



# Code of Business Conduct & Ethics





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# A Message from our CEO

Dynatrace lives and works by our Core Values. They serve as the guiding principles in realizing our Mission, Purpose, and Vision, and form the basis for our culture. They guide how we act as individuals and as a company.

Our Core Values are:

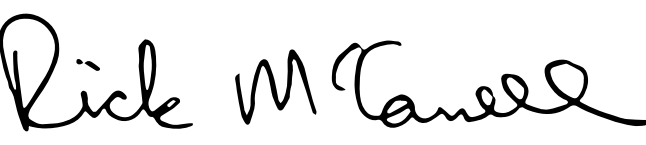
**Innovate with Passion**  
**Engage with Purpose**  
**Win with Integrity**

This Code of Business Conduct & Ethics helps ensure that our Core Values remain central to everything we do. It is the roadmap that guides our interactions, decisions, and behaviors and directly impacts our ability to recruit and retain the best talent, partner with top organizations, and maintain trusting relationships with our customers and partners.

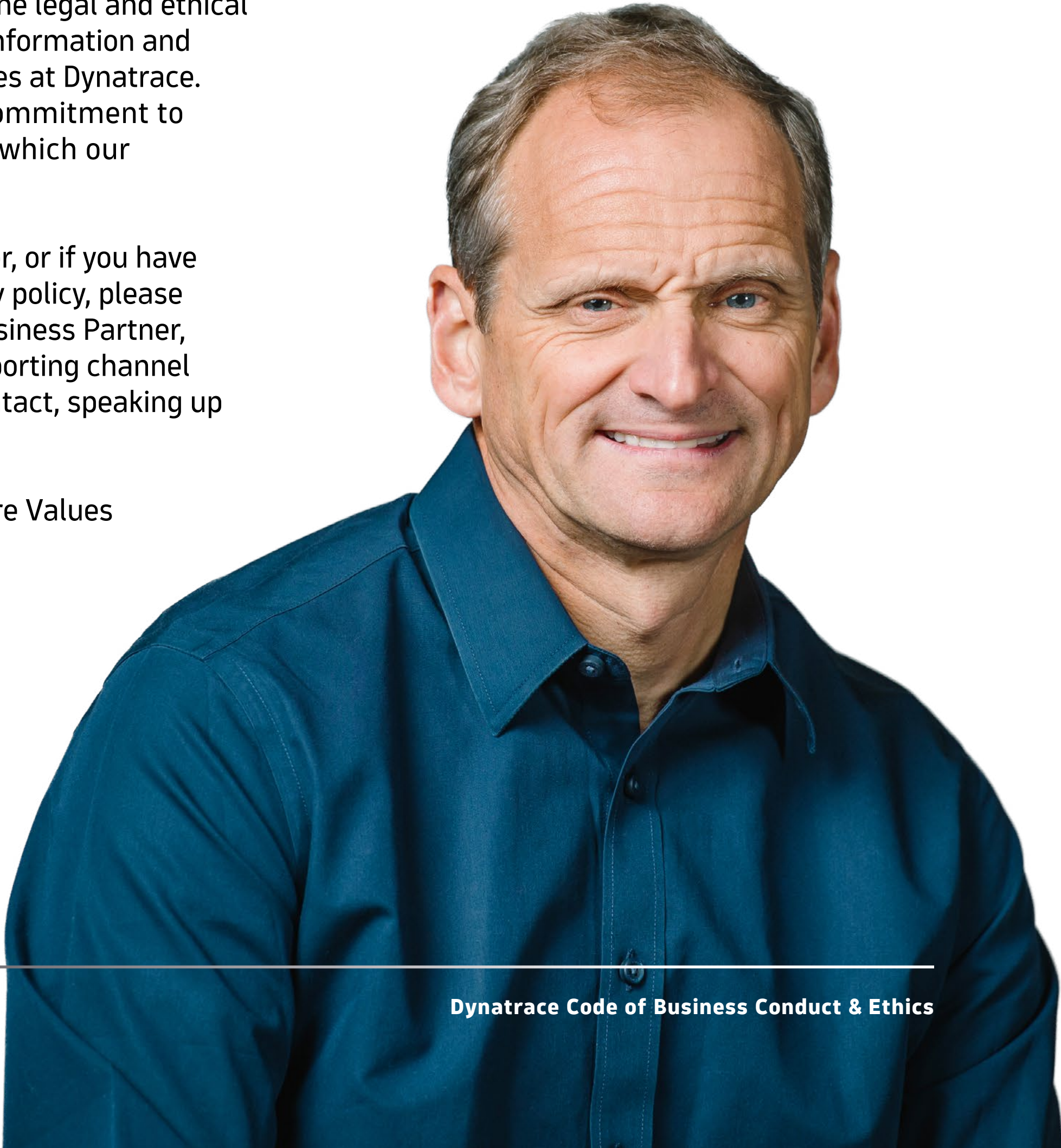
This Code provides a comprehensive framework for the legal and ethical responsibilities that we all share, pointing us to the information and resources needed to make sound decisions in our roles at Dynatrace. By adhering to this Code, we not only uphold our commitment to integrity, but also strengthen the foundation upon which our success is built.

If an issue arises that this Code can't help you answer, or if you have concerns about possible violations of law or company policy, please reach out to your manager, your People & Culture Business Partner, our Global Ethics & Compliance Office, or another reporting channel mentioned in this Code. But no matter whom you contact, speaking up is essential to a culture of integrity.

Thank you for your commitment to upholding our Core Values and embracing the principles outlined in this Code.



**Rick McConnell**  
Chief Executive Officer





# Our Mission, Purpose, Vision, and Values

- Our **Mission** is to deliver answers and intelligent automation from data.
- Our **Purpose** is to enable flawless and secure digital interactions.
- Our **Vision** is a world where software works perfectly.
- Our **Values** are Innovate with Passion, Engage with Purpose, and Win with Integrity.

For additional information about our shared beliefs and principles, please see the [Dynatrace Culture Code](#).





# About our Code

This Code of Business Conduct & Ethics (the Code) applies to all Dynatrace employees and officers. It also applies to members of the Dynatrace Board of Directors when they act in their capacity as directors. We also expect contractors, temporary workers, interns, consultants, partners, and agents performing services for us to be familiar with the Code and to comply with it when acting on Dynatrace's behalf.

The Code doesn't address every possible situation that you might face in your work. Accordingly, we expect you to use good judgment and common sense to determine whether a course of action is consistent with our ethical and legal standards. Ask for guidance when you're uncertain and speak up when you believe something isn't right. The "Speaking Up" section of the Code highlights the different ways that you can seek guidance, ask questions, and report concerns.

The Code applies in all countries where Dynatrace or you are located and where the company conducts business. As a global company, there may be circumstances where local law, other legal requirements, or local customs differ from our Code, or where we have supplemented the Code to address local requirements. If you become aware of any conflicts, please contact the [Dynatrace Global Ethics & Compliance Office](#) for guidance. When in doubt, the best approach is to follow the stricter requirement and to think of the Code as reflecting minimum standards for you to follow.

As part of demonstrating commitment to the Code, new employees, officers, and directors are required to acknowledge the Code as part of the onboarding process. On an annual basis, employees are required to re-acknowledge the Code. In this Code, we sometimes refer to our employees as "Dynatrancers".

We also maintain a [Supplier Code of Conduct](#) that sets forth expectations for our third-party suppliers and vendors.

**The Code is designed to be a practical resource to help you uphold Dynatrace's Core Values and act ethically and responsibly.**

**The Code provides the foundation for our commitment to integrity and includes policies, standards, and guidelines related to how we conduct business.**





# Making Good Decisions

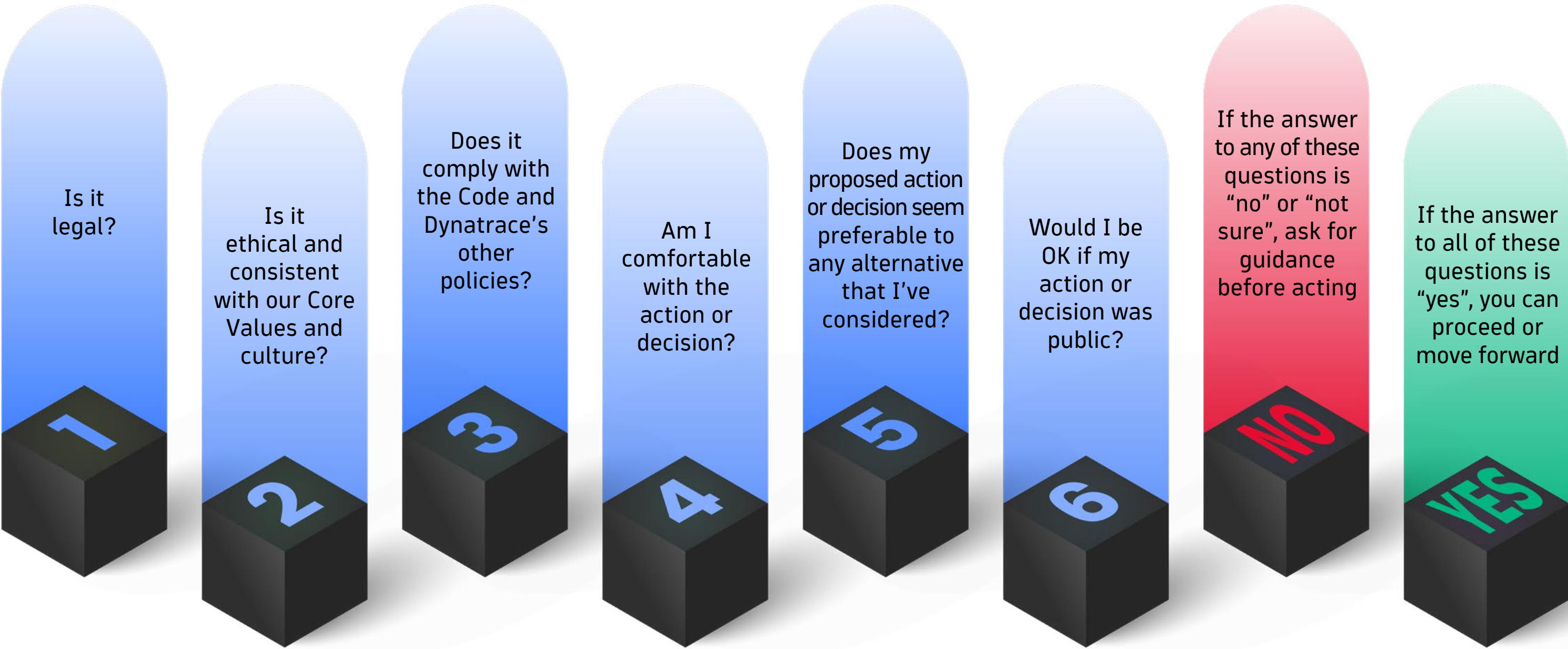
Each of us has a responsibility to act ethically and with integrity.

