CODE OF ETHICS
Living our values and purpose: the ServiceNow Code of Ethics

“Everything comes down to trust. Trust is the ultimate human currency.”

Bill McDermott
ServiceNow Chief Executive Officer

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.

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 guide-rails 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.

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenow.ethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
A letter from our Chief Ethics and Compliance Officer

ServiceNow is a value-driven organization and is committed to fostering an ethical culture. This helps uplift our brand, increase stakeholder trust, and attract and retain our customers and the best employees. Whether it is by winning the right way, or upholding ServiceNow’s core values every day, we all play a part in delivering world-class service to our customers in an ethical and forthright manner.

Integrity isn’t a choice—it’s a core value that is represented in every thread of our company’s identity.

Everyone in the ServiceNow community—from our employees to our Board of Directors—are expected to live our purpose and values and act with integrity and honesty. Therefore, when you suspect or witness an ethical issue or potential violation of our Code of Ethics, it is your duty to speak up. When you report a concern, you help make our company stronger by helping us identify areas of opportunity which benefit all of us.

You are protected from retaliation for reporting your concerns and can report your concern anonymously. To learn more about the multiple ways you can report ethical concerns and the policies in place to protect you from retaliation, please review the Whistleblower and Complaint (Speak Up) policy.

Thank you for all you do to make ServiceNow a world-class company, both in what we do and how we do it.

We all win when we win the right way.

John Castelly
Chief Ethics and Compliance Officer
INTEGRITY

We live our values everyday

We speak up and do not tolerate retaliation

We avoid organizational or personal conflicts of interest

We do not engage in insider trading or tipping

We comply with all applicable laws and regulations

We do not make bribes or engage in corrupt activity

We compete for business fairly

We follow our code and uphold our commitments
We live our values everyday

"We have to win the right way and we have to stick to our Code of Ethics for our customers, our employees and our partners."

Russ Elmer
ServiceNow General Counsel

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.

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We speak up and do not tolerate retaliation

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.

Q: What if I only suspect a violation but don't have all the details?

A: If you have a good faith belief that there has been a potential violation of our Code, policies or the law by anyone affiliated with ServiceNow, including partners, all employees have a duty to report the matter.

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We speak up and do not tolerate retaliation

When faced with a situation that could be unethical, ask these questions...

- Does it align with our values?
- Does it comply with our Code of Ethics?
- Is it ethical and right? Is it legal?
- Would it withstand public scrutiny?
- Is it in our best interest?

If you answered **YES** to all the questions, the situation is likely ethical.

If you answered **NO** to any of the questions, the situation is likely unethical.

Need guidance in determining whether a situation is unethical?

Need to report a concern?

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We Speak Up and Do Not Tolerate Retaliation

No tolerance for retaliation:

ServiceNow does not tolerate retaliation against anyone who

(i) raises a concern in good faith or escalates a report or Red Flag,
(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.

If you are a person who has received a report of an actual or potential violation of Corporate Policies or a Red Flag, it is your responsibility to ensure that the Legal, Ethics & Compliance Team (legal_compliance@servicenow.com) is made aware so that it may be investigated and appropriately resolved.

Need to know more?

- Whistleblower and Complaint Policy (the Speak Up Policy) (internal)

How can you speak up?

- Contact your manager, Global People, 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”

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenow.ethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We Speak Up and Do Not Tolerate Retaliation

Our investigation process for when a concern is reported:

**Intake**
First, a cross-functional team reviews the report to determine if an investigation is appropriate. If it is, then we’ll assign the right parties to investigate.

**Assignment**
We’ll assign a lead investigator to the concern. Investigations are handled by different groups based on the nature of the concern and the reporting channel. Global People may investigate some situations, while others may involve Security, Legal, Compliance, or even outside third parties.

**Investigation**
The team conducts an investigation, which can include collecting documents, interviewing witnesses, and assessing facts.

**Determination**
The team makes a factual determination of the concerns. Relevant decision-makers review and approve the response.

**Outcome**
If there is a finding of misconduct, ServiceNow will take appropriate action and remediation will occur, in accordance with ServiceNow’s policies.

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We avoid organizational or personal 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.

Q: I’ve been approached to sit on the board of a non-profit organization. Do I need approval before accepting this position?

