



## CODE OF BUSINESS CONDUCT

Adopted by the Board of Directors on March 5, 2014  
As Amended by the Board of Directors on July 25, 2019

### Our Mission and Core Values

*Our mission is to enable global companies to become Mobile First organizations, embracing mobility as their primary IT platform in order to transform their businesses and increase their competitiveness. We operate on the basis of responsiveness, openness, honesty and trust with our customers, business partners, employees and stockholders. Our employees are encouraged to demand excellence, take intelligent risks, and to “act like an owner.” These core values are shared regularly with employees on a worldwide basis, and this open communication in an environment of trust guides our decision-making.*

### Policy Overview

This Code of Business Conduct flows directly from our commitment to our mission and core values. We consistently aim for excellence and to provide value for both our customers and stockholders, and it is critical that we do so with integrity and high ethical standards. It is unacceptable to cut legal or ethical corners for the benefit of MobileIron, Inc. or its subsidiaries (collectively, “**MobileIron**”) or for personal benefit.

This code is intended to deter wrongdoing as well as the appearance of wrongdoing. Doing the right thing is more important than winning while risking our reputation or the trust of our customers, partners and stockholders.

This code is designed to ensure:

- operating our business ethically and with integrity;
- avoiding actual or apparent conflicts of interest;
- compliance with the letter and spirit of all laws and MobileIron policies, including full, fair, accurate, timely and understandable disclosure in reports, documents and other public communications we file with the U.S. Securities and Exchange Commission (the “**SEC**”) and in our other public communications; and
- the prompt internal reporting of suspected violations of this code.

### To whom does the code apply?

The code applies to all of us: the directors, executives, employees and independent contractors of

MobileIron and its subsidiaries. In addition to our own compliance, all of us must ensure that those we manage, and those that we hire to work on our behalf, comply with this policy.

### **Honest and Ethical Conduct**

Consistent with our core values, MobileIron personnel must act and perform their duties ethically, honestly and with integrity – doing the right thing even when “no one is looking.” We tell partners, customers, partners, publishers, investors and the public the truth about our company. We commit to only what we can do and we deliver on our commitments. No winks. No nods.

### **Conflicts of Interest**

A conflict of interest may exist where the interests or benefits of one person or entity conflict or appear to conflict with the interests or benefits of MobileIron. Your decisions and actions related to MobileIron should be based on the best interests of MobileIron and not based on personal relationships or benefits, either for yourself or for others. MobileIron personnel must never use or attempt to use their position with MobileIron to obtain improper personal benefits.

A conflict of interest may arise in many situations. We cannot list them all in this policy of course. However, some examples include:

- serving as a director, employee or contractor for a company that has a business relationship with MobileIron or is a competitor of MobileIron;
- having a financial interest in a competitor, supplier or customer of MobileIron, other than holding direct interest of less than a 1% in the stock of a publicly traded company;
- receiving something of material value from a competitor, supplier or customer of MobileIron beyond entertainment or nominal gifts in the ordinary course of business, such as a meal or logo wear;
- being asked to present at a conference where the conference sponsor has a real or potential business relationship with MobileIron (as a vendor, customer or investor, for example), and the sponsor offers travel or accommodation arrangements or other benefits materially in excess of our standard benefits; or
- directly or indirectly using for personal gain, rather than for the benefit of MobileIron, an opportunity that you discovered through your role with MobileIron.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. Conflicts of interest can also occur when a family member of a director, officer or employee participates in any of the above activities. We encourage you to seek guidance from your manager and the human resources or legal departments when you have any questions or doubts.

No director, officer or employee of MobileIron may accept loans from any person or entities having or seeking to do business with MobileIron. Executive officers and directors may not receive loans from MobileIron, nor may MobileIron arrange for any loan to such persons.

In the interest of clarifying the definition of "conflict of interest," if any member of the Board who is also

a partner or employee of an entity that is a holder of MobileIron Common Stock, or an employee of an entity that manages such an entity (each, a “**Fund**”), acquires knowledge of a potential transaction (investment transaction or otherwise) or other matter other than in connection with such individual’s service as a member of the Board (including, if applicable, in such individual’s capacity as a partner or employee of the Fund or the manager or general partner of a Fund) that may be an opportunity of interest for both the Company and such Fund (a “**Corporate Opportunity**”), then, provided that such director has acted reasonably and in good faith with respect to the best interests of the corporation, such an event shall be deemed not to be a "conflict of interest" under this policy.

If you are aware of an actual or potential conflict of interest, or are concerned that a conflict might develop, please discuss with your manager and then obtain approval from our General Counsel/Head of Legal before engaging in that activity or accepting something of value.

We will abide by the securities laws that govern conflicts of interest by our executive officers and directors. As a result, the actions or relationships that will be considered conflicts with respect to our executive officers and directors are only those that meet the requirement for disclosure in our periodic filings with the SEC pursuant to Item 404 of Regulation S-K, referred to as related party transactions. Such related party transactions must be approved by the Audit Committee as required by applicable laws and regulations, and provided such approval is obtained in advance and such transactions are publicly disclosed, such approval shall not be deemed a waiver of this Code.

