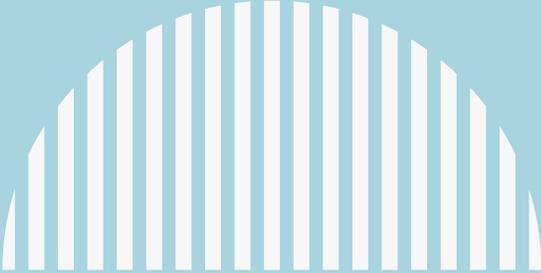


Our Code of Ethics

How we make our world of work, work.



A Code based on values

At ServiceNow, we make the world of work, work better for people. Our purpose is core to how we think, act, partner, innovate, and execute each and every day. Living and breathing our purpose requires all of us working together in the same way, towards the same goals, with our customers always at the heart of everything we do.

So, how do we do it?

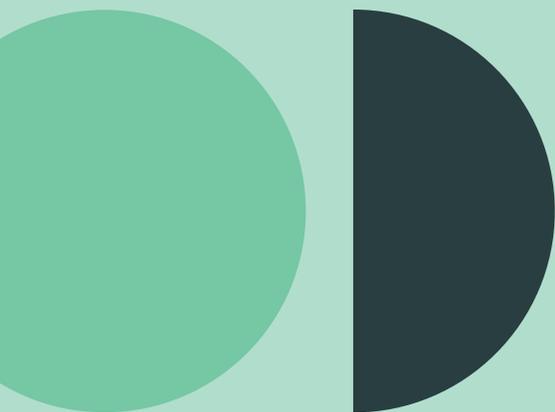
We show up every day with our purpose leading the way, aligned to our core values, and we always do the right thing by keeping **integrity**, **teamwork**, and **trust** top of mind. This not only applies to ServiceNow's employees and leaders, but our entire community including contingent workers, executive officers, and Board of Directors.

We recognize that decisions are not always clear-cut. That's why our Code provides an overview of some of our specific policies, as well as the framework to help us navigate areas of uncertainty and apply our values to all situations.

- Stay hungry and humble**
- Embrace diversity, create belonging**
- Enjoy the journey**
- Win as a team**
- Innovate and execute**
- Deliver customer success**

Our values and behaviors come together as our Code of Ethics (our "Code"). And, the true function of our Code is to act as our cultural guiderails and provide tools and resources to help you do the right thing, time after time, no matter the circumstances.

Because, to make the world of work, work better for people, we must make our world of work the best that it can be.



Integrity



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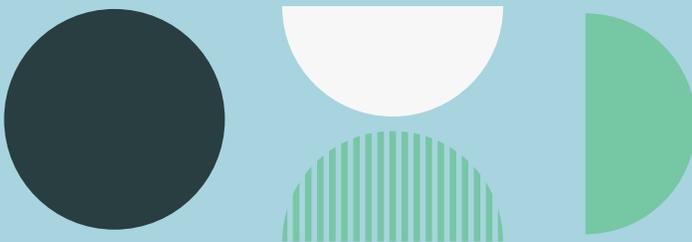
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Do the right thing

Integrity isn't a part-time principle. We always do the right thing – for our Company, our teams, our customers, our business partners, our shareholders, and the communities where we live, work, and play. That's why our core values are deeply embedded in our Code. Our reputation as a Company is a direct result of what each of us does individually. So, we're all responsible for upholding our reputation by acting with integrity, aligned to our values, and following our Code each and every day.

Contacts:

Reach out to your manager, Global Talent, or Legal, Ethics & Compliance for support if you'd like help evaluating whether something complies with our Code. If you think someone might be violating our Code – raise it – using the channels shown in the "Speak Up" section.

Speak Up

No tolerance for retaliation

ServiceNow does not tolerate retaliation against anyone who (i) raises a concern in good faith, (ii) participates in an internal investigation, or (iii) refuses to engage in conduct that violates applicable laws or Company policies. Retaliation against someone for engaging in these activities will result in disciplinary action, up to and including termination of employment.

Doing the right thing means speaking up whenever something doesn't seem right. Not all of the details are needed to raise a concern – just a good faith belief that misconduct or violations of our Code may be occurring. All concerns are taken seriously and investigated promptly and thoroughly, as appropriate.

