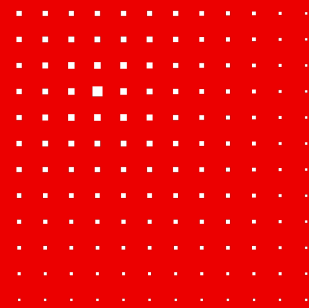




Code of Ethics and Business Conduct



VERSION

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Our Code

This Code of Ethics and Business Conduct (this “Code”) describes CrowdStrike’s core values and its expectations for how you act when conducting business on CrowdStrike’s behalf.



Who

We expect all employees, officers, Board members and independent contractors (“CrowdStrikers” or “you”) to know and follow this Code.

In the course of their relationship with CrowdStrike, CrowdStrikers should:

- exercise good judgment
- uphold these standards in their day-to-day activities
- comply with all applicable policies and procedures



What

Although this Code does not cover every issue that may arise, it will provide you with general guidelines for exercising good judgment and you can refer to CrowdStrike’s other policies and procedures for more information on how to implement the general principles described below. See [Global Policies CrowdConnect page](#).

CrowdStrike may issue additional policies and procedures on the topics below from time to time.



Why

This Code is intended to deter wrongdoing, as well as the appearance of wrongdoing.

Doing the right thing is more important than winning while doing the wrong thing. We never want to jeopardize our reputation or the trust of our customers, partners, stockholders, fellow employees and the communities we operate in

Everyone's Responsibility

All CrowdStrikers, regardless of tenure or title, are **responsible for recognizing legal and ethical issues and doing the right thing in conducting business activities.**

If you have a concern regarding conduct that you believe to be a violation of a law, regulation, the Code, or other CrowdStrike policy, or you are aware of questionable legal, financial, or accounting matters, or simply are unsure whether a situation violates

Raising Concerns and Reporting Violations

We expect all employees, officers, Board members and independent contractors ("CrowdStrikers" or "you") to know and follow this Code.



Reach out to an appropriate person within CrowdStrike.

- Your manager
- People Organization
- Legal Team
- Chief Financial Officer ("CFO") or Chief Accounting Officer ("CAO")



Send an email to ethics@crowdstrike.com.



File an attributed or anonymous report through our third-party hosted hotline, EthicsPoint

- Online at crowdstrike.ethicspoint.com, or
- By phone at 1-844-330-7796 (USA/Canada) or by international toll-free access numbers
- Regardless of the local number you dialed, when prompted dial 844-330-7796.

The CFO, CAO, a member of the People Organization or the Legal Team will review concerns submitted through EthicsPoint.



EthicsPoint Hotline Numbers:

1-844-330-7796	USA/Canada
1-800-881-011	Australia
0-800-225-5288	Germany
000-117	India
00-800-222-55288	Ireland
00-663-5111	Japan
800-288-2872	Mexico
0808-03-4288	Romania

Don't See A Hotline Number for Your Country?

You Can Look up your Country's EthicsPoint Hotline Number by Connecting to: crowdstrike.ethicspoint.com

Non-US CrowdStrikers:

You may not use EthicsPoint for matters that are required to be handled locally in accordance with local law. If you are unsure, please reach out to your manager, the People Organization, or the Legal Team.

Asking Questions

If you are unsure, you should always seek guidance.

If you encounter a situation where you have a question about the law, the Code or any CrowdStrike policy or are unsure of the best course of action, reach out through any of the appropriate resources listed on the previous page.

Manager's Role

If you are approached with a question or concern related to the Code or any other CrowdStrike policy:

Listen carefully and give the person your complete attention.

Seek guidance if you need it.

Report concerns if you see something that doesn't seem in line with the Code or our values.

CrowdStrike managers should demonstrate not only compliance with the Code but support direct reports in learning and adhering to the Code and speaking up if they see a problem.



Anonymous Reports

If you are submitting an unattributed report, please provide as much information as possible so CrowdStrike can conduct an efficient and effective review.

Although CrowdStrike encourages you to share your name so we can more effectively address your concern, we provide ways for you to report concerns anonymously.

CrowdStrike also provides reporting procedures that allow you to bypass a supervisor if you believe the supervisor is engaged in prohibited conduct.

Disciplinary Action

If you have knowledge of a potential violation and fail to report it, you too may be subject to disciplinary action under this Code.

