Corporate Code of Business Conduct and Ethics

Amended and Restated* August 31, 2026

(Originally Adopted February 12, 2025)

***Note about amendment**:

On August 31, 2026, the Board of Directors of SailPoint, Inc. (the "Company") approved an amended and restated Corporate Code of Business Conduct and Ethics (the "Code"), effective immediately. The amendments, among other things, summarize existing policies and practices at the Company under the following new headings: (i) insider trading, (ii) anti-corruption, (iii) data privacy and information security, (iv) export controls and economic sanctions, and (v) human rights.

The amendments do not constitute or result in a waiver of any provision of the Code with respect to any director, officer, or employee. The full text of the amended Code is available below.

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SAILPOINT, INC.
CORPORATE CODE OF BUSINESS CONDUCT AND ETHICS

The Board of Directors (the "*Board*") of SailPoint, Inc. (together with its subsidiaries, the "*Company*") has adopted this Corporate Code of Business Conduct and Ethics (this "*Code of Conduct*"), which provides basic principles and guidelines to assist directors, officers, employees, contractors, agents, and other representatives (collectively, "*Stakeholders*") of the Company and of its subsidiaries in complying with the legal and ethical requirements governing the Company's business conduct.

The Board has adopted this Code of Conduct in order to deter wrongdoing and promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by the Company;
- compliance with applicable governmental laws, rules, and regulations;
- protection of Company assets, including corporate opportunities and confidential information;
- fair dealing practices;
- the prompt internal reporting of violations of the Code of Conduct to an appropriate person or persons identified in the Code of Conduct; and
- accountability for adherence to the Code of Conduct.

This Code of Conduct covers a wide range of business practices and procedures but cannot cover every issue that may arise. However, a familiarity with the basic principles of this Code of Conduct should assist Stakeholders in avoiding illegal or unethical behavior. All Stakeholders are required to be familiar with the Code of Conduct, comply with its provisions and report any suspected violations as described below. Stakeholders must also comply with the Company's other corporate compliance and ethics policies.

The Company reserves the right to add to, modify, and rescind this Code of Conduct or any portion of it at any time. This Code of Conduct governs in the event of any conflict or inconsistency between this Code of Conduct and any other materials distributed by the Company. However, if a law conflicts with a policy in this Code of Conduct, you must comply with the law.

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I. Statement of Principles

A. Basic Standards

The Company's fundamental policy is to conduct its business with honesty and integrity in accordance with the highest legal and ethical standards, including acting in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated. The Company and its Stakeholders must comply with all applicable legal requirements of the State of Delaware, the United States, and each country in which the Company conducts business.

B. Individual Responsibility and Compliance

This Code of Conduct provides guidance for specific situations that may arise. However, each Company Stakeholder has the responsibility to exercise good judgment, so as to act in a manner that will reflect favorably upon the Company and such Stakeholder, particularly in his or her capacity on behalf of the Company.

All Stakeholders must comply with the spirit as well as the letter of this Code of Conduct. They must not attempt to achieve indirectly (through the use of intermediaries, for example) what is prohibited directly by this Code of Conduct. All Stakeholders must endeavor to comply with all securities and other laws, rules, and regulations of federal, state, and local governments and other private and public regulatory authorities that are applicable to the Company and its operations.

Please see Annex A for specific compliance and complaint procedures.

II. Implementation

A. Condition of Employment

Each officer and employee of the Company, regardless of level, must become familiar with and agree to comply with this Code of Conduct as a condition of such employee's employment. All officers and employees must be provided with a copy of this Code of Conduct at the time their employment with the Company commences; provided, however, that individuals already employed by the Company at the time of the adoption of this Code of Conduct must be provided with a copy of this Code of Conduct shortly after its adoption. All supervisors are responsible for promoting compliance with this Code of

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Conduct by all employees under their supervision, regardless of level, and for ensuring that those employees are familiar with this Code of Conduct and understand their responsibility for full compliance with it.

B. Condition of Director Appointment/Election

Each member of the Board must become familiar with and agree to comply with this Code of Conduct. All directors must be provided with a copy of this Code of Conduct at the time of their appointment or election to serve on the Board.