As part of this responsibility:

- Use the Code to guide how you work and make decisions
- Use good judgment
- Do the right thing
- Consider Dynatrace’s Core Values and standards of behavior or actions that align with them
- Raise concerns and ask questions

## There may be times when you’re unsure what type of action or decision to take

In these situations, ask yourself the following questions:



If you’re in need of guidance, speak up.

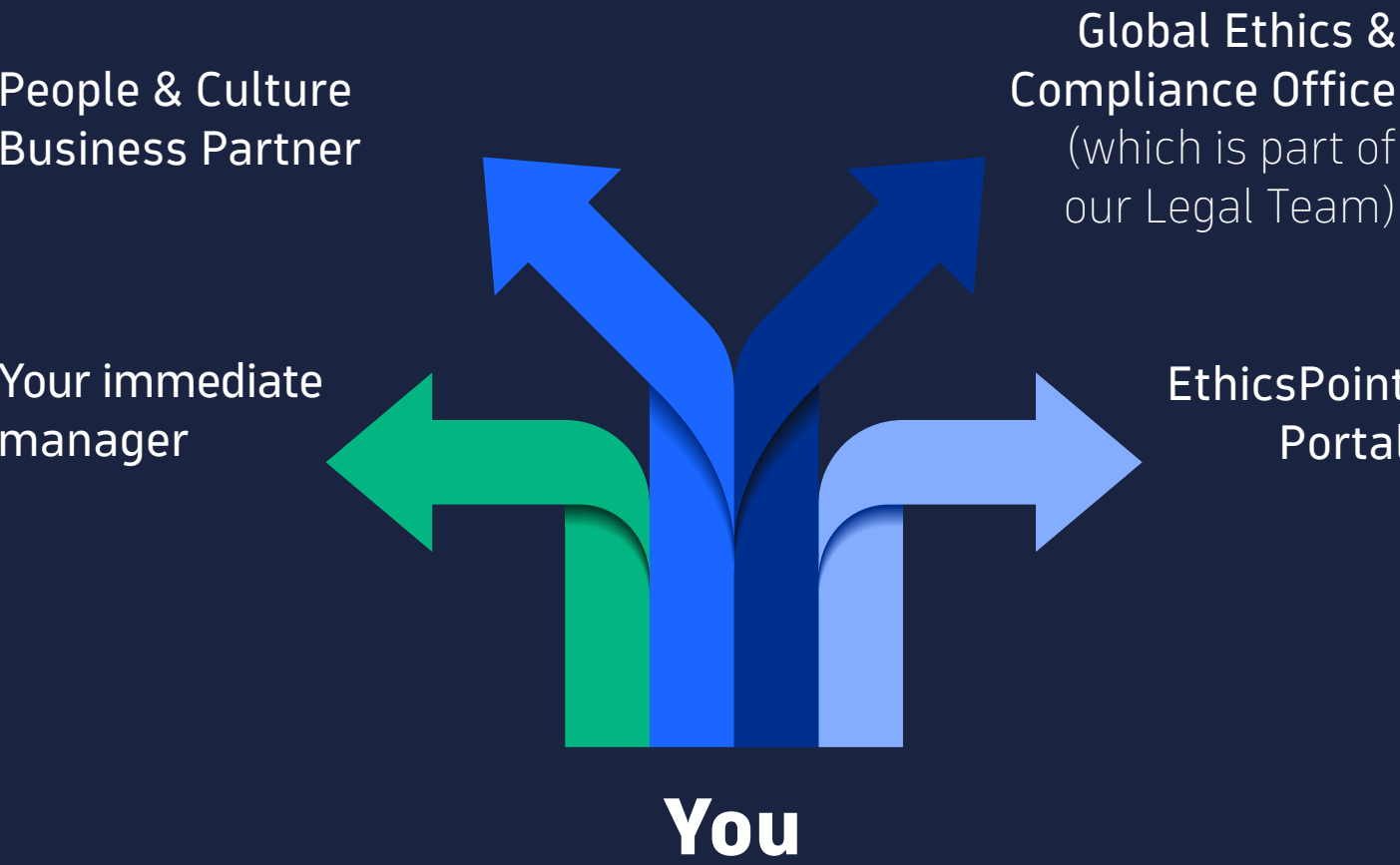
Please see the next page of the Code for information about the different alternatives available to you to do so.



# Speaking Up

If you have a good faith concern about a possible violation of our Code, other Dynatrace policies and procedures, or applicable laws, rules, or regulations related to Dynatrace business, you must speak up about it. You should also speak up if you have a question or need guidance.

**You have several options available to you:**



**Your immediate manager**

The best starting point will usually be your manager, who will often be able to provide you with guidance and answers. However, if the conduct in question involves your manager, if you have reported the conduct in question to your manager and you don't believe that your manager has dealt with it properly, or if you don't feel comfortable discussing the matter with your manager, you should raise the matter through another channel.

**Other internal resources**

You can speak with your People & Culture Business Partner or our Global Ethics & Compliance Office (which is part of the Dynatrace Legal Team). Communications with members of the Dynatrace Legal Team that are made for the purpose of providing or receiving legal advice may be considered privileged communications. You should also be aware that the Dynatrace Legal Team represents the company and does not act as personal lawyers to employees.

**Dynatrace EthicsPoint portal**

We also have a confidential EthicsPoint portal that you can use to raise any good faith concerns relating to inappropriate, fraudulent, unethical, or illegal behavior, including concerns about retaliation.

The EthicsPoint portal is operated by a third party. Concerns can be reported 24/7 online through the website linked below or by phone. You can report concerns or ask questions in multiple languages. Our EthicsPoint phone number is **+1 833-596-6172** (toll-free in the United States).

Please visit the website linked below for international toll-free numbers assigned to other countries.

[www.dynatrace.com/ethics](http://www.dynatrace.com/ethics)



# Speaking Up

## Anonymous reporting

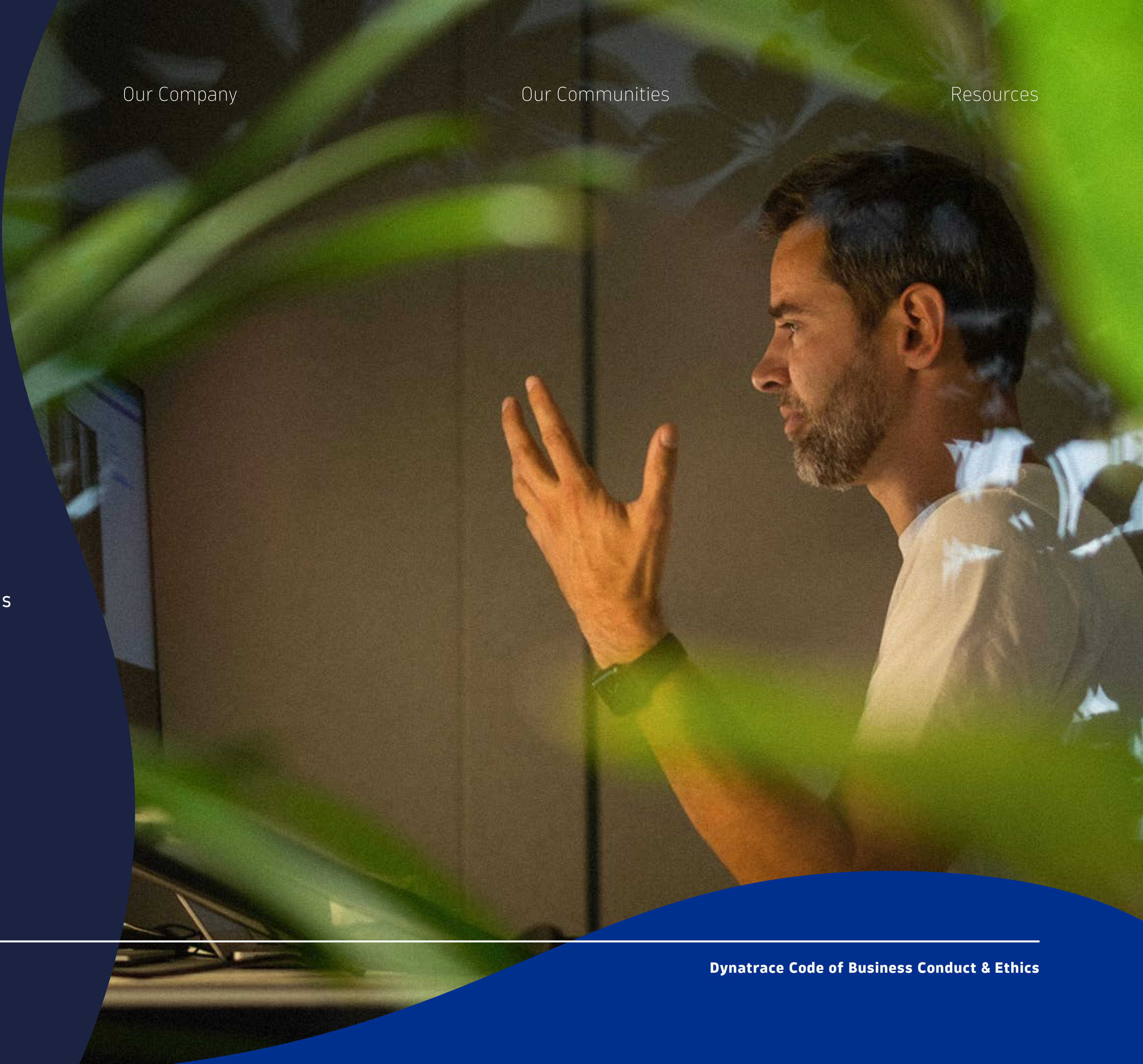
All calls and reports to the [EthicsPoint portal](#) are confidential and may be made anonymously, where permitted by local law. Keep in mind that in some circumstances, it might be difficult or even impossible for Dynatrace to thoroughly investigate anonymous concerns. We encourage you to share your identity when reporting a concern. Regardless of how you submit them, Dynatrace encourages you to raise concerns, and does not tolerate retaliation against those who do so in good faith.

## Investigations

We take concerns reported to us seriously and we handle them on a case-by-case basis. We have processes in place to investigate concerns raised. You should not conduct your own investigation into a matter. As part of looking into concerns, we maintain confidentiality to the fullest extent possible.

## Cooperation

You're expected to cooperate with the company in any investigation of a potential violation of the Code, any other company policy or procedure, or any law, rule, or regulation. Failing to cooperate may result in disciplinary action, up to and including termination.





# Speaking Up

## No false accusations

You should not use our reporting channels in bad faith or in a false or frivolous manner or to report grievances that do not involve the Code or other ethics, legal, or compliance-related issues.

While we prefer that you raise concerns internally, nothing in the Code, any agreement you may have with Dynatrace, or any Dynatrace policy prevents, restricts, or limits you from reporting concerns or violations of law to government agencies or officials or through courts. For additional information, please see the “Other Notices” section of this Code and our [Whistleblower Complaint Handling Policy](#).

## No retaliation

We’re committed to maintaining a culture where you feel comfortable raising concerns and helping with investigations. We never tolerate any retaliation against anyone who, acting **in good faith** on the basis of a reasonable belief, reports suspected misconduct or is asked to participate in an investigation.

