



How We Work at Elastic
Elastic Code of Business Conduct and Ethics
Version 2

CEO's Introduction

As Elasticians, each one of us shares in a commitment to integrity in all that we do. Elastic's Code of Business Conduct and Ethics sets the standards for behavior at Elastic, and is the foundation upon which our reputation is built.

Elastic's Code of Business Conduct and Ethics supports our vision, mission, and strategic objectives for building and sustaining a truly great distributed company, and being recognized as trustworthy by our various stakeholders, including our community, users, customers, partners, employees and shareholders. The continued growth and success of Elastic depends upon maintaining the trust and confidence of these stakeholders. The way to maintain that trust is by creating value for our stakeholders by building great products, acting with integrity and professionalism, and demonstrating empathy while executing with the speed, scale, and relevance needed to support Elastic's business objectives.

This Code of Business Conduct and Ethics is based upon Elastic's Source Code (<https://www.elastic.co/about/our-source-code>), and is supplemented by policies and practices that help ensure we all understand how to act in accordance with it and apply it in our day-to-day interactions. We also have a Community Code of Conduct (<https://www.elastic.co/community/codeofconduct>) that governs our global user community and ensures we create spaces that foster communication, collaboration, and contributions. Whether it is within Elastic or outside Elastic, and regardless of position or tenure, each Elastician should strive to conduct themselves in accordance with high ethical standards.

Now, it is not possible for any code of conduct or ethics to cover every possible situation, nor should we expect it to. We entrust Elasticians with the freedom to take decisions that are consistent with the values and ethics of our company. All of us are obligated to report actual or potential infringements upon it. If you report a violation in good faith, we will take the report seriously and not tolerate retaliation against you. As CEO of Elastic, I stand by this promise.

Thank you for your strong support in helping Elastic achieve its goals and objectives. The Elastic Code of Business Conduct and Ethics is our guide to help all of us be successful.

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Part 1

Using the Code of Business Conduct and Ethics

This Elastic Code of Business Conduct and Ethics (the “**Code**”) has been put in place to provide rules to the members of the board of directors (the “**Board of Directors**”) and employees and personnel of Elastic N.V. and its subsidiaries (together, “**Elastic**”) (hereafter, collectively our “**employees**”) about what to do when faced with questions regarding business conduct and ethics related to our activities.

Any time you are about to make a decision involving an ethical matter, take a minute and think about whether it is the right one. Look into the Code for guidance, use the Ethical Tests set forth below, and beware of red flags. If you are still in doubt, ask! This is the golden rule in using the Code and will always steer you in the right direction.

If you have any reason to believe that ethical principles were or are being violated, report it immediately.

The Code is based on our core values which govern how we do business and sets out the responsibilities of Elastic towards its stakeholders. By establishing the principles of desired behavior and procedures, the Code is meant to navigate you through ethical and legal dilemmas and help you do the right thing and make the right decision.

The Code is binding on all employees and applies to all our business activities, locations and ventures and should be used alongside other Elastic policies, guidance, work rules, contracts and instructions. We are all responsible for both complying with the Code and acting in the spirit of the Code.

Each employee is expected (i) to read and understand this Code and its application to the performance of his or her business responsibilities and (ii) to conduct himself or herself in accordance with this Code and to seek to avoid even the appearance of wrongdoing or improper behavior. Those who violate the standards in this Code may be subject to disciplinary action, which may include suspension, termination and/or the reporting of violative conduct to appropriate regulatory and criminal authorities. We all have an obligation to report actual or potential infringements of this Code.

After carefully reviewing this Code, you must sign an acknowledgement, indicating that you have received, read, understood and agree to comply with this Code. The acknowledgement must be returned either electronically in a manner provided for by Elastic or to the person designated by the Company’s General Counsel as the compliance officer (the “**Compliance Officer**”) within ten (10) business days of your receipt of this Code and otherwise as required by Elastic.

Have Questions or Need Guidance on the Code?

If you have any questions about the Code, and/or desire guidance regarding the Code, you can contact Marielle Reints, the Compliance Officer, at marielle.reints@elastic.co, or +1 415 609 7124.