C. Association with Unaffiliated Enterprises

The Company's employees associated with enterprises not controlled by the Company (including vendors, suppliers, contractors, lawyers, and accountants) must be guided in their conduct by this Code of Conduct's provisions. Such persons must attempt to influence those enterprises to conduct their activities in conformity with all applicable laws and this Code of Conduct and must report violations of this Code of Conduct to the Company's General Counsel.

D. Letter to Vendors, Suppliers, and Contractors

The Company may periodically, as it deems necessary and appropriate, send to its significant vendors, suppliers, and contractors a letter that:

- Advises that it is against the Company's policy for directors, officers, or other employees to accept gifts or entertainment of more than nominal value from any entity that does, or is seeking to do, business with the Company;
- States that the provision of any gifts and/or entertainment is not, and will not become, a condition of doing business with the Company; and
- Requests the recipient to identify any director, officer, or other employee or representative of the Company who pressures or solicits the recipient for gifts, entertainment, or other special favors.

E. Interpretation Questions

Any questions on how to proceed or interpret this Code of Conduct may be directed to the Company's General Counsel or another member of the Company's Legal Department.

Please see Annex A for specific compliance and complaint procedures.

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F. Violation of Policy

Compliance with this Code of Conduct is essential. Violations of this Code of Conduct will result in disciplinary action, up to and including dismissal of any Stakeholder where warranted.

III. Conflicts of Interest

A. General

A conflict of interest occurs when an individual's private interest (or the interests of their family) interferes, or even appears to interfere, in any way with the interests of the Company as a whole. A conflict of interest can arise when a Stakeholder takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when a Stakeholder, or a member of such person's family or household, or an entity with which the Stakeholder is affiliated receives improper personal benefits or payment as a result of the Stakeholder's position with the Company. A conflict of interest is deemed to exist whenever, as a result of the nature or responsibilities of his or her relationship with the Company, a Stakeholder is in a position to further any personal financial interest or the financial interest of any member of such person's family.

No Stakeholder is permitted to engage in any business or conduct or enter into any agreement or arrangement that would give rise to actual or potential conflicts of interest. Stakeholders should not permit themselves to be placed in a position that might give rise to the appearance that a conflict of interest has arisen.

Loans by the Company to, or guarantees by the Company of, obligations of directors, officers, employees or their family members are of special concern. Loans by the Company to, or guarantees by the Company of, obligations of any director or officer (or their family members) are expressly prohibited.

While it is not possible to describe all circumstances where a conflict of interest involving a Stakeholder exists or may exist, the following situations may involve actual or potential conflicts of interest:

- An interest in, or position with, any supplier, customer, or competitor of the Company (except for an investment in publicly traded securities as described below).
- Giving or accepting gifts or favors in violation of Section V(B), below.

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- The disclosure or use of confidential information gained by reason of employment with the Company (or, in the case of a director, election or appointment to the Board) for profit or advantage by a director, officer, or other employee or anyone else.
- Competition with the Company in the acquisition or disposition of rights or property or other business opportunity.

The following situations likely do not give rise to conflicts of interest:

- Ownership of publicly traded securities of a supplier, customer, or competitor of the Company that do not confer upon the holder any ability to influence or direct the policies or management of the supplier, customer, or competitor.
- A transaction with one of the Company's banks, where the transaction is customary and conducted on standard commercially available terms (such as a home mortgage or bank loan).
- A transaction or relationship disclosed in accordance with this Code of Conduct and determined by outside legal counsel not to be a prohibited conflict of interest.

These examples are given only to guide Stakeholders in making judgments about conflicts of interest. If any Stakeholder finds himself or herself in a situation where a conflict of interest exists or may exist, he or she should immediately report the matter as provided below.

B. Reporting Conflicts of Interest Involving Non-Officer Employees

Actual or potential conflicts of interest involving a non-officer employee, or a member of such person's immediate family or entity with which the Stakeholder is affiliated, must be reported in writing by the affected person (or by others having knowledge of the existence of the actual or potential conflicts of interest) to the employee's immediate supervisor or the Human Resources manager, who shall consult with the Company's General Counsel to determine whether a conflict of interest actually exists and to recommend measures to be taken to neutralize the adverse effect of the conflict of interest reported, if such measures are available or appropriate under the circumstances. If the supervisor or Human Resources manager is themself involved in the potential or actual conflict, the matter should instead be discussed directly with the General Counsel. This procedure will be applied in a manner that is intended to minimize its effect on the personal affairs of employees while still protecting the Company's interests. The matter may also

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be referred to the Board for its approval or rejection.

