



Policy on Corporate Political Contributions and Industry Associations

Applicability

This Policy on Corporate Political Contributions and Industry Associations (the “Policy”) governs corporate political contributions and other campaign expenditures by ServiceNow, Inc. and its majority-owned subsidiaries (the “Company”).

Political Activities of Employees

While the Company’s employees may participate as individual citizens in the political process, their decision to do so is entirely personal and voluntary. Employees engaging in political campaign activities are expected to do so as private citizens and must always make clear that their views and actions are their own and not those of the Company. Employees must not use their position with the Company to coerce or pressure other employees to make contributions to support or oppose any political candidates, elections, or ballot initiatives. Employees engaging in political activities must also adhere to the applicable provisions of the Company’s Code of Ethics.

Contacts with Government Officials and Representatives

The Company’s employees must promptly consult the Company’s Global Government Relations (“Government Relations”) Department or the Legal Department on issues that involve U.S. federal, state, and local government officials as well as foreign policymakers. Only the Company’s officers and those selected by the Government Relations Department or the Legal Department may express views of the Company on legislation, ballot initiatives, regulations, or government action. Other employees may communicate the Company’s views only with specific guidance from the Government Relations Department.

Corporate Political Contributions and Industry Associations

Public policy issues have the potential to impact the Company’s business, its employees, business partners, shareholders, and the communities in which the Company operates. The Company’s management believes that in certain cases it may be appropriate, and in the Company’s best interests, to use its resources to (i) make Political Contributions¹ to political parties, candidates for public office, or political organizations and/or (ii) contribute or pay membership fees to trade and industry associations and coalitions (“Industry Associations”) engaged in political activity.

¹ “Political Contributions” include any gift, loan, advance or deposit of money or anything of value (a) for the purpose of influencing any federal, country, state or local election for political office or ballot initiative or (b) to pay debt incurred in connection with any an election or ballot initiative.

The Nominating and Governance Committee of the Company's Board of Directors has adopted this Policy to ensure that Political Contributions and contributions to Industry Associations are made in a manner consistent with the Company's core values and to protect or enhance shareholder value, without regard to the private political preferences of company officers. The use of any Company funds for Political Contributions or contributions to Industry Associations must follow this Policy's approval guidelines.

The Company has determined not to make direct independent expenditures or pay for any electioneering communication in U.S. federal campaigns. The Company does not sponsor any political action committees.

Political Contribution Approval Guidelines

Any Political Contribution made by the Company must be approved in advance by the relevant geographic or territorial director of the Government Relations Department and must support a political candidate, political party, or ballot initiative that the geographic or territorial director determines is beneficial to the long-term business interests of the Company. In determining whether or not to approve a request to make a Political Contribution, the geographic or territorial director of the Government Relations Department should examine a variety of factors, including, but not limited to, the merits of the candidate, election or ballot initiative, the value of the contribution to the election or ballot initiative, the quality and effectiveness of the organization to which the contribution will be made, and the appropriateness of the Company's level of involvement in the election or ballot initiative. Further, such geographic or territorial director should consult with, as appropriate, the Head of the Government Relations Department and members of the Legal Department, the Compliance Department and Company management.

In addition to the approval of such geographic or territorial director, any Political Contribution to a candidate, political party or ballot initiative requires the approval of the General Counsel.

All Political Contributions also are required to comply with the Company's Code of Ethics, the Foreign Corrupt Practices Act and all applicable laws and regulations in the jurisdictions in which the contributions are made.

Industry Association Approval Guidelines

Membership fees or contributions to an Industry Association must be approved in advance by the relevant geographic or territorial director of the Government Relations Department and must support objectives that such director determines are beneficial to the long-term business interests of the Company.

Donations to 501(c)(4) Organizations

The Company may make contributions to an entity operating under Internal Revenue Code ("IRC") section 501(c)(4). By law, these entities are permitted to use a portion of membership dues for political activities. Some of the groups to which the Company belong may engage in political activities.

Federal Elections

No Company funds should be used for contributions related to a U.S. federal election (whether to a candidate, political party, or political action committee) because it may violate the law. In some cases, Company funds may be used to support federal political activity with the advance approval of the Head of the Government Relations Department and the General Counsel.

Board Oversight

Management will report annually to the Nominating and Governance Committee regarding the Company's compliance with this Policy and provide a review of the overall strategic priorities for Political Contributions and Industry Association affiliations.

Any Political Contribution made by the Company in the U.S. to a candidate, political party or ballot initiative, or any membership fees or contributions to an Industry Association, will be reported to, and reviewed by, the Nominating and Governance Committee.

Disclosure

The Company's annual voluntary disclosure on its website will include the following (beginning for the 2022 calendar year):

- a copy of this Policy;
- any direct corporate Political Contributions made in the U.S. to a candidate, political party or ballot initiative and campaign, political action committees, and 527 organizations;
- donations from Company funds to an entity operating under IRC section 501(c)(4) that may be used for political purposes; and
- Industry Associations that received dues from Company funds and the portion of those dues used for political purposes.

The Company also must comply with applicable laws and regulations relating to the reporting of corporate Political Contributions.

Amendments to the Policy

Amendments to the Policy must be approved by the Nominating and Governance Committee.