We have several ways you can let us know when you see, hear, or feel something is wrong. Please raise concerns under the reporting methods you feel comfortable with below. If you feel more comfortable raising concerns anonymously, you can do so to the extent permitted by applicable law.

Contacts:

- Contact your manager, Global Talent, or Legal, Ethics & Compliance
- Email legal_compliance@servicenow.com
- Submit a concern online at www.servicenow.ethicspoint.com
- Call the Speak Up Line at (855) 869-7272 or the number listed for your country at www.servicenow.ethicspoint.com
- Contact a member of our executive team ("P4 member")
- Contact the ServiceNow Board of Directors by sending a letter to our Santa Clara, CA, headquarters labeled "Attention: Board Audit Committee Chair"

Need to know more?

- [Whistleblower and Complaint Policy](#) (the Speak Up Policy)



Address conflicts of interest

Those within the ServiceNow community are expected to act with integrity and in the best interest of ServiceNow. That means avoiding situations where our personal interests conflict, or appear to conflict, with ServiceNow's interests. And if a potential issue arises, your first instinct should be transparency.

Examples of potential conflicts of interest:

- Using ServiceNow business opportunities, confidential information, assets, or services to benefit another entity, individual, or yourself.
- Participating in outside employment or consulting activity without prior approval.
- Serving on a Board of Directors for a non-profit or for-profit organization or company, without prior approval.
- Hiring or supervising a family member or household member.
- Engaging in a romantic relationship with a subordinate employee.
- Accepting gifts, entertainment, or favors from a customer, potential customer, sales partner, competitor, vendor, or supplier in violation of our Conflict of Interest Policy.

Need to know more?

- [Conflict of Interest Policy](#)
- [Related Party Transactions Policy](#)



No insider trading

We're honest and respectful in every trade we make, and that starts with making sure we follow all applicable financial laws. We don't trade Company securities if we're in possession of material non-public information about the Company. It's not only against our Code – it's illegal, too.

Similarly, it's illegal to "tip" or share material non-public information with others so they can trade based on such information.

Our Code for avoiding insider trading:

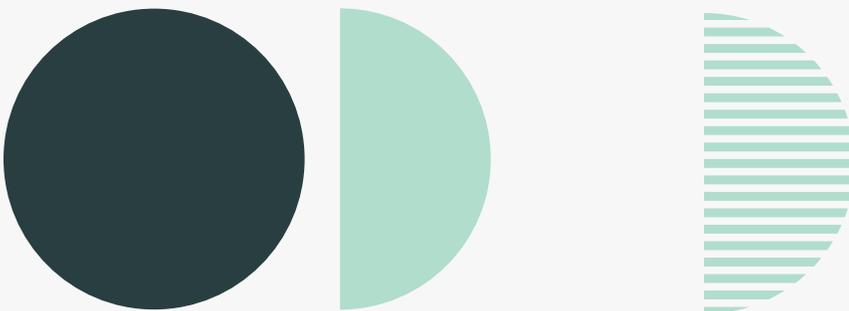
- Information is "material" if there is a substantial likelihood that a reasonable investor would consider it important when making an investment decision.
- Information is "non-public" until the Company broadly communicates it, and it has been absorbed by the investing public. We don't trade in Company securities while in possession of material non-public information, disclose material non-public information, or give trading advice about the Company.

Contacts:

Reach out to our Insider Trading Team with questions.

Need to know more?

- [Insider Trading Policy](#)



Comply with all applicable laws

We do the right thing for ServiceNow, our customers, our partners, and the communities in which we operate – without exception. We demonstrate our commitment to this by complying with all applicable laws and regulations.

Our Code for legal compliance:

- We comply with all applicable anti-corruption, anti-money laundering, sanctions, anti-boycott, import and export laws, and regulations that govern who we can do business with, how we can do business, where we can do business, and the transfer of sensitive technologies.
- We are truthful and transparent when interacting with government officials and representatives, and we comply with all applicable lobbying laws.
- We are committed to respecting human rights, and upholding all applicable human rights laws, rules, and regulations, including those pertaining to child labor, modern slavery, and human trafficking.
- We are committed to adhering to all applicable labor laws, rules, and regulations, including those pertaining to minimum wages and working hours.
- We are committed to engaging in responsible and sustainable business practices.

