



Anti-Bribery & Corruption Policy

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Anti-Bribery & Corruption Policy

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Issuing Authority: Global Business Integrity Committee

Document Owner: VP, Business Integrity Officer

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Basis for Policy

The purpose of this Policy is to clearly communicate to all Elasticians and our business partners Elastic's total commitment to avoiding bribery in all of our business dealings. This policy also requires all Elasticians, and others acting on Elastic's behalf, to comply with all anti-bribery laws and to follow the practices and procedures in this Policy that are designed to ensure that we meet or exceed all applicable legal and ethical standards.¹

Bribery is illegal in all countries where we do business. The United States Foreign Corrupt Practices Act and the UK Bribery Act are the best-known examples of laws making bribery illegal. We do not expect you to become experts in all anti-bribery laws. However, we do expect and require you to be familiar with this Anti-bribery and Corruption Policy ("Policy"), seek guidance if you have any questions, and report in good faith all actual or potential violations of which you are aware.

It is crucial to understand that an actual payment of money is not the only form a Bribe can take. A Bribe is an offer, promise, or authorization of *anything of value* (i.e., Gifts, Hospitality, travel, political contributions, charitable donations, or offers of employment) that is given for the purpose of improperly influencing an individual to obtain or retain business, direct business to another person, or otherwise secure any advantage. Simply stated, a Bribe is giving or promising anything of value to induce a person to misuse their governmental, corporate, or other position. In this Policy, we refer to all such behavior as Bribes or Improper Payments.

Bribes can occur in the public and private sectors, and they can involve Government or Public Officials or private sector individuals. Public Sector Bribery takes place when anyone acting on behalf of any government is involved. Under some laws, a reference to a Government or Public official 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. Moreover, under some anti-bribery laws, spouses and immediate family members of any of these persons are also treated as Government or Public Officials.

This Policy applies to Elastic's operations worldwide and to all of its directors, officers, and Employees, wherever they are located. The practices and procedures in this Policy apply not only to activities of these individuals, but also to all programs, events, campaigns, and other initiatives of Elastic and any of its functions and businesses.

¹ All capitalized terms used in this policy are defined in the Definitions section below.

Statement of Policy

Bribery of any person, regardless of whether they are a Government or Public Official, or any other use of Elastic's funds or assets for any unlawful or improper purpose is illegal and strictly prohibited.

Principal Guidelines

To uphold our commitment to avoiding bribery in all business dealings, Elasticians and Third Party Representatives acting on Elastic's behalf must adhere to the following guidelines:

- **No Improper Payments:** No Elastician may offer, promise, authorize, or give any Improper Payment, which is understood as anything of value (including Gifts, Hospitality, travel, political contributions, charitable donations, or offers of employment) to induce a person to misuse their governmental, corporate, or other position. For specific guidance related to providing and accepting Gifts and Hospitality to build goodwill and strengthen commercial relationships without creating the appearance of impropriety or violating anti-bribery laws, refer to Elastic's Gift & Hospitality Policy.
- **Prohibition of Facilitating Payments:** Facilitating Payments, which are small payments to low-level Government or Public Officials to encourage them to perform their regular duties with more urgency, are strictly prohibited.
- **Accurate Record-Keeping:** All transactions and expenditures must be accurately, fairly, and in reasonable detail reflected and recorded in Elastic's books and records. No payment shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documentation supporting the payment.
- **Due Diligence for Third Parties:** Before retaining Third Party Representatives who may represent or act on Elastic's behalf (such as consultants, agents, resellers, or channel partners), risk-based due diligence may be required
- **Reporting Violations:** Any Elastician who learns of or suspects a violation of this Policy, or receives a demand for anything of value that would violate this Policy, must promptly report the matter. Such reports should be made consistent with the guidelines set forth in the "Reporting Violations or Potential Violations" section of this Policy, or by immediately contacting the Business Integrity Officer (VP, Business Integrity) or the Chief Legal Officer.
- **Compliance with Standards:** All Elasticians must follow the procedures outlined in this Policy, which are designed to ensure we meet or exceed all applicable legal and ethical standards.