Retaliation is a negative consequence that you experience as a result of raising a concern, asking a question, or participating in an investigation. Examples of retaliation might include an inappropriate demotion, receiving an unfair performance review, an unjustified reduction in your salary/bonus, job reassignment, threats, being excluded from meetings, or other harassment.

If you believe you’ve been retaliated against or you’ve witnessed retaliation against someone else, report it through one of our channels. Anyone who is found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

**“Good faith” doesn’t mean that you have to be right (when looking back in hindsight). It means that you honestly believe it to be true and you’ve provided all relevant information.**

## Consequences for violating the Code

If it’s determined that you violated the Code, you may be subject to disciplinary action that Dynatrace determines to be appropriate under the circumstances and in accordance with applicable law, up to and including termination of employment.

Dynatrace may also contact or refer matters to law enforcement or disclose matters to a regulator or self-regulatory organization, as appropriate.



# Responsibilities of Managers

While all of us should act ethically and with integrity, if you're a manager, you have additional responsibilities. You help set the tone and reinforce the culture at Dynatrace.

You should:

- Lead by example and role model the behavior that you'd like to see in others
- Create an "open door" culture and environment where colleagues are comfortable raising concerns or asking questions
- Listen when matters are brought to your attention and respond promptly to members of your team or other Dynatrancers who raise concerns or ask questions
- Provide adequate and appropriate guidance to your team related to your team's role
- Ensure your team completes all required company-wide compliance training
- Promptly address, report, or escalate issues and problems when they arise if you believe they violate the Code, the law, our policies, or the way we are committed to conducting business

Managers and other leaders sometimes need help in determining the proper course of action. When in doubt, ask for guidance.





# Our People





# Diversity, Equity, Inclusion, and Belonging (DEIB)

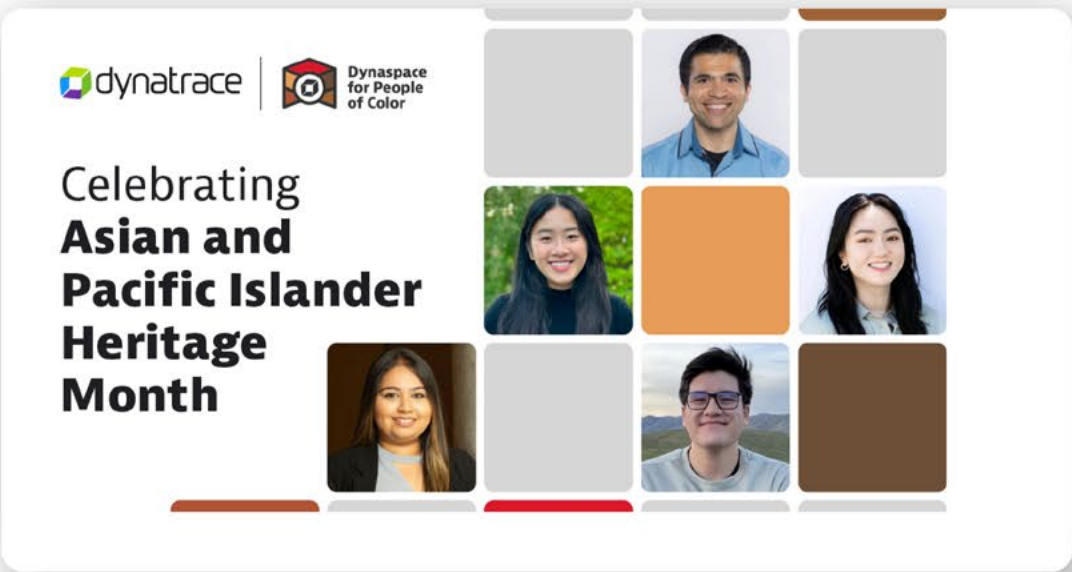
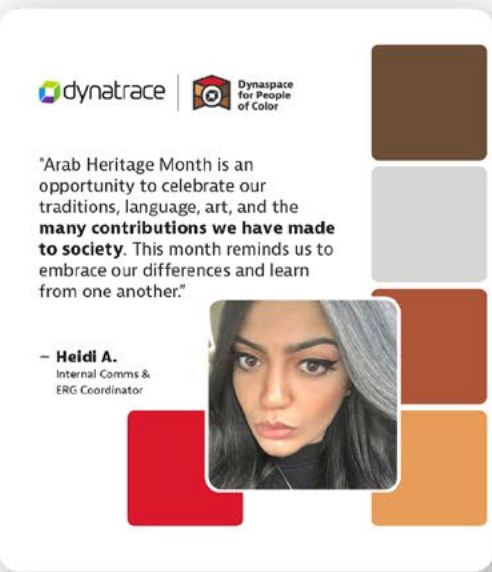
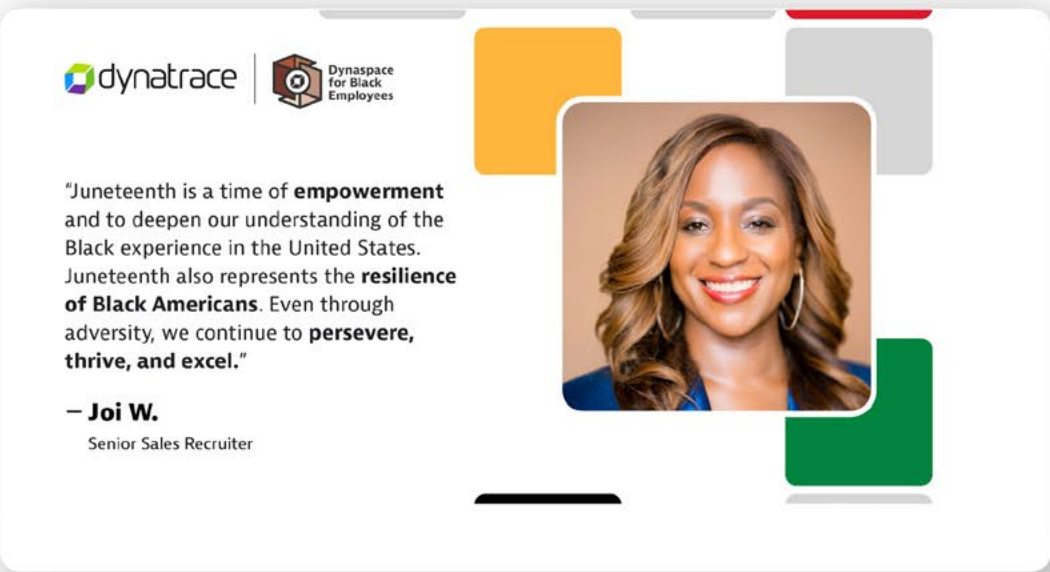
At Dynatrace, we respect and value our diverse backgrounds, identities, experiences, characteristics, and perspectives.

DEIB is critical to our mission, and we're committed to maintaining a culture where every Dynatracer feels respected, safe, included, and valued. When diversity meets collaboration—a way of working embedded in our DNA—we create powerful innovations that support our customers around the world.

As a global company, we're also mindful that conduct which may be acceptable in one country may be viewed differently in another.

To support and advance DEIB at Dynatrace:

- Be respectful of others' differences and views and keep an open mind
- Treat others how they want to be treated—and how you'd want to be treated
- Appreciate the unique ways that others contribute to our company
- Think about how your words and actions may be interpreted or perceived by others
- Be mindful of potential unconscious biases and microinequities and seek to eliminate them
- Consider joining or supporting one of our company's Dynaspaces, which are Employee Resource Groups (ERGs) focused on fostering an inclusive workplace





# Equal Opportunities

We base employment decisions such as hiring, promotion, compensation, and disciplinary action on an individual's merit, qualifications, experience, and abilities. We prohibit discrimination or unequal treatment based on, or because of, protected characteristics, which can vary around the world.

Characteristics protected by law can include:

- Age
- Alienage or citizenship
- Ancestry
- Color
- Disability (mental and physical)
- Ethnicity
- Genetic information
- Marital or family status
- Military or veteran status
- National origin
- Race
- Religion (including religious dress and grooming practices)
- Sex (including pregnancy, sexual orientation, gender identity, or gender expression)
- Any other characteristic protected by law

We also make reasonable accommodations or adjustments for qualified individuals with disabilities and colleagues with needs related to their religious observance or practice. A reasonable accommodation/adjustment for these purposes is a modification or adjustment to job duties or the work environment that enables an individual to perform the essential functions of a job without putting undue hardship on Dynatrace.





# Harassment

Harassment is unwelcome conduct based upon an individual’s protected characteristics that creates an intimidating, hostile, or offensive work environment. We don’t tolerate harassment of any kind in our workplaces or anywhere we’re conducting business—including in offices, virtual meetings, e-mail, social media, and other communications, or at off-site events. Harassment can occur during work hours and outside of it. Harassment can be overt and intentional and it can also include unintentional behavior. Even if local law doesn’t prohibit this type of conduct, you’re held to a higher standard under our Code.

Harassment can take many forms, and can be verbal, physical, visual, or sexual in nature.

Examples of harassment can include:

- Bullying or abusive conduct that can be threatening, aggressive, humiliating, or demeaning
- Slurs, disparaging remarks, insults, inappropriate jokes, teasing, using disrespectful or harmful words or actions, or sabotaging/undermining someone’s work performance
- Displaying or sharing offensive material

Sexual harassment can include unwelcome propositions, demands, or advances, as well as unwelcome physical contact or inappropriate remarks of a sexual nature.

Harassment isn’t just something that can occur between Dynatracers. Harassment can also involve customers, partners, suppliers, and advisors—and anyone else who interacts with Dynatracers.

All of these forms of harassment are prohibited by the Code.

**To help provide a positive, safe, and welcoming work environment:**

- **Treat others with dignity and respect**
- **Act with empathy and kindness**
- **Use care with your words and actions —be mindful of behavior that can be considered a microaggression**
- **Don’t ignore behavior that may be a form of harassment—say something or report it (whether you experience something directly, hear about it, or witness it)**



# Health and Safety

We follow laws and local guidelines to maintain a safe, healthy, and secure workplace. You should speak up if you're aware of, or suspect, any safety issues or concerns in our workplaces.

## Drugs and alcohol

Dynatrace cares about the health and safety of our employees. Employees are prohibited from using alcohol or any drug in a way that, in either case, results in impaired performance, inappropriate behavior, or endangers the safety of themselves or others while doing work for the company or while on company business, regardless of location.

Illegal drugs in our offices, while working, or at company-attended or company-sponsored events are strictly prohibited. This prohibition specifically includes the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in our offices, while working, or when otherwise conducting Dynatrace business.

Contact People Ops or a People Business Partner if you have any concerns about drug or alcohol use at the company or at a company sponsored event.

**We offer employee assistance programs (EAPs) if you need help with drug or alcohol abuse. Additional information is available on [Dynatrace's SharePoint](#).**

## Threats, violence, and weapons

We do not tolerate any level of violence or the threat of violence in the workplace, and no one should ever bring a weapon into a Dynatrace workplace.

Threats can also include verbal assaults and other aggressive and intimidating behavior—these are not acceptable.

Contact your manager or another Dynatrace leader immediately about any threats or concerns in this area.