Need to know more?

- [Global Procurement Policy](#)
- [Anti-Corruption Policy](#)
- [Anti-Human Trafficking Policy](#)
- [U.S. Public Sector Code of Ethics Addendum](#)
- [U.S. Public Sector Gifts & Gratuities Policy](#)
- [U.S. Export and Trade Controls Policy](#)



No improper payments

U.S. Public Sector Guidance

- There are specific laws and regulations that apply to interactions with U.S. government employees and U.S. government contractor employees. For more information specific to those interactions, please refer to the U.S. Public Sector Gifts & Gratuities Policy.
- If the contemplated gift or payment relates to a U.S. government official, employee, or contractor, reach out to the U.S. Public Sector Compliance Team for guidance.

Ethics and integrity come first at ServiceNow. If it comes down to losing business or gaining it unethically, the choice is clear – we would rather lose business and maintain our integrity.

Anti-corruption laws and Company policy prohibit us (and third-parties acting on our behalf) from offering, authorizing, or providing anything of value in order to obtain an improper business advantage or influence a government official.

ServiceNow can be held accountable for the actions of third-parties acting on our behalf, including our channel partners, vendors, and consultants. That's why we make it clear to our third-parties that ServiceNow requires full compliance with all applicable anti-corruption laws. We Speak Up if we have concerns about a third-party's conduct or our own conduct.

Our Code for payments:

- We never offer or pay bribes or kickbacks to anyone. We don't allow our partners to do it either.
- Gifts or hospitality we offer to a government official or customer must be modest, appropriate, directly tied to a legitimate business purpose, and in compliance with applicable laws.
- We never offer or provide cash, gift cards, or travel stipends to a government official or employee of a state-owned enterprise (such as a public hospital or university).
- We do not make charitable or political contributions in exchange for an improper business advantage or in connection with any official governmental decision.
- We do not make hiring decisions to improperly benefit a customer or government official.
- We hold ourselves to the same standards – we do not request or accept kickbacks or bribes.

Contacts:

Unless you are certain that a proposed payment or fee is permissible under the Anti-Corruption Policy and applicable law, reach out to our Anti-Bribery and Anti-Corruption Team before proceeding.

Need to know more?

- [Anti-Corruption Policy](#)
- [Global Travel, Expense, and Credit Card Policy](#)
- [U.S. Public Sector Code of Ethics Addendum](#)
- [U.S. Public Sector Gifts & Gratuities Policy](#)

Compete fairly

As market leaders, we want to be known for always leading the right way – with products, services, and solutions that deliver value to our customers – not through unethical practices. When we compete, we do it fairly, in ways that build trust with our customers and each other. We compete in compliance with our policies and procedures. We comply with the antitrust and competition laws of all countries in which we do business.

Our Code for competing fairly:

- We do not enter into formal or informal agreements to limit competition, including agreements to fix prices, allocate customers or geographic territories, or reduce the quality of our products.
- We do not discuss prices, discounts, incentives, demographic divisions, customers, research, and development plans, strategic initiatives, or other non-public competitively sensitive information with our competitors.
- We do not discuss our bidding plans with our competitors, or otherwise compromise competitive bidding processes, or assist others in doing so.
- We do not set or discuss the price that our sales partners offer to customers.
- We do not use any illegal or unethical means to seek or acquire information about other companies, competitors, or customers.

Need to know more?

- [U.S. Public Sector Code of Ethics Addendum](#)
- [U.S. Public Sector Gifts and Gratuities Policy](#)

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Customer success as a leading digital transformation company can't exist without trust and fair competition.



Kevin Haverty
Chief Revenue Officer

Uphold our commitments

Applicability

Our Code applies to everyone in the ServiceNow community, from executive officers to contingent workers, and members of our Board of Directors. All are responsible for upholding the standards set forth in our Code, ServiceNow policies, and applicable laws.

Oversight

Our Board of Directors established the standards in our Code and, directly or through its committees, oversees its compliance. Our General Counsel is responsible for ensuring adherence to our Code and, while serving in this capacity, reports directly to the Board of Directors and its committees.

