



CVENT HOLDING CORP.

WHISTLEBLOWING POLICY

This Whistleblowing Policy ("**Policy**") sets out procedures for reporting malpractices within Cvent Holding Corp. and its wholly owned operating subsidiaries, including Cvent, Inc., Cvent Europe Ltd., Cvent Deutschland GmbH, Cvent Canada Inc., Cvent Australia PTY Limited, Cvent Singapore PTE Limited, Cvent India Private Limited, Cvent Nederland B.V., and Cvent España 2019, S.L.U. and any future wholly owned operating subsidiaries (the "**Company**").

1. What is the purpose of this Policy?

1.1 The goals of this Policy are to:

- 1.1.1 encourage Staff (as defined below) to report suspected wrongdoing as soon as possible with the knowledge that their Concerns (as defined below) will be treated seriously, and that their confidentiality will be respected to the extent possible.
- 1.1.2 provide guidance on how to raise such Concerns.
- 1.1.3 reassure Staff that they will be able to raise Concerns and not suffer any detriment so long as the Concern is raised in good faith, even if the Concern proves unfounded.
- 1.1.4 further the objectives of (a) Sections 301(4)(B) and 806 of the Sarbanes-Oxley Act of 2002 and (b) the Audit Committee of the Company's Board of Directors (the "Board"), for receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters, the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters (as further defined below, "Inappropriate Conduct"), and to alert the Audit Committee to possible problems before they have serious consequences to the Company.

2. What is Whistleblowing?

Whistleblowing is the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice or wrongdoing which affects others ("**Concern**"). In this policy the term '**Whistleblowing**' means reporting by Staff of suspected misconduct, illegal acts or failures to act when obliged to within the Company.

3. Non-Retaliation

3.1 Cvent prohibits and will not tolerate retaliation against any employee because that employee filed a good faith Concern under this policy or participate in an investigation of a Concern. Specifically, no one will be denied employment, promotion or any other benefit of employment or be subjected to any adverse employment action based on their good-

faith raising of a Concern or by participating in an investigation related to a Concern. In addition, no one will be disciplined, intimidated or otherwise retaliated against because they exercised their rights under this policy or applicable law. Cvent further prohibits retaliation where an employee refuses to perform an act that violates any law or regulation.

4. Who can Raise a Concern?

- 4.1 This Policy applies to all persons working at the Company whether they are directors, officers, employees, temporary workers, trainees or independent contractors or employees of such contractors (“**Staff**”).
- 4.2 Staff has a responsibility to act in good faith and provide initial information that is grounded in a reasonable belief regarding the validity of a Concern. The motivation of Staff is irrelevant to the consideration of the validity of the Concern. Directors, officers and employees of the Company are not subject to disciplinary action for factual statements or errors made in good faith. However, the intentional filing of a false Concern, whether orally or in writing, may itself be an improper activity and one that may result in disciplinary action.
- 4.3 Staff has a responsibility to be candid and set forth all known information regarding a Complaint to the Company Contact, Counsel and the Investigation Team and to assist in the investigation.
- 4.4 Staff acknowledges that an investigation may not proceed if the Staff does not agree to be interviewed by the General Counsel, VP of Human Resource, outside counsel or a member of the investigation team or provide further information regarding the Concern.
- 4.5 Staff is not to act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the Audit Committee, General Counsel or the investigation team. Staff shall not be part of an investigation team unless expressly requested by the Audit Committee. Staff shall refrain from obtaining evidence relating to a Concern for which he or she does not have a right of access. Such improper access may itself be an illegal or improper activity and one that may result in disciplinary action.

5. What is Responsibility as an Investigation Participant?

- 5.1 Company employees who are interviewed, asked to provide information or otherwise participate in an investigation of a Complaint, including employees who are the subject of the investigation (“**Investigation Participants**”) have a duty to cooperate fully with the Company Contact, Counsel and the Investigation Team and assist in the investigation.
- 5.2 Investigation Participants should refrain from discussing the investigation or their testimony with those not connected to the investigation. If the Investigation Participant knows the identity of the Employee Complainant, the Investigation Participant should not discuss with the Employee Complainant the nature of evidence requested or provided,

or testimony given to the Company Contact, Counsel or the Investigation Team unless authorized by such person or team.

- 5.3 Requests for confidentiality by Investigation Participants will be honored to the fullest extent reasonably practicable within the law and the legitimate needs of the investigation.