# Human Rights

We respect the fundamental rights, freedoms, and standards of treatment of all people and we expect other companies that we work with to do the same. Respecting human rights is important to our values, reputation, and our supply chain sustainability. We align our practices with the United Nations Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

Our [Human Rights Policy](#) guides our commitment to:

- Protect internationally proclaimed human rights in our business as well as advancing DEIB
- Compensating employees fairly
- Respecting freedom of association and collective bargaining
- Providing a safe, productive, and healthy workplace for Dynatrace employees

As outlined in our Human Rights Policy, we prohibit all forms of forced labor, including illegal child labor, all forms of slavery, and any form of human trafficking.

If you suspect or become aware of any human rights issues in our operations or in our relationships with suppliers, partners, and other third parties, speak up and report it.

**When selecting suppliers, partners, and other third parties, we should evaluate their commitments to respecting human rights—whether through their own policies or by their agreement to comply with the Dynatrace Supplier Code of Conduct. See the “Supply Chain Responsibility” section of the Code for additional information.**





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# Our Company





# Conflicts of Interest

Many of us engage in, or are asked to participate in, outside activities that broaden both our personal and professional interests. Some of us may have friends or family members that may want to do business with Dynatrace or come work here.

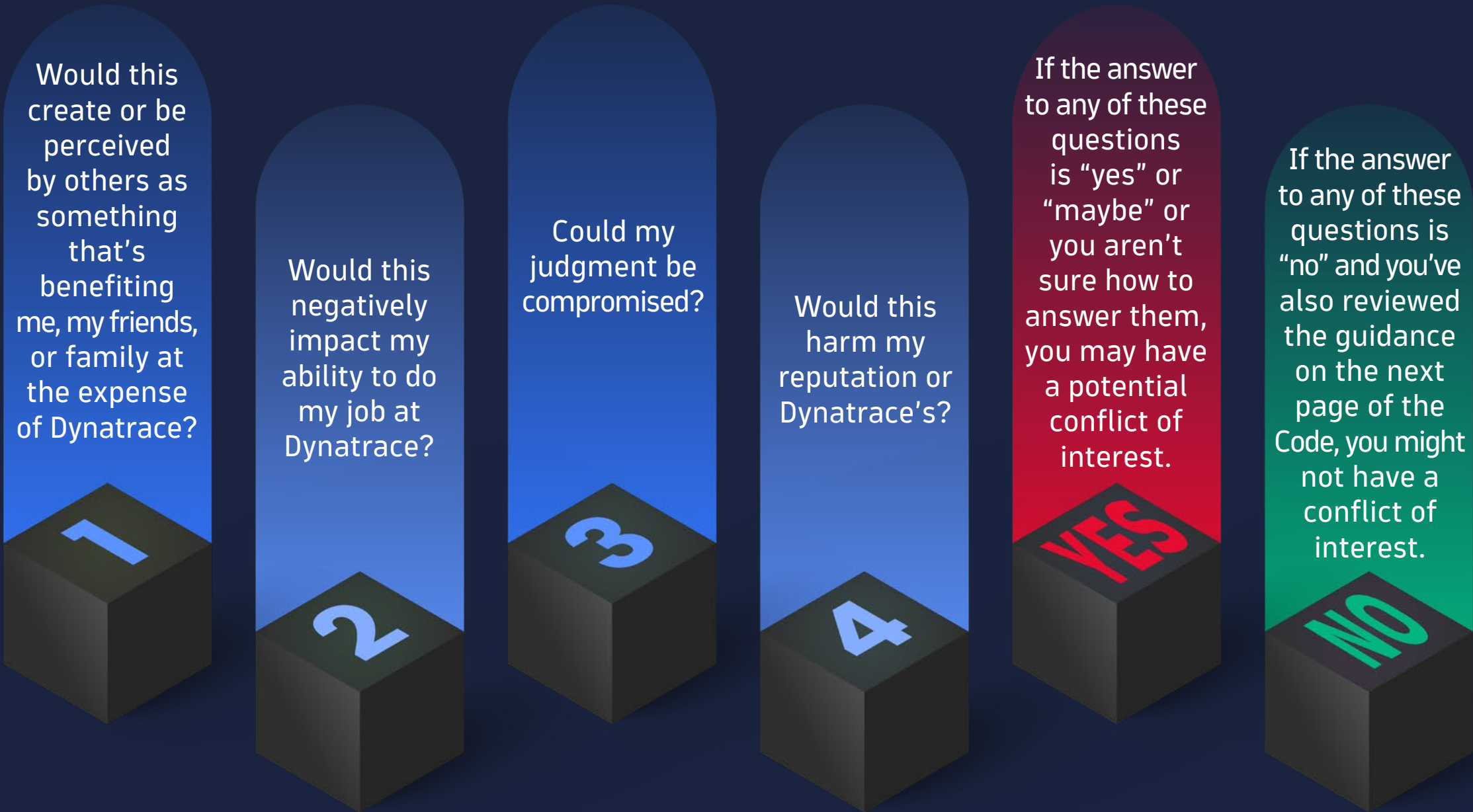
These situations create a potential conflict of interest because your personal interest and motivation may interfere—or appear to interfere—with your duties and obligations as a Dynatrace employee and with the company’s interests.

Conflicts such as these may make it difficult to perform your work objectively and effectively. Conflicts of interest also can harm our reputation.

**The existence of a conflict of interest isn’t automatically a violation of our Code. However, failure to disclose it is. So, when in doubt, be open and transparent. Please see the next two pages of the Code for additional guidance.**

## Questions to Ask and Disclosure Requirements

When faced with a potential conflict of interest, ask yourself:



Initially, discuss the matter with your manager. With the input of your manager, disclose any potential conflict to the [Dynatrace Global Ethics & Compliance Office](#). Please await a response/guidance before taking action.



# Conflicts of Interest

Conflicts of interest can arise in many situations. While it's not possible to list every situation that can cause a conflict, some common examples include:

## Personal relationships

- Referring for employment, hiring or directly or indirectly supervising someone with whom you're related or have a close relationship
- Participating in the selection process for a supplier that's owned by or employs someone with whom you're related or have a close relationship
- Engaging in a romantic relationship with a direct report or other subordinate employee

## Family members

A member of your family receives some personal benefit (whether improper or not) as a result of your position with the company. These benefits can include cash, gifts, entertainment, services, discounts, loans, guarantees, or being selected by Dynatrace as a supplier, consultant, or partner.

**Relatives and family members can include a spouse or domestic partner, child, mother, father, in-laws, aunts, uncles, nieces, nephews, cousins, grandparents, grandchildren, step, adoptive and foster relationships and other individuals who may reside in your home.**



# Conflicts of Interest

Additional common examples of situations that can cause a conflict include:

## Outside employment/activities

Taking on outside employment, consulting, or volunteering if it:

- Interferes with your judgment or ability to perform your Dynatrace job duties
- Involves working for a competitor or supplier
- Uses Dynatrace confidential information, systems, or assets

**Outside boards—You may join the board of a private business or other organization that has no relation to Dynatrace or our business. You must receive approval from the Dynatrace Global Ethics & Compliance Office before accepting an appointment to the advisory or governing board of an organization whose interests are related to, or may conflict with, Dynatrace's. Dynatrace employees must receive approval from the Chief Legal Officer before serving as a director of another publicly traded company.**

## Gifts, meals, and entertainment

Receiving gifts, meals, and entertainment can give rise to a conflict of interest in certain situations.

Please see the “Gifts, Meals, and Entertainment” section of this Code for additional information.

## Financial interests

Having a financial interest or investment in another company or organization (such as a supplier, partner, or competitor) if it would create, or create the appearance of, a conflict of interest with Dynatrace. As a general guideline, it’s permissible for you to own or invest less than 1% of the outstanding stock of another company or organization that you’re not involved in advising or participating in business decisions—including through a mutual fund.

## Business/corporate opportunities

- Taking for yourself a business or corporate opportunity that was discovered through the use of Dynatrace property, information, or your position
- Using company property, information, or your position for personal gain
- Competing with Dynatrace (either directly or indirectly)



# Fair Dealing and Competition

You should deal honestly, ethically, and fairly with Dynatrace's suppliers, customers, competitors, and employees. Statements regarding our products and services (and comparative statements regarding our competitors' products and services) should not be untrue, misleading, deceptive, or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Obtaining information about our competitors is a normal business practice—but it has to be conducted properly through lawful and ethical channels.

This means that we:

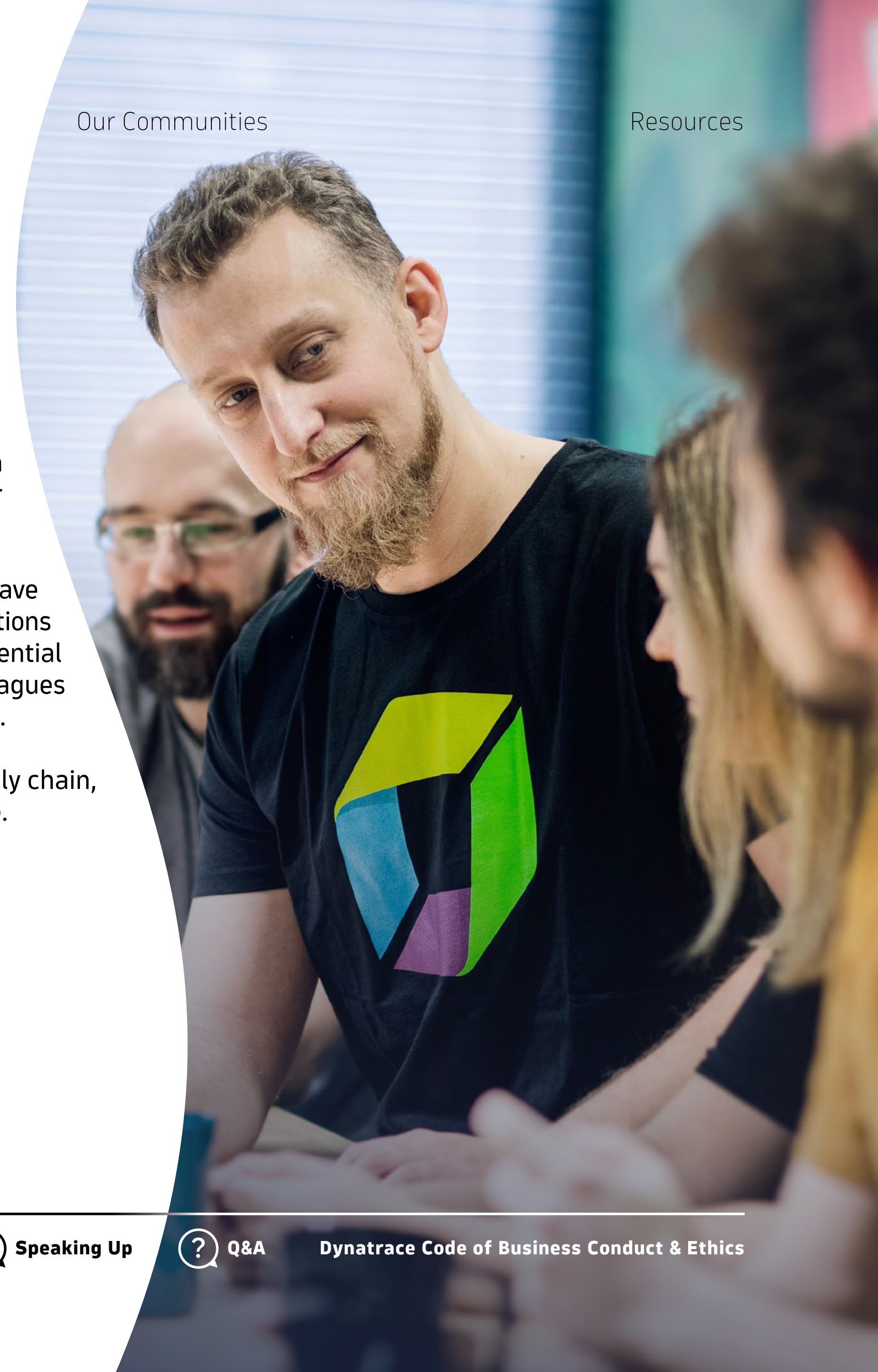
- Do not conceal or misrepresent our identity to gain access to a competitor's product or service
- Do not engage third parties to help us gain competitive intelligence through misrepresentation
- Use public and other permitted sources of information
- Use good judgment and avoid the appearance of anything that might be viewed as inappropriate

In addition, if you're offered competitive information that you believe shouldn't be disclosed to Dynatrace (either because it's confidential to another company or has been obtained illegally or unethically), don't accept the information and notify your manager. Examples can include customer lists, pricing information, and strategic/marketing plans.