Violations

Violations of our Code, other ServiceNow policies, or applicable laws can result in disciplinary action, up to and including termination of employment.

Waivers and Amendments

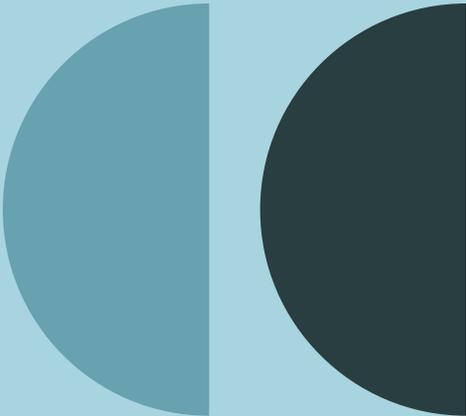
Waivers of provisions of our Code may be made only by our General Counsel, or, with respect to directors, executive officers, and senior financial officers, by the Board of Directors or the appropriate Board Committee. In addition, any amendments to our Code must be approved by the Board of Directors. When required, any waiver or amendment will be reported as required by federal securities laws and applicable stock exchange rules.

Our Code for upholding our commitments:

- Review and understand our Code.
- If you don't understand something about our Code, our policies, or certain laws, ask.
- Speak Up if you see or hear about potential violations of our Code, ServiceNow policies, or applicable laws.
- Be truthful and cooperate fully in internal investigations.
- Complete all required training to show you understand the principles set forth in our Code, ServiceNow policies, and applicable laws.



Teamwork



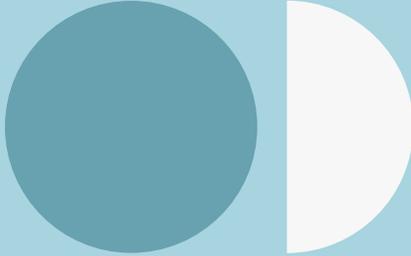
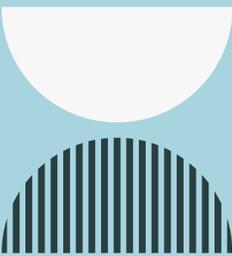
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Lead by example

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Partner and collaborate
carefully

12
Embrace diversity, create
belonging



Lead by example

Everyone at ServiceNow is responsible for upholding the culture and values that are outlined in our Code. When each of us accepts that responsibility and commits to leading by example, our team is as strong as it can be.

With that in mind, you should pay attention to how decisions are made, wins are celebrated, losses are handled, consensus is reached, and debate is fostered. Our success largely depends on all of us embracing that accountability and leading by example in every action.

Our Code for leading by example:

- Listen to your team, take their concerns seriously, and escalate concerns when you feel you need additional support.
- Talk with teams about acting with integrity and doing the right thing. Make it known that at ServiceNow, we all must align to our policies and all applicable laws.
- Emphasize that while reaching our goals and executing on our priorities matter, how we achieve them is equally important.
- Listen. Good leadership allows for two-way dialogue. Ask questions and check in regularly, particularly about the challenges your team is facing.

Communicate accurately

Our commitment to building and maintaining a strong reputation and brand relies on each of us aiming for the same target and projecting the same information. We must ensure that internal and external audiences all receive consistent – and accurate – information about our Company.

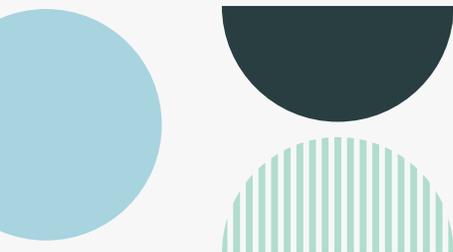
When it comes to addressing the public, we must be truthful and provide accurate information. Our statements can't be misleading, and we must speak with one unified voice to ensure we are upholding our commitments to investors and the public. This includes any commentary about, or from, the Company on social media.

Our Code for communicating accurately:

- All financial disclosures about the Company must be fulsome, accurate, and timely.
- All communications about our products, including advertising and promotional statements, must be accurate.
- We never disclose confidential or non-public information about ServiceNow without authorization.
- When contacted by the press, or when unsure about external speaking opportunities, direct inquiries to our Global Communications Team.

Need to know more?