C. Reporting Conflicts of Interest Involving Directors or Officers

An actual or potential conflict of interest involving a director or officer, or a member of such person's immediate family or entity with which the Stakeholder is affiliated, must be reported by the affected person (or by others having knowledge of the existence of the actual or potential conflict of interest) to the Company's General Counsel, who shall promptly disclose the possible conflict of interest to the Board, or an applicable committee thereof, at the earliest time practicable under the circumstances. The Board, or the applicable committee thereof, will determine whether the possible conflict of interest indeed constitutes a conflict of interest. The Board's or Board committee's approval will be required prior to the consummation of any proposed transaction or arrangement that is determined by the Board to constitute a conflict of interest.

Any member of the Board or any officer having a possible conflict of interest, either directly or indirectly, in any proposed transaction or arrangement is not permitted to vote (in the case of a member of the Board) or use his or her personal influence on the matter being considered by the Board. Finally, any member of the Board or any officer having a possible conflict of interest, either directly or indirectly, must be excused from any meeting of the Board during discussion (subject to the exception set forth in the paragraph below) and vote on the particular matter (in the case of an interested director). The minutes of the Board meeting should reflect the disclosure, the absence from the meeting of the interested director or officer, and the abstention from voting (in the case of an interested director).

The foregoing requirements do not prohibit the interested director or officer from briefly stating his or her position on the matter or from answering pertinent questions of the disinterested members of the Board, as the interested director's knowledge may be of assistance to the other Board members in their consideration of the matter.

IV. Record Keeping

A. Company Books and Records

1. *Books and Records*. The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. As such, the Company's books, records, disclosures, and accounts must accurately and fairly

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reflect the Company's transactions in reasonable detail and in accordance with the Company's accounting practices and policies. Each director, officer, and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records, and accounts are accurately maintained. The following examples are given for purposes of illustration and are not intended to limit the generality of the foregoing in any way:

- No false or deliberately inaccurate entries (such as overbilling or advance billing) are permitted for any reason. Discounts, rebates, credits, and allowances do not constitute overbilling when lawfully granted. The reasons for the grant should generally be set forth in the Company's records, including the party requesting the treatment.
- No payment shall be made with the intention or understanding that all or any part of it is to be used for any person other than that described by the documents supporting the payment.
- No undisclosed, unrecorded, or "off-book" funds or assets are permitted.
- No false or misleading statements, written or oral, shall be intentionally made to any internal accountant or auditor or the Company's independent registered public accounting firm with respect to the Company's financial statements.

2. *Public Communications*. Each director, officer and employee who is involved in the Company's disclosure process must: (a) be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and (b) take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

3. *Internal Accounting and Disclosure Controls*. The Company's Chief Executive Officer and Chief Financial Officer are responsible for implementing and maintaining a system of internal accounting and disclosure controls sufficient to provide reasonable assurances that:

- Transactions are executed in accordance with management's

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general or specific authorization;

- Transactions are recorded as necessary to: (a) permit the preparation of financial statements in conformity with generally accepted accounting principles or any other applicable criteria and (b) maintain accountability for assets;
- Access to assets is permitted only in accordance with management's general or specific authorization; and
- The recorded accountability of assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

4. *Ethical Conduct*. No Stakeholder is permitted to willfully, directly, or indirectly:

   - Falsify, or cause to be falsified, any book, record, disclosure, or account of the Company;
   - Make, or cause to be made, any materially false or misleading statement or omit to state, or cause another person to omit to state, any material fact necessary in order to make statements made, in light of the circumstances under which the statements were made, not misleading to an accountant in connection with any audit or examination of the Company's financial statements; or
   - Take any action to fraudulently influence, coerce, manipulate, or mislead the Company's independent registered public accounting firm.

   Stakeholders must exercise reasonable due diligence in order to avoid the events described above.

5. *Compliance Procedures*. The Company proactively promotes ethical behavior and is committed to achieving compliance with all applicable laws, rules, regulations, standards, and policies, including accounting standards, accounting controls, and audit practices. Enforcement of sound ethical standards is the responsibility of every Stakeholder, and each Stakeholder is obligated to promptly report any unethical conduct or violations of applicable laws, rules and regulations, this Code of Conduct, or any other Company compliance-related policy to appropriate personnel.

