



## **WHISTLEBLOWER POLICY FOR ACCOUNTING AND AUDITING MATTERS**

### **Statement of Policy**

Mobile Iron, Inc. (“*MobileIron*”) is committed to complying with all laws and regulations that govern our business, including those that govern our accounting and auditing practices. We also encourage open discussion within the workplace of our business practices. We will not tolerate conduct that is in violation of laws and regulations. If a MobileIron employee has a good faith complaint regarding a possible violation of law, regulation or policy (except for complaints under MobileIron’s discrimination or harassment policies, which should be reported and handled in accordance with those policies), including with regard to accounting or auditing matters, we expect the employee to immediately report the complaint in accordance with this policy. Other third parties, such as consultants or vendors, also may report a good faith complaint regarding accounting or auditing matters in accordance with this policy.

The Audit Committee of our Board of Directors has established these procedures to facilitate the reporting of complaints regarding accounting or auditing matters. The procedures enable (i) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters and (ii) the confidential, anonymous submission of concerns regarding questionable accounting or auditing matters. This policy is a supplement to our Code of Business Conduct.

### **Scope of Accounting Matters Covered by Policy**

This policy covers complaints relating to accounting matters, including the following:

- fraud, deliberate error or gross negligence or recklessness in the preparation, evaluation, review or audit of the financial statements of MobileIron;
- fraud, deliberate error or gross negligence or recklessness in the recording and maintaining of financial records of MobileIron;
- deficiencies in our internal accounting controls or noncompliance with them;
- misrepresentation or false statement to management, regulators, the outside auditors or others by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of MobileIron; or
- any other deviation from full and fair reporting of our results or financial condition.

### **Policy of Non-Retaliation**

MobileIron will not retaliate against any individual, and will not permit retaliation, (including but not limited to discharge, demotion, suspension, threats, or harassment), by any MobileIron employee against any individual, for raising a good-faith concern regarding non-compliance with this policy. Also, MobileIron will not retaliate against any individual, and will not permit retaliation, (including but not

limited to discharge, demotion, suspension, threats, or harassment), by any MobileIron employee against any individual, for participating in the investigation of any such complaint. If any employee believes he or she has been subjected to any such retaliation, or the threat of it, they may file a complaint with our Chief Compliance Officer. We will take appropriate corrective action if an employee has experienced retaliation in violation of this policy.

### **General Counsel / Head of Legal**

Our General Counsel/Head of Legal is responsible for receiving, reviewing and then investigating (under the direction and oversight of the Audit Committee) complaints under this policy. If an employee has a complaint covered by this policy, they must report such matter to our General Counsel/Head of Legal. If the suspected violation involves our General Counsel/Head of Legal, the employee must report the suspected violation to our Chief Executive Officer or any member of the Audit Committee.

### **Anonymous Reporting of Complaints**

We have also established a procedure under which complaints regarding accounting matters may be reported anonymously. Employees may anonymously report these concerns by either (i) leaving an anonymous message via a toll free telephone call at 650-282-7600, (ii) sending a message from an anonymous email address to [policyquestions@mobileiron.com](mailto:policyquestions@mobileiron.com), or (iii) delivering the complaint anonymously via regular mail to our General Counsel/Head of Legal at MobileIron, Inc., 490 East Middlefield Road, Mountain View, CA 94043, USA.

Employees should make every effort to report their concerns either directly to our General Counsel/Head of Legal (or any member of the Audit Committee, if appropriate) or anonymously using one or more of the methods specified above. The complaint procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he or she believes is engaged in prohibited conduct under this policy. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow our General Counsel/Head of Legal and other persons investigating the report to adequately assess the nature, extent and urgency of the allegations.

### **Policy for Receiving and Investigating Complaints**

Upon receipt of any complaint, our General Counsel/Head of Legal will notify the Chair of the Audit Committee and provide applicable information regarding such complaint. . To the extent that complaint pertains to an accounting or audit matter, the Audit Committee will be notified promptly of all such complaints and will determine the planned course of action. Complaints regarding matters other than accounting or audit will be investigated by our General Counsel/Head of Legal or other appropriate person designated by our General Counsel/Head of Legal.

Initially, the Audit Committee will determine if there is an adequate basis for an investigation. If so, our General Counsel/Head of Legal will appoint one or more internal or external investigators to promptly and fully investigate the claim(s) under the direction and oversight of the Audit Committee. The Audit Committee may also appoint other persons to provide direction and oversight of the investigation. Our General Counsel/Head of Legal will also confidentially inform the reporting person (if their identity is known) that the complaint was received and whether an investigator has been assigned.

Confidentiality of the employee submitting the complaint will be maintained to the fullest extent possible

consistent with the need to conduct an adequate investigation. However, MobileIron may find it necessary to share information on a “need to know” basis in the course of any investigation.

If the investigation confirms that a violation has occurred, MobileIron will promptly take appropriate corrective action with respect to the allegations and with respect to the employees who violate this policy (who may face discipline up to and including termination of their employment). Further, in appropriate circumstances, the matter may be referred to governmental authorities that may investigate and initiate civil or criminal proceedings.

### **Retention of Complaints**

Our General Counsel/Head of Legal will maintain a log of all complaints, tracking their receipt, investigation and resolution, and will prepare a periodic summary report for each member of the Audit Committee. Each member of the Audit Committee will have access to the log and our General Counsel/Head of Legal, may provide access to the log to other personnel involved in the investigation of complaints. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with any established document retention policy.

### **Periodic Review of Procedures**

The Audit Committee will review the procedures outlined above and consider changes to such procedures periodically.

Updated: July 25, 2019.