

TENABLE HOLDINGS, INC.
SUPPLIER CODE OF CONDUCT

In pursuing our mission, we strive to achieve the highest business and personal ethical standards as well as compliance with the laws and regulations that apply to our business. We trust and expect that our suppliers and partners will honor the same values and commitments. This Supplier Code of Conduct (the “*Code*”) of Tenable Holdings, Inc., and its subsidiaries (“*Tenable*” or the “*Company*”) expresses the expectations we hold for our suppliers.

For the purposes of this Code, a “supplier” is any third party wherever located that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company’s behalf, including suppliers, vendors, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.

This Code is not intended to conflict with or modify the terms and conditions of any existing contract or agreement. In the event of such a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Code.

I. COMPLIANCE WITH LAWS

LAWS, REGULATIONS AND CONTRACTS

Acting ethically and obeying the law is a Tenable core value. Our success depends upon each person acting ethically and legally. Suppliers must conduct business and perform work in compliance with all applicable laws and regulations.

WAGES AND BENEFITS

Suppliers must pay workers at least the minimum compensation required by applicable law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required. Supplier or its staff shall not be entitled to any of the benefits that Tenable may make available to its employees, including, but not limited to, wages, group health or life insurance, profit sharing, or retirement benefits, except as expressly stated in its agreements with Tenable. Supplier is not authorized to make any representation, contract, or commitment on behalf of Tenable unless previously specifically requested or authorized in writing to do so.

FINANCIAL RESPONSIBILITY/ ACCURATE RECORDS

Suppliers must create and maintain complete and accurate business records. All records, regardless of format, made or received in furtherance of a business transaction must fully and accurately represent the transaction or event being documented.

ANTITRUST/ FAIR COMPETITION

Tenable supports vigorous, open, and fair competition. Suppliers must conduct business in accordance with all applicable antitrust or competition laws and regulations. This includes avoiding business practices, such as entry into arrangements that unlawfully restrain competition, improper exchange of competitive information, price fixing, bid rigging, or improper market allocation.

II. EMPLOYMENT PRACTICES

HUMAN RIGHTS

We expect our suppliers to treat people with respect and dignity, encourage inclusion and diversity, and promote equal opportunity. We expect suppliers to share our commitment to human rights and equal opportunity in the workplace. We also expect suppliers to adhere to our Human Rights Policy and to conduct their employment practices in full compliance with all applicable laws and regulations and in conformance with our commitment to a workplace free of harassment, unlawful discrimination, and retaliation. We expect our suppliers to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, or reprisal.

FREE ASSOCIATION, COLLECTIVE BARGAINING, AND WAGES

We expect our suppliers to recognize and respect the right of their employees to freely join or refrain from joining worker organizations of their choosing and to enter collective bargaining as permitted by applicable laws. We also expect our suppliers to provide fair compensation and follow applicable wage and hour laws and regulations, including those related to minimum wage, overtime pay, and maximum working hours.

NON-DISCRIMINATION

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment and we do not tolerate any discriminatory practices based on any characteristics protected under applicable law, including race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, physical or mental disability, or any other characteristic protected by federal, state or local law.

ANTI-HARASSMENT

We expect our suppliers to ensure that employees may perform their work in an environment free from physical, psychological, sexual, and verbal harassment, or other abusive conduct.

HUMAN TRAFFICKING AND MODERN SLAVERY

We expect our suppliers to abide by all applicable anti-human trafficking and modern slavery laws, including, but not limited to, our Modern Slavery Act Statement and the UN Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, and to not engage in the use of forced, bonded, or indentured labor, involuntary prison labor, slavery, or trafficking of persons and to take affirmative steps to prevent such acts from occurring in their own operations and their own supply chain. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

CHILD LABOR

We expect our suppliers to ensure that child labor is not used in the performance of work and to comply with the International Labour Organization Forced Labour Convention (No. 29), and the Abolition of Forced Labour Convention (No. 105). The term “child” refers to any person under the minimum legal age for employment where the work is performed. Suppliers must, prior to employing any worker, review and validate all relevant documentation to ensure that such worker has the legal right to work in that jurisdiction.

EMPLOYEE SAFETY & HEALTH

We expect our suppliers to comply with applicable safety and health laws, regulations, policies, and procedures and to provide for the health, safety, and welfare of their employees, visitors, and others who may be affected by their activities. We require our suppliers to comply with all applicable health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their people,

visitors, and others who may be affected by their activities, including taking proactive steps to minimize health risk exposure and reduce accidents.

DRUG-FREE WORKPLACE

We expect our suppliers to maintain a workplace free from the use, possession, sale, or distribution of controlled or illegal substances.

DIVERSITY, EQUITY, AND INCLUSION

We are committed to engaging with small and diverse businesses and driving meaningful diversity, equity, and inclusion initiatives across our supply base. We encourage our suppliers to demonstrate a commitment to identify, measure, and improve a culture of diversity and inclusion through all aspects of workplace and supplier management, include small and diverse suppliers in subcontracting activities where possible, and proactively engage with their local communities to positively contribute to economic growth and opportunities for social change.