   Please see Annex A for specific compliance and complaint procedures.

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V. Use of Company Property and Resources

A. Protection and Proper Use of Company Assets

The use of any Company funds or assets for any unlawful or improper purpose is prohibited. All employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability and are prohibited. Any suspected incident of fraud or theft should be reported immediately for investigation. Company equipment should not be used for non-business-related purposes, though incidental personal use may be permitted (such as occasional use of the Company's stationery, supplies, copying facilities or telephone when the cost to the Company is insignificant), it must not result in significant added cost to the Company, disruption of business processes, or any other disadvantage to the Company.

The obligation of employees to protect the Company's assets includes an obligation to protect the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing, and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any non-public financial data and reports. Unauthorized use or distribution of this information violates Company policy, and it could also be illegal and result in civil or criminal penalties.

B. Questionable or Improper Payments and Gifts

1. *Anti-Bribery*. No payments or gifts from the Company's funds or assets shall be made to or for the benefit of a representative of any domestic or foreign government (or subdivision thereof) or government-controlled entity, labor union, or any current or prospective customer or supplier for the purpose of improperly obtaining a desired government action or any sale, purchase, contract, or other commercial benefit. This prohibition applies to direct or indirect payments made through third parties and employees and is also intended to prevent bribes, kickbacks, or any other form of payoff ("Prohibited Gifts"). For additional restrictions and guidance regarding interactions with government and other officials, please refer to the Company's Anti-Corruption Compliance Policy.

2. *Other Prohibitions*. In addition to the foregoing, directors, officers, and other employees of the Company shall:

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(a) not give or accept: (i) payments of any kind; (ii) Prohibited Gifts; or (iii) other gifts that total more than $250 in fair market value from any one source annually;

(b) not give anything of value (for example, gifts or entertainment) to, or accept anything with greater than a de minimis value from, domestic or foreign government personnel (see Anti-Corruption Compliance Policy for bona fide travel expenditures exception);

(c) not give gifts that total more than $250 in fair market value to any non-governmental personnel annually. Additionally, directors, officers, and other employees of the Company shall ensure that the gifts do not violate any policy of the recipient before sending;

(d) not give gifts to, or receive gifts from, any personnel of a current audit firm of the Company (including any firm that has performed audit services for the Company during the two prior fiscal years).

3. *Reasonable Meals & Entertainment*. Except with respect to domestic and foreign government personnel, the foregoing does not prohibit directors, officers, or employees from (a) providing or accepting reasonable and appropriate business-related meals with third parties or (b) attending reasonable and appropriate entertainment with third parties, such as a live sporting or other event; provided that such meal or entertainment is limited in frequency and expense and otherwise consistent with the Company's applicable expense policy. Please consult the Company's Legal Department if you have questions regarding the reasonableness of a proposed meal or entertainment opportunity.

4. *Proper Documentation*. All arrangements with third parties (such as distributors or agents) should be evidenced or memorialized in a written contract, order or other document that describes the goods or services that are in fact to be performed or provided and should be for reasonable fees or costs.

5. *Extension of Credit by the Company*. No director, executive officer, or any immediate family member thereof, which means any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, may seek or accept from the Company credit, an extension of credit, or the arrangement of an extension of credit in the form of a personal loan. Any personal loan existing at the time this Code of Conduct was

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originally adopted shall not be materially modified, extended, or renewed.

C. Corporate Opportunities

All directors, officers and employees owe a duty to the Company to advance the Company's interests when the opportunity to do so arises. Subject to the Company's certificate of incorporation, without the written consent of the Board, directors, officers, and other employees are prohibited from taking for themselves personally (or for the benefit of friends or family members) an opportunity that is:

1. a potential transaction or matter that may be an investment or business opportunity or prospective economic or competitive advantage in which the Company could reasonably have an interest or expectancy, or
2. discovered through the use of Company property, information, or position.

In addition, subject to the Company's certificate of incorporation, directors, officers, and other employees are prohibited from using Company property, information, or position for personal gain and competing with the Company directly or indirectly. Subject to the Company's certificate of incorporation, directors, officers, and other employees of the Company owe a primary duty to the Company to advance its legitimate interests when the opportunity to do so arises.