CrowdStrike takes allegations of wrongdoing seriously and promptly conducts investigations into reported violations of this Code.

Your failure to comply with this Code or any other CrowdStrike policy can result in disciplinary action, up to and including:

- suspension or termination of employment or affiliation with CrowdStrike
- civil or criminal penalties, depending on the nature of the violation and applicable law.

In addition, CrowdStrike may report civil or criminal violations to the relevant authorities.

Non-Retaliation Policy

Any acts that appear to be retaliatory should be immediately reported to the People Organization, the Legal Team or through EthicsPoint.

CrowdStrike prohibits retaliation against any individual for reporting in good faith a concern regarding non-compliance with this Code, or for participating in a compliance investigation, even when allegations are not substantiated.

Respect

CrowdStrikers are expected to create a respectful workplace

that supports a culture where all employees are valued and to make all employment decisions based on a principle of mutual respect and dignity. CrowdStrike is committed to a policy of equal employment opportunity and creating a discrimination and harassment free work environment.

CrowdStrike strictly prohibits discrimination or harassment of any kind on the basis of a person's legally protected characteristics or status.

How is “harassment” defined

“Harassment” is generally a form of discrimination that:

Consists of unwelcome behavior, based on a person's legally protected characteristic or status.

That has the purpose or effect of creating an intimidating, hostile, or offensive work environment.

Harassment can come in many forms, including:

- Physical actions
- Verbal or written remarks
- Cartoons, or pictures

CrowdStrike prohibits and does not tolerate harassment by any employees or non-employees.

Legally protected characteristics and status

Examples include:

- Age
- Ancestry
- Color
- Gender (including pregnancy, childbirth, or related medical conditions)
- Gender identity or expression
- Genetic information
- Marital status
- Medical condition
- Mental or physical disability
- National origin
- Protected family care or medical leave status
- Race
- Religion (including beliefs and practices or their absence)
- Sexual orientation
- Military or veteran status
- Other considerations protected by national, state or local law

Equal Opportunity and Discrimination Free

If you experience or witness any discrimination or harassment, report the incident as described above.

See also: [CrowdStrike's Policy Against Unlawful Harassment](#) and applicable local policies

No adverse employment action will be taken against any person for making a good-faith complaint or report of discrimination, harassment, or improper conduct, assisting in an investigation, or exercising rights under applicable laws.

Retaliation against any person for any such protected activity will not be tolerated.

Substance Abuse

You must comply with all laws.

CrowdStrikers should never:

- Be under the influence of an illegal substance while working or on the job.
- Consume, possess, distribute, sell, or purchase illegal substances.
- Drive a vehicle while under the influence of alcohol or an illegal or controlled substance while on CrowdStrike business or to and from CrowdStrike events or work.

Substance abuse is contrary to the health and safety of CrowdStrikers and their ability to perform their job duties.

At CrowdStrike-sponsored events where alcohol is made available, the moderate consumption of alcohol by legal-age individuals is permitted, provided, good judgment is exercised.

Child and Forced Labor

CrowdStrike explicitly bans the use of any forced labor or exploitative working conditions.

CrowdStrike's policy on child labor and forced labor is based on International Labour Organization conventions and national laws.

CrowdStrike restricts employment to those who have reached the age of 16 years or older, or the local minimum employment age, or the mandatory school age, whichever is higher.

Combating Trafficking in Persons

CrowdStrike has a zero-tolerance policy regarding trafficking in persons and slavery.

As required by law and pursuant to CrowdStrike policy, all CrowdStrikers are prohibited from engaging in any practice that constitutes trafficking in persons or slavery.

Political Activity and Contributions

CrowdStrikers should never make political donations or contributions on behalf of, or using CrowdStrike's name, time, funds, or other resources.

CrowdStrikers are free to participate in personal political activities.

This means that you must:

- make all political contributions with your own money
- conduct political activities on your own time
- not use CrowdStrike resources to participate in your personal political activities or request reimbursement for expenses associated with these activities.

If your job involves working with the government, you may not engage in lobbying on behalf of CrowdStrike unless approved by your manager and in coordination with the Legal Team.

The laws regarding political involvement and contributions by employees, contractors or Board members of a company that does business with the government are complicated and vary between jurisdictions.