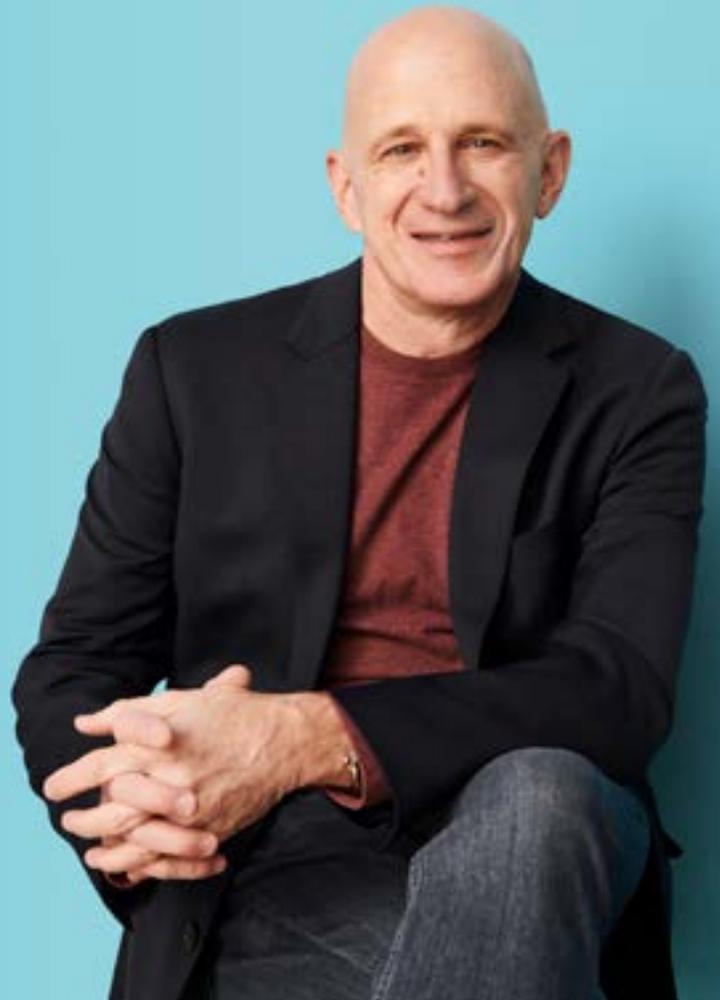
- [Social Media Policy](#)
- [Corporate Communications Policy](#)



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**Now more than ever,
our words and actions
matter. Doing the right
thing is essential to
living our purpose.**

Alan Marks
Chief Marketing and
Communications
Officer



Partner and collaborate carefully

We collaborate and win as a team through strong partnerships with a broad range of global channel partners, vendors, suppliers, and consultants. We are mindful when selecting these partners.

It is our responsibility to ensure third-parties acting on our behalf uphold the strict standards we've set for ourselves, and align to our values – by following all applicable laws and ServiceNow requirements. It's your responsibility to act as a guardian of our Code, to communicate our expectations, and report any concerns when working with third-parties.

Our Code for partnering and collaborating carefully:

- We follow proper protocols for vetting and entering into business with any third-party.
- We work with third-parties only when there is a valid business reason for doing so.
- We never encourage or allow third-parties to engage in illegal conduct or conduct that violates our policies.
- We ensure our vendors abide by our Supplier Code of Conduct and that our channel partners abide by our Partner Code of Conduct.

Contacts:

Any concerns about sales, procurement, or supplier process irregularities, or potential misconduct by third-parties should be sent to our Anti-Bribery and Anti-Corruption Team.

Need to know more?

- [Global Procurement Policy](#)
- [Partner Code of Conduct](#)
- [Supplier Code of Conduct](#)



Embrace diversity, create belonging

We embrace diversity, inclusion, and belonging as a business imperative. It's a cultural value and a shared commitment across our global leadership team. Diverse, inclusive teams where everyone belongs are more creative, more innovative, and more successful. Research proves it. And we believe it.