VI. Business and Trade Practices

A. Compliance with Laws, Rules, and Regulations

Obeying the law, both in letter and in spirit, is the foundation upon which the Company's ethical standards are built. All directors, officers, and other employees must respect and obey the laws of the cities, states, and countries in which the Company operates. Although directors, officers, and other employees may not know every law that is applicable to the Company, it is important that directors, officers, and other employees know enough to ask questions and seek advice from supervisors, managers, the Legal Department, or other appropriate Company personnel if they have any doubt regarding the legality or compliance with this Code of Conduct of an action taken, or not taken, on behalf of the Company or by any Stakeholder.

B. Fair Dealing

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Directors, officers, and other employees must deal fairly with the Company's customers, suppliers, competitors, partners, service providers, employees, and anyone else with whom they have contact in the course of performing their job. No director, officer, or other employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other practice involving unfair dealing.

C. Confidentiality

Directors, officers, and other employees shall maintain the confidentiality of information entrusted to them by the Company or its customers, suppliers, or employees, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information (regardless of its source) that, if disclosed, might be of use to competitors or harmful to the Company or its customers, suppliers, or partners. Confidential information also includes written material provided and information discussed at all meetings of the Board or any committee thereof and all information that is learned about the Company's suppliers and customers that is not in the public domain. The obligation to preserve confidential information continues even after employment or agency with the Company ends. Any documents, papers, records, or other tangible items that contain trade secrets or proprietary information are the Company's property.

D. Health, Safety, and Environmental Policy

The Company is committed to conducting its business in compliance with applicable health, safety, and environmental laws, rules, and regulations in a manner that has the highest regard for the health and safety of human life and the environment. Each employee has the responsibility for maintaining a healthy, safe, and environmentally-friendly workplace by following health, safety, and environmental laws, rules, and regulations and reporting accidents, injuries, and unsafe equipment, practices, or conditions.

Directors, officers, and other employees should be aware that environmental and health and safety laws may provide for significant civil and criminal penalties against individuals and the Company for the failure to comply with applicable requirements. Each director, officer, and other employee must comply with all applicable environmental and safety and health laws, rules, and regulations, including occupational safety and health standards.

Employees should report to work in a condition allowing them to perform their duties free from the influence of drugs, alcohol, or other controlled substances.

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The use of illegal drugs in the workplace will not be tolerated.

Violence, harassment, and threatening behavior are not permitted.

E. Retention of Documents and Records

It is the Company's policy to cooperate with all governmental investigative authorities. Each director, officer, and other employee shall retain any record, document, or tangible object of the Company that is known to be the subject of an investigation or litigation.

It is a violation of this Code of Conduct for any director, officer, or other employee to knowingly alter, destroy, mutilate, conceal, cover up, falsify, or make a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any state, federal, or other government department or agency or any bankruptcy, or in relation to or contemplation of any such matter or case.

VII. Employment Practices and Work Environment

A. Non-Discrimination Policy

The Company values the diversity of its employees and is committed to providing an equal opportunity in all aspects of employment to all employees without regard to race, color, gender, gender identity, genetic information, religion, age, pregnancy, family status, national origin, citizenship status, military service or reserve or veteran status, sexual orientation, disability, or any other protected characteristic. Directors, officers, and other employees should use reasonable efforts to seek business partners for the Company that do not discriminate in hiring or in their employment practices, and who make decisions about hiring, salary, benefits, training opportunities, work assignments, advancement, discipline, termination, and retirement solely on the basis of a person's ability to perform the tasks required by their position.

B. Freedom of Association

The Company recognizes and respects the right of employees to exercise their lawful rights of free association, including joining or electing not to join any association. The Company expects its business partners to also adhere to these principles.

C. Harassment

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The Company will not condone any type of harassment or abuse of an employee by a director, officer, or other employee or any partner, customer, or supplier of the Company on the basis of race, color, gender, gender identity, genetic information, religion, age, pregnancy, family status, national origin, citizenship status, military service or reserve or veteran status, sexual orientation, disability, or any other protected characteristic.

VIII. Other Policies and Governance Matters

A. Insider Trading

The Board has adopted an Insider Trading Policy to provide guidelines to all members of the Board and all officers, crew members, and contingent workers of SailPoint and its subsidiaries, and other persons as designated by SailPoint's General Counsel from time to time (each, a "Covered Person") with respect to transactions in SailPoint's securities. The policy applies to all transactions in SailPoint's securities (collectively referred to as "Company Securities"), including SailPoint's common stock, options to purchase common stock, or any other type of securities that SailPoint may issue from time to time. The Insider Trading Policy also applies to Covered Persons' applicable family members.