See also: [CrowdStrike's Lobbying and Political Contributions Policy](#)

If you have any questions about how your personal political activities or contributions or work-related political activities could affect CrowdStrike, please contact the Legal Team.

Honor

CrowdStrikers should be aware of and comply with all applicable laws.

Because CrowdStrike is a global company, we are subject to the laws of many countries and jurisdictions.

The Code and the Law

Violations of laws, rules, and regulations may subject the violator to individual criminal or civil liability, as well as to disciplinary action by CrowdStrike.

These violations may also subject CrowdStrike to civil or criminal liability or the loss of business.

If you have any questions on how to interpret or comply with applicable law, please contact a member of the Legal Team.

The application of laws to particular situations can be complex. CrowdStrike's policies and guidelines are intended to assist in navigating many of these laws.

In some instances, the Code and other CrowdStrike policies might go beyond the requirements of applicable laws, rules and regulations, and in those instances, you must follow our Code and policies.

However, if a provision of the Code or other policy conflicts with applicable law, the law supersedes.

Global Trade Regulation

Work with the Legal Team to be sure that transactions stay within the bounds of applicable laws...

...if you are involved in sending or making available:

- CrowdStrike software services any form of technical data from one country to another

Always seek help if you have any questions about export (or import) controls matters.

A wide range of complex laws and regulations dictate where and how CrowdStrike can send and receive its products, services, and technology.

The U.S. and several other countries limit the export and import of such goods, typically those that use or contain encryption.

In some cases, the United States or other governments may prohibit doing any business with certain countries, organizations, or individuals.

Insider Trading

Insider trading violates this Code and the law, and may result in substantial civil and criminal penalties, including the possibility of a jail sentence.

Buying or selling stock while in possession of material non-public information or passing such information along to others so that they may buy or sell stock, constitutes illegal insider trading.

What is “**non-public**” information?

“**Non-public**” information is any information that has not yet been disclosed or absorbed by the public.

Examples of material non-public information include:

- unreleased sales figures
- pending mergers or acquisitions
- earnings estimates
- labor disputes
- introduction of new products or services

Insider Trading

If you have questions about whether a stock transaction is legal or may violate insider trading laws, promptly contact the Legal Team.

See also: [CrowdStrike's Insider Trading Policy](#)

CrowdStrike shares non-public information with CrowdStrikers to successfully carry out our business. You may also inadvertently learn non-public information – for example by overhearing a conversation.

Government Contracting

If your work involves a government entity, you are responsible for knowing the specific requirements that apply.

CrowdStrike is proud to support numerous government and quasi-governmental entities across the world. Doing business with the government is highly regulated and driven by statutory requirements.

Always ask your manager or contact the Legal Team if you are unclear about what is required.

Activities that may be appropriate when dealing with commercial customers may be improper, and even illegal, when dealing with the government.

The penalties for failing to follow government procurement laws are severe and include substantial civil and criminal fines, imprisonment for responsible individuals, and debarment of CrowdStrike from doing business with the government.

Fairness and Honesty

It is unacceptable to cut legal or ethical corners for the benefit of our company or for your personal benefit.

This Code flows directly from our commitment to our mission and core values. We consistently aim for excellence and to provide value for both our customers and shareholders, and it is critical that we do so with integrity and high ethical standards

Honest and Ethical Conduct

Consistent with our core values, you must **act and perform your duties ethically, honestly and with integrity.**

See also: [CrowdStrike's Fraud Policy](#)

We do the right thing even when "no one is looking."

We are honest and trustworthy in our dealings with partners, customers, vendors and other third parties. We must only enter into agreements on behalf of CrowdStrike that contain terms which CrowdStrike can honor. No winks. No nods.

Antitrust and Competition Laws

CrowdStrike is committed to fair and open competition, and the advancement and protection of a vibrant marketplace.

The following are examples of prohibited conduct under antitrust and pro-competition laws:

- ✗ Agreeing with competitors about prices
- ✗ Agreeing with distributors or resellers about prices to customers
- ✗ Agreeing with competitors to structure or orchestrate bids to direct a contract to a certain bidder (also known as bid rigging)
- ✗ Agreeing with competitors to boycott a supplier or customer
- ✗ Entering into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor

If any of these topics of discussion arise when talking with a competitor, employees should **stop the conversation immediately** and report it to the CrowdStrike Legal Team.