Political Contributions

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.

Charitable Contributions

Corporate charitable giving is a wonderful way to support the communities in which we conduct business operations and the causes that we champion. We strongly encourage individual Elasticians to contribute to charitable, educational, and other social causes. These individual donations do not require any internal approvals, but Elastic will only match those of your contributions that clearly meet the criteria of our donation matching program. Please contact the Elastic Cares team for more information at elasticcares@elastic.co.

Unfortunately, there have been cases of companies and other organizations using Gifts to charities as a clever disguise for an Improper Payment. In order to ensure that this will not happen at Elastic, all charitable donations using Elastic's funds outside of the Elastic Cares matching program must be submitted to Business Integrity for pre-approval using the Gift & Hospitality Pre-Approval Request Form at Help-@-Elastic.

Third Party Representatives

Elastic may be considered in violation of anti-bribery laws if a Third Party Representative, as defined below, pays a Bribe on the company's behalf. This potential liability exists even where Elastic did not know or have reason to know that the Third Party Representative paid a Bribe. This underscores the critical importance of ensuring all third parties adhere to the highest ethical standards and comply with all anti-bribery and corruption regulations.

As this is considered a particularly critical area of bribery risk for companies, Elastic manages these risks in a number of ways:

1. We ensure that Third Party Representatives are being retained to provide legitimate services. Our onboarding process for Third Party Representatives, such as consultants, requires a valid business purpose for their engagement. Furthermore, our internal financial controls ensure that all payments made to Third Party Representatives are for legitimate, clearly documented sales or services.
2. Prior to engaging a Third Party Representative, we carefully consider and, if appropriate, investigate the reputation and history of legal compliance of any proposed Third Party Representative. This process is risk-based, meaning it is proportional to the particular risks presented by a Third Party Representative in the context of a specific engagement. For example, Elastic conducts anti-corruption due diligence on all channel partners (including resellers, distributors, and others) who will represent us outside the U.S. in a country perceived to have high levels of corruption and requires all such partners to certify their compliance with relevant anti-corruption laws. The depth of our due diligence review on these and other Third Party Representatives may be more or less detailed depending upon various factors, including the degree of interaction they may have with Government or Public Officials.
3. We expect all Third Party Representatives to maintain accurate records of funds received or spent on behalf of Elastic, as required by the Elastic Global Third Party Code of Conduct.
4. Our contracts also mandate strict compliance with all applicable anti-bribery laws.

Red Flags

All Elasticians should be alert to any signs of potential corrupt behavior. The following are some of the less obvious signs, or red flags, that may arise:

- A person responsible for awarding a contract to Elastic requests to be invited to a legitimate Elastic-sponsored event and asks Elastic to cover the full cost of travel and room and board for themselves and their guest for the duration of the event and a few extra days.
- In addition to negotiated contractual payment terms, Elastic is asked to make a donation to a specific charity or political organization.
- In addition to negotiated contractual payment terms, Elastic is asked to employ or offer an internship to a person.
- A Government or Public Official, particularly one with discretionary authority over the business at issue, strongly recommends that Elastic hires a particular Third Party Representative.
- A Third Party Representative requests contract terms or payment arrangements that call for payment in cash, to someone else, or in another country or another country's currency (i.e., not where services are rendered or where the third party resides).
- A Third Party Representative fails to provide sufficiently detailed invoices.

These and other red flags can arise at any stage of a transaction or a relationship and must be promptly investigated and appropriately addressed. If you become aware of any red flags but are not sure how to respond to them, you are required to immediately report the issue consistent with steps outlined under “Reporting Violations or Potential Violations”, below.