Some Ethical Tests

This Code cannot cover every situation that you will encounter. If you are faced with an ethical decision that you find difficult to resolve, ask yourself these questions about your intended response:

- **Is it legal and ethical?**
- **Is it consistent with our values and the Code?**
- **Is it beneficial to Elastic and its stakeholders?**
- **Would it be considered fair by those affected?**
- **Can I, my team, my department, and Elastic deliver the response to which I am committing?**

If you are still uncertain about the ethics or legality of an issue, seek additional guidance before proceeding. Begin by asking your manager. You can also contact Elastic's HR Department or Legal Department to raise a particular issue, or to ask for advice.

Red Flags – Some Warning Signs of Impending Unethical Behavior

If you hear someone say.....

"Well, maybe just this once"

"No one will ever know"

"It doesn't matter how it gets done as long as it gets done"

"It sounds too good to be true"

"Everyone does it"

"Shred that document"

"We can hide it"

"No one will get hurt"

"What's in it for me?"

"Just do it"

"Don't write it down"

"We didn't have this conversation"

.....the next action is very likely to be unethical!

Raising Concerns

If you have reasons to believe that a provision of the Code has been or is being violated, you have a responsibility to raise your concerns.

You can raise your concerns through your manager, higher level manager, the Human Resources Department, and the Legal Department. If these channels do not appear to be appropriate, or are not responsive, you may anonymously report your concern through Elastic's confidential Reporting Hotline, available at 800-916-7037.

Elastic will not permit retaliation for reports of misconduct by others made in good faith by employees, or for assisting in any investigation or process with respect to such misconduct. Malicious reports are strictly prohibited and will be sanctioned as a disciplinary offence.

See Elastic's WHISTLEBLOWER POLICY for a more detailed outline of reporting possibilities and an explanation of how reports are handled at Elastic.

Relations with our Stakeholders

Elastic's principal stakeholders are: our shareholders, employees, users, customers, business partners and the communities within which we operate.

Maintaining a relationship of mutual trust with each of the stakeholders is essential for the sustainability of our business. The Code provides guidance as to how we should conduct these relationships.

Our Employees

We at Elastic do our best to be an employer of choice through the creation of a positive, responsible and open working environment free of harassment and discrimination.

Relations with our employees are based on respect for the dignity of each and fair treatment for all.

Our Shareholders

We recognize that Elastic's success in the marketplace requires the trust and confidence of the investment community, including our global user community.

Elastic will protect the interests of shareholders and other investors.

Our Community and Customers

We treat our customers with respect, honesty and fairness.

People rely on Elastic to give them quality products and services. They are entrusting many of their most important data to our protection. Elastic provides products and services giving good value and consistent quality, reliability and safety.

We also have a separate Community Code of Conduct (<https://www.elastic.co/community/codeofconduct>) that governs our global user community.

Our Business Partners

Strengthening our marketplace relationships and opportunities depends on our reputation for conducting all aspects of our business with our business partners in a way that is mutually beneficial, as well as open.

Local Communities

Elastic recognizes that success in business depends on compliance with legal constraints, sensitivity to local customs and conventions governing business relationships, and a commitment to make a positive contribution to the sustainable development of the communities in which we work.

Part 2

Elastic's Code of Business Conduct and Ethics

In this part you will find basic rules on how to ethically and legally conduct your activities for Elastic.

Workplace Rules

1. Respect

At Elastic, we are committed to treating others with respect and dignity. We expect employees to conduct their activities with co-workers, customers and other stakeholders, as well as business partners with respect for all people.

2. No discrimination

We strive to maintain a working environment that is based on merit and inclusiveness. Elastic values diversity and will recruit and promote employees on the basis of their suitability for the job and Elastic's needs, without discrimination as to race, religion, national or ethnic origin, color, sex (including gender identity, sexual orientation, and pregnancy), age, marital status, genetic information or disability unrelated to the task at hand or other grounds according to legal regulations.

Elastic is an equal opportunity employer and makes employment decisions on the basis of merit and business needs.

3. Harassment and bullying

Elastic strictly prohibits harassment of any kind, including harassment on the basis of race, color, veteran status, religion, gender, sex, sexual orientation, age, mental or physical disability, medical condition, national origin, marital status or any other characteristic protected under federal or state law or local ordinance.

All employees are expected to be open, honest, and courteous with each other. Any form of harassment or bullying is prohibited.

4. Development

Elastic provides employees with opportunities to enhance their skills and capabilities, with the objective of enabling them to develop fulfilling careers and to maximize their contribution to our business. Employees have the responsibility to participate in relevant trainings.

