

Global Public Sector Addendum

Table of Contents

1. Purpose	1
2. Applicability and Definitions	1
3.1 Applicability	1
3.2. Definitions	1
3. Bribery, Gifts, and Marketing Activities	2
3.1. Bribery and Kickbacks	2
3.2. Gifts	2
3.3. Exceptions	2
3.3.1. Widely Attended Gathering	2
3.3.2. Gifts with Approval of the Public Sector Agency	3
3.3.3. Gifts Under a Pre-Existing Relationship	3
4. Contracting with Public Sector Entities	3
4.1. Courtesies	3
4.2. Use of Consultants to Obtain Business	4
4.3. Conflicts of Interest	4
4.4. Procurement Integrity and Confidential Information	4
4.5. Contract Compliance and False Claims	5
5. Public Sector Employment Issues	5
5.1. Confidential Public Sector Information	5
5.2. Post-Government Employment	5
5.3. Military Reserve Personnel	6
6. Reporting Violations and Consequences	6
6.1. Duty to Report	6
6.2. No Retaliation	6
6.3. Consequences for Failure to Comply	6
6.4. Changes to this Addendum	6

1. Purpose

This Global Public Sector Addendum (“**Addendum**”) is intended to supplement the SentinelOne Code of Business Conduct and Ethics (“**Code**”) with a policy framework relevant to the public sector business of SentinelOne (the “**Company**”). Because the Company sells to and supports public sector customers around the world, the Company must also comply with applicable laws and regulations which apply specifically to public procurements. This addendum sets forth the Company rules and guidance for public sector compliance, consistent with our Code and the Company’s values.

If you ever are in an uncomfortable situation or have any doubt about whether a situation is consistent with our ethical standards or complies with the law, please seek help from your manager or the Compliance Team at compliance@sentinelone.com. If you would like to remain anonymous, please refer to our Whistleblower Policy for instructions on how to report a situation or seek help anonymously.

2. Applicability and Definitions

3.1 Applicability

This Addendum applies to all employees, contractors, consultants, agents, representatives, officers, and members of our Board of Directors (“**Board**”). However, unlike the Code, which applies generally to all conduct by Company personnel, this Addendum applies specifically to situations involving Public Sector entities (defined below), and other activities which may involve interacting with Public Sector entities (whether they are customers yet or not).

3.2. Definitions

“**Bribe**” means a gift (anything of value) that is offered with the intent to cause a public official to do something (or not do something) as part of their official responsibilities.

“**Courtesy**” means a free subscription or license for Company products or services that is offered to a customer for a trial period, usually as part of a customer’s consideration of whether to purchase the product or service.

“**Gifts**” or “**Gratuities**” means anything of value – even something of very little value, like a cup of coffee, or narrow value like company swag. (Public Sector agencies sometimes call these “gratuities” – the idea is the same.)

“**Kickback**” means a payment from a prime contractor or partner in exchange for work or the purchase of services within the Public Sector sphere (broadly defined).

“**Public Sector**” means any government agency at the national, provincial/state, or local level. This includes state-owned enterprises and concerns such as publicly owned utilities, public educational institutions, and may include quasi-public sector entities such as transit authorities, banks, or utilities, depending on whether the laws of that quasi-public sector entity consider it a government entity for purposes of compliance with procurement regulations and/or government ethics rules like those relating to bribery and gifts.

3. Bribery, Gifts, and Marketing Activities

3.1. Bribery and Kickbacks

It is both a crime, and against Company policy, to bribe a Public Sector official, or arrange for a kickback in exchange for facilitating business with a customer, partner, or reseller/distributor. You should not offer anything of value to a Public Sector official, directly or indirectly through a partner or intermediary, with the intent to cause that person to do (or not do) any official act. Similarly, you should neither seek nor give anything of value or partners, resellers, distributors, or other intermediaries, as a reward for doing business with the Company. If you have any questions about whether a business arrangement could constitute bribery or a kickback, contact the Compliance Team.

3.2. Gifts

It is Company policy to not give any gifts or gratuities to Public Sector officials, employees, or contractors, to ensure compliance with strict Public Sector rules regarding gifts and gratuities.

3.3. Exceptions

There are certain legal exceptions which exist for giving gifts or gratuities to Public Sector personnel that may apply. Depending on the exception, or if any doubt exists, contact the Compliance Team to check in advance as to whether the gift will be allowable.

3.3.1. Widely Attended Gathering

An exception to the general rule against gifts for Public Sector personnel allows companies to provide free tickets to attend a widely attended gathering (“WAG”) where (a) there are a large number of attendees (more of a conference or an event than a dinner party); (b) the attendees are diverse (as in, not just the Company and a few customers or agencies); and (c) there is an exchange of ideas or views. The Company may give free tickets to Public Sector personnel to attend such WAGs provided that such Public Sector personnel do not have a significant role in any procurement or other activity that may affect the Company. If such Public Sector personnel are involved in any procurement activity, the Company should not give them free tickets (so as not to raise potential bribery concerns).