A: Yes. You should complete a COI disclosure to ensure no conflicts of interest exist, prior to accepting a board position. You should also complete a disclosure before accepting part time employment or a position as a consultant.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.
We avoid organizational or personal conflicts of interest

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 and ServiceNow Gift Policy.

For more specific information regarding the giving and receiving of gifts, please review the ServiceNow Corporate Gift Policy.

Need to know more?
• Conflict of Interest Policy (Internal)
• Related Party Transactions Policy (Internal)
• ServiceNow Corporate Gift Policy (Internal)
• Ethics Employee Resource Center (Internal)

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We do not engage in insider trading or tipping

We don’t trade in ServiceNow’s securities while in possession of material non-public information, disclose material non-public information, or give trading advice about the Company.

Our Code for avoiding 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 ServiceNow’s securities if we’re in possession of material non-public information about ServiceNow. 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.

• 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 ServiceNow broadly communicates it, and it has been absorbed by the investing public.

Q: I may have inadvertently displayed an email to my barber which stated that ServiceNow will soon acquire a major competitor. I've just learned this may be considered material non-public information. If the barber buys or sells ServiceNow stock based on this information, is this insider trading? If so, should I report what happened?

A: Yes. This information is material non-public information, and if your barber trades based on this information, it would be considered insider trading. You should report this violation and any potential violation of the Insider Trading Policy to insidertradingpolicy@servicenow.com.

Need to know more? • Insider Trading Policy (Internal)
We comply with all applicable laws and regulations

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 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?

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

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We do not make bribes or engage in corrupt activity

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.

Need to know more?

- Anti-Corruption Policy (Internal)
- ServiceNow Corporate Gift Policy (Internal)
- Global Travel, Expense, and Credit Card Policy (Internal)

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We do not make bribes or engage in corrupt activity

Our Code for avoiding bribes and corrupt activity:

• 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 (and pre-approved by Legal, Ethics & Compliance Team in certain circumstances).

• 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) or public international organizations.

For more specific information regarding the giving and receiving of gifts, please review the ServiceNow Corporate Gift Policy.

• We do not make charitable contributions, sponsorships 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.

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We do not make bribes or engage in corrupt activity

U.S. Public Sector

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 U.S. Public Sector Compliance at USPublicSectorCompliance@servicenow.com for guidance.

Need to know more?  
- U.S. Public Sector Gifts & Gratuities Policy (Internal)
- U.S. Public Sector Code of Ethics Addendum (Internal)

Q: I would like to take a government employee out an expensive lunch as a thank you. Is this ok?

A: Probably not. The rules governing the types of gifts and entertainment we can offer government employees are much stricter than those governing our interactions with commercial contacts. Taking a government employee (foreign or domestic) to lunch could violate anti-corruption laws, including the U.S. FCPA and U.K. Bribery Act, and may also violate local laws. Please contact the Anti-Bribery/Anti-Corruption team if you have questions or need more information.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.
We compete for business 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 competently 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.

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

Kevin Haverty
Vice Chairman
Global Public Sector

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We compete for business fairly

Q: I’m an account executive at ServiceNow and we are in the process of submitting a bid for two companies—“Company 1” and Company 2. An account executive from ABC Software reached out promising not to compete for the business of Company 1 if we respect their existing relationship with Customer 2 and do not compete for their business.

Should I agree to this proposal?

A: You must not agree to this proposal. We do not enter into formal or informal agreements to limit competition, including agreements to allocate customers—it is unethical and likely illegal to do so. You should communicate clearly to ABC Software that ServiceNow does not agree to ABC Software’s proposal. Instead, we will compete and win the right way.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.

Need to know more?

- U.S. Public Sector Code of Ethics Addendum
- U.S. Public Sector Gifts and Gratuities Policy

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We follow our Code and 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.

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We follow our Code and uphold our commitments

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.

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TEAMWORK

We lead by example

Our communications are always accurate and truthful

We choose our business partners and suppliers carefully

We embrace diversity, equity, and inclusion
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.

**Need to know more?**

- [Ethical Leadership: Managers Toolkit](#) (Internal)
- [People Leaders Resources Site](#) (Internal)
- [Ethics Employee Resources Center](#) (Internal)
- [ServiceNow People Pact](#) (Internal)

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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 at press@servicenow.com.