5. Remuneration

Elastic is committed to paying fair wages, salaries, and benefits in accordance with applicable laws and industry standards.

6. Use of Elastic assets

All employees, agents and contractors are responsible for the proper use of company assets. Employees shall use Elastic's assets, including your time, work and work product; cash and accounts; physical assets, such as inventory, equipment, vehicles, computers, systems, facilities and supplies; intellectual property, such as patents, copyrights, trademarks, inventions, technology and trade secrets;

and other proprietary or nonpublic information in accordance with internal policies and for business purposes only, unless prior express, written permission has been given for such other use.

Elastic's electronic communication equipment and related services (including email, Internet, mobile, bulletin boards, fax machines, file storage) must be protected from unauthorized external access or use. Under no circumstances should they be used for transmitting illegal, offensive, obscene or otherwise inappropriate materials.

You have an obligation to use all reasonable efforts to safeguard Elastic's nonpublic information. You may not disclose nonpublic information to anyone outside of Elastic, except when disclosure is required by law or when disclosure is required for business purposes and appropriate steps have been taken to prevent misuse of that information. This responsibility includes not disclosing nonpublic information in Internet discussion groups, chat rooms, bulletin boards or other electronic media. In cases where disclosing nonpublic information is required or necessary, you should coordinate with the Legal Department. The misuse of nonpublic information is contrary to company policy and may also be a violation of law.

7. Insider trading

Material nonpublic information is anything that an employee learned in connection with work for Elastic that has not been revealed publicly but may be considered important by investors when making investment or trading decisions. Examples of material nonpublic information include (but are not limited to):

- Information that Elastic is about to win or lose a large contract
- Information that Elastic is about to announce a major change in strategy or an important new product
- Information that Elastic is about to acquire a company or sell a division or product
- Information about quarter-end or year-end financial data
- Information that Elastic is about to repurchase shares, change dividend policies, or announce a stock split
- Information about developments in lawsuits or regulations that will significantly impact Elastic
- Any similar information about an Elastic customer, vendor or other business partner, such as information about an impending joint venture

It is material nonpublic information even if the information is discovered by accident.

Employees are prohibited, directly or indirectly through others, from making stock trades while in possession of material nonpublic information. Employees may not disclose material nonpublic information to anyone, or even suggest to anyone that it might be a good time to buy or sell Elastic stock, while in possession of material nonpublic information.

Employees having access to material nonpublic information should consult with the General Counsel before making any trades or sharing any information, or, if the General Counsel is not available, the Chief Financial Officer.

For more information on this subject, see Elastic's INSIDER TRADING POLICY.

8. Conflict of interest

No Elastic employee may be involved in an activity for personal gain which is in conflict with Elastic's business interests.

Any personal interests or interests of one's immediate family member in relations to Elastic's business must be disclosed.

9. Health, safety and security

Elastic places a high priority on the health, safety and security of employees and their work environment in line with the best industry practices.

Employees have a duty to take every reasonable precaution to avoid injury to themselves, their colleagues and members of the public and comply with internal policies and instructions. This includes reporting to work free from the influence of any substance that could inhibit safe and acceptable conduct.

Doing Business

1. Gifts and entertainment

Gifts and entertainment may only be offered by Elastic employees to customers in the ordinary course of business, provided they are reasonable and modest and neither influence the recipient's objectivity nor could be construed as a means to make the recipient feel obligated. Any business gift or entertainment should be consistent with customary business practice and should be reasonable and appropriate for the circumstance. If you are in doubt whether a gift or entertainment is reasonable and modest, you must obtain prior approval from your manager. Remember to disclose any gifts or hospitality to your manager.

The receipt of gifts or substantial favors by Elastic employees from vendors and other business partners may be seen as an improper inducement to give some concession in return to the donor. Employees must observe the following principles:

- **Gift and favors must not be solicited.**
- **Gifts in the form of money must never be accepted.**
- **Reasonably small gifts and hospitality may be accepted provided they do not place the recipient under any obligation, are not capable of being misconstrued, and can be reciprocated at the same level.**
- **Any offer of other gifts or favors of unusual size or questionable purpose must be reported immediately to your manager. The manager will decide whether you may accept such gifts or favors, or refuse them.**
- **All gifts must be reported to your manager.**

Reasonable gifts that may be accepted without prior approval of your manager include marketing-branded items of minor value, such as pens, notepads, diaries, USBs, or offers of reasonable business meals of customary value.