The Insider Trading Policy is intended to prevent even the appearance of improper conduct on the part of anyone employed by or associated with the Company. Under the Insider Trading Policy, a Covered Person who is aware of material nonpublic information relating to the Company may not, among other things, engage in transactions in Company Securities (except as otherwise specified therein), recommend the purchase or sale of any Company Securities, or disclose material nonpublic information to specified persons (i.e., "tipping").

Additional information may be found in the Insider Trading Policy.

B. Anti-Corruption

The Board has adopted an Anti-Corruption Compliance Policy that requires SailPoint, its officers, members of its board of directors, crew members, and any third parties acting for, with, or on its behalf to comply with the United States Foreign Corrupt Practices Act of 1977, as amended, the UK Bribery Act 2010, and all other anti-corruption and/or anti-bribery laws applicable to SailPoint. In general terms, the FCPA and other anti-corruption laws prohibit the corrupt giving, paying, or offering of a bribe or anything else of value to a non-U.S. government official (including an employee of a non-U.S. state-owned or controlled company) to obtain or retain business. The UK Bribery Act 2010 also criminalizes bribery of non-UK government officials and additionally criminalizes commercial bribery (i.e., the

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offer or payment of a bribe or kickback to a private party in order to induce such party to perform improperly their job). Crew members are required to comply with these laws and SailPoint's Anti-Corruption Compliance Policy. Additional information about these laws and SailPoint's procedures regarding such laws can be found in the Anti-Corruption Compliance Policy.

C. Data Privacy and Information Security

The Company is entrusted with confidential, proprietary, and personal information belonging to its customers, partners, employees, and other individuals, and safeguarding that information is fundamental to the Company's business as an identity security provider. Directors, officers, and other employees must collect, use, share, store, and dispose of personal information only as permitted by applicable data protection laws (including the EU and UK GDPR and the California Consumer Privacy Act), the Company's Privacy Statement, the Company's customer Data Processing Addendum, and the Company's internal information security and privacy policies, and must protect all such information consistent with the Company's Information Security Management System and the security standards and certifications described in the Company's Trust Center (including its ISO 27001 and SOC 2 programs). Any actual or suspected loss of, unauthorized access to, or improper disclosure of personal or confidential information must be reported immediately in accordance with the Company's incident response procedures. Questions regarding privacy or data security may be directed to the Privacy team at privacy@sailpoint.com.

D. Export Controls and Economic Sanctions

The Company's products, services, software, technology, and technical data are subject to U.S. and other export control and economic sanctions laws, including the U.S. Export Administration Regulations, the trade and economic sanctions administered by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC), and Israeli export controls applicable to the Company's encryption technology. Directors, officers, and other employees may not export, re-export, transfer, or otherwise provide the Company's solutions, including through electronic transmission or the oral or visual disclosure of controlled technology, to any country, government, entity, or individual that is embargoed, sanctioned, or otherwise restricted under these laws, or without any license or governmental authorization that is required, including authorizations required for the export of encryption items. Because these requirements are complex and violations can result in significant civil and criminal penalties, including loss of export privileges, any question regarding a proposed transaction, destination, product, or party must be raised with the Legal Department before proceeding.

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E. Human Rights

The Company's fundamental policy is to conduct its business with honesty and integrity in accordance with the highest legal and ethical standards. It is committed to protecting and respecting human rights and has a zero-tolerance approach to modern slavery in its business dealings and supply chain in all forms, including human trafficking, servitude, child labor, and forced labor.

IX. Reporting Violations

The Company proactively promotes ethical behavior and is committed to achieving compliance with all applicable laws, rules, regulations, standards, and policies, including accounting standards, accounting controls, and audit practices.

Directors, officers, and other employees should report any known or suspected unethical conduct or violations of applicable laws, rules or regulations, this Code of Conduct, or any other code, policy, or procedure of the Company to appropriate personnel identified in this Code of Conduct. Any employee of the Company may submit a good faith complaint regarding a violation or suspected violation to the Company's management without fear of dismissal or retaliation of any kind. The Company will not retaliate, and prohibits all directors, officers, and other employees from retaliating, against any employee who in good faith reports known or suspected unethical conduct, violations of laws, regulations, or Company policies. Please see Annex A for specific compliance and complaint procedures.