Need to know more?
- Corporate Communications Policy (Internal)
- Social Media Policy (Internal)

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We choose our business partners and suppliers 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.

Q: What is needed prior to onboarding a vendor?

A: A signed contract, a purchase order, and the vendor risk assessment process must be complete.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.

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We choose our business partners and suppliers carefully

Our Code for partnerships and collaborations:

- 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.

Need to know more?

- Global Procurement Policy (Internal)
- Partner Code of Conduct (Partner Portal)
- Supplier Code of Conduct
- ServiceNow Corporate Gift Policy

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We embrace diversity, equity, and inclusion

Transparency, trust and belonging are the new business currency.

Karen Pavlin
Chief Diversity Officer

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.

Need to know more?

• Equal Employment Opportunity (EEO) Policy
• Anti-Harassment Policy (Internal)
• 2023 Diversity, Equity, and Inclusion Report
• Diversity, Equity, and Inclusion Site

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We embrace diversity, equity, and inclusion

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 any form of harassment (including, but not limited to, sexual harassment), discrimination or retaliation within the work relationship, including during the recruitment process.

• Reports of harassment (including but not limited to, sexual harassment), discrimination and retaliation will be promptly, effectively, thoroughly and objectively investigated.

• Disciplinary action up to and including separation of employment will be taken on a case by case basis, as appropriate and based on the outcome of any investigation.

Q: At several team meetings, my co-worker made comments about another colleague's nationality though he says he is “just kidding”. Should I say something to my manager or report this?

A: Yes. Please tell your manager or utilize the Speak-Up hotline. It is every employee's duty to promote an inclusive and respective workplace and culture. All ServiceNow employees deserve to work in an environment where they can be comfortable and successful.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.
THE WORLD WORKS WITH SERVICENOW

TRUST
- We maintain a safe and respectful workplace
- We maintain accurate books and records
- We abide by policies on gifts and business courtesies
- We protect customer and employee data
- We safeguard ServiceNow’s data and innovation
- We protect and use corporate assets responsibly
We maintain a safe and respectful workplace

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.

Need to know more?

- Global Occupational Health and Safety Policy (Internal)
- U.S. Workers’ Compensation Policy (Internal)
- Workplace Safety Incident Reporting Guidelines
We maintain accurate books and records

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

Gina Mastantuono
Chief Financial Officer

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.

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 849-7272 or the number listed for your country as listed on the Ethics Hotline.
We maintain accurate books and records

Q: My team held an off-site dinner where some team members could not attend. If all team members had attended, the dinner would have ended up being on budget. Without them, the total amount exceeded the total allowed expense.

When submitting the expense report, can I include all team members on the expense so it will be approved under the Travel and Expense Policy?

A: No. Our books and records form the basis on which we make important strategic decisions. They help us fulfill our commitments and hold us accountable to those who rely on our financial information. You have a responsibility to make sure all records you create (such as time sheets, expense reports, and other corporate information) are prepared as accurately as possible. You should never make a false or misleading entry in any of ServiceNow’s records, whether financial or non-financial.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.

Need to know more?
- Record Retention Policy (Internal)
- Global Disbursement Policy (Internal)
- Internal Audit Policy (Internal)

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We abide by policies on gifts and business courtesies

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, ServiceNow’s Anti-Corruption Policy and the recipient’s rules and policies.

• Gifts to non-U.S. Government officials may be provided in very limited circumstances and must be ServiceNow branded and of nominal value.

• 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.

For more specific information regarding the giving and receiving of gifts, please review the ServiceNow Corporate Gift Policy.

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.

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenow.ethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We abide by policies on gifts and business courtesies

Need to know more?

- Anti-Corruption Policy (Internal)
- ServiceNow Corporate Gift Policy (Internal)
- U.S. Public Sector Gifts & Gratuities Policy (Internal)
- U.S. Public Sector Code of Ethics Addendum (internal)
- Global Travel, Expense, and Credit Card Policy (Internal)

Q: A vendor I’ve work with often just sent me a few branded stickers. What should I do with them?

A: Keep them if you want. Accepting a token(s) of appreciation that is of nominal value is OK.

Q: I would like to take some business partners out to dinner, but I’m not sure if the company they work for is owned or partially owned or controlled by a foreign government. What should I do?

