- Do not speak to the press about Tanium-related business without first consulting the Tanium Communications department. Refer to the External Communications and Social Media Policy for additional details.
- Do not use Tanium's electronic communications systems, such as our computer networks and email systems, for inappropriate purposes, to conduct business activities unrelated to Tanium, or to transmit inappropriate content. Employees should not have an expectation of privacy with respect to electronic communications made using Tanium systems and, to the extent permitted by applicable local law, Tanium retains the right to access such information with or without consent. Refer to the Acceptable Use Policy and the Employee Data Privacy Policy for guidance on the use of Tanium's systems and information on how Tanium may use personal data.
- You are expected to treat the physical assets provided to you by Tanium with care, including computer and communications equipment, software, office equipment, and facilities. These assets remain the property of Tanium and are provided for business use; while we allow limited personal use of such assets, any such use must comply with Tanium policies, should not be excessive, and should not interfere with the performance of your job duties.
- Spend Tanium money wisely. Tanium Personnel are expected to act responsibly and exercise sound judgment using company finances for business-related expenses, including travel, entertainment, and gifts. You must also maintain accurate and complete records regarding expenditures, submit accurate and complete spending reports, and comply with Tanium policies, internal controls, tax rules, and legal

## TANIUM CODE OF CONDUCT

requirements related to the use of Tanium finances (see the Anti-Corruption section below for information on specific legal restrictions). Refer to the Travel & Expense Policy for additional guidance.

### Business Practices

Tanium Personnel must comply with the laws of the countries where we do business. If you have any questions or concerns about the applicability or interpretation of any law, contact the Legal department. Particular attention should be given to the following laws when conducting Tanium business:

- **Anti-Corruption:** Tanium Personnel must comply with all anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and any local laws which prohibit bribery. You must also adhere to the Tanium Anti-Corruption Policy which generally prohibits giving or receiving payments or giving anything of value, including gifts, to anyone for an improper purpose, such as to influence a business decision, obtain a special advantage, or compromise the objectivity of the recipient.
- **Antitrust and Competition:** Tanium firmly believes in fair competition as a basis for the success of our business. Tanium Personnel must adhere to all applicable antitrust and competition laws, which generally prohibit agreements not to compete, or that unreasonably restrain trade. We must not abuse market power to hinder competition, discuss or make certain agreements with competitors or resellers about prices, customers, or products. For specific details, refer to Tanium's Antitrust and Competition Policy.
- **Global trade:** Tanium complies with global trade laws that restrict the import and export of certain goods and technical data and preclude business transactions with sanctioned countries and restricted parties. All Tanium Personnel are expected to comply with applicable global trade laws, and should consult with the Legal department and refer to Tanium's Global Trade Compliance Policy for additional guidance.
- **Recordkeeping:** Tanium maintains its company books, records, accounts and financial statements in reasonable detail and in a manner that accurately and appropriately reflects its transactions. Tanium Personnel must comply with applicable laws and company policies regarding the preservation or destruction of records, including any legal holds placed on records for pending litigation or investigations. Refer to Tanium's Records Retention and Destruction Policy for additional guidance.
- **Health and Safety:** Tanium is committed to providing a safe workplace, and expects Tanium Personnel to comply with the environmental, health and safety laws where we have operations. Violence of any kind, including threats of violence, is unacceptable at the workplace, at a Tanium-sponsored event, or during any time you are acting on behalf of Tanium. Alcohol and drugs may not be consumed at Tanium office locations except at special events where alcohol may be served if approved in advance by the CEO. Tanium Personnel should report to work fit for duty and free of any adverse effects from a controlled substance (including alcohol, drugs, and prescription medication) that impairs their ability to work.