No employee shall offer, promise, give or authorize the gift of anything of value directly or indirectly to an official or employee of a government or a government-controlled entity in an effort to secure official

action; or to anyone, including a government official or employee or a customer, in an effort to induce that person or someone else to perform work duties improperly or otherwise disloyally, or to reward past improper or disloyal performance. Such behavior may constitute a bribe, which is a criminal offense in most countries. Business amenities should not violate law or create an appearance of impropriety. Employees should avoid providing or accepting any cash payment, or other business amenity that can be construed as a bribe or payoff. All company funds expended for business amenities must be accurately recorded in Elastic's books and records.

When in doubt as to whether a contemplated payment or gift may violate applicable anti-corruption laws, contact your manager or the Legal Department before taking any action.

For more information on this subject, see Elastic's ANTI-CORRUPTION POLICY.

2. Antitrust and competition

Many countries have antitrust (US) and competition (EU) laws that are designed to ensure that competition is fair and honest. Our commitment to fairness includes respecting the rights of our competitors to compete lawfully in the marketplace and abiding by all applicable laws in the course of competing. Such laws typically prohibit agreements or actions among competitors that might restrain trade or reduce competition. Under most antitrust laws, companies cannot agree with any competitor to:

- Fix or control prices
- Boycott specified vendors or customers
- Allocate products, territories or markets
- Limit the production or sale of products

Additionally, where Elastic has a "dominant" market share in any product area, it may be subject to additional laws that prohibit abuse of that dominant position.

Competition laws also govern, usually quite strictly, relationships between Elastic and its competitors. Collusion among competitors is illegal, and the consequences of a violation are severe. You must not enter into an agreement or understanding, written or oral, express or implied, with any competitor concerning prices, discounts or other terms or conditions of sale, profits or profit margins, costs, allocation of product, customers, markets or territories, limitations on production or supply, boycotts of customers or suppliers, or bids or the intent to bid, or even discuss or exchange information on these subjects.

Elastic is committed to obeying both the letter and spirit of these laws, which are often referred to as antitrust, consumer protection, competition or unfair competition laws. Although the spirit of these laws is straightforward, their application to particular situations can be quite complex. To ensure that Elastic complies fully with these laws, you should have a basic knowledge of them and should promptly involve our Legal Department when questionable situations arise.

No employee may engage in conduct prohibited by antitrust and competition laws.

3. Advertising and marketing

We will avoid practices which seek to increase sales by any other means than legitimate marketing efforts.

You shall not use untruths, concealment and overstatement in any advertising and other public communications. No one at Elastic shall deliberately give inadequate or misleading descriptions of products or services to anyone.

We are bound to provide a high standard of after-sales service in our efforts to maintain customer satisfaction and cooperation. Elastic employees shall endeavor to provide prompt redress if things go wrong, so that all complaints are resolved quickly, fairly and recorded appropriately.

4. Confidentiality

Confidential information is any information about Elastic or its customer or business partners that is not generally known to the public and either Elastic or Elastic's customers or business partners have a legitimate interest in protecting such information from disclosure. Unauthorized disclosure could damage Elastic or give unfair advantage to others.

In the course of your involvement with Elastic, you may come into possession of information that has not been disclosed or made available to the general public. This nonpublic information may include, among other things:

- financial data and projections including but not limited to sales bookings and pipelines;
- proprietary and technical information, such as trade secrets, patent applications, inventions, product plans and customer lists;
- information regarding corporate developments, such as business strategies, plans for acquisitions or other business combinations, divestitures, major contracts, expansion plans, financing transactions and management changes;
- personal information about employees; and/or
- nonpublic information of customers, business partners and others.

Employees shall not disclose confidential information to third parties or colleagues that do not need to know such information without prior authorization. Employees are expected to actively protect confidential information.

Confidential information may be disclosed on a need to know basis only. Use good judgment before disclosing confidential information to anybody who claims to need it. Business partners should be contractually bound by a duty of confidentiality when receiving Elastic's confidential information.

Confidential information includes, but is not limited to, information about new products, pricing, software development, source codes, data of third parties, personal data, inside information, and Elastic's strategy. Elastic is bound by a duty of confidentiality for any information received from Elastic's customers and business partners.

