



# Global Whistleblowing Policy

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**Supersedes:** Global Whistleblowing Policy adopted by the Board of Directors on December 2, 2020

**Document Review Date:** 2 years from effective date

**Issuing Authority:** Global Business Integrity Committee

**Document Owner:** VP of Business Integrity

**Contact:** [ethics@elastic.co](mailto: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 this Whistleblowing Policy ("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 sets out the kinds of matters that must be reported, how to report them, the procedure that is followed once a report has been made, and how employees reporting concerns are protected.

In general, this Policy covers any actual or suspected legal, regulatory, or criminal Misconduct and all reports made in good faith are covered by Elastic's non-retaliation policy. However, reporting certain types of suspected wrongdoing may also fall within the scope of Whistleblowing, as defined below, entitling the reporter to external legal protections as well. Depending on applicable law, this may include, but is not limited to, the following:

- Improper accounting, internal accounting controls, or auditing matters;
- Criminal offenses, including fraud, bribery, and corruption;
- Sales practice or market conduct violations;
- Discrimination;
- Any other failure to comply with applicable laws, rules, or regulations;
- Failure to comply with Elastic's Code of Business Conduct and Ethics;
- Failure to comply with any of Elastic's published corporate policies, including our compliance policies addressing anti-bribery, export control, trade sanctions, data security, data privacy, insider trading, and similar compliance matters; or
- Covering up the wrongdoing in any of the above categories.

This Policy applies to Elastic's operations worldwide and to all of its directors, officers, and employees, wherever they are located. Elastic also encourages those outside the company who may have knowledge of relevant Misconduct to submit a report, and the processes below outline how third parties (including partners, customers, vendors, and other stakeholders) may also report their concerns. Note that some countries or other jurisdictions have specific laws related to Whistleblowing, and this Policy may be supplemented by local policies in accordance with those laws. Please see the "Related Information" section at the end of the Policy for details on any current supplemental policies that may apply to you.

## Statement of Policy

It is Elastic's corporate policy to require all of its employees, directors, and officers to promptly bring to the company's attention all suspected wrongdoing under this Policy. It takes courage to make a report, but you have a responsibility to share with us any genuine concerns of non-compliance. You have Elastic's unwavering commitment to protect anyone who has in good faith reported a complaint, or who assists in any related investigation, against any Reprisal, Threats, Discrimination, Harassment, Retribution, or Retaliation.

If you believe you are or have been experiencing negative consequences for having submitted a complaint or for participating in a related investigation, please report this immediately, following the guidelines set forth in the "How to Report" section below. Elastic will promptly and thoroughly investigate your complaint, and if any claim of Reprisal, Threats, Discrimination, Harassment, Retribution, or Retaliation is substantiated, then we will take appropriate action, up to and including terminating the employment of those engaged in such behavior.

It is Elastic's corporate policy to seriously consider all complaints and to investigate them appropriately. We will bring each complaint to a conclusion and will respect to the fullest extent practicable the confidentiality of each person who reports, except as necessary to conduct the investigation and take any remedial action, and in accordance with and as permitted by applicable laws.

Any Elastician who has actual knowledge or a well-founded suspicion of a potential wrongdoing under this Policy but does not report it may be considered in violation of the Policy and subject to disciplinary action, up to and including termination of employment or any other working relationship with Elastic.

## How to Report

If you have observed or are otherwise aware of potential violations of this Policy, and if you reasonably believe the violations are of the nature described under "Basis for Policy" above, you must promptly take one of the following steps (and/or the steps prescribed in one of Elastic's relevant local Whistleblowing policies):

- Email 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;
- 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](mailto: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.

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

Finally, while we encourage individuals to report concerns directly to Elastic, 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.

## **Investigations and Corrective Actions**

Elastic is committed to conducting fair, timely, and effective investigations of all alleged Misconduct. The non-executive directors of Elastic have overall responsibility for monitoring Elastic's responses to all received complaints, but the day-to-day work of triaging complaints for potential investigation falls to Elastic's Business Integrity Office, which handles all complaints, regardless of the reporting channel. Business Integrity will acknowledge all complaints within a reasonable time and allegations that require investigation will be promptly assigned to a trained lead investigator for review, who may work with other appropriate professionals to fully investigate the matter. Depending on the nature of a complaint, subject matter experts (e.g., Human Resources, privacy attorneys, information security professionals) may also be consulted or involved in the investigation. Matters that meet certain criteria may also be escalated, either immediately upon receipt or during or after the course of the investigation, to the Chief Legal Officer, Chief Human Resources Officer, Chief Financial Officer, or Chair of the Audit Committee. The Audit Committee of the Board of Directors is regularly updated on the outcome of investigations. In certain critical matters involving, for example, potentially material risk or allegations against a senior officer, the Audit Committee may recommend that a Special Committee of the Board of Directors lead the investigation. In cases where allegations are made against the Board of Directors of Elastic, the non-executive members of the Board can choose to initiate and coordinate their own investigation.