You also must abide by any legal obligations that you may have to a former employer. These obligations may include restrictions on the use and disclosure of your former employer's confidential information, restrictions on the solicitation of former colleagues to work at the company, and non-competition obligations.

For additional information related to dealing with our supply chain, see the "Supply Chain Responsibility" section of this Code.

**Healthy competition is a good thing for our business and we should win on the merits. For additional information, please also refer to the "Antitrust" section of the Code.**





# Compliance with Laws

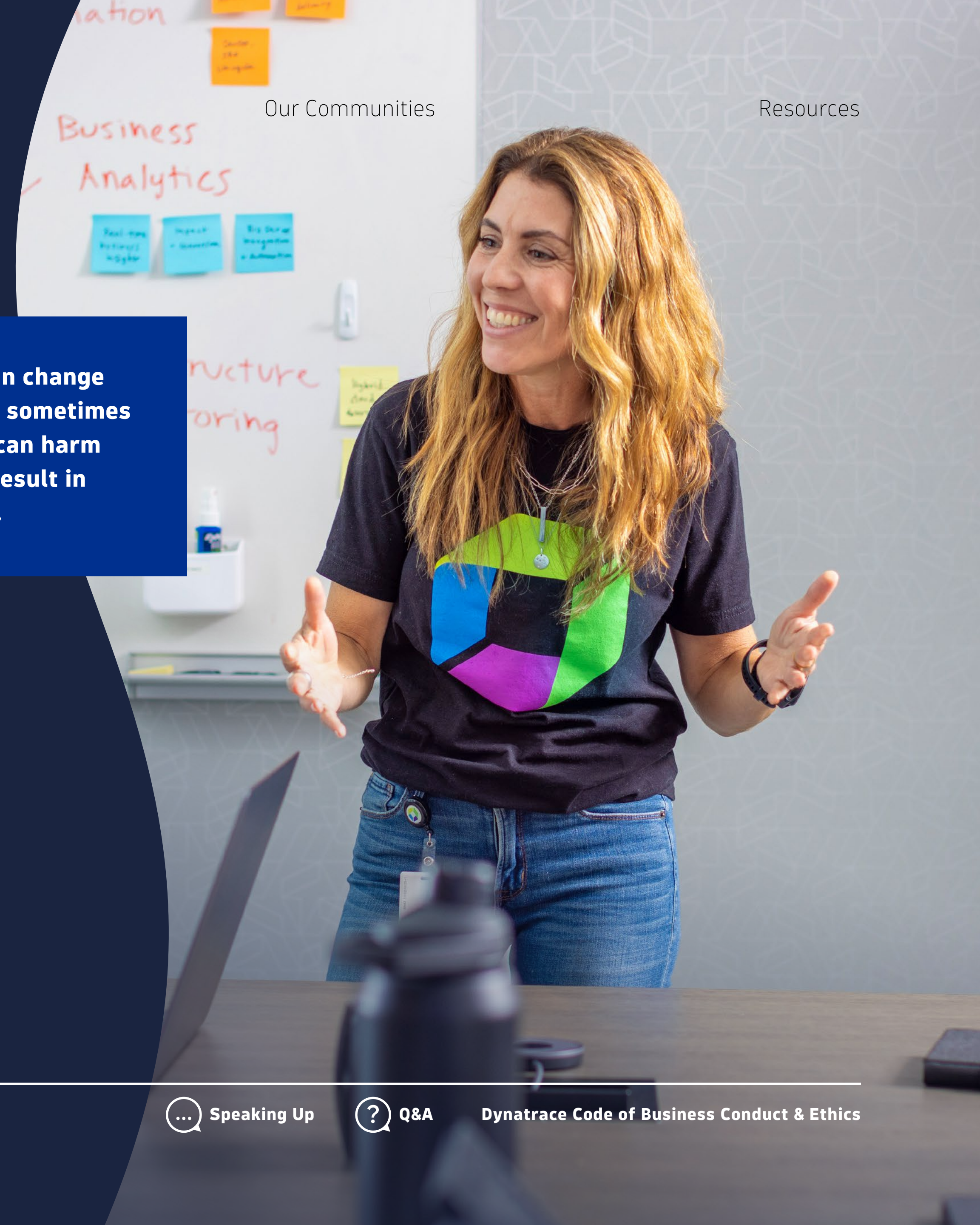
As a global company, Dynatrace is subject to laws, rules, and regulations around the world. You should learn about, understand, and comply with applicable laws, rules, and regulations that relate to your position and/or location.

If you have questions or need guidance, please contact the [Dynatrace Global Ethics & Compliance Office](#).

If you become aware of the violation of any law, rule, or regulation by the company, it's your responsibility to promptly report the matter to your manager or to the Dynatrace Global Ethics & Compliance Office.

As stated earlier in the Code, while we prefer that you raise concerns internally, nothing in the Code, any agreement you may have with Dynatrace, or any Dynatrace policy prevents, restricts, or limits you from reporting concerns or violations of law to government agencies or officials or through courts. For additional information, please see the "Other Notices" section of this Code and our Whistleblower Complaint Handling Policy.

**Laws, rules, and regulations can change from time to time and they can sometimes be complex. Failure to comply can harm our reputation and could also result in financial costs to our company.**





# Antitrust

We comply with applicable antitrust and competition laws, and we seek to avoid situations that could put us at risk. Antitrust and competition laws prohibit arrangements or actions that could unreasonably restrict a free and competitive marketplace.

This means that we don't engage in discussions or agreements (whether formal or informal) with competitors to:

- Fix or set prices or other terms of sale
- Divide or allocate sales opportunities or territories
- Prevent another company from entering the market
- Agree not to solicit each other's customers
- Boycott particular customers or suppliers
- Rig or coordinate bids
- Share confidential information about pricing, profits, costs, sale terms, customers, discounts, promotions, marketing plans, or other sensitive information.

We also don't force customers to buy something that they don't want by improperly tying the offering to something that they do want.

As antitrust and competition laws are complex and can vary from country to country, you should consult with the Dynatrace Global Ethics & Compliance Office before taking action that might be viewed as anti-competitive.

**If someone from another company raises a topic with you that you believe might be anti-competitive, you should stop the conversation. It's best to then contact the Dynatrace Global Ethics & Compliance Office for guidance.**



# Anti-Bribery and Anti-Corruption

As a Dynatrace Core Value, we Win With Integrity, which means, in part, that we don't permit or tolerate bribery or corruption. The consequences for violating anti-bribery and anti-corruption laws can be significant to both you and the company from a reputational, legal, and financial standpoint. We behave with integrity in our business dealings, which means that we:

**Do not offer, give, solicit, or accept bribes or kickbacks to obtain business, retain business, or gain an unfair advantage**

Bribery can include payments or the offer of payments of anything of value (not just cash). Gifts, meals, entertainment, promises of jobs, and charitable or political contributions can be considered bribes if offered in exchange for a decision or favorable treatment. Kickbacks can include receiving discounts, favors, or preferential treatment in exchange for something else.

**Do not make facilitation or "grease" payments, even if they're legal or standard practice in the country where requested**

A facilitation or "grease" payment is a small payment of cash or something else of value made to a government employee to secure or speed up the performance of a routine government action, such as issuing a permit or approval. These do not include official payments.

**Record payments and receipts honestly and accurately**

**Conduct appropriate due diligence on customers, suppliers, and other business partners**

Keep in mind that this Code and our other policies may be stricter than a local country's laws, rules, and regulations.

Anti-bribery and anti-corruption laws often prohibit indirect payments. We also expect partners, agents, and other third parties acting on our behalf to meet these standards. Don't ignore any "red flags" if you believe that a third party may be making illegal payments or engaging in corrupt behavior when acting on behalf of Dynatrace. You should report any activity that you suspect may violate this Code or applicable laws, rules, and regulations in this area.

**Use extra care when interacting with government or public officials. For additional guidance, see the "Gifts, Meals, and Entertainment" section of this Code.**

**For additional information, please also refer to our [Anti-Corruption Policy](#).**



# Gifts, Meals, and Entertainment

Accepting or providing gifts, meals, entertainment, travel, and other gratuities and amenities can help build and strengthen business relationships. However, they can also create conflicts of interest, perceived conflicts of interest, or suggest improper conduct.

This section of the Code is focused on business-related gifts, meals, and entertainment to and from people and firms outside of Dynatrace. Gifts between Dynatracers should not compromise, or appear to compromise, the propriety of relationships and should comply with our [Global Travel and Expense Policy](#).

When giving or receiving gifts, meals, and entertainment, you should ensure that they are legal, appropriate, reasonable, and connected to a legitimate business purpose.

**If you need guidance or have questions, please contact the [Dynatrace Global Ethics & Compliance Office](#).**

## When deciding whether it is appropriate to offer or accept something, you should consider the following factors:

### Purpose

What’s the reason for the gift? Could the gift be viewed as a bribe or an offer to induce any action or inaction or influence someone? Could the gift make the recipient feel that they need to return a favor?

### Legal

Does the gift comply with applicable laws and the policies of both the giving and receiving companies?

Is the recipient a government employee? Special considerations may apply (as discussed on the next page).

### Value

Is the gift excessive in value? Does it seem overly generous?

### Transparency

Is there openness about the gift or is it being provided in a more secretive manner? Is it being provided directly to and from people with a business relationship (as opposed to through an intermediary or to a family member of someone)?

### Frequency

Is this an infrequent gift or has there been anything else recently given or accepted?

### Reputation

Would you or Dynatrace be embarrassed, or would you or the company look poorly, if details about the gift were publicly known?

