



JAMF HOLDING CORP.

WHISTLEBLOWER POLICY

Effective May 9, 2025

INTRODUCTION

Jamf Holding Corp. (“Jamf”) is committed to conducting business ethically and in compliance with applicable laws, regulations, and our Code of Conduct. This applies to every business decision in every area of the company worldwide. As part of this commitment, Jamf has adopted this Whistleblower Policy (“Policy”).

PURPOSE

This Policy is designed to provide a confidential or anonymous avenue of communication for reporting any improper activities. It is intended to encourage and enable employees and others to report concerns within Jamf without fear of retaliation. This Policy also helps ensure compliance with applicable laws, including Sections 301(4)(B) and 806 of the Sarbanes-Oxley Act of 2002, and the European Union Whistleblower Protection Directive (Directive (EU) 2019/1937), applicable across EU Member States where Jamf operates.

SCOPE

This Policy applies to directors, officers, employees, contractors, consultants, shareholders, job applicants, volunteers, and other third parties such as business partners. It is the responsibility of all individuals covered by this Policy to use the guidance provided within to report all known and suspected improper activities.

REPORTING VIOLATIONS

If you have knowledge of, or reasonable good-faith grounds to suspect, inappropriate activities related to Jamf – whether it be a breach of internal policies, principles, or legal or regulatory obligations – we encourage you to speak up. You should feel comfortable about voicing your concerns so that Jamf can investigate. Employees who have knowledge of, or



reasonable grounds to suspect, misconduct and who fail to report or escalate the matter in accordance with this policy may be subject to disciplinary action.

Improper activities may include, but are not limited to:

- Financial malpractice, misrepresentations, impropriety, or fraud, including accounting and auditing or disclosure concerns.
- Failure to comply with a legal or regulatory obligation.
- Public health and safety.
- Criminal activity.
- Bribery, facilitation of tax evasion or money laundering.
- Privacy and data protection breaches.
- Anti-competitive conduct.
- Breaches of sanctions.
- Unfair labor practices.
- Illegal employment practices such as discrimination, harassment, or retaliation.
- Violations of human rights, such as modern slavery and human trafficking.
- Attempts to cover up any of these types of behaviors.

Employees and contractors are encouraged to report concerns as early as possible with your manager, and to resolve issues quickly and internally where appropriate. If you do not feel safe or able to raise concerns with your manager, you may submit a report to Legal and Compliance or Human Resources. Any manager or supervisor who attempts to discourage or obstruct an employee or peer from making a good faith report of misconduct or a potential violation will be subject to disciplinary action, up to and including termination.

Jamf's external helpline (<https://report.syntrio.com/jamf>) is available for both internal and external parties to report concerns and provides the option of anonymous reporting. The external helpline is available at any time, and provides online reporting as well as local, toll-free phone numbers that connect reporters to a multilingual reporting service.

When making your report, we encourage you to provide as much detail as possible concerning the suspected inappropriate activity. This will allow us to conduct any investigation promptly and effectively.



Nothing in this Policy prohibits you from reporting suspected violations of law or regulations to any governmental authority. Employees and contractors in the EU may choose to report externally to the competent national authority if:

- No appropriate action was taken internally.
- The reporter has reasonable grounds to believe internal reporting would not be effective.
- The reporter fears retaliation.

Legal and Compliance will provide a list of competent national authorities and how to contact them, based on your country of employment.

CONFIDENTIALITY

Jamf will treat all reports of suspected wrongdoing in a confidential and sensitive manner and maintain your privacy. Confidential means that your identity will be shared only with those who have a need to know in order to effectively conduct an investigation on your concern, or where there is a legal requirement to share your identity.

Anonymous reports will be accepted and reviewed; however, the ability to investigate such reports may be limited if sufficient details are not provided or if anonymity limits necessary follow-up. In addition, persons making reports should be cautioned that their identity might become known for reasons outside of the control of Jamf.

Whistleblower reports and personal data are processed in compliance with applicable data protection laws, including the GDPR. The legal basis for processing includes legal obligation and legitimate interest. Any personal information that you disclose while reporting a concern will be managed as outlined in the Privacy Policy and Employee Privacy Notice. If you have further questions on the treatment of your personal data, you can contact the privacy team at privacy@jamf.com.



REVIEW OF REPORTS

Under the direction of the Audit Committee of the Board of Directors, the Chief Legal Officer or their designees will be responsible for reviewing any allegation reported through Jamf channels. Receipt of reports will be acknowledged within 7 calendar days. The Chief Legal Officer or their designees will also be responsible for following up on the report and liaising with the reporter as needed. Feedback on follow-up measures will be provided within three months of acknowledgment, or within six months where justified by the complexity of the case. External counsel, auditors, or investigators may be engaged as necessary.

The Chief Legal Officer will designate impartial and competent persons or departments responsible for following up on whistleblower reports and maintaining communication with the reporter.

REPORTING TO BOARD OF DIRECTORS

The Chief Legal Officer 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 will have a direct reporting line to the Audit Committee and will have regular briefings and other communications with the Chair of the Audit Committee.

NO RETALIATION

Retaliation of any kind against anyone who, in good faith, reports a concern or participates in an investigation is strictly prohibited. Retaliation includes, but is not limited to, adverse employment actions such as dismissal, demotion, suspension, threats, harassment, or any other form of discrimination that results from the reporting of a concern or cooperation in an investigation.

Any individual who believes they have been subjected to retaliation should report the matter immediately through the appropriate internal reporting channels. All such reports will be taken seriously, investigated promptly, and addressed appropriately. Violations of



this non-retaliation policy may result in disciplinary action, up to and including termination of employment or contract.

RECORD RETENTION

The Chief Legal Officer 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.

TRAINING & AWARENESS

Jamf will conduct regular training and awareness campaigns to ensure that all employees and contractors, including those within EU jurisdictions, are informed of:

- Their rights and protections under this Policy and applicable laws.
- How to access and use reporting channels.
- Prohibition on retaliation.

POLICY ADMINISTRATION

The Audit Committee is responsible for the creation and oversight of this policy, including the periodic review and updates as necessary. The Audit Committee is also responsible for confirming that the procedures contained in this Policy are in place and may request reports from Jamf executives about the implementation of this Policy and take any other steps in connection with that implementation as it deems necessary.