5. Data protection

Elastic collects and processes personal data, mainly of its customers and employees. Personal data is any information about an identifiable person. Employees shall keep personal data confidential. You must handle the nonpublic information of others responsibly and in accordance with our agreements with them. Nonpublic information of others includes notes, reports, conclusions and other materials prepared by an employee based on the nonpublic information of others.

Personal data can be collected and processed only to the extent that is necessary for the given purpose.

Seek to access only such personal data that is necessary for the performance of your job. Do not use personal data for your own benefit or private purposes.

Elastic will only collect and retain personal information from employees that is required for the effective operation of Elastic or as required by law.

All Elastic employees shall comply with the data privacy policies and instructions issued by Elastic.

6. Information security

Elastic strives to protect information in its possession from any misuse, be it information about users, customers, business partners, employees or Elastic itself. Employees are expected to protect any data, information, hardware and software in Elastic's possession from unauthorized access, use, disclosure, modification, recording or destruction.

All Elastic employees shall adhere to all security measures and comply with Elastic's policies on information security.

7. Paying our suppliers

Elastic will pay its vendors, subcontractors, distributors and agents in accordance with the agreed upon terms.

8. Export and Import of Elastic's Products

When moving across national borders, Elastic's products are subject to various export and import regulations. These regulations may prohibit import, export and re-export of Elastic's products to certain countries or even to certain individuals. Export is not only limited to goods physically crossing the borders, but it also equally includes software downloads or services provided from one country to another. Elastic's policies are organized to support compliance with all applicable export and import laws, and we aim to ensure that our distributors also comply with these regulations.

Export and import regulations impact not only sales transactions, but also other areas of Elastic's business, such as product development, web settings, finance, customer support, etc. All employees and persons working for Elastic must thus familiarize themselves with the relevant rules and involve Elastic's Legal Department where necessary.

For more information on this subject, see Elastic's EXPORT CONTROL MANUAL.

Our Relations with Local Communities

1. Laws, rules and regulations and local customs

Elastic respects the traditions and cultures of each country in which it operates. We aim to comply with all laws and regulations wherever we operate. Where there is conflict between local laws or customs and the principles and values set out in the Code, you must apply whichever sets the highest standard of behavior.

2. Community relations

We will promote strong relationships with the communities of which we are a part.

Employees are encouraged to participate in community and civic affairs. However, they are expected to avoid any outside personal interest or activity (whether or not for profit) that will interfere with their duties to Elastic.

Elastic will look for ways of supporting communities in which it operates through charitable donations and educational and cultural contributions, which will be made within a policy set and reviewed by the Board of Directors.

3. Human rights

While the primary responsibility for the protection of human rights lies with governments and international organizations, where it is within our power to do so, we will promote the observance of human rights in the countries where we operate. We support the principles set forth in the Universal Declaration of Human Rights.

4. Care of the environment

Where it is within our power to do so, we will prevent, or otherwise minimize, mitigate and remediate any harmful effects of our operations on the natural environment and finite resources.

5. Political donations and lobbying

Elastic does not directly or indirectly participate in party politics or make payments to political parties or individual politicians. We represent views to governments and others on matters affecting our business interests and those of shareholders, employees and others involved in our activities. Elastic's assets — including company funds, employees' work time and company premises and equipment — must not be used for, or be contributed to, political campaigns or political activities under any circumstances.

6. Quality of Public Disclosures

Elastic has a responsibility to provide full and accurate information in our public disclosures, in all material respects, about our financial condition and results of operations. Our reports and documents filed with or submitted to the United States Securities and Exchange Commission and our other public communications shall include full, fair, accurate, timely and understandable disclosure, and Elastic has established a Disclosure Committee to assist in monitoring such disclosures.

7. Tax and record keeping

No one at Elastic shall knowingly avoid tax or legal obligations with respect to record keeping. We shall endeavor to make sure that we are not exploited for the purposes of tax evasion by business partners and other stakeholders.

Employees shall record all financial transactions, including those where payment is made in cash.

All taxable benefits to which employees are entitled to will be listed and declared for tax purposes.

Every employee is responsible for making an honest declaration of business expenses. Fraudulent behavior by employees will not be tolerated.