Directors, officers, and other employees are expected to cooperate in internal investigations of misconduct.

X. Assessment of Potential Violations

The Board shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of this Code of Conduct. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code of Conduct and shall include written notices to the individual involved that the Board has determined that there has been a violation, censure by the Board, demotion, or re-assignment of the individual involved, suspension with or without pay or benefits, and termination of the individual's employment or such other action as the Board may determine is appropriate under the circumstances. In determining what action is appropriate in a particular case, the Board or such designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action, and

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whether or not the individual in question had committed other ethical or financial reporting violations in the past.

XI. Waivers of this Code of Conduct

Any waiver of a provision of this Code of Conduct may be made only by the Board or the Audit Committee (in the case of a violation by a director or executive officer) or the General Counsel (in the case of a violation by any other person) and will be promptly disclosed as required by SEC and Nasdaq rules.

XII. Amendments to this Code of Conduct

Any amendment to this Code of Conduct shall be made only by the Board or a committee thereof. If an amendment to this Code of Conduct is made, appropriate and timely disclosure will be made in accordance with legal requirements.

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This document states a policy of SailPoint, Inc. and is not intended to be regarded as the rendering of legal advice.

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ANNEX A

CODE OF BUSINESS CONDUCT AND ETHICS
COMPLIANCE PROCEDURES

SailPoint, Inc. (the "*Company*" or "*we*") is committed to maintaining the highest ethical and legal standards. We strive to comply with both the letter and spirit of applicable laws and regulations. We conduct our day-to-day business with our employees, customers, representatives, suppliers, competitors, governments, and the public in an honest and ethical manner. Trust, integrity, and accountability are critical elements of our culture as an organization.

We understand that there may be times when you personally experience or witness an activity or course of conduct that may not be compliant with the Company's policies or procedures or applicable law. Since not every situation that will arise can be anticipated, it is important to have a way to approach a new question or problem. When considering these situations, you should:

1. ***Consider what you specifically are being asked to do and whether it seems unethical or improper***. This will enable you to focus on the specific question and the alternatives you have. If something seems unethical or improper, it probably is.

2. ***Discuss the problem with a supervisor***. In many cases, supervisors will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is the responsibility of supervisors to help solve problems and ensure that the Company complies with the legal and ethical requirements governing the Company's business conduct. However, if you are uncomfortable discussing the issues you have addressed with your supervisors, the Company has other resources, as discussed in this Annex A, through which you may report to the Company's Human Resources Department, Legal Department, or confidentially through the Company's hotline either online at https://irdirect.net/SAIL/whistleblower_iframe/ or by phone at 1.800.916.7037.

3. ***Seek help from Company resources***. Generally, you should consider your direct management team (immediate chain of command) and the Company's Human Resources Department as your first source of communication for questions or complaints regarding most matters because, in most cases, they are in the best position to address your concerns. If that is not appropriate or if a satisfactory resolution is not obtained, you can contact any member of the Company's Legal Department (including via email at

legaldepartment@sailpoint.com).

Questions or concerns regarding compliance, legal and ethical matters can also be submitted directly to the Company's General Counsel at chris.schmitt@sailpoint.com. The Company has established an anonymous, confidential reporting hotline, administered by an independent third-party provider, for the purpose of permitting concerned parties to anonymously report compliance, accounting, or ethical concerns. Reports may be submitted to the hotline either online at https://irdirect.net/SAIL/whistleblower_iframe/ or by phone at 1.800.916.7037.

4. ***Report violations in confidence and without fear of retaliation***. You will not be retaliated against for reporting information, in good faith, that you reasonably believe relates to possible misconduct, unethical acts, and/or securities law or accounting violations. Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act you may have performed in connection with such reporting. The Company takes claims of retaliation seriously. We will investigate allegations of retaliation, and anyone found responsible for retaliating against an employee who made a good faith report will be subject to disciplinary action, up to and including termination of employment and possible legal action. Anonymity will be protected whenever possible.

5. ***Always ask first, act later***. When unsure of what to do in any situation, you should seek guidance and ask questions before the action in question is taken.

6. ***Report early; you do not need to have all the facts to report.*** If you are unsure whether to report or not, you should report out of an abundance of caution. You do not need to have all the facts to report. It is the Company's responsibility to investigate.