If you have questions about antitrust laws, promptly contact the Legal Team.

These topics might be discussed at events such as at an industry association meeting or a trade show.

Illegal agreements do not have to be signed contracts and may be as simple as informal understandings between two parties.

Most countries in which CrowdStrike operates have antitrust and positive competition laws and regulations that prohibit agreements or actions that reduce competition without benefiting consumers.

Anti-Corruption, Bribery, and Kickbacks

CrowdStrike has a zero-tolerance policy for kickbacks, bribery, and corruption.

There are no exceptions to this policy, even if our competitors engage in corrupt behavior or corruption is an accepted practice in a country where we operate.

You are required to adhere to **both the spirit and the letter of this policy** with respect to our business anywhere in the world.

We seek to act, and to be treated, at all times with the utmost integrity, honesty and transparency, and in compliance with anti-corruption laws in all countries in which we do business.

You are strictly prohibited from:

- Improperly promising, offering, providing, or authorizing the provision of money or anything else of value (such as an expensive gift or favor) directly or indirectly to any government, government official or other individual, entity, or organization in exchange for business or any benefit for CrowdStrike or any other person associated with CrowdStrike's business.
- Soliciting or accepting improper payments or other things of value in relation to CrowdStrike's business.
- Engaging in activities that conflict with your duties to CrowdStrike — this includes soliciting or accepting payments or other things of value for the purpose of improperly obtaining or rewarding favorable treatment in connection with fostering a business arrangement.

Who counts as a “government official”?

The definition of “government official” is broad and can vary depending on the applicable law. In general, a “government official” is any government officer, employee or consultant, candidate for public office, or employee of government owned or controlled companies, publicly operated or funded international organizations, or political parties or the spouse of immediate family members of any of the persons mentioned above.

See also: [CrowdStrike's Anti-Bribery & Corruption Policy](#)

Integrity

All assets of CrowdStrike must be carefully and properly accounted for.

Financial Integrity, Records, and Accounting

Making false or misleading records or documentation is strictly prohibited.

All of CrowdStrike's books, records, accounts and financial statements must be:

- maintained in reasonable detail.
- must accurately, fairly and completely reflect the transactions and matters to which they relate.
- must conform both to applicable legal requirements and to CrowdStrike's system of internal controls.

Unrecorded funds or assets should not be maintained.

For additional information on your specific responsibilities in ensuring the integrity of CrowdStrike's books, records, accounts, and financial statements, see [CrowdStrike's Fraud Policy](#) and [CrowdStrike's Anti-Bribery & Corruption Policy](#).

Questions about the Fraud Policy should be directed to the CrowdStrike Controller.

Questions about the Anti-Bribery & Corruption Policy should be directed to the Legal Team.

Money Laundering

Avoid engaging in any transaction that is structured in a way that could be viewed as concealing illegal conduct or the tainted nature of the proceeds or assets at issue in a transaction.

Money laundering is an act of concealing the source of money to avoid disclosing its sources or use and/or to avoid paying taxes.

CrowdStrike is committed to complying fully with all anti-money laundering and anti-terrorism laws throughout the world.

Consult with the Legal Team if you have any questions regarding the appropriate due diligence to be taken before conducting business with any vendor, supplier, contractor, reseller, distributor, customer or other third party.

Conflicts of Interest

CrowdStrikers are expected to act, at all times and in all ways, in the best interest of CrowdStrike while performing their job duties.

This means CrowdStrikers must avoid conflicts of interest.

Potential conflicts of interest are not uncommon or necessarily prohibited.

What is a “**conflict of interest**”?

A “**conflict of interest**” occurs when a CrowdStriker’s ability to perform his or her job responsibilities or duties for CrowdStrike are impacted by personal interests or the interests of a third party. These competing interests may limit the ability to perform the job objectively and without bias.

Some situations where a potential conflict of interest may arise include:

- Outside employment, advisory roles, board seats, or personally owned businesses
- Personal investments in companies that directly compete with or are similar to CrowdStrike
- CrowdStrike investing in a company in which you are a stockholder or a director
- Business opportunities found through your CrowdStrike duties
- Transacting CrowdStrike business with family members or other related persons
- Accepting excessive gifts, entertainment, or other business courtesies as part of your role at CrowdStrike, either directly or through a family member or a close friend

If you are faced with a situation that appears to present a potential conflict of interest, contact your manager or the Legal Team before taking any action.