Business Conduct Values

Elastic understands that our customers and business partners expect us to manage our business ethically, transparently, and responsibly. However, it is not possible for Elastic to agree to each customer's or partner's Supplier Code of Conduct or similar policy, and that is why we have adopted the following set of Business Conduct Values, which apply to all of our personnel worldwide.

1. Compliance with Labor Laws

No Forced Labor: We will not use forced or involuntary labor of any type (e.g. forced, bonded, indentured or involuntary prison labor). All employment with Elastic is voluntary.

No Child Labor: We will not use child labor. "Child" refers to any person employed under the minimum age for employment in the relevant jurisdiction. We support the use of legitimate workplace apprenticeship programs which comply with all the laws and regulations applicable to such apprenticeship programs.

Wages and Benefits: We will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally-mandated benefits.

Working Hours Laws: We will not exceed prevailing local work hours and will appropriately compensate overtime. We will not force our employees to work more than the allowable time required to work without their consent.

2. No Discrimination:

We will not discriminate in hiring and employment practices on the grounds of race, religion, national or ethnic origin, color, sex (including gender identity, sexual orientation, and pregnancy), age, marital status, genetic information or disability.

3. Respect and Dignity:

We will treat all our employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment.

4. Protection of Freedom of Association:

We shall respect the legal rights of employees to join or to refrain from joining worker organizations, including trade unions. We have the right to establish favorable employment conditions and to maintain effective employee communications programs as a means of promoting positive employee relations.

5. Protection of the Environment:

We will operate in a manner that is protective of the environment. At a minimum, we will comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.

6. Compliance with Health and Safety Laws:

We will provide our employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Consistent with these obligations, we have effective programs that encompass life safety, incident investigation, chemical safety, and ergonomics.

7. Ethical Dealings:

We will observe the highest ethical principles in performing work. We will be familiar and will strictly comply with all laws and regulations on bribery, corruption, and prohibited business practices. We have not and will not corruptly offer, promise, or make or agree to make any payments or gifts, of money or anything of value, directly or indirectly to anyone for the purpose of influencing decisions.

8. Compliance with Laws, Regulations, and Other Legal Requirements:

We will comply with all applicable laws and regulations in all locations where we conduct business.

Part 3

Implementing the Code

This Code applies to all Elastic employees and anyone acting on our behalf.

Adherence to the provisions of the Code is a condition of employment or engagement with Elastic.

Any violation of the Code of Business Conduct and Ethics will be considered to be a breach of work discipline and may lead to disciplinary action.

Managers and supervisors have an additional responsibility to ensure that employees understand the Code and values that underpin it and are informed of the requirements relating to their job.

If you have reason to believe that a provision of the Code has been or is being violated, you may raise your concerns through different channels. Elastic will not tolerate any kind of retaliation for reports or complaints regarding misconduct that were made in good faith. Open communication of issues and concerns by all employees and business partners without fear of retribution or retaliation is vital to the successful implementation of this Code. See Elastic's WHISTLEBLOWER POLICY for a more detailed outline of reporting possibilities and an explanation of how reports are handled at Elastic.

We will implement the Code throughout Elastic by holding workshops for all existing employees and making ethics training part of the basic program for all employees. Ethical awareness will be maintained by regular training sessions in which relevant issues will be discussed.

Elastic will monitor its ethical performance regularly. Elastic's independent auditors may be asked to report on any practice they discover in the course of their work which appears to breach Elastic's Code of Business Conduct and Ethics.

Waivers and amendments

Except as otherwise provided in the Code, the Board of Directors or its designated committee must review and approve any matters requiring special permission under the Code for a member of the Board of Directors or an executive officer. Except as otherwise provided in the Code, the General Counsel' or, if the General Counsel is not available, the Chief Financial Officer, must review and approve any matters requiring special permission under the Code for any other employee, agent or contractor.

Any waiver of any provision of this Code for a member of the Board of Directors or an executive officer must be approved in writing by the Board of Directors or its designated committee and promptly disclosed, along with the reasons for the waiver, to the extent required by law or regulation. Any waiver of any provision of this Code with respect to any other employee, agent or contractor must be approved in writing by the General Counsel' or, if the General Counsel is not available, the Chief Financial Officer.

Copies of approvals and waivers will be retained by Elastic.

Amendments to, or waivers of, this Code will be disclosed on Elastic's website.