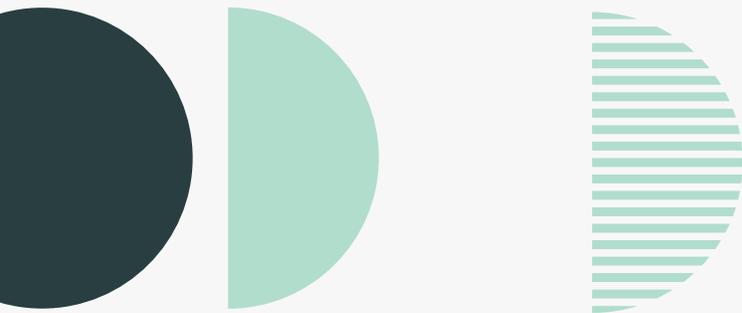
We're committed to racial justice and equity for all, and want to always be learning, growing, and understanding how to be allies. We extend that to our customers and partners and do our part to lead the charge for sustainable, positive change.

Our Code for embracing diversity and creating belonging:

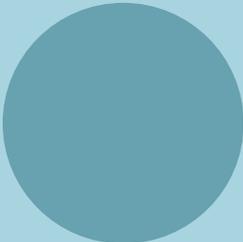
- We're committed to providing equal employment opportunities and pay equity to all qualified candidates.
- We strictly prohibit discrimination, harassment, or retaliation against any individual on the basis of any legally protected characteristic recognized by applicable national, state, or local law including race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, or veteran status.

Need to know more?

- [Equal Employment Opportunity \(EEO\) Policy](#)
- [Anti-Harassment Policy](#)
- [2020 Diversity Report](#)



Trust



In this section

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Focus on safety and security

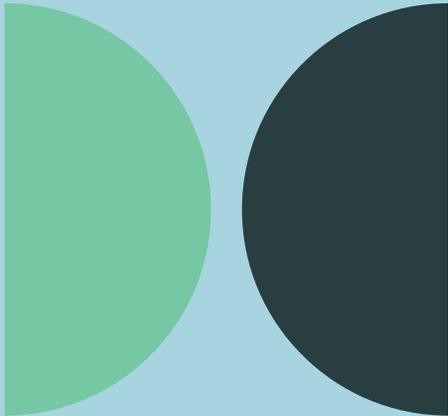
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Maintain accurate books and records

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Protect customer and employee data

17
Protect our innovation

18
Safeguard our corporate resources



Focus on safety and security

A safe, secure work environment is essential for focusing and collaborating to execute on our priorities, whether in a ServiceNow office or working remotely. This means creating trust by:

- Treating each other respectfully and not tolerating harassment, discrimination, bullying, intimidation, or threats of violence.
- Not allowing firearms, other dangerous devices, and drugs or other illegal substances, at work or at work events.
- Never working under the influence of drugs or alcohol.

Our Code for creating a safe workplace:

- Treat others with respect.
- Be thoughtful – act responsibly and with others in mind.
- Resolve problems and disagreements with conversation, not threats.

Contacts:

You should report all workplace safety and security concerns to ServiceNow's 24/7 Global Security Team via email or by calling any of the numbers listed below. For any life-threatening emergencies, you should contact your local emergency authority.

- +1-855-760-8477 (U.S.)
- +31-20-241-4277 (EMEA)
- +65-6809-0905 (APJ)
- +91-40662-94902 (India)

To raise other concerns, use one of the methods outlined in the "Speak Up" section.

Need to know more?

- [Environmental, Health and Safety Policy](#)
- [Workers' Compensation Policy](#)
- [Workplace Safety Incident Reporting Guidelines](#)



Maintain accurate books and records

Our business relies on the trust of our investors and the public, so we must maintain complete and accurate books and records at all times. We must ensure our financial reports, public filings, and public statements meet legal requirements and accounting standards. And that our business records fairly and accurately reflect our activities.

Our Code for maintaining accurate books and records:

- We accurately record and report financial transactions in compliance with all applicable laws, regulations, accounting practices, and ServiceNow policies.
- Our written contracts fully and accurately reflect all deal terms.
- We don't enter into side agreements or off-the-books transactions.
- We retain and dispose of all documents and materials in compliance with our legal obligations and our Record Retention Policy.

Need to know more?

- [Record Retention Policy](#)
- [Global Disbursement Policy](#)
- [Internal Audit Policy](#)

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We need to have unrelenting commitment to integrity in all we do.



