

☐ Check this box if no longer subject to Section 16. Form 4 or Form 5 obligations may continue. See Instruction 1(b).

☐ Check this box to indicate that a transaction was made pursuant to a contract, instruction or written plan for the purchase or sale of equity securities of the issuer that is intended to satisfy the affirmative defense conditions of Rule 10b5-1(c). See Instruction 10.

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

|                                              |           |
|----------------------------------------------|-----------|
| OMB APPROVAL                                 |           |
| OMB Number:                                  | 3235-0287 |
| Estimated average burden hours per response: | 0.5       |

|                                                                                                                                                                                                                                                                 |                                                                                       |                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Name and Address of Reporting Person*<br><u>Thurmond Mark C.</u><br><br>(Last) (First) (Middle)<br><u>C/O TENABLE HOLDINGS, INC.</u><br><u>6100 MERRIWEATHER DRIVE</u><br><br>(Street)<br><u>COLUMBIA</u> <u>MD</u> <u>21044</u><br><br>(City) (State) (Zip) | 2. Issuer Name and Ticker or Trading Symbol<br><u>Tenable Holdings, Inc. [ TENB ]</u> | 5. Relationship of Reporting Person(s) to Issuer<br>(Check all applicable)<br><input checked="" type="checkbox"/> Director 10% Owner<br><input checked="" type="checkbox"/> Officer (give title below) Other (specify below)<br><u>Co-Chief Executive Officer</u> |
|                                                                                                                                                                                                                                                                 | 3. Date of Earliest Transaction (Month/Day/Year)<br><u>11/24/2025</u>                 |                                                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                 | 4. If Amendment, Date of Original Filed (Month/Day/Year)                              |                                                                                                                                                                                                                                                                   |

Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned

| 1. Title of Security (Instr. 3) | 2. Transaction Date (Month/Day/Year) | 2A. Deemed Execution Date, if any (Month/Day/Year) | 3. Transaction Code (Instr. 8) |   | 4. Securities Acquired (A) or Disposed Of (D) (Instr. 3, 4 and 5) |            |         | 5. Amount of Securities Beneficially Owned Following Reported Transaction(s) (Instr. 3 and 4) | 6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4) | 7. Nature of Indirect Beneficial Ownership (Instr. 4) |
|---------------------------------|--------------------------------------|----------------------------------------------------|--------------------------------|---|-------------------------------------------------------------------|------------|---------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------|
|                                 |                                      |                                                    | Code                           | V | Amount                                                            | (A) or (D) | Price   |                                                                                               |                                                          |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | M                              |   | 1,363                                                             | A          | \$0     | 106,364                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | F                              |   | 660 <sup>(1)</sup>                                                | D          | \$25.68 | 105,704                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | M                              |   | 1,162                                                             | A          | \$0     | 106,866                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | F                              |   | 562 <sup>(1)</sup>                                                | D          | \$25.68 | 106,304                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | M                              |   | 2,267                                                             | A          | \$0     | 108,571                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | F                              |   | 1,097 <sup>(1)</sup>                                              | D          | \$25.68 | 107,474                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | M                              |   | 3,857                                                             | A          | \$0     | 111,331                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | F                              |   | 1,865 <sup>(1)</sup>                                              | D          | \$25.68 | 109,466                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | M                              |   | 3,713                                                             | A          | \$0     | 113,179                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | F                              |   | 1,796 <sup>(1)</sup>                                              | D          | \$25.68 | 111,383                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | M                              |   | 4,368                                                             | A          | \$0     | 115,751                                                                                       | D                                                        |                                                       |
| Common Stock                    | 11/24/2025                           |                                                    | F                              |   | 2,112 <sup>(1)</sup>                                              | D          | \$25.68 | 113,639                                                                                       | D                                                        |                                                       |

Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)

| 1. Title of Derivative Security (Instr. 3) | 2. Conversion or Exercise Price of Derivative Security | 3. Transaction Date (Month/Day/Year) | 3A. Deemed Execution Date, if any (Month/Day/Year) | 4. Transaction Code (Instr. 8) |   | 5. Number of Derivative Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5) |       | 6. Date Exercisable and Expiration Date (Month/Day/Year) |                 | 7. Title and Amount of Securities Underlying Derivative Security (Instr. 3 and 4) |                            | 8. Price of Derivative Security (Instr. 5) | 9. Number of derivative Securities Beneficially Owned Following Reported Transaction(s) (Instr. 4) | 10. Ownership Form: Direct (D) or Indirect (I) (Instr. 4) | 11. Nature of Indirect Beneficial Ownership (Instr. 4) |
|--------------------------------------------|--------------------------------------------------------|--------------------------------------|----------------------------------------------------|--------------------------------|---|----------------------------------------------------------------------------------------|-------|----------------------------------------------------------|-----------------|-----------------------------------------------------------------------------------|----------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------------------------------------------------------|
|                                            |                                                        |                                      |                                                    | Code                           | V | (A)                                                                                    | (D)   | Date Exercisable                                         | Expiration Date | Title                                                                             | Amount or Number of Shares |                                            |                                                                                                    |                                                           |                                                        |
| Performance Restricted Stock Units         | <sup>(2)</sup>                                         | 11/24/2025                           |                                                    | M                              |   |                                                                                        | 1,363 | <sup>(3)</sup>                                           | <sup>(3)</sup>  | Common Stock                                                                      | 1,363                      | \$0                                        | 1,365                                                                                              | D                                                         |                                                        |
| Performance Restricted Stock Units         | <sup>(2)</sup>                                         | 11/24/2025                           |                                                    | M                              |   |                                                                                        | 1,162 | <sup>(4)</sup>                                           | <sup>(4)</sup>  | Common Stock                                                                      | 1,162                      | \$0                                        | 5,816                                                                                              | D                                                         |                                                        |
| Performance Restricted Stock Units         | <sup>(2)</sup>                                         | 11/24/2025                           |                                                    | M                              |   |                                                                                        | 2,267 | <sup>(5)</sup>                                           | <sup>(5)</sup>  | Common Stock                                                                      | 2,267                      | \$0                                        | 20,407                                                                                             | D                                                         |                                                        |
| Restricted Stock Units                     | <sup>(2)</sup>                                         | 11/24/2025                           |                                                    | M                              |   |                                                                                        | 3,857 | <sup>(6)</sup>                                           | <sup>(6)</sup>  | Common Stock                                                                      | 3,857                      | \$0                                        | 3,857                                                                                              | D                                                         |                                                        |
| Restricted Stock Units                     | <sup>(2)</sup>                                         | 11/24/2025                           |                                                    | M                              |   |                                                                                        | 3,713 | <sup>(7)</sup>                                           | <sup>(7)</sup>  | Common Stock                                                                      | 3,713                      | \$0                                        | 18,565                                                                                             | D                                                         |                                                        |

