



Whistleblowing policy

1. Purpose and Scope

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 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 categories 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.

Any past, present, or likely future wrongdoing will fall within this Policy if it concerns one or more of the following categories:

- Questionable accounting, internal accounting controls, or auditing matters;
- Criminal offenses, including fraud, bribery, and corruption;
- Any other failure to comply with applicable laws, rules, or regulations, including regulations of the U.S. Securities and Exchange Commission;
- 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 has been established by the Audit Committee of the Board of Directors of Elastic to enable all Elasticians to confidentially and anonymously submit complaints related to any of the foregoing misconduct. It applies to Elastic's operations worldwide and to all of its directors, officers, and employees, wherever they are located. It also provides the means for Elastic's contingent workers, customers, vendors, and all others to come forward with credible information about suspected wrongdoing.

2. Policy Statement

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.

3. 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 “Purpose and Scope” above, you must promptly take one of the following steps:

- Discuss the situation with your manager;
- If your manager is involved in the situation or you are uncomfortable speaking with your manager, send an email to ethics@elastic.co or contact the Chief Ethics & Compliance Officer, Senior Vice President of Human Resources, General Counsel, or Chief Financial Officer. You will find all of these individuals’ contact information on our Wiki pages dedicated to ethics and compliance;
- 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;
- Anyone (including employees, contingent workers, vendors, and all others) may also report ethical, legal, or regulatory concerns via the Ethics and Compliance Hotline by phone or via the web-reporting tool available at <https://www.elastic.co/about/trust>. You may choose to identify yourself or remain anonymous;
- 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., 800 West El Camino Real, Suite 350, Mountain View, California 94040, Attn: Chairperson of Audit Committee. We will forward all such communications to the Chairperson of our Audit Committee.

Employees can also consult Elastic’s Chief Ethics & Compliance Officer in confidence about suspicions of possible reportable misconduct. The contact information for the Chief Ethics & Compliance Officer is available on our Wiki pages dedicated to ethics and compliance. If requested by the employee, the Chief Ethics & Compliance Officer will escalate the matter by submitting a formal report.

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.

4. Investigations and Corrective Actions

The non-executive directors of Elastic have overall responsibility for monitoring Elastic's responses to all received complaints. In cases 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.

Investigation into all accounting, internal controls and auditing complaints will be overseen by the Audit Committee of the Board of Directors and are handled as directed by the Audit Committee in accordance with internal procedures. The Audit Committee will also investigate (or designate others to conduct or manage the investigation while overseeing their work) and determine appropriate disciplinary action with respect to any complaints that implicate any executive officer of Elastic.

All other complaints will be handled as follows. After a complaint is received, Elastic will acknowledge receipt within a reasonable time. We will then route the complaint to the appropriate professionals to comprehensively review and resolve the matter reported in the complaint. For example, depending on the nature of a complaint, it may be addressed by Human Resources, the Chief Ethics & Compliance Officer, or other seasoned professionals.

We are committed to dealing with all genuine concerns in a fair and appropriate way. We will take corrective action in any particular case that will depend 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 working 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 the results of the investigation and the specific resolution (so long as we are able to disclose this information). However, 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 make 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.

5. Whistleblower Protection Programs

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 federal, state, or local government agency or commission, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission, the Occupational Safety and Health Administration, and the National Labor Relations Board. 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.

6. Amendment

We are committed to periodically reviewing and updating this Policy to reflect the changing legal and business environment. All amendments must be approved by the Board of Directors or the Audit Committee of Elastic.