Gina Mastantuono
Chief Financial Officer

Give and receive gifts responsibly

We're trusted with the responsibility of giving modest gifts, meals, and entertainment in accordance with all applicable laws, our policies, and the recipient's own internal policies.

Our Code for giving and receiving gifts:

- When we give or receive a gift or hospitality, it must be reasonable, appropriate, and tied to a legitimate business purpose.
- Gifts or hospitality to government personnel must also comply with applicable anti-corruption laws, and the recipient's rules and policies.
- We can't use personal funds to do something that can't be done with ServiceNow funds.
- We can't use a third-party, including our channel partners and consultants, to do something that can't be done with ServiceNow funds.
- We can accept modest gifts and hospitality from third-parties, but never ask for them.

Refer to the U.S. Public Sector Gifts & Gratuities Policy for specific restrictions applicable to interactions with U.S. government employees and U.S. government contractor employees.

Need to know more?

- [Anti-Corruption Policy](#)
- [U.S. Public Sector Code of Ethics Addendum](#)
- [Global Travel, Expense, and Credit Card Policy](#)
- [U.S. Public Sector Gifts & Gratuities Policy](#)



Protect customer and employee data

Keeping our customers', employees', partners', and service providers' information safe and secure is a priority for ServiceNow. We are committed to privacy in our own products, our data practices, and in the third-party products we use. We maintain a comprehensive data privacy program and follow all applicable privacy and data protection laws and regulations. We process personal data in compliance with our privacy and security documentation. We all must follow the obligations outlined in these documents without exception.

Our Code for protecting customer and employee data:

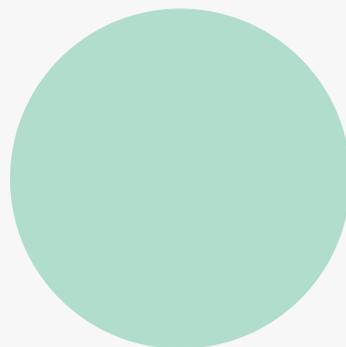
- Handle all personal data in accordance with our privacy and security policies, procedures, and standards.
- Treat all personal data we have access to as confidential information.
- Access only the personal data necessary to fulfill the business purpose.
- Ensure that appropriate data protection terms are in place with any third-party before disclosing personal data of our stakeholders.

Contact:

If you believe that any data may have been mishandled, or you suspect a potential security or privacy incident, contact our Global Security Team.

Need to know more?

