



Australia Whistleblower Policy

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Effective Date: September 4, 2025

Supersedes: N/A (Law newly applicable to Elastic)

Document Review Date: 2 years from effective date

Issuing Authority: Chief Legal Officer

Document Owner: VP, Business Integrity

Contact: ethics@elastic.co

Basis for Policy

Elastic recognizes the importance of the integrity of our business practices and financial information and is committed to fostering a transparent corporate culture. We maintain a Global Whistleblowing Policy to promote and encourage all of our employees and others who reasonably believe that they are aware of any suspected wrongdoing to report such matters without fear of harassment, discrimination, or retaliation.

This Policy supplements our global policy, outlining the specific requirements that Elasticsearch Pty Ltd is required to observe under all applicable Australian whistleblower law, including the Corporations Act 2000 (Cth) ("*Corporations Act*") and applies to Elastic's Australia entity, Elasticsearch Pty Ltd. Elastic encourages employees to raise concerns of any kind, regardless of whether they fall under the protections of Australian whistleblower law. However, this Policy outlines the kinds of reports of suspected or actual misconduct or improper behavior that may be eligible for whistleblower protection in Australia, as well as who may make a report and who may receive it, in order to qualify for protection under the law. It also outlines Elastic's duties under the law.

Statement of Policy

Whistleblower Reports

For purposes of this Policy, a Whistleblower Report is one that is made:

- By an Eligible Whistleblower who has reasonable grounds to suspect Wrongdoing
- About Wrongdoing; and
- Directly to an Eligible Recipient

Whistleblower Reports may be made verbally or in writing but should include as much information and evidence as possible.

Eligible Whistleblowers

The following people can make a disclosure under this Policy:

- Officers or employees (current or former) of Elasticsearch Pty Ltd;
- Suppliers and service providers of Elasticsearch Pty Ltd and their employees, contractors, or

sub-contractors (current or former);

- Any other person associated with Elasticsearch Pty Ltd, such as a volunteer, temporary worker, or partner;
- Relatives, dependents, or spouses of any individual identified above;
- A lawyer on behalf of a discloser in one of the above categories.

Disclosable Matters

Elastic's Global Whistleblowing Policy encourages Elastic employees and others who reasonably believe they are aware of violations of law, regulation, or policy to report those matters to the Company. Many examples of misconduct do not fall into one of the categories listed below. And in raising a good faith complaint of any kind, you will always be protected by Elastic's policy of non-retaliation. Please see Elastic's Global Whistleblowing Policy for more information. But a disclosure will only be protected under Australian whistleblower law if it is a "disclosable matter." Matters are "disclosable" if you have reasonable suspicion of "misconduct," or "an improper state of affairs or circumstances," in relation to Elasticsearch Pty Ltd. In general, this means conduct that:

- Breaches the *Corporations Act* (this includes fraud, negligence, breach of trust, and breach of duty)
- Breaches other financial sector laws
- Represents an offense against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months, or
- Represents a danger to public safety or the financial system.

The conduct does not necessarily have to involve a direct violation of law to be covered but could be related to a widespread or systemic issue that would be of interest to a regulatory authority.

A report is also not "disclosable" and eligible for whistleblower protection if it relates solely to a personal work-related grievance. Generally this includes situations such as:

- An interpersonal conflict with another employee
- A decision about your employment, transfer, or promotion
- A decision about the terms and conditions of your employment
- A decision to suspend or terminate your employment or otherwise discipline you

While such concerns may not be eligible for whistleblower protection under Australian law, Elastic encourages employees to speak up about such grievances so they can be resolved. Employees should reach out to their HRBP or any member of Employee Success to discuss their concerns.

Eligible Recipients

Finally, to qualify as a Whistleblower Report under this Policy, the disclosure must be made to an "Eligible Recipient." Eligible recipients include:

- Elastic's Ethics Hotline, where reports may be made anonymously, if desired, or Elastic's Business Integrity team (ethics@elastic.co)
- Any director/officer or senior manager of any Elastic entity. A "senior manager" is someone who has significant responsibilities and decision-making authority within the company and would include, for instance, someone at the Vice President level or above
- Any member of Elastic's Internal Audit Team
- Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA)
- Your lawyer, if disclosing to obtain legal advice or representation under the whistleblower protections of the *Corporations Act*

Reports may be made anonymously and still qualify for protection under whistleblower law.

In certain limited circumstances, an Eligible Whistleblower may make public interest or emergency disclosures to a journalist or parliamentarian. However, there are strict criteria for these disclosures and employees are strongly advised to seek independent legal advice before making such a disclosure.

Investigations of Whistleblower Reports

Elastic is committed to conducting fair, timely, impartial, and effective investigations of all alleged misconduct. Elastic's Business Integrity Office has the responsibility for reviewing complaints for potential investigation, regardless of reporting channel. The non-executive directors of Elastic have overall responsibility for overseeing Business Integrity's work. Any report made under this Policy, to any Eligible Recipient, should be sent to Business Integrity at ethics@elastic.co for review.

Following receipt, Business Integrity will act quickly to take steps to preserve the confidentiality of the Eligible Whistleblower's identity, determine if further information is required, and take steps to obtain the information. Business Integrity will also determine whether the disclosure falls within the scope of this Policy and, if so, inform the Business Integrity Officer (VP, Business Integrity). The disclosure will then be investigated consistent with Elastic's standard internal investigations practices and this Policy.