## **Compliance**

MobileIron strives to comply with all applicable laws and regulations. It is your personal responsibility to adhere to the standards and restrictions imposed by those laws and regulations, including those relating to financial and accounting matters. The same applies to policies we adopt, such as this one. Even if conduct complies with the letter of the law or our policies, we must avoid conduct that will have an adverse impact on the trust and confidence of our customers, partners or investors.

For example, regardless of local practices or actions by competitors, you must never directly or indirectly make a payment (cash or any other items of value) to a foreign official or government employee to obtain or retain business for MobileIron, or to acquire any improper advantage. You must fully comply with all anti-corruption laws of the countries in which we do business, including the U.S. Foreign Corrupt Practices Act, which applies globally. For more information about the rules governing gifts to foreign officials, please reference our Anti-Corruption Policy.

## **Accurate Financial and Accounting Disclosures**

Our principal executive officer, principal financial officer and people who perform similar functions are our “senior financial officers” and are responsible for ensuring that disclosures in our periodic reports and other public communications are full, fair, accurate, timely and understandable. No director, officer or employee may cause MobileIron to enter into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, no director, officer or employee may create any false or artificial documentation or book entry for any transaction entered into by MobileIron.

## **Insider Trading Guidelines**

These guidelines are intended to supplement MobileIron’s Insider Trading and Trading Window Policy (“Insider Trading Policy”); however, MobileIron’s Insider Trading Policy is not a part of this Code of

Business Conduct and is not incorporated by reference. You should familiarize yourself with MobileIron's Insider Trading Policy. It describes policies that address the risks of insider trading, such as:

- a prohibition on hedging MobileIron stock
- periodic blackout windows when you may not trade MobileIron stock
- a prohibition on trading in derivative securities related to MobileIron stock, which includes, but is not limited to, publicly-traded call and put options; and
- a prohibition on engaging in short selling of MobileIron stock at any time.

It does not matter how many shares you buy or sell, or whether it has an effect on the stock price – if you have material, nonpublic information and you trade or “tip” the information to someone else, you have broken the law.

You should contact our General Counsel/Head of Legal, at [policyquestions@mobileiron.com](mailto:policyquestions@mobileiron.com) if you have any questions.

### **Managing Compliance Accountability**

This code is a statement of certain fundamental principles, policies and procedures that govern MobileIron personnel in the conduct of our business. Reported violations of this code will be investigated and appropriate action taken. Any violation of this code, including fraudulent reports, may result in disciplinary action. That disciplinary action may include termination of employment and legal proceedings if warranted.

### **Reporting**

If you have a concern regarding conduct that you believe to be a violation of a law, regulation or MobileIron policy, or you are aware of questionable legal, financial or accounting matters, or simply are unsure whether a situation violates any applicable law, regulation or MobileIron policy, please:

- discuss the situation with your manager;
- if your manager is involved in the situation or you are uncomfortable speaking with your manager, contact our General Counsel/Head of Legal or our Chief Financial Officer; or
- if you don't believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, or you believe you are the subject of retaliation for good-faith reporting of a concern, please report your concern via our hotline online at [policyquestions@mobileiron.com](mailto:policyquestions@mobileiron.com) or by phone at **650-282-7600**, through which you may choose to identify yourself or remain anonymous. The General Counsel/Head of Legal, an audit or corporate governance committee member or others, as appropriate, will review concerns submitted through the hotline.

We expect our employees to do their best to comply with this policy. It is important that you stay vigilant to ensure there are no violations of this policy by anyone. Do not stay silent in the face of a potential violation. If you have knowledge of a potential violation and fail to report it via the process set forth above,

you too may be subject to disciplinary action under this code. For more information, see the Whistleblower Policy.

### **No Retaliation.**

MobileIron will not retaliate against any individual for filing a good-faith concern regarding non-compliance with this policy. MobileIron will not retaliate against any individual participating in the investigation of any such complaint either. Finally, MobileIron will not permit any such retaliation by any manager or executive officer, or by any company with which we contract. For more information, see the Whistleblower Policy.

### **Waivers of this Code**

Any amendment or waiver of any provision of this Code of Conduct must be approved in writing by the Board and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of the code for a senior financial officer will be promptly disclosed to stockholders if and as required by applicable law or the rules of any stock exchange on which any of MobileIron's capital stock is listed, including rules and regulations of any stock exchange on which any of MobileIron's capital stock is listed. The term "waiver" includes the approval of a material departure from a provision in this Code of Conduct, as well as failure to take action within a reasonable period of time regarding a material departure from a provision of this Code of Conduct that has been made known to and MobileIron executive officer.

### **Amendments**

We are committed to continuously reviewing and updating our policies. We therefore may amend this code at any time and for any reason. We welcome your comments about this policy as well. Contact your manager or our General Counsel/Head of Legal with any such comments.