



# Whistleblower and Complaint Policy

## 1.0 Introduction

Workday, Inc. (“Workday”) is committed to promoting high standards of ethical business conduct and compliance with applicable laws, rules, and regulations, as well as its Codes of Conduct and related policies and procedures (collectively, “Codes”). As part of this commitment, Workday has adopted this Whistleblower and Complaint Policy (“Policy”).

## 2.0 Purpose

It is our policy to treat concerns or complaints about illegal or unethical conduct, including those concerning accounting, auditing matters, or deceptive financial practices, seriously and expeditiously, and to encourage and enable all persons to raise serious concerns within Workday. All persons, including directors, employees, self-employed individuals, shareholders, individuals belonging to Workday’s administrative, management or supervisory boards, volunteers and trainees, as well as agents, business partners, contingent workers, subcontractors and suppliers, and those working under their supervision, of Workday and its subsidiaries are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities. This Policy is designed to provide a confidential or anonymous avenue of communication for reporting any improper activities. This Policy is also designed to recognize the Defend Trade Secret Act of 2016 (“DTSA”) and the immunity the DTSA provides to any employee or individual performing work as a contingent worker or consultant for Workday who discloses trade secret information as part of whistleblowing activity. Where relevant, this Policy also reflects the provisions of the EU Directive 2019/1937 of 23 October 2019 (“EU Whistleblowing Directive”) and the protections granted to those reporting breaches to the relevant European Union (“EU”) acts, or from relevant domestic law incorporated by the EU Member States in which Workday operates.

## 3.0 Reporting Violations

It is the responsibility of all individuals covered by this Policy to comply with the Codes. This includes the responsibility to report alleged violations of: (i) the Codes and related Workday policies; (ii) any laws and governmental rules and regulations, including federal securities laws and the rules and regulations thereunder; and (iii) any accounting, internal accounting controls, and auditing matters, in accordance with this Policy.

Individuals covered by this Policy should not independently conduct their own investigation, but instead should report their concern or complaint by following the procedures in this Policy. Concerns may be reported confidentially or anonymously where allowed by law. If you choose to report by email and wish to report anonymously (if permitted by law in your country), please take steps to ensure your anonymity is maintained. The processes implemented by Workday will ensure protection of your anonymity wherever required by law, including in following up on your report. Anyone reporting a concern is encouraged to provide as much detail as possible regarding the subject matter of the concern, since the ability to investigate may depend on the quality and specificity of the information that is provided.

The Chief Legal Officer and the Chief Integrity & Compliance Officer (“CICO”) or their designees will coordinate the prompt investigation and resolution of all reports and ensure that any corrective action deemed necessary and appropriate is taken.

**3.1 Reporting to People Leader or Leadership.** Workday employees, contingent workers and all individuals covered by the Policy, should share any questions, concerns, suggestions, or complaints with someone who can address them properly. In many cases, for employees and contingent workers, your people leader will be in the best position to address an area of concern. People leaders will promptly consider the information submitted to them and take appropriate action. People leaders are required to report alleged violations of the Codes to their management, Workday People & Purpose, the Workday Integrity Team, or Workday Legal, Compliance, and Corporate Affairs. This includes allegations received from persons outside Workday (aka non-employees), as well as allegations regarding third parties who provide services to Workday.

However, if you are not comfortable speaking with your people leader or you are not satisfied with your people leader's response, you are encouraged to speak with:

- a) the Workday Integrity Team ([integrity@workday.com](mailto:integrity@workday.com));
- b) Workday's Chief People Officer, a member of Employee Relations, or head of Internal Audit; or
- c) a member of Workday Legal, Compliance, and Corporate Affairs.

**3.2 Reporting Using the Speak Up Tool.** If you are not comfortable discussing a concern with anyone directly, you may report the concern by the following means:

- a) Speak Up online. By clicking on <https://speakup.workday.com> and following the instructions; or
- b) Speak Up hotline. By calling the Workday Speak Up hotline: From within the United States, toll-free at (800) 325-9976, or for calls outside the United States, visit <https://speakup.workday.com> for a list of in-country numbers. Our Speak Up hotline is available 24 hours a day, 7 days a week.