### Timing

Is the gift being given or received around the time of a contract negotiation, renewal, or other important corporate decision? Did someone ask for a gift?

### Type

You should never give or receive gifts in cash (regardless of the amount).

**You should not give or receive cash equivalents (e.g., gift cards) of \$250 or more without approval from the [Dynatrace Global Ethics & Compliance Office](#).**

Multiple gifts given or received from the same person or entity should not exceed this amount in a calendar year.



# Gifts, Meals, and Entertainment

Specific examples of gifts, meals, and entertainment that often are acceptable include:

- Promotional items with a company logo
- Customary holiday gifts sent to an office as a thank you
- Meals and entertainment of modest or reasonable value
- Routine tickets to a local sporting or cultural event
- Invitations to an industry conference, trade show, or event (with the registration fee waived or reduced) if the primary purpose is to discuss business or develop business relationships
- Prizes randomly given or received through raffles, contests, or industry events

Also keep in mind that you can't use a third party to give something that you're not permitted to give directly, and a third party can't receive something that you're not permitted to receive directly.

## Government employees

**Before offering anything of value—which includes gifts, meals, entertainment, travel, and other gratuities or amenities—to a government employee, you're required to obtain the prior approval of the Dynatrace Global Ethics & Compliance Office. Some government employees are easy to identify, but government employees can also include elected officials, law enforcement, inspectors, and employees of state owned or controlled firms and universities.**

## Travel and expense policy

**Keep in mind Dynatrace's Global Travel and Expense Policy for our guidelines and procedures related to business travel.**



# Anti-Money Laundering

Money laundering is the process of creating the appearance that funds obtained from criminal activities are legitimate or originated from a lawful source. We comply with applicable anti-money laundering laws.

This means that we:

- Follow “Know Your Customer” or “KYC” procedures
- Only accept payments from, and send payments to, customers, suppliers, partners, and others who we do business with
- Report any red flags or suspicious activity by customers, partners, or others that might suggest improper financial transactions or processes

# Global Trade Compliance

As a global company, our business activities are subject to various international trade compliance laws. Violations can result in penalties and fines for our company. This includes the following areas:

**Export and Import controls**

Exports and imports of certain types of software, technology, and products may be subject to licensing requirements.

**Trade embargoes and sanctions**

We are prohibited from conducting business with certain sanctioned countries and specific entities and individuals.

**Anti-boycott**

We must not participate in unsanctioned boycotts or refusals to trade or do business with certain countries.

Dynatrace’s policy is to comply with these regulations and prohibitions even if compliance may result in the loss of some business opportunities. You should learn and understand the extent to which global trade controls apply to transactions that relate to your job at Dynatrace. Contact the [Dynatrace Global Ethics & Compliance Office](#) if you need guidance.





# Insider Trading

If you trade in Dynatrace stock (which is a form of securities), you need to comply with applicable laws. You should be aware that misuse of material nonpublic information can be a violation of insider trading laws and can result in severe penalties.

You may not buy, sell, or otherwise trade in Dynatrace securities—whether for your own account or for the account of another—if you possess material nonpublic information about Dynatrace. It’s against our Code and also illegal. You also may not disclose material nonpublic information about Dynatrace to others who may trade on the basis of that information—this is called “tipping” and it’s also a form of insider trading. These prohibitions also apply to trading in the securities of other public companies, including Dynatrace’s customers, suppliers, partners, and other enterprises with which we are working, when you have material nonpublic information about them.

Information about Dynatrace is “material” if it could reasonably be expected to affect the investment or voting decisions of a stockholder or investor, or if the disclosure of the information could reasonably be expected to significantly alter the total mix of information in the marketplace about the company.

In simple terms, material information is any type of information that could reasonably be expected to affect the market price of company securities. Both positive and negative information may be material. Material information can include:

- Earnings results and any projections of future earnings or losses, or other earnings guidance
- Pending or proposed corporate mergers, acquisitions, tender offers, joint ventures or dispositions of significant assets
- Changes in management or the Board of Directors
- Significant actual or threatened litigation or governmental investigations or major developments in such matters
- A cybersecurity or other technology-related risk or incident, including the discovery of significant vulnerabilities or breaches
- Significant developments regarding the Dynatrace platform, our offerings, customers, partners, contracts or financing sources (e.g., the acquisition or loss of a contract)
- A significant pending or unannounced contract with a partner or customer

Information is “nonpublic” if it has not been disseminated in a manner making it available to investors generally—such as through an SEC filing, the distribution of a press release through a widely disseminated news or wire service, or by other means that are reasonably designed to provide broad public access.

If you’re not sure whether certain information is considered material or nonpublic, contact the [Dynatrace Global Ethics & Compliance Office](#) for guidance before trading.

For additional information, refer to our [Insider Trading Policy](#).





# Confidentiality

As a general rule, you're expected to safeguard, maintain, and protect information that is confidential, strategic, or proprietary to Dynatrace. This includes information related to our company as well as our customers, suppliers, business partners, employees, and others. Part of this obligation includes preventing confidential information from being improperly accessed, shared, or lost.

- You should only share confidential information on a “need to know” basis and when you're authorized to do so. This applies to information sharing within our company to other Dynatracers as well as externally.
- Be careful to avoid inadvertent disclosures of confidential information in a public place where your conversation may be overheard.
- When you're authorized to share confidential information outside of the company, ensure that an appropriate non-disclosure agreement (NDA) is in place or that we have an agreement that includes confidentiality provisions that cover the information sharing.

Contact the [Dynatrace Global Ethics & Compliance Office](#) for guidance and assistance.

**Confidential information includes all nonpublic information that might be of use to competitors or could be harmful to Dynatrace or its customers if disclosed. Confidential information can include:**

- **Company financial results, information, data, and reports**
- **Internal e-mails and other types of internal correspondence**
- **Processes and know-how**
- **Plans and strategies**
- **Trade and business secrets**
- **Recordings or transcripts of meetings or calls**

These obligations regarding confidentiality and trade secrets continue to apply after your employment with Dynatrace ends.

Please see the “Other Notices” section of this Code for exceptions to the general obligation to maintain confidentiality that's described in this section and elsewhere in this Code.



# Privacy and Data Protection

We're committed to handling personal information about individuals in accordance with applicable laws that apply to us around the world. As part of our business operations, we collect and use personal information regarding customers, employees, contractors, suppliers, and other third parties.

Our customers trust us to help them innovate and operate more efficiently. Integral to this trust is our ability to help keep their data safe and to provide features in our platform that align to their data protection and privacy requirements. Employees entrust us with their personal information when they join Dynatrace.

**Personal information is anything that—by itself or in combination with other information—could reasonably be used to identify someone. Sometimes, personally identifiable information is referred to as “PII”.**

**Examples of personal information include (but not are limited to):**

- **Names**
- **Identification numbers**
- **E-mail addresses**
- **Phone numbers**
- **Location data (such as IP addresses)**

We don't disclose others' personal information except on a need-to-know basis and when we're legally permitted to do so. If you work with personal information as part of your job at Dynatrace, you should understand how to comply with applicable legal requirements as well as our policies.

You should contact the Dynatrace Privacy Office with any questions about personal information or our privacy practices. For additional information, refer to our [Data Protection Policy](#).





# Company Systems and Assets

You're trusted to use Dynatrace's systems and assets properly and responsibly and protect them against loss, theft, misuse, or damage (which can have a direct impact on our company's profitability). Company systems and assets include, but are not limited to, laptops and other computer equipment; company-owned cell phones; software and hardware; offices and labs; customer, supplier, and partner lists; and corporate information.

Dynatrace's assets also include intellectual property (IP), such as patents, copyrights, trademarks, trade secrets, and know-how and other information regarding how our products and solutions work. You should protect our IP and remember that Dynatrace owns any work product that you develop or design in your work at the company, to the extent permitted by law.

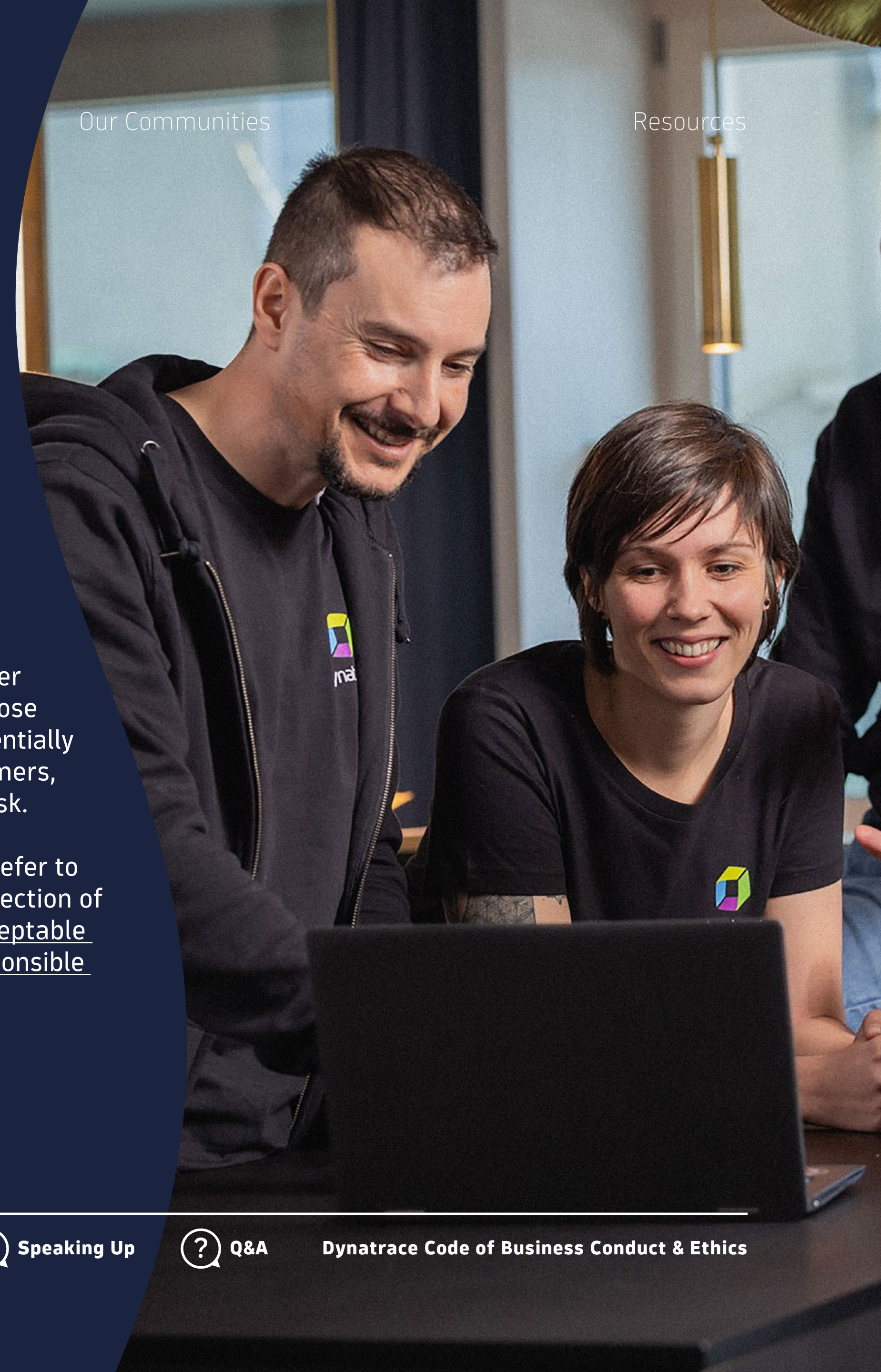
**You should use the company's systems, assets, information, trade secrets and services for legitimate and authorized business purposes.**

**This means:**

- **Limit personal use of company systems and assets within reason and for appropriate uses**
- **Immediately report any loss, theft, misuse, or damage of company systems and assets**
- **Spend the company's money in an appropriate way**

Improperly handled computer systems and assets can expose Dynatrace to bad actors, potentially putting our company, customers, and other stakeholders at risk.