Implementation & Enforcement

Bribery is always a violation of Elastic's policies and will result in disciplinary action, up to and including termination of employment.

Moreover, violations of anti-bribery laws can result in severe criminal and civil penalties for the individuals involved, including imprisonment, forfeiture of profits, and significant fines. Elastic will not reimburse any officer, director, Employee, or anyone else for fines imposed on the individual and/or any legal charges incurred by such individual due to the violation of anti-bribery laws, and the violator will be responsible for paying any amounts from their personal assets. In addition, Elastic will cooperate fully with law enforcement authorities in the investigation and prosecution of alleged violations of anti-bribery laws.

Reporting Violations or Potential Violations

If you have observed or are otherwise aware of, or if you have a reasonable suspicion of, a potential violation of any anti-bribery laws or this Policy, you must promptly take one of the following steps:

- Email the Business Integrity Team at 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;
- If the actual or suspected Misconduct or irregularity pertains to an executive director of Elastic, report concerns directly to the Lead Independent Director of Elastic at the company'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 or by writing to Elastic N.V., 88 Kearny St, Floor 19, San Francisco, CA 94108, Attn: Chairperson of Audit Committee. We will forward all such communications to the Chairperson of our Audit Committee.

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 Policy limits any Elastician from making a good faith report or complaint to the appropriate authorities.

Roles & Responsibilities

Role	Responsibility
Employees	Be familiar with this Policy and always adhere to its provisions. Seek guidance from the Business Integrity team or their manager if they have any questions, and promptly report in good faith all actual or potential violations of which they are aware.

Managers	Must immediately inform the Business Integrity team (ethics@elastic.co) if an employee discusses a potential violation of any anti-bribery laws or this Policy.
Business Integrity Counsel	Provide guidance on the interpretation and application of this Policy.
Global Business Integrity Committee	Provide oversight and waiver of any provision of this policy.
VP, Business Integrity	Oversee the implementation, administration, and review of this policy.

Definitions

Bribe/Improper Payment: An offer, promise, or authorization of anything of value (e.g., entertainment, gifts, travel, charitable donations, employment) given to improperly influence an individual to obtain or retain business, direct business to another person, or secure any advantage. Simply stated, it's giving or promising anything of value to induce a person to misuse their governmental, corporate, or other position.

Commercial Bribery: Bribery involving private sector individuals.

Employee: For the purposes of this policy, any reference to an Elastic Employee is inclusive of full-time, part-time, as well as temporary and contract workers.

Facilitating Payments: Small payments to low-level Government or Public Officials to encourage them to perform their regular duties with more urgency. These are prohibited.

Gift: Something of value - typically a tangible item or direct financial benefit - that can be offered or given. Gifts are generally items of value given directly to an individual.

Government or Public Official: Any person holding a government position, having governmental duties (including consulting or ceremonial duties), or having an employment relationship with any government department, agency, or instrumentality (including any government-owned or government-controlled commercial enterprise or quasi-governmental agency) (collectively, "Government Entities"). The term includes publicly-operated or controlled international organizations, political parties or candidates for public office, members of a royal family, and any person that is a government employee, or otherwise covered, under local law (e.g., spouses and immediate family members of Government Officials).

Hospitality: Business courtesies such as meals, company swag, tickets to events, and travel for business events. Hospitality typically involves experiences, services, or events provided to an individual, often with the intent of facilitating business discussions or strengthening relationships, and may include associated costs like meals, entertainment, or travel.

Public Sector Bribery: Bribery that takes place when anyone acting on behalf of any government is involved.

Third Party Representative: Refers to individuals, companies - like consultants, agents, contractors, resellers, other channel partners - or any other intermediary acting on Elastic's behalf.

Related Information

Code of Business Conduct and Ethics
Gift & Hospitality Policy (Internal Only)
Travel & Expense Policy (Internal Only)

Forms

None

Change History

Date	Summary of Change
September 04, 2025	New Policy