The WAG exception generally does not apply to entertainment or sporting events. However, some Public Sector agencies may allow their officials to accept free entertainment or sporting tickets, with written agency permission, when the agency determines that such attendance is in the agency’s interest, and the value of the employee’s attendance outweighs the concern that the employee or agency may be, or may appear to be, improperly influenced by the free tickets. Generally, the exception is available only where there is a meaningful opportunity for discussions that benefit the agency. Two examples of such exceptions are:

- An invitation to a corporate infield tent at a horse race where invited government personnel can meet other attendees in the tent and talk before, during, and after the races with a large and diverse group of participants sharing a wide range of views.

- An invitation to view a sporting event from a large box in an indoor arena or stadium, if the box can accommodate a large, diverse group of attendees, and provide an opportunity for discussion and exchange of ideas during the WAG.

Before giving any free tickets under the WAG exception, the Company should ask the invitee to get written approval from their agency ethics office, for which the Company should be prepared to provide a description of the event, the estimated value of the tickets, a description of the other attendees, and a description of how the event will benefit the attending official(s) (and/or their agency). Also, before offering or giving any free tickets under the WAG exception, approval must be sought from the Compliance team.

When in doubt, check with the Compliance team, because different rules may apply based on the country or state/province of the particular Public Sector official being invited.

3.3.2. Gifts with Approval of the Public Sector Agency

Certain gifts may be allowable under agency ethics rules, such as de minimis gifts of food or drinks at conferences or office visits, or branded swag which some agencies have deemed to have little intrinsic or marketable value. Before giving any gifts to Public Sector personnel, check with the Compliance team, and ask the recipient to clarify in writing whether their agency ethics rules allow them to accept such a gift.

There are certain other exceptions which may apply depending on the Public Sector agency involved, such as allowing gifts to an agency (instead of a person) or allowing gifts of de minimis food and drink or swag at a widely attended gathering. There is also a general exception for providing moderate cost food and drink at an office to Public Sector personnel; however, such Public Sector personnel should be given the opportunity to contribute the cost of their food or drink if their agency ethics rules require them to do so. If you have a question about the value or type of such gifts, check with the Compliance team first, before placing the order.

3.3.3. Gifts Under a Pre-Existing Relationship

Most agency ethics rules contain an exception for bona fide pre-existing relationships, such as those between former colleagues. In such situations, former colleagues may buy each other food or drink, or exchange gifts, based on their pre-existing, personal, non-work relationship, subject to a rule of reasonableness (as in, no extravagant gifts or one-sided gift relationships). When in doubt regarding this, check with the Compliance team.

4. Contracting with Public Sector Entities

4.1. Courtesies

Public Sector customers generally cannot accept free products or services – both because of laws and regulations prohibiting voluntary services, and also to guard against potential instances of free products or services being a form of bribery. However, most Public Sector agencies have the ability to accept products or services from private sector entities like the Company under certain circumstances such as in connection with a proof of concept (POC) or evaluation trial license, where (1) the product or service is being offered freely; (2) there is no expectation by the Company of payment; and (3)

both the Company and Public Sector customer agree the product or service is not being offered to induce the Public Sector customer to buy the products or services in the future.

4.2. Use of Consultants to Obtain Business

The Company can (and does) lawfully use consultants, advocates, and business development professionals to seek Public Sector business. In doing so, however, the Company complies with certain rules such as the U.S. federal rule against contingency fees for business development, and similar rules at the state and local level (or in other countries).

The Company must also ensure that any consultants, advocates, or business development professionals engaged by the Company do not violate the Company's Code, this Addendum, or any applicable laws and regulations, such as those relating to bribery or gifts, lobbying, and improper influence of Public Sector agencies. Employees must also comply with the Company's Global Lobbying and Political Engagement Policy, which governs all lobbying efforts and political engagements, including those conducted through third parties. To ensure compliance, any Company agreements for the use of consultants, advocates, or business development professionals must be reviewed and approved by the Compliance team.

4.3. Conflicts of Interest

Public Sector agencies increasingly demand that their contractors offer products and services free of any organizational conflicts of interest (OCI) or personal conflicts of interest (PCI).

As a large commercial technology company, doing business with thousands of private sector and Public Sector customers worldwide, SentinelOne cannot promise any one Public Sector customer that it will only work for that customer, and not work for a different customer whose interests might be different from that Public Sector customer. However, the Company can agree to terms that it will objectively provide its products and services to a Public Sector customer, and strictly maintain the confidentiality of all customer information, such that the Company's work for any customer should not affect the work for a Public Sector customer.

Similarly, the Company cannot agree to terms that seek to govern or restrict personal conflicts of interest which may arise within the Company's global workforce. However, the Company can agree to comply with its Code of Business Conduct and Ethics and this Addendum.