For additional information, refer to the "Information Security" section of the Code below, our [IT - Acceptable Use Policy](#), and our [AI - Responsible Use Policy](#).





# Information Security

All Dynatracers are critical to information security. Familiarize yourself with applicable Dynatrace policies that are posted in the [Employee Digital Enablement \(EDE\)](#) section of our SharePoint and complete all required training.

To protect our information systems:

- Use a Dynatrace e-mail address when conducting business
- Use caution to avoid phishing and other suspicious e-mails
- Use a VPN when available
- Obtain EDE authorization before installing third party software on your work laptop or computer
- Passwords shouldn't be written down and left in a place where unauthorized persons might discover them
- Store Dynatrace's data in EDE-approved repositories
- Only use authorized artificial intelligence (AI) tools and use these tools in compliance with our [AI - Responsible Use Policy](#).
- Laptops and mobile devices shouldn't be left unattended or out of your line of sight in public places
- When traveling, try to use wall plugs and your own chargers instead of USB chargers built into hotel and airport desks, lamps and other devices
- All items that may hold data belonging to Dynatrace or our customers should be disposed of in a way that data held on the device is securely destroyed in accordance with applicable standards

For additional information, see the "Company Systems and Assets" section of this Code, our [IT - Acceptable Use Policy](#), and our [AI - Responsible Use Policy](#).

**If you know of, or suspect, that any Dynatrace confidential information, personal data, information technology, or information system has or may have been compromised as part of a security breach, you must report it through the EDE section of our Sharepoint or by sending an email to [corporatesecurity@dynatrace.com](mailto:corporatesecurity@dynatrace.com).**





# Recordkeeping and Reporting

Accurate information is essential to our company’s ability to meet legal and regulatory obligations and it’s also important to our reputation.

Dynatrace, Inc. is a public company listed on the New York Stock Exchange or NYSE. It is Dynatrace policy to provide full, fair, accurate, timely, and understandable disclosure in reports and documents filed with, or submitted to, the U.S. Securities and Exchange Commission (SEC) and in our other public communications.

All Dynatrace books, records, and accounts need to be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. Employees involved in the process of preparing our public disclosures and filings have a special responsibility in this area, but each of us contributes as part of Dynatrace conducting business.

- Our publicly disclosed financial statements that are filed with the SEC are required to conform to generally accepted accounting principles (GAAP) and the company’s accounting policies
- No undisclosed or unrecorded account or fund is to be established for any purpose
- No false or misleading entries are to be made in the company’s books or records for any reason
- No disbursement of corporate funds or other corporate property may be made without adequate supporting documentation
- Follow applicable internal controls and policies
- Report any records that appear to be inaccurate, false, or misleading

**Comply with any “legal holds” (related to litigation, investigations, or other matters) that the Dynatrace Legal Team may communicate to you. Legal holds may require you to retain e-mail, records, and other information.**



# Recordkeeping and Reporting

Concerns or questions regarding accounting, internal accounting controls, or auditing or securities law matters will be directed to the Audit Committee of the Dynatrace Board of Directors or a designee of the Audit Committee in accordance with the procedures established by the Audit Committee for receiving, retaining, and treating complaints regarding accounting, internal accounting controls, or auditing matters. You can also communicate directly with the Audit Committee or its designee regarding such matters by e-mailing [corporatesecretary@dynatrace.com](mailto:corporatesecretary@dynatrace.com) (anonymity cannot be maintained) or through one of the other reporting channels described in the “Speaking Up” section of this Code, which provide an option for anonymity.

If you’re asked for information or records as part of an audit or investigation that’s being conducted by Dynatrace, our auditors, or another third party, you should be transparent and provide accurate and complete information.

**You may not enter into any undisclosed or unapproved “side letters” with customers or other business partners.**

A “side letter” is any promise, deal, bargain or other arrangement, whether written or verbal, that is separate or different in any way from the terms documented in the applicable governing agreement and may include a conversation, e-mail or letter that varies or supplements the terms and conditions of the governing agreement.



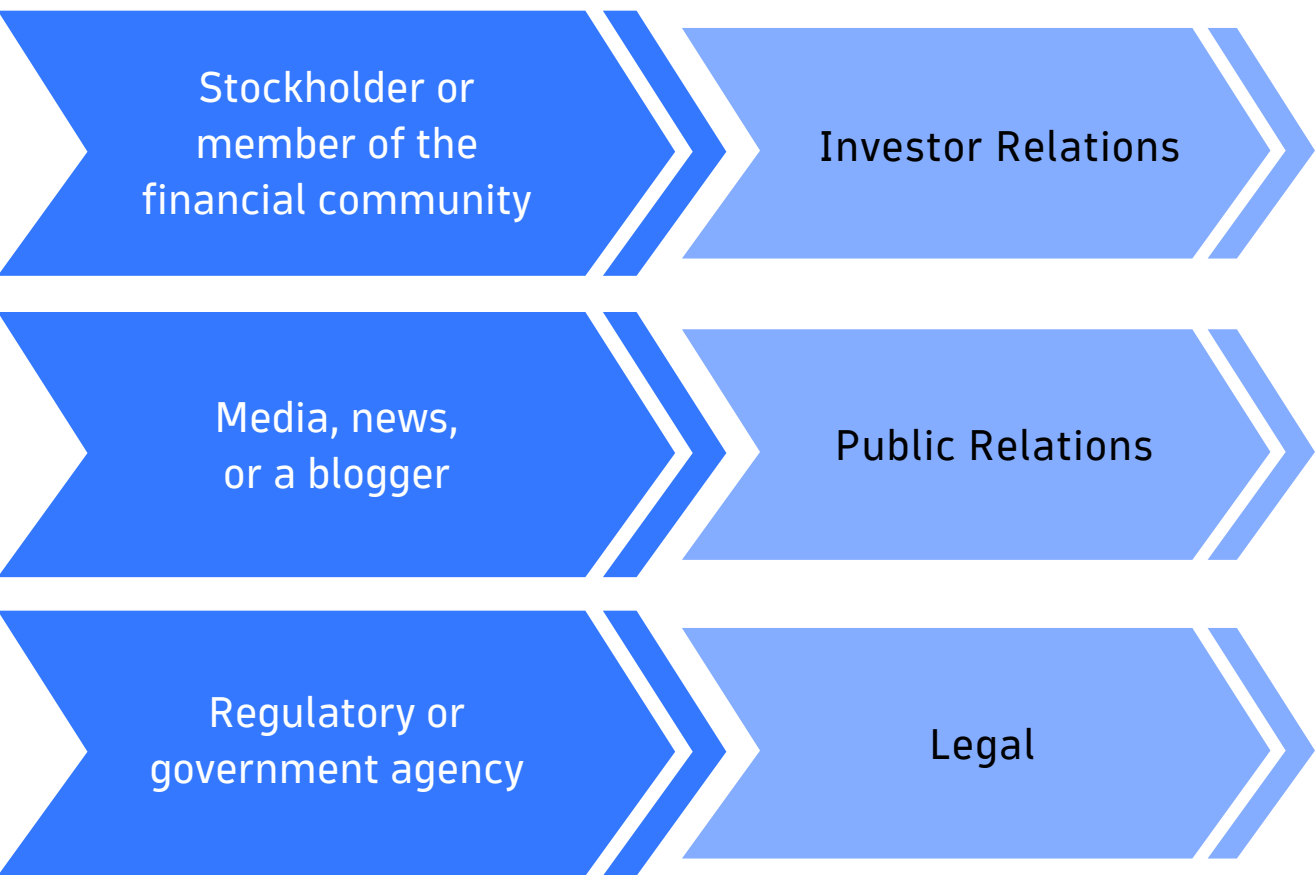
# Speaking on Behalf of the Company

We have authorized spokespersons and look to appropriate members of Dynatrace senior management and the Dynatrace Board of Directors to provide the company’s official views and statements on various issues. This helps us provide consistent and accurate messaging to our different stakeholders.

From time to time, you may be contacted by someone externally for information concerning Dynatrace, such as the media, marketing professionals, securities analysts, investment advisers, or stockholders.

Unless you’re an authorized Dynatrace spokesperson or an appropriate member of Dynatrace senior management, you shouldn’t discuss internal company matters with, or disclose internal company information to, anyone outside the company, except as required in the performance of your company duties.

If you receive any inquiries of this nature, you should decline to comment and refer the person to one of the following teams:



**We encourage Dynatracers to speak at conferences and events. However, if you’re planning to speak externally at a conference, on a webcast or podcast, or be interviewed in your capacity as a Dynatrace employee, you should obtain approval in advance from your manager and the Dynatrace Public Relations team (unless you’re an authorized spokesperson for the company).**

You can reach Dynatrace Investor Relations at [ir@dynatrace.com](mailto:ir@dynatrace.com) and Dynatrace Public Relations at [pr-team@dynatrace.com](mailto:pr-team@dynatrace.com). Legal matters can be submitted to the [Dynatrace Global Ethics & Compliance Office](#).



# Social Media

We recognize and encourage Dynatrace participation in social media in a responsible manner. Social media can be a great way to share information about Dynatrace and promote our brand. However, social media mistakes can negatively affect our company's reputation and how customers and others perceive Dynatrace.