**3.3 Reporting to the Audit Committee.** You may also report concerns directly to the Audit

Committee of the Board of Directors (“Audit Committee”), which will take whatever steps they deem necessary to respond to a report that they receive. Reports may be submitted by using any of the below processes and indicating that the report should be delivered to the Audit Committee:

- a) By using Speak Up online or our Speak Up hotline as explained in section 3.2 above;
- b) By email to Workday’s Chief Legal Officer and CICO at [generalcounsel@workday.com](mailto:generalcounsel@workday.com); or
- c) By written correspondence to the Workday Board of Directors, Audit Committee c/o Corporate Secretary, 6110 Stoneridge Mall Road, Pleasanton, CA 94588, USA.

**3.4 Reporting to the Competent Authorities**. Nothing in this Policy prohibits you from reporting potential violations of law or regulations to any governmental authority. If you are located in the EU, you may report your concern externally to the competent national authority, either orally or in writing. The reports will then be treated in accordance with the relevant authority’s internal process. Detailed information on the procedures for reporting externally to the competent authorities depending on your location is available [here](#).

#### **4.0 Review of Allegations Reported Through Workday Channels**

The Chief Legal Officer and the CICO or their designees will be responsible for reviewing, or overseeing the review of, any allegation from any source reported through Workday channels. The Chief Legal Officer and CICO or their designees will promptly notify the sender and acknowledge receipt of the report (no later than 7 days following the report). They will also be responsible for following up on the report and liaising with the sender as needed. Feedback will be provided within a reasonable timeframe, and as appropriate. You may contact the Chief Legal Officer and CICO at [generalcounsel@workday.com](mailto:generalcounsel@workday.com).

#### **5.0 Statement of Non-Retaliation**

It is against Workday policy to retaliate, or attempt to retaliate, in any form against any person who reports in good faith a possible violation of (i) any law or regulation, (ii) the Codes and related Workday policies or (iii) any accounting, internal accounting controls or auditing matters. For the purposes in this Policy, “good faith” means that the reporting party had reasonable grounds to believe that the information they provided was true at the time they reported it. Workday prohibits any form of intimidation or retaliation against any person because of any lawful action to:

- provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the person reasonably believes constitutes a violation of laws, rules, regulations, any Workday policies, or accounting, internal accounting controls and auditing matters; or
- file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or about to be filed relating to a violation of any law, rule, regulation, Workday policy, or accounting, internal accounting controls and auditing matters.

The prohibited forms of retaliation or attempted retaliation include, but are not limited to, discharge, demotion, suspension, threats, harassment, or any other manner of discrimination with respect to a reporting person's terms or conditions of employment based on lawful actions of such person with respect to a good faith report or cooperation or assistance with an investigation conducted by Workday. This prohibition on retaliation applies to all individuals covered by this Policy, including employees, directors, agents, consultants, contingent workers, and other persons or entities who do business on behalf of Workday globally. It also applies to individuals who help reporters make reports (i.e., facilitators), and third persons connected with reporters who could suffer retaliation as a result of said connection, such as colleagues or relatives, as well as legal entities that the reporting individual owns, works for, or is otherwise connected with in a work-related context.

## **6.0 Statement of Confidentiality**

Where an individual reports a concern in good faith, Workday will keep the reporter's identity, identifying data, discussions and actions relating to such report, and, where required by law, any third party mentioned in the report, confidential to the extent possible, consistent with the ability to investigate, and in compliance with all applicable laws and regulations.

## **7.0 Retention of Records**

The Chief Legal Officer and the CICO or their designees will maintain a record of all complaints and reports, tracking their receipt, investigation, and resolution for a reasonable period of time, in accordance with applicable law.

## **8.0 Reporting to Board of Directors**

The Chief Legal Officer and the CICO will periodically report to the Audit Committee with respect to reports and allegations received in connection with this Policy and resulting investigations, including with respect to reports or inquiries received from regulatory or government agencies. The Chief Legal Officer and the CICO will have a direct reporting line to the Audit Committee and will have regular briefings and other communications with the Audit Committee chairperson or designated Audit Committee member as deemed necessary.

## **9.0 Policy Administration**

The Audit Committee is responsible for periodically reviewing this Policy and other policies as requested by Workday's management and will recommend revisions to such policies for approval by the Board or management, as appropriate. The Audit Committee is also responsible for confirming that the procedures contained in this Policy are in place and may request reports from Workday executives about the implementation of this Policy and take any other steps in connection with that implementation as it deems necessary. To the extent that this Policy violates the law in any location where Workday conducts business, Workday will comply with applicable laws.

**Effective: April 2024**