III. ANTI-CORRUPTION

ANTI-CORRUPTION AND ANTI-BRIBERY

We compete on the merits of our products and services and do not use the exchange of business courtesies to gain an unfair competitive advantage and we expect the same from our suppliers. We have a zero-tolerance policy for corruption, and prohibit anyone conducting business on our behalf, including suppliers, from offering or making any improper payments or anything of value to government officials, political parties, candidates for public office, or other persons. This includes the offer and/or receipt of any bribe or kickback to and/or from any customer, supplier, or others. We expect our suppliers not to make any illegal, improper, or corrupt payments. Our suppliers must comply with Tenable's Anti-Corruption Policy and applicable anti-corruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, and other similar laws prohibiting bribery and corruption in business dealings.

IV. USE OF ASSETS, SECURITY AND PROTECTING INFORMATION

USE OF ASSETS

Suppliers should use and manage Tenable assets responsibly. Suppliers should also protect and responsibly use both the physical and non-physical assets of Tenable, including property, supplies, consumables, equipment, information, and other intellectual property when authorized by Tenable to use such assets.

CYBERSECURITY, DATA PRIVACY, AND INFORMATION SECURITY

Suppliers must take care to safeguard and protect information entrusted to them by us, our customers or third parties, and information generated or developed by them in support of our business from unauthorized access, destruction, use, modification, or disclosure. We expect suppliers to comply with all applicable contractual and legal requirements and industry best practices, including intellectual property and data privacy laws. Our suppliers should take proper care to protect information, including confidential, proprietary and personal information, competition sensitive information, and intellectual property. Information should not be used for any purpose other than the business purpose for which it was provided unless there is prior written authorization from the owner. Tenable information should not be used for any purposes beyond the scope of the business arrangement with our company, without prior authorization.

Suppliers will only use information technology and software that has been legitimately acquired and that they have a right to use. Information maintained on electronic systems should be protected against cyber

intrusions and other unauthorized use or access through appropriate physical and electronic security procedures. In addition to complying with our cybersecurity requirements, suppliers are encouraged to implement practices and procedures to ensure the security of their people, property, and other assets, including their supply chains.

Suppliers must follow all applicable laws and regulations pertaining to data protection, privacy, and information security, and be committed to respecting and protecting the privacy of individuals by collecting the minimum personal information necessary for legitimate business purposes.

All our suppliers should ensure that any data processing of personal information is done ethically and legally, always taking the utmost care to safeguard personal information in accordance with sound industry practices.

V. ENVIRONMENT AND SUSTAINABILITY

ENVIRONMENT

We expect our suppliers to comply with all applicable environmental laws, regulations, and directives. We encourage our suppliers to operate as responsible stewards of the environment and in a manner that actively and responsibly manages risk, conserves natural resources, prevents pollution, and protects the environment. Whenever possible, suppliers are encouraged to measure and share their greenhouse gas emissions publicly, demonstrate actions that reduce energy, waste, and water usage in their operations, and set Science-Based Targets in alignment with the Paris Climate Agreement. In addition, wherever possible, we expect suppliers to cooperate in the Company's efforts to track its Scope 3 greenhouse gas emissions. We also encourage suppliers to take all reasonable measures to reduce their negative impact on the environment through adoption and promotion of programs such as recycling, waste reduction and conservation of natural resources.

VI. COMPLIANCE PROCEDURES

ETHICS AND COMPLIANCE POLICIES

Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and expectations related to or addressed expressly within this Code. We encourage our suppliers to implement their own written code or standards of conduct, and to flow down the principles to the entities that furnish goods and services to our suppliers.

REPORTING AND WHISTLEBLOWER PROTECTION

We expect our suppliers to provide their employees with avenues for raising legal or ethical issues or reporting concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

Suppliers are strongly encouraged to raise any concerns or report suspected misconduct to Tenable. This may be done anonymously by either: (i) leaving a message by phone on our ethics hotline at 1-866-854-1450 (US) or +1 (402) 517-3533, (ii) sending a message through www.openboard.info/TENB/index.cfm, (iii) sending a message from an anonymous email address to compliance-reporting@tenable.com, or (iv) sending a report by regular mail to our General Counsel or Chief People Officer at Tenable Holdings, Inc., 6100 Merriweather Drive, Columbia, MD 21044. Please only use these forums to report ethical and compliance violations such as accounting or audit related complaints or concerns, accounting matters or controls, code of ethics violations, violations of the Foreign Corrupt Practices Act, corruption or bribery, or security or exchange violations. Any issues regarding payment, billing, etc. should be resolved by contacting your Tenable contact directly. Tenable will not tolerate retaliation taken against any individual

who has in good faith raised questions, sought advice, or reported misconduct, questionable behavior, or a possible violation of law or policy. Tenable will not retaliate and will prohibit retaliation taken against any individual who has in good faith raised questions, sought advice, cooperated in any investigation regarding improper conduct, or reported misconduct, questionable behavior, or possible violation of law or policy.

CONSEQUENCES FOR VIOLATING STANDARDS

In the event of a violation of this Code, we may pursue corrective action to remedy the situation. In the case of an actual or possible violation of law or regulation, we may be required to report the matter to the proper authorities. We reserve the right to terminate our relationship or take any other appropriate action with any supplier under the terms of our existing contract or agreement. Additionally, Tenable may elect to conduct audits of certain of its suppliers to confirm their compliance with this Code.