If you're active on social media, this means that:

- When posting or otherwise communicating about any Dynatrace business, topics, or matters related to our industry, don't misrepresent yourself—it should be clear that you're a Dynatrace employee
- If need be, to avoid any confusion, make it clear that your views are your own and that you're not speaking on behalf of Dynatrace. You shouldn't tag a Dynatrace account if you're sharing personal opinions unrelated to Dynatrace business or matters
- You shouldn't disclose any confidential or private information about Dynatrace's business operations, products, or services or our customers, suppliers, partners, or others unless you've been authorized to do so
- You should be mindful of what you post or communicate, even if it's not related to Dynatrace. Think carefully before posting or hitting "send"

**If you come across something inaccurate or concerning about Dynatrace on social media, report it to the Dynatrace Social Media team, who will look into the matter and handle the situation. For additional information, refer to our [Social Media Policy](#).**



[Introduction](#)

[Our People](#)

[Our Company](#)

[\*\*Our Communities\*\*](#)

[Resources](#)

# Our Communities





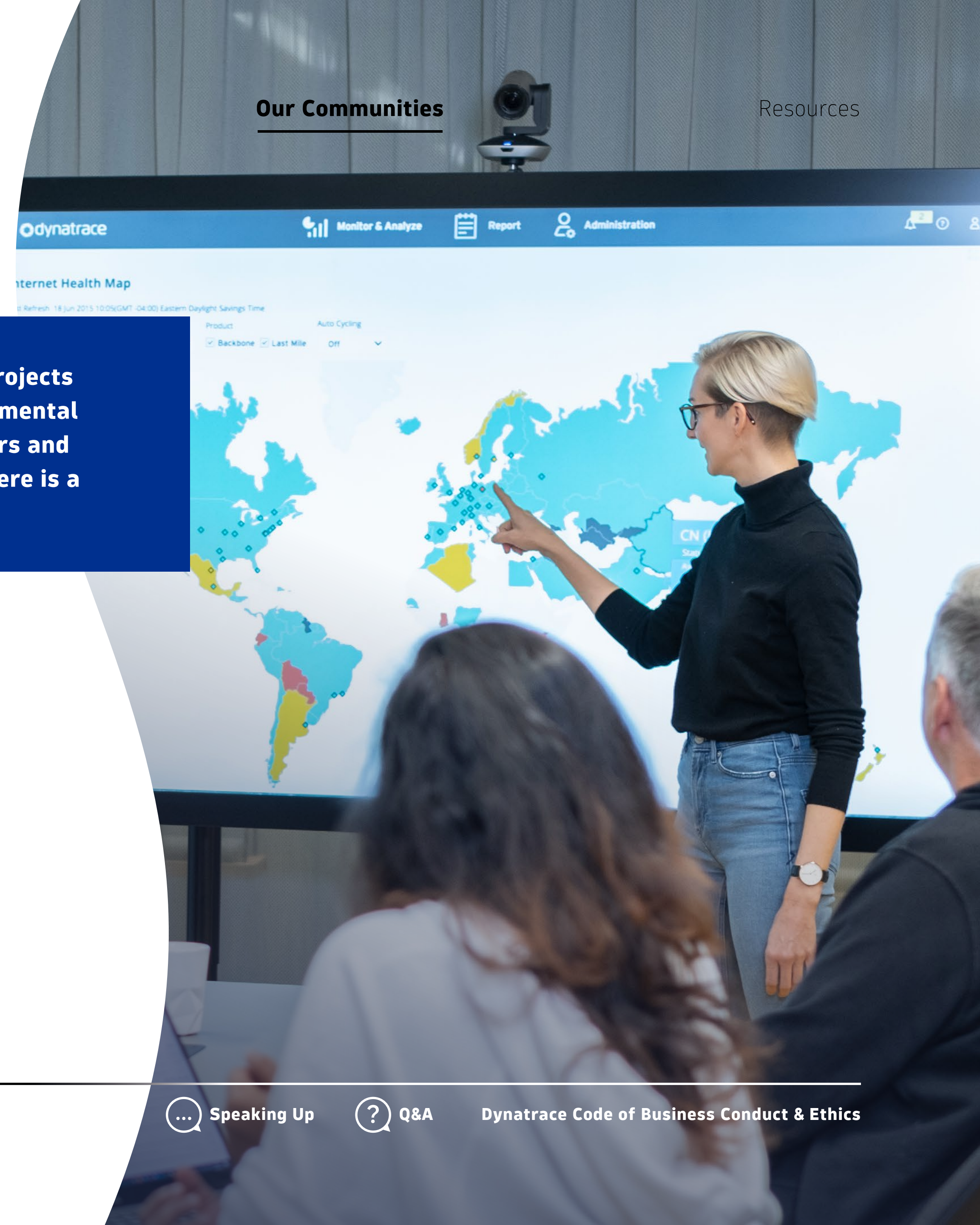
# Environmental Responsibility

Dynatrace is committed to monitoring and managing our business operations to better understand and continuously reduce our negative impact on the environment.

We believe that environmental sustainability and accountability are critical for our future. As part of our environmental initiatives, we should look for opportunities to:

- Minimize our carbon footprint
- Prioritize the use of clean energy
- Adopt operationally sustainable practices in our workplaces—such as turning off lights that aren't being used, minimizing waste, and looking for opportunities to recycle
- Learn about environmental initiatives ongoing at Dynatrace

**When you're evaluating new projects or initiatives, consider environmental or sustainability-related factors and different alternatives when there is a business case to do so.**





# Supply Chain Responsibility

We believe our commitment to conducting our business in an ethical, legal, and environmentally and socially responsible manner is a shared commitment that extends to our vendors, contractors, subcontractors, consultants, and other service providers.

We look to reflect our Core Values in our business with third parties through our procurement policies and practices, including requirements relating to human rights and modern slavery, and adherence to our [Supplier Code of Conduct](#). We perform due diligence designed to identify and prevent human rights risks to people in our business and supply chain. We are committed to taking remedial

action if we identify adverse human rights impacts resulting from, or caused by, our business activities. If you work with suppliers, you should familiarize yourself with our Supplier Code of Conduct, which defines the basic business practices that we require of our suppliers.

If you're involved in selecting a supplier:

- Follow applicable Dynatrace Procurement policies and practices for completing any required risk assessments/evaluations, receiving proposals/bids, negotiating and contracting, receiving appropriate approvals, and onboarding

- Base decisions on key factors and objective criteria such as relevant experience, service quality, pricing/cost, and reputation
- Avoid potential or actual conflicts of interest (or disclose them if they arise)
- After a contract has been signed, understand what's been agreed to, monitor ongoing commitments, and address ongoing compliance
- Report any violations or concerns with suppliers using one of our "Speaking up" channels

# Volunteering and Charitable Giving

Dynatrace encourages you to become involved in your community and to give back. We contribute to our communities through our support of employee volunteer work. For additional information, see the Volunteer Time Off section of our SharePoint.

Dynatrace makes corporate donations to various causes and organizations whose values and interests are consistent with our company's. You should receive the applicable internal approval before contributing any company funds or property to a charitable organization. You should request approval through the [Dynatrace Global Ethics & Compliance Office](#).



# Political Process, Contributions, and Lobbying

Dynatrace respects your right to support political parties and candidates of your choice and to take part in political activities. However, furthering your own political activities and interests—including campaign work or fundraising—should be done on your own time, outside of Dynatrace work and without using our offices or other resources.

Business contributions to political campaigns are strictly regulated by federal, state, and local law in the U.S. and many other jurisdictions. You may not, except with the prior approval of the Chief Financial Officer, use any Dynatrace funds for political contributions of any kind to any political candidate or holder of any national, state, or local government office or any political action committee, or PAC.

There are also laws that sometimes restrict employees and their family members from making personal political contributions if Dynatrace is a vendor or supplier of the federal, state, or local government or bidding on a new contract. If no restrictions apply to you, you may make personal contributions to political candidates and campaigns, but you may not represent that you are making contributions on Dynatrace’s behalf.

Similarly, any lobbying on Dynatrace’s behalf needs to be coordinated and compliant with applicable laws. Before contacting any government officials on behalf of Dynatrace about legislation, regulations, or government policies, you must obtain approval in advance from the Dynatrace Global Ethics & Compliance Office.

**You should notify Dynatrace by contacting the Dynatrace Global Ethics & Compliance Office if you’re planning to run for an elected or appointed office.**





# Administration of the Code

Dynatrace's management, under the supervision of the Dynatrace Board of Directors or a committee of the Board or, in the case of accounting, internal accounting controls, auditing or securities law matters, the Board's Audit Committee, is responsible to monitor compliance with the Code, and when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.

Dynatrace's management periodically reports to the Board or the Audit Committee on our compliance efforts, including, without limitation, alleged violations of the Code and the actions taken with respect to violations.

# Waivers and Amendments

We acknowledge that the Code won't cover every situation or circumstance. Any waivers of the Code for executive officers or directors must be approved by the Dynatrace Board of Directors, or, if permitted, the Audit Committee of the Board of Directors. If such a waiver is provided, we will promptly disclose it publicly if required by law or stock exchange rules. Any waiver of the Code for other employees or officers may be made by the Chief Legal Officer, the Dynatrace Board of Directors, or, if permitted, the Audit Committee of the Board of Directors.

Dynatrace reserves the right to amend, modify, suspend, or revoke this Code and any and all policies, procedures and programs in whole or in part, at any time, with or without notice, consistent with applicable law. Any amendments to the Code must be approved by the Board of Directors. We will promptly disclose amendments publicly if required by law or stock exchange rules.



# Other Notices

This Code does not alter or modify the terms and conditions of your employment relationship, whether at will or governed by a written contract. The Code does not constitute an employment contract or an assurance of continued employment with Dynatrace.

Dynatrace reserves the right to interpret this Code and these policies in its sole discretion as it deems appropriate.

Dynatrace supports our employees’ rights to speak publicly about matters of public concern or to engage in certain activities related to the terms and conditions of their employment. The Code will be administered in compliance with applicable laws, rules, and regulations; thus, it should not be viewed as limiting your ability to: (i) file a charge or complaint about potential violations of law with a governmental agency or commission, such as the U.S. Equal Employment Opportunity Commission, the U.S. National Labor Relations Board or the U.S. SEC; (ii) participate or testify truthfully in any governmental investigation or proceeding; (iii) exercise any rights applicable to you under the U.S. National Labor Relations Act, including assisting co-workers with or discussing any employment issue for the purpose of mutual aid or protection; (iv) share compensation information concerning you or others (so long as you are not sharing information about other Dynatracers that you obtain because your job responsibilities require or allow access to such information); or (v) discuss or disclose information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that you have reason to believe is unlawful. Any communications and disclosures related to these matters must be consistent with applicable law and the information disclosed must not have been obtained through a communication that was subject to the attorney-client privilege or a similar legal privilege (unless disclosure of that information would otherwise be permitted consistent with such privilege or applicable law).

Dynatrace will not limit any right you may have to receive an award pursuant to the whistleblower provisions of any applicable law or regulation for providing information to the SEC or any other government agency. Any provisions of any agreement between Dynatrace and any current or former employee that is inconsistent with the above language or that may limit or interfere with the ability of any person to receive an award under the whistleblower provisions of applicable law will not be enforced by Dynatrace.

The Code is published electronically. The version of this Code that is posted at [www.dynatrace.com](http://www.dynatrace.com) and on Dynatrace’s SharePoint is the most up-to-date document and supersedes any previous versions should there be any conflict or discrepancy.

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This Code was updated in August 2024.





# Policy and Reference Links

[AI - Responsible Use Policy](#)

[Anti-Corruption Policy](#)

[Corporate Communications Policies and Procedures](#)

[Data Protection Policy](#)

[Export Compliance Policy](#)

[Global Travel and Expense Policy](#)

[Human Rights Policy](#)

[Information Security Policy](#)

[Insider Trading Policy](#)

[IT - Acceptable Use Policy](#)

[Social Media Policy](#)

[EthicsPoint Portal](#)

[Supplier Code of Conduct](#)

[Whistleblower Complaint Handling Policy](#)