In any situation where you are asked to provide information on Company conflicts of interest or asked to consider contractual or regulatory language regarding such conflicts, please contact the Compliance team.

4.4. Procurement Integrity and Confidential Information

There is a special category of Public Sector confidential information which includes all non-public sensitive information relating to a Public Sector procurement. This generally includes anything that would be found in another company's proposal for a Public Sector contract (as in, proposal language, pricing, technical approach, resumes of key personnel, etc.), and also includes non-public Public Sector agency information relating to acquisition strategies, plans, selection processes, etc. No Company personnel should seek out such Public Sector confidential information, nor accept it if

offered by anyone. If anyone at the Company should encounter such confidential information, immediately report to the Compliance team, without further disseminating the information.

4.5. Contract Compliance and False Claims

At the federal level in the U.S., and in many states, there is a False Claims Act (or analogous statute) which prohibits contractors (like the Company) from intentionally making any false statements in connection with their invoices for payment by Public Sector customers. A number of Public Sector customers, including the U.S. government, have taken the position that every invoice submitted is an “implied certification” of compliance with the terms of a Public Sector contract. This legal theory puts a premium on ensuring the Company only agrees to terms that it can meet with its products and services, and that it makes only accurate statements to Public Sector customers, especially in connection with invoicing. Any non-standard terms in a Company contract require Commercial Legal (commercial.contracts@sentinelone.com) review. In the event of a discrepancy between what was provided to a Public Sector customer, and what was invoiced, please contact Commercial Legal so that the Company can work out with the customer how to reconcile the difference.

5. Public Sector Employment Issues

5.1. Confidential Public Sector Information

Public Sector employees are exposed to confidential, Public Sector information while working for their Public Sector agencies, just as employees at other companies are exposed to confidential information. However, because these Public Sector agencies are often buying products and services (including those of Company competitors), Public Sector employees can be exposed to information not just about their agencies’ operations, but also information about Company competitors such as pricing and technical details. Public sector personnel coming to work for the Company should be reminded of their confidentiality obligations under the Code, and special care should be taken to ensure they neither bring any Public Sector confidential information with them, nor share any such information with the Company.

5.2. Post-Government Employment

Special rules may apply to Public Sector employees after they leave public service. The most important and obvious is the continuing obligation of Public Sector personnel to maintain the confidentiality of any information they were exposed to while in Public Sector employment. Certain employees, particularly those of senior rank, or those who work on procurement matters, may also leave government with limitations on what they can do in the private sector, or “cooling off” periods that bar them from contacts back to their former agency for a period. In any case where the Company is hiring a person from Government, or hiring a person who has previously served as a Public Sector executive or general/flag officer in the military, the Compliance team and the People team should review the person’s resume prior to hiring, and ensure the person has been counseled (by their agency’s ethics official, and possibly the Company as well) on the specific rules applicable to them.

5.3. Military Reserve Personnel

The Company has a number of personnel who continue to serve in their country's armed forces as reservists – working full-time for the Company, while serving on a part-time basis in the military. The Company is grateful for the service of these personnel but must be careful because of their dual status and access to Public Sector information as reservists. Just as the Company does for information belonging to employees' former employers, the Company should not ask reservists to share any confidential information relating to their military service.

6. Reporting Violations and Consequences

6.1. Duty to Report

As with any other issue under the Code of Business Conduct and Ethics, if you have a concern about any actual or possible violations of this Code or any of our policies, you have a duty to report it promptly. (This mirrors the Company's duty to report major violations of contracting law, or fraud, to Public Sector customers.)

You may raise any concern orally or in writing through several channels. Use the channel that is most comfortable for you. Your manager is often in the best position to resolve a concern quickly. However, you can always report a concern to the Company's Chief Legal Officer, the Compliance team, the next level of management or anonymously. Consult the process set forth in our Whistleblower Policy for additional ways to report concerns.

6.2. No Retaliation

The Company will not tolerate any reprisals or retaliation against any person or entity raising a concern or participating in any investigation in good faith.

6.3. Consequences for Failure to Comply

The Company can face severe consequences for failing to comply with laws and regulations applicable to the Public Sector, including criminal prosecution, civil fraud suits, civil actions under federal or state false claims acts, and/or suspension or debarment from government contracting. To ensure its compliance, the Company may take action against Company personnel who fail to follow this Addendum or the Company's Code, or applicable Public Sector laws and regulations; such action may include discipline up to and including termination of employment or any consulting/contracting arrangement.

6.4. Changes to this Addendum

Our Board reserves the right in its sole discretion to modify or grant waivers to this Addendum, in order to remain compliant with applicable laws and regulations. Any such modification(s) or waiver(s) must be approved in writing. Any amendments or waiver for the principal executive officer, principal financial officer, principal accounting officer, controller, or any other persons performing similar functions in the company will be publicly disclosed if and as required by applicable laws, rules, and regulations.