We are committed to dealing with all genuine concerns in a fair and appropriate way. Whether we will take corrective action in any particular case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation. The corrective action will be proportionate to the seriousness of the offense and may include disciplinary measures against the accused party, up to and including termination of employment or any other relationship that the offending party may have with Elastic. We will also take reasonable and necessary steps to prevent the occurrence of any similar issues in the future.

We will advise each reporter as to how Elastic will deal with the complaint, the expected timeframe of the investigation, and, at times, the results of the investigation. Due to confidentiality obligations and privacy and other considerations, there may be times when we will not be able to provide the specific details regarding the investigation or any resulting corrective or disciplinary action that was taken. Any information shared with the employee about the investigation and action taken must be treated as confidential information by the employee.

While we require Elasticians to report in good faith any wrongdoing that this Policy covers, we must warn you that deliberately filing a complaint with false information, providing false information during an investigation into a complaint, or refusing to cooperate with an investigation, will all be grounds for disciplinary action, up to and including termination of employment or any other working relationship with Elastic. Also, if you report Misconduct in which you have had personal involvement, the fact that you made the report does not exempt you from possible disciplinary actions or civil, criminal, or regulatory liability. However, Elastic's disciplinary actions will take into consideration that an employee has voluntarily reported the suspicions of Misconduct.

## **Whistleblower Protection Programs**

Depending upon your location, reporting on certain types of Misconduct may entitle you to protection or other incentives from government agencies. Elastic will not in any way limit or prohibit you from filing a charge or complaint with, or otherwise communicating or cooperating with or participating in

any investigation or proceeding that may be conducted by any government agency or commission, as provided by applicable law. You may disclose documents or other information to such government agencies, as permitted by law, without giving notice to, or receiving authorization from, Elastic. You may also accept an award from any government agency for information provided to them. However, you should take reasonable precautions to prevent the unauthorized use or disclosure of any confidential or proprietary information of Elastic to any parties other than the applicable government agency, and you should not disclose any Elastic attorney-client privileged communications or attorney work product. None of the agreements that you entered into with Elastic, or any of the policies to which you are subject, should be interpreted or understood to conflict with this Policy.

## Roles & Responsibilities

Role	Responsibility
Business Integrity Officer	Also known as the VP of Business Integrity, the Business Integrity Officer is the owner of the Global Whistleblowing Policy and may be consulted about suspicions of reportable Misconduct. The Business Integrity Officer leads the Business Integrity Office.
Business Integrity Office	All complaints, regardless of the reporting channel, are triaged through Elastic's Business Integrity Office, which is part of the Legal team. Contact the Business Integrity Office at <a href="mailto:ethics@elastic.co">ethics@elastic.co</a> .
Non-executive directors of Elastic	The non-executive directors of Elastic have overall responsibility for monitoring Elastic's responses to all received complaints. Where allegations are made against members of the Board of Directors of Elastic, the non-executive members of the Board can choose to initiate and coordinate their own investigation.
Lead Investigator	Assigned to investigate allegations requiring investigation. The lead investigator may work with other appropriate professionals to fully investigate the matter including various subject matter experts (e.g., Human Resources, privacy attorneys, information security professionals).
VP, Business Integrity	Oversee the implementation, administration, and review of this document.
Global Business Integrity Committee	Provide oversight and waiver of any provision of this policy.

## Definitions

**Misconduct:** Refers to any actual or suspected legal, regulatory, or criminal wrongdoing, which may include, but is not limited to: improper accounting, internal accounting controls, or auditing matters; criminal offenses, including fraud, bribery, and corruption; sales practice or market conduct violations; discrimination; any other failure to comply with applicable laws, rules, or regulations;

failure to comply with Elastic’s Code of Business Conduct and Ethics; failure to comply with any of Elastic’s published corporate policies, including our compliance policies addressing anti-bribery, export control, trade sanctions, data security, data privacy, insider trading, and similar compliance matters; or covering up the wrongdoing in any of the above categories.

**Whistleblowing:** Refers to reporting certain types of suspected wrongdoing that may entitle the reporter to external legal protections, which may include, but is not limited to: improper accounting, criminal offenses, sales practice violations, discrimination, failure to comply with laws or Elastic policies, or covering up wrongdoing.

**Elastician:** Any director, officer, or employee of Elastic.

**Good Faith Report or Complaint:** A report or complaint made with a genuine concern of non-compliance, without deliberately filing with false information.

**Reprisal, Threats, Discrimination, Harassment, Retribution, or Retaliation:** Negative consequences an individual might experience for submitting a complaint or participating in an investigation, against which Elastic provides protection.

## Related Information

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

- EU and UK Whistleblowing Policy
- Australia 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	This policy has been updated to broaden its scope beyond a US-centric focus, now including references to local policies where applicable. We've also clarified existing language, provided definitions for key terms, updated job titles (e.g., General Counsel to CLO), and corrected the referenced Elastic address. The Investigations section has been revised to align with current guidelines, and the approver for amendments has changed from the Board of Directors to GBIC. Finally, the document has been formatted to the new policy template.