A: Contact ABAC_Compliance@servicenow.com for guidance before you schedule any outings. It is important to know if an entity is owned or partially government owned.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.
We protect customer and employee data

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

Chris Bedi
Chief Digital Information Officer

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.

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We protect customer and employee data

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.

Q: I was at a cafe finalizing a presentation for a customer and left my table to order a cup of coffee. I left my laptop open and unlocked on my table so I wouldn’t lose any time getting back to work.

Are there steps that I should have taken to protect customer and employee data?

A: Yes. You must always be diligent when working with confidential data. When working in a public place, ensure you use a privacy screen to prevent the disclosure or theft of confidential data, such as ServiceNow bid details, business plans, and customer data. When not in use, lock your laptop’s screen and ensure it is kept in a secure location.

To access additional scenarios and resources, visit our Ethics Employee Resources Site.

Need to know more?

• Acceptable Use Policy (Internal)
• Employee Privacy Statement Policy (Internal)
• Information Security Policy (Internal)
• Data Protection Statement Policy (Internal)
We safeguard ServiceNow’s data and 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.

Need to know more?

- Corporate Business Continuity Management Policy (Internal)
- Trademark and Copyright Guidelines

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenow.ethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We safeguard ServiceNow’s data and innovation

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.

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
We protect and use corporate assets responsibly

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.

Need to know more?

- Global Travel, Expense, and Credit Card Policy
- Acceptable Use Policy
- Global Disbursement Policy

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
### Speak Up

- Report any concerns to a manager, Global People, Legal, Ethics & Compliance, or legal_compliance@servicenow.com
- Contact your manager, Global People, 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”

### Workplace Safety and Security Concerns

- You should report all workplace safety and security concerns to ServiceNow’s 24/7 Global Security Team 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.)
  - +31202414277 (EMEA)
  - +6568090905 (APJ)
  - +914066294902 (India)

### Innovation and Data Queries

- IP-Legal-Team@servicenow.com

### Trade Related Questions

- tradecompliance@servicenow.com

### U.S. Public Sector

- USPublicSectorCompliance@servicenow.com
Appendix: resources

- To learn more about the topics in our Code of Ethics, please access the Code of Ethics Scenarios Supplement in the Ethics Employee Resource Center (Internal).

Policies and Resources

- Acceptable Use Policy (Internal)
- Anti-Corruption Policy (Internal)
- Anti-Harassment Policy (Internal)
- Anti-Human Trafficking Policy (Internal)
- Human Rights Statement
- Corporate Communications Policy (Internal)
- Conflict of Interest Policy (Internal)
- Corporate Business Continuity Management Policy (Internal)
- Data Protection Statement Policy (Internal)
- 2023 Diversity, Equity, and Inclusion Report
- Diversity, Equity, and Inclusion Site
- Employee Privacy Statement Policy (Internal)
- Equal Employment Opportunity (EEO) Policy
- Ethics Employee Resource Center (Internal)
- Ethical Leadership: Managers Toolkit (Internal)
- Global Impact Site
- Global Travel, Expense, and Credit Card Policy
- Global Disbursement Policy (Internal)
- Global Procurement Policy (Internal)
- Global Occupational Health and Safety Policy (Internal)

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenowethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.
Appendix: resources

Policies and Resources

- Information Security Policy (Internal)
- Internal Audit Policy (Internal)
- Insider Trading Policy (Internal)
- Partner Code of Conduct (Partner Portal)
- People Leaders Resources Site (Internal)
- Related Party Transactions Policy (Internal)
- ServiceNow Corporate Gift Policy (Internal)
- ServiceNow People Pact (Internal)
- Record Retention Policy (Internal)
- Social Media Policy (Internal)
- Supplier Code of Conduct
- Trademark and Copyright Guidelines
- U.S. Export and Trade Controls Policy (Internal)
- U.S. Public Sector Code of Ethics Addendum (Internal)
- U.S. Public Sector Gifts & Gratuities Policy (Internal)
- U.S. Workers' Compensation Policy (Internal)
- Whistleblower and Complaint Policy (the Speak Up Policy) (internal)
- Workplace Safety Incident Reporting Guidelines

To report concerns or seek guidance about any of the issues raised here, contact the Ethics Hotline online at www.servicenow.ethicspoint.com or call +1 (855) 869-7272 or the number listed for your country as listed on the Ethics Hotline.