For further details on how complaints are managed and investigated at Elastic, including under this Policy, please refer to Elastic's Global Whistleblowing Policy.

All employees or others mentioned in a Whistleblower Report are treated with a presumption of innocence and all investigations conducted in a fair and objective manner. If a Whistleblower Report mentions or relates to an Elastic employee, Elastic will take steps to ensure that the employee is treated fairly, including being given an opportunity to respond.

Legal Protections for Eligible Whistleblowers

1. Confidentiality

Elastic is committed to maintaining confidentiality over all complaints raised under this Policy. Elastic will not disclose an Eligible Whistleblower's identity unless that disclosure is authorized under law or the reporter consents to disclosure. Similarly, the company will ensure that the information contained in a Whistleblower Report is disclosed only to the extent necessary to conduct an investigation or obtain legal advice.

Elastic will also take steps to reduce the risk that an Eligible Whistleblower is identified as part of any process under this Policy, including redacting, where possible, references to an Eligible Whistleblower and reminding individuals involved in handling and investigating a Whistleblower Report of confidentiality requirements. Elastic has a legal obligation to protect a Whistleblower's identity and release of information in breach of this Policy will be considered a serious violation and may result in disciplinary action.

In practice, it is important for Eligible Whistleblowers to be aware that it may be difficult to protect the confidentiality of their identity in cases where the concerns are personal in nature or relate to information that only they, or a small number of people, have access to. Whistleblowers are encouraged to limit discussing their Whistleblower Report with others to assist in protecting their identity.

2. Detrimental Treatment

Elastic strictly prohibits retaliation against any employee for reporting potential misconduct, and that extends to any disclosures by an Eligible Whistleblower under this Policy. And the *Corporations Act* makes it illegal for someone to cause or threaten detriment to someone because they believe that person has made, may have made, is proposing to make, or could make a whistleblower disclosure.

Elastic will thus take all reasonable steps to protect Eligible Whistleblowers from Detrimental Treatment as a result of their disclosure, and those found in violation of this clause will be subject to disciplinary action. Elastic will assess the risk of detriment to an Eligible Whistleblower and take appropriate steps to protect them, which may include reassigning them to other duties, making adjustments to their working arrangements, or reassigning or relocating other employees involved in the Disclosable Matter. Elastic will also remind Eligible Whistleblowers of the professional counseling support services available to them, including the Elastic Employee Assistance Program, if needed.

Eligible Whistleblowers who believe they have been subjected to a detriment because of an actual or intended disclosure should immediately report their concerns to Elastic's Business Integrity team (ethics@elastic.co).

3. Compensation

An Eligible Whistleblower who makes a disclosure under this Policy may seek compensation and other remedies if they suffer loss, damage or injury due to the Disclosure or where Elastic has failed to take reasonable precautions to prevent Detrimental Treatment.

4. Other Protections

Under Australian Whistleblower laws, an Eligible Whistleblower is protected from any civil, criminal or administrative liability in relation to making a disclosure. However, this protection does not grant a Whistleblower immunity for any misconduct he or she has engaged in that is revealed in their Whistleblower Report.

Policy Availability and Awareness

This Policy is made available to all officers and employees of Elasticsearch Pty Ltd on our internal Wiki page. It is also publicly available on Elastic's website. Elastic will also provide training on this Policy to relevant employees, as appropriate.

Violations of this Policy

Violations of this Policy may result in disciplinary action up to and including termination of employment.

Roles & Responsibilities

Role	Responsibility
Issuing Authority (CLO)	Coordinate with Document Owner to secure necessary approvals (or delegate this task); approve Policy waivers, if necessary and appropriate
Document Owner (VP, Business Integrity)	Review, approve, and implement policy; coordinate subsequent reviews, updates, and approvals; ensure compliance with Policy
Business Integrity Team	Triage all disclosures made pursuant to this Policy, including determining whether eligibility criteria have been met, such that the disclosure falls within the Policy. Ensure all Policy requirements are followed during the investigative process. Inform VP, Business Integrity if a Whistleblower Report falling under this Policy is received.
Employment Legal (Attorney assigned to cover APJ region)	Serve as a resource for Business Integrity and HR function regarding employee rights during course of any investigation and follow up actions under this Policy

Definitions

Detrimental Treatment: Retaliatory action or threats of action against anyone who has made, who is believed to have made, or who may be proposing to make a Whistleblower Report under this Policy. Detrimental conduct includes (but is not limited to: dismissal from employment, discrimination, harassment, or intimidation, harm or injury, or damage to property or reputation. It does not include action that is reasonable for protecting a Whistleblower from detriment (such as transfer to a different team) or managing a Whistleblower's unsatisfactory performance.

Disclosable Matter: See definition provided in the Disclosable Matter of this Policy.

Eligible Recipients: See definition provided in the Eligible Recipients section of this Policy.

Eligible Whistleblower: See definition provided in the Eligible Whistleblower section of this Policy.

Whistleblower Reports: See definition provided in the Whistleblower Reports section of this Policy.

Related Information

Please refer to the following jurisdiction-specific Whistleblowing policies if applicable to you:

- Global Whistleblowing Policy

Our Code of Business Conduct and Ethics also provides additional information about Misconduct that should be reported to the company.

Forms

[Report a Concern](#)

Change History

Date	Summary of Change
September 04, 2025	New policy developed and adopted