If CrowdStrike determines an actual conflict of interest exists or that the activity will interfere with your ability to perform your duties for CrowdStrike, we may ask you not to engage in the activity.

For more information, CrowdStrike employees can refer to the [CrowdStrike Employee Handbook](#) and applicable local policies.

Security and Privacy

At CrowdStrike, security is the responsibility of EVERY CrowdStriker.

CrowdStrike's Security First initiative is designed to create a culture emphasizing physical and information security by focusing on three primary areas: people, facilities, and information.

Security First

If you see something,
don't just say something...
do something.

Security First is more than “see something, say something.”

Stopping breaches for our customers means our fight against the adversary is never ending, including internally with our own technology, people and partners.

CrowdStrike's expectation for you is to **personally adopt CrowdStrike's commitment to security and ethical conduct** and apply it to all activities you perform.

Not only within CrowdStrike but also in the world at large, including your technology resource use, your social media practices, your handling of CrowdStrike and customer data, the way you collaborate with others, and creating and managing secure solutions.

See also: [CrowdStrike's Information Security Policies](#).

Workplace Safety

All CrowdStrikers are expected to comply with health and safety laws, CrowdStrike policies and the safety procedures in the local facilities.

- All potentially violent or dangerous situations should be immediately reported to CrowdStrike's physical security team, your local manager, the People Organization, or Legal Team, including when they occur at off-site events.
- If you feel that you or someone else is in imminent danger, call the local authorities.

CrowdStrike is committed to having a safe and comfortable work environment and has zero tolerance for acts or threats of violence. Besides physical harm, this can also include abusive language, intimidation, or instilling fear in others. Any actual or implied threat will be treated as real and serious danger.

Acceptable Use of CrowdStrike Assets

CrowdStrikers should protect CrowdStrike's assets and ensure their efficient use.

Examples of CrowdStrike's assets include:

- its software (in all forms)
- technology resources
- business and marketing plans
- customer lists
- engineering and manufacturing ideas
- designs
- its logos and tradenames
- any financial information that has not been made publicly available

See also: [CrowdStrike's Employee Security Handbook](#), and the [Global Policies CrowdConnect page](#) for additional guidance

Given the very nature of its business, CrowdStrike has implemented a robust and detailed set of policies addressing CrowdStrike property, information security, acceptable use of CrowdStrike technology resources, home office, virtual private networks, and mobile equipment.

Unauthorized use or distribution of this information is a violation of CrowdStrike policy.

Safeguarding Confidential Information

CrowdStrikers must protect CrowdStrike's confidential information and the confidential information entrusted to us by our customers, partners, and suppliers.

- Your duty to safeguard confidential information continues after your relationship with CrowdStrike ends.
- If you are requested by a government or regulatory authority to provide them with confidential information, consult with the Legal Team before responding.
- All media inquiries should be directed to press@crowdstrike.com.

See also: [CrowdStrike's Employee Security Handbook](#), [Global Policies CrowdConnect page](#) and applicable local policies

Protecting confidential information means only sharing information with other CrowdStrikers on a need-to-know basis, and not disclosing it to others outside of CrowdStrike except as strictly necessary to carry out a business purpose and under non-disclosure agreements or subject to a duty of confidentiality.

Confidential information should not be shared with your family or friends.

What is “**confidential information**”?

Confidential information is generally non-public information.

Examples of confidential information are:

- data that identifies a customer
- software programs, including source and object code
- product development plans and release dates
- know-how, processes, and techniques unique to CrowdStrike
- marketing and sales plans
- competitive analyses
- pricing
- potential contracts, mergers, acquisitions or divestitures
- financial statements, plans or forecasts prior to public release
- personnel information

Privacy

CrowdStrikers should respect the privacy of individuals we work with, including, our fellow CrowdStrikers, our customers, prospective customers, partners and suppliers.

You should be familiar with applicable privacy laws and CrowdStrike's Privacy Policy and perform your responsibilities consistent with such laws and our Privacy Policy. Privacy laws vary by country and change from time to time, seek assistance from the Privacy Team and Legal Team when personal information is involved.