
Whistleblower and Complaint Policy

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 Code of Conduct and related policies. As part of this commitment, Workday has adopted this Whistleblower and Complaint Policy (the “Policy”).

It is our policy to treat concerns or complaints about accounting, auditing matters, or deceptive financial practices seriously and expeditiously. This Policy is intended to encourage and enable employees and others to raise serious concerns within Workday. Directors, employees, contractors, and consultants 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 (the “DTSA”) and the immunity the DTSA provides to any employee or individual performing work as a contractor or consultant for Workday, who discloses trade secret information as part of whistleblowing activity.

1.0 Reporting Violations

It is the responsibility of all directors, employees, and contractors to comply with the Workday Code of Conduct (the “Code”) and to report alleged violations of: (i) the Code 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.

Workday employees and contractors should share any questions, concerns, suggestions, or complaints with someone who can address them properly. In many cases, your manager will be in the best position to address an area of concern. However, if you are not comfortable speaking with your manager or you are not satisfied with your manager's response, you are encouraged to speak with the Workday Integrity Team (integrity@workday.com), Workday’s Chief People Officer, the head of Employee Relations, the head of Internal Audit, Workday’s General Counsel and Chief Compliance Officer (“CCO”), or a member of Workday Legal.

Managers will promptly consider the information submitted to them and take appropriate action in accordance with the law, governmental rules and regulations, and otherwise consistent with good business practice. Managers are required to report allegations of violations of the Code to their management, Workday People & Purpose, the Workday Integrity Team, or Workday Legal. This includes allegations or reports received from persons outside Workday, as well as allegations regarding third parties who provide services to Workday.

If you are not comfortable discussing a concern with anyone directly, you may report the concern confidentially and anonymously by the following means:

1. By clicking on <https://speakup.workday.com> and following the instructions.
2. By e-mail to integrity@workday.com. Note: If you choose to report by email and wish to report anonymously, please take steps to ensure your anonymity is maintained.
3. By calling our Workday Integrity Speakup line: 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 Ethics and Compliance Hotline is available 24 hours a day, 7 days a week.

If you wish to report a matter directly to the Audit Committee of the Board of Directors (the “Audit Committee”), you may use the process above and indicate that the report should be delivered directly to the Audit Committee. The Audit Committee will take whatever steps they deem necessary to respond to a report that they receive, including whether to refer the matter for investigation.

You may remain anonymous in reporting violations online or through our Speakup hotline, if permitted by law in your country. 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 will be largely dependent on the quality and specificity of the information. The General Counsel and CCO or their designees will be responsible for reviewing, or overseeing the review of, any report of an allegation from any source. The General Counsel and CCO or their designees will promptly notify the sender and acknowledge receipt of the report, unless the report was submitted anonymously. You may contact the General Counsel and CCO at generalcounsel@workday.com.

2.0 Statement of Non-Retaliation

It is against Workday policy to retaliate in any form against any person who provides truthful information to a law enforcement official concerning such person’s reasonable good faith belief that a possible violation of any federal, state, or foreign law has occurred. Workday prohibits any form of intimidation or retaliation by any employee or contractor of Workday 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, or any Workday policies; 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, or regulation.

The prohibited forms of 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 policy applies to all employees, directors, agents, consultants, contractors and any other people or entities who do business on behalf of Workday (collectively “Workmates and our business partners”) globally.

3.0 Statement of Confidentiality

Where an individual reports a concern in good faith, Workday will keep discussions and actions relating to such report confidential to the greatest extent possible and in compliance with all applicable laws and regulations.

4.0 Investigations

Employees should not independently conduct their own investigation but instead should make their complaint or report by following the procedures in this Policy. The General Counsel and CCO 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.

5.0 Retention of Records

The General Counsel and CCO or their designees will maintain a record of all complaints and reports, tracking their receipt, investigation, and resolution for a reasonable period of time.

6.0 Reporting to Board of Directors

The General Counsel and CCO will periodically report to the Audit Committee with respect to any alleged accounting violations, any compliance issues that may have a material impact on Workday's financial statements, and any material reports or inquiries received from regulatory or government agencies or from our Ethics and Compliance Speakup line, including with respect to any material violations of the Code. The General Counsel and CCO 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.

7.0 Policy Administration

The Audit Committee is responsible for periodically reviewing this Policy and other policies as requested by Workday's management and will recommend material 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.

Effective: April 2, 2020