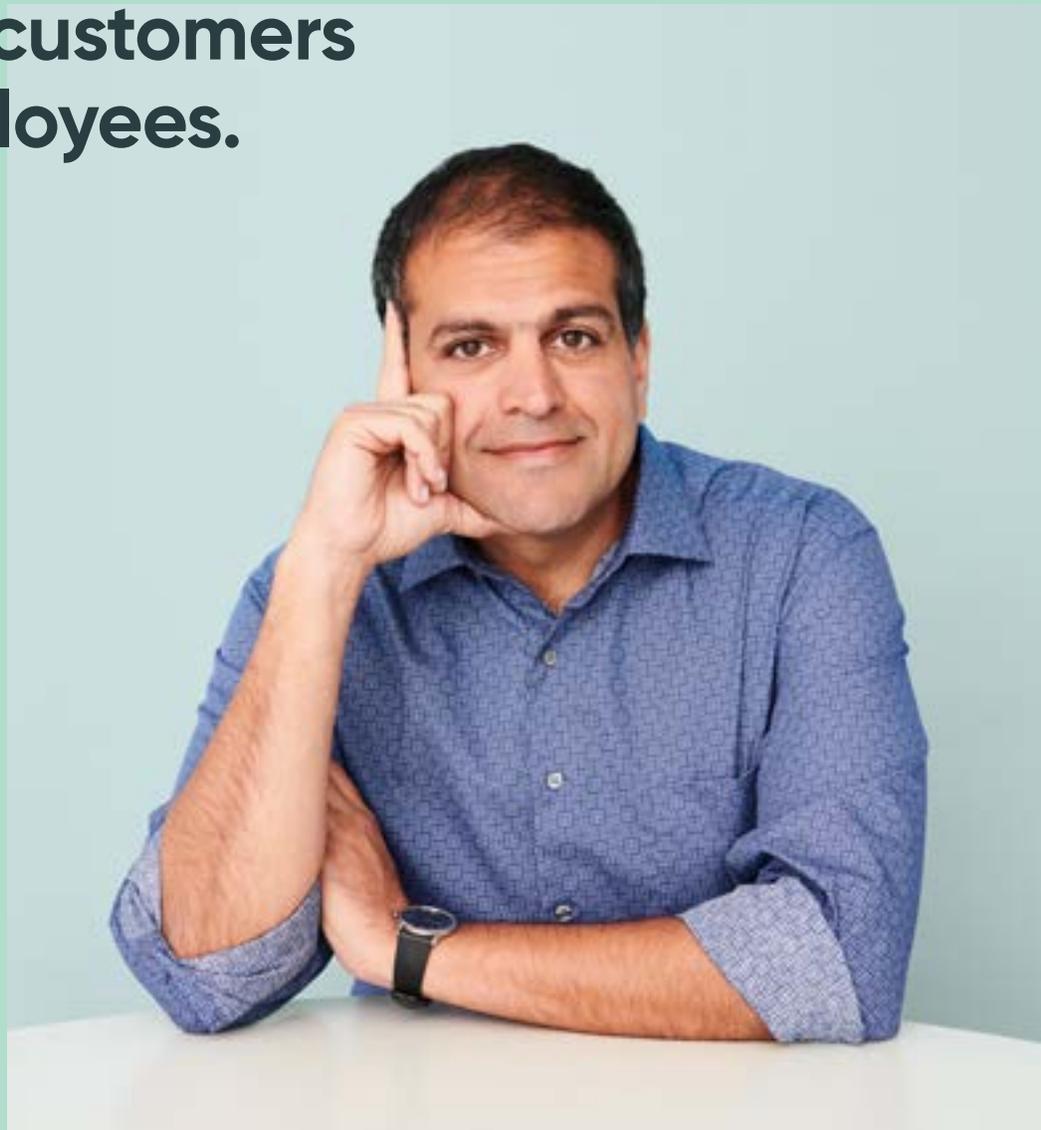
- [Acceptable Use Policy](#)
- [Data Protection Statement Policy](#)
- [Employee Privacy Statement Policy](#)
- [Information Security Policy](#)



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Handling and protecting all data with care serves our two most important assets – our customers and our employees.

Chris Bedi
Chief Innovation Officer



Protect our innovation

Innovation isn't just a buzzword at ServiceNow. It's one of the core values that drives everything we do, and it's essential to our commitment to continued growth and customer focus. So, it's crucial that we protect and respect our innovation every day.

It's equally crucial that when we're handling the ideas, information, or intellectual property of others, that we protect and respect it as well. This is critical for maintaining trust with our customers, our partners, and the communities in which we operate.

Our Code for protecting our innovation:

- We use best practices to safeguard confidential ServiceNow information or intellectual property – and we do not disclose it to others – even after leaving ServiceNow.
- We also protect ServiceNow's innovation in our copyrights, trademarks, and patents – and ensure they are being used appropriately.
- We don't use confidential information or intellectual property of other companies without proper authorization.
- We don't use copyrighted materials – including graphics, videos, and music – without a license.

Need to know more?

- [Corporate Business Continuity Management Policy](#)
- [Trademark and Copyright Guidelines](#)

Safeguard our corporate resources

Our corporate resources are the tools that allow us to innovate and conduct business in the ServiceNow way. From the laptops we work on to the tools we use for our business needs and the workspaces we collaborate in, the way we provide value to our investors and our customers is by putting our corporate resources to their best use – for business purposes.

Each of us is responsible for ensuring our corporate resources are used appropriately. That means guarding against waste, fraud, and abuse – and keeping an eye out for any misuse or misconduct. It also includes keeping a close watch on how we use corporate assets and spend our corporate funds on things like travel or work-related expenses.

Contacts:

Report any concerns to a manager, Global Talent, Legal, Ethics & Compliance, or legal_compliance@servicenow.com.

Need to know more?

- [Global Travel, Expense, and Credit Card Policy](#)
- [Acceptable Use Policy](#)
- [Global Disbursement Policy](#)



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