

Whistleblower and Complaint Policy

Effective Date: 22-May-23
Policy Owner: Legal

As part of its commitment to the highest standards of ethical business conduct and compliance with all applicable laws, the Board of Directors (the “**Board**”) of Tanium Inc. (collectively with its subsidiaries, the “**Company**”), acting upon the recommendation of the Audit Committee of the Board (the “**Committee**”), has adopted this policy to provide guidance to employees on the reporting of improper activities. This policy may be amended by the Committee and the Company’s CEO or Chief Compliance Officer are authorized to make non-material changes from time to time, as deemed necessary.

Reporting Improper Activities

Employees should report any concerns they have regarding actual or suspected violations of (a) laws, governmental rules and regulations, (b) internal accounting controls or accounting and auditing practices and policies or (c) any Company policies. This includes complaints or reports received from persons outside the Company and complaints regarding third parties who provide services to or receive products and services from the Company.

Reports may be submitted to one or more of the following recipients: the employee’s direct manager, another manager, an officer of the Company, a member of the Human Resources or Legal departments, or the Chief Compliance Officer. If an employee is not comfortable discussing a suspected violation with the above individuals, the employee may also report the suspected violation confidentially and, where permitted by local law, anonymously, by submitting a report to the Company’s third-party hosted website at 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. Reports may also be submitted by sending (a) a letter addressed to the Company’s corporate headquarters at 2100 Powell St., Suite 1600, Emeryville, CA 94608, marked “Attention: Chief Compliance Officer” or (b) an email to legal@tanium.com.

Employees are encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern because the Company’s ability to investigate will be largely dependent on the quality and specificity of such information. Employees should not independently conduct their own investigation, but instead should make a report as set forth in this policy and fully cooperate with any resulting investigation.

The recipient of a report must promptly consider the information submitted, take appropriate action in accordance with applicable law and good business practices, and provide the information to the Company’s Chief Compliance Officer. The Chief Compliance Officer, or their designees, will be responsible for (a) reviewing, or overseeing the review, of any report of a suspected violation from any source, (b) coordinating the investigation and resolution of all reports, (c) ensuring that corrective action, as necessary and appropriate, is taken, and (d) reporting to the Committee pursuant to this policy. Individuals who are found to have engaged in improper activities will be subject to discipline, up to and including termination of employment. If an employee intentionally and knowingly submits a false report of improper activities, he or she will be subject to discipline.

Confidentiality

If an employee reports a suspected violation and was not engaged and did not participate in any of the activities underlying the suspected violation, the Company will attempt to keep its discussions and actions confidential to the greatest extent possible and in compliance with applicable laws. A reporting employee’s identity may need to be disclosed to conduct a thorough investigation, to comply with the law, or to give individuals an opportunity to defend against accusations made



against them. All reports and records associated with reports made under this policy are considered Company confidential information.

Non-retaliation

The Company prohibits any form of intimidation or retaliation by any employee, contractor, subcontractor or agent of the Company against any employee because of any lawful act done by such employee to (a) provide information or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of applicable laws or Company policies, or (b) file, testify, participate in or otherwise assist in a legal proceeding relating to a violation of law. Prohibited forms of intimidation or retaliation include, but are not limited to, discharge, demotion, suspension, threats, harassment or any other manner of discrimination with respect to an employee's terms or conditions of employment based on lawful actions of such employee with respect to a good faith report or cooperation or assistance with an investigation conducted by the Company. Any employee who believes they are being retaliated against for making a report of improper activity should immediately contact Human Resources or the Chief Compliance Officer.

Reporting and Records

The Chief Compliance Officer shall disclose to the Committee the receipt of any reports relating to internal accounting controls or accounting and auditing practices and policies and may provide reports of other suspected violations to the extent the Chief Compliance Officer deems appropriate. The Chief Compliance Officer will also provide updates to the Committee on the status of any review, investigation, and resolution of the disclosed reports. These disclosures and updates shall be made at the Committee's regularly scheduled meetings or on a more frequent basis, if necessary, as to specific reports. The Chief Compliance Officer or the Committee may take whatever steps deemed necessary to respond to reports received by the Company, including reporting to the Board or appropriate governmental authorities the fact that violations may have occurred, and any actions taken to remedy such violations. Records regarding reports will be retained in compliance with applicable law and Company policy.