6. How to Raise a Concern

- 6.1 This Policy is prepared and updated for the purposes of providing our Staff a way to help the Company operate in a legal and ethical manner, and in compliance with applicable local whistleblower laws and regulations. Company's Whistleblowing process may be described as follows:

- 1) Raise your Concern with your manager or HR Business Partner and explain as fully as you can the information or circumstances that gave rise to your Concern. Think about how the matter can be best resolved. If you want to report the matter anonymously, you can use the hotline. In all cases (anonymously or not) you have the option of reporting issues to the hotline designated below. *Cvent has an online portal and telephone hotline number where Concerns against the Company or its Staff in certain permitted areas can be filed on the internet at www.cvent.ethicspoint.com and 877-219-5568 or via telephone at a local toll-free number listed on Appendix A.*
- 2) Once the Concern is reported, it will be assessed by the individual to whom you reported the Concern (or to whom the hotline assigns the Concern) and appropriate actions will be considered (i.e., informal interview, internal investigation or more formal investigation). The decision whether or not to initiate or conduct an investigation shall not be deemed an accusation against any person, and any investigation shall be treated as a neutral fact-finding process.
- 3) If actions are not taken by the individual to whom you reported the Concern within 5 business days, you may report to Cvent's General Counsel, Lawrence Samuelson, by contacting him at LSamuelson@cvent.com.
- 4) Upon receipt of a Concern, the manager who received the alert gives written feedback as to how the matter is investigated and resolved and what kinds of measures may and will be taken to prevent such events in the future.
- 5) If the matter is not resolved in spite of actions undertaken by the manager who received the alert, the Concern shall be notified to Cvent's General Counsel. At this stage, if you reported anonymously, you will be asked whether you wish to disclose your identity throughout the proceedings or you wish to stay anonymous. Information on matters dealt with at this stage shall be recorded.
- 6) At this stage appropriate actions will be taken (i.e., informal interview, internal investigation or more formal investigation) by the appropriate members of Cvent management, unless the Chair of the Audit Committee, in its sole discretion, appoints a person other than a Company contact to conduct the

investigation, including an outside attorney. As necessary, Cvent's General Counsel or Vice President of Human Resources may be jointly responsible for managing the investigation of violations and determining appropriate disciplinary action for implicated Staff. At this stage, if you agree to disclose your identity, you may be interviewed by Cvent's General Counsel and, as necessary, a member of Cvent senior management, and you will potentially be asked to provide information throughout the investigation.

- Resolving matters at this stage may take longer, depending on the complexity of the issue and level of information provided.
- Information gathered during an investigation may be privileged and communicated to the investigation team in order to assist the General Counsel or outside attorney in collecting and understanding the information necessary to render effective legal advice and representation to the Audit Committee.

7) Cvent's General Counsel will regularly update the Chair of the Audit Committee with respect to Concerns raised. The Audit Committee may, in its sole discretion, request a briefing by the General Counsel or outside counsel of any particular Concern. The Audit Committee shall have full authority to determine the action to be taken in response to a Concern and to direct additional investigation of any Concern.

6.2 To assist in the response to or investigation of a Concern, the Concern should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the Concern. Without limiting the foregoing, the Concern should, to the extent possible, contain the following information:

6.2.1 the alleged event, matter or issue that is the subject of the Concern;

6.2.2 the name of each person involved;

6.2.3 if the Concern involves a specific event or events, the approximate date and location of each event; and

6.2.4 any additional information, documentation or other evidence available to support the Concern.

6.3 Please be informed that in addition to this Policy, there is another document dealing with the Whistleblowing process - the Code of Business Conduct and Ethics ("**Ethics Code**"). When in doubt, please refer to this document.

6.4 The rights and protections described in this Policy include those in 41 U.S.C. § 4712 (implemented by 48 CFR § 52.203-17, Contractor Employee Whistleblower Rights and Requirement to Inform Employees of Whistleblower Rights) and 10 U.S.C. § 2409 (implemented in 48 CFR § 203.9, Whistleblower Protections for Contractor Employees).

- 6.5 The procedures contained above should ensure that your Concern can be dealt with internally. However, if you believe that a disclosure of information should be made externally (e.g., the disclosure may be in the public interest), such disclosure should be justified and we advise you to first reach out to an independent party or a specialist (such as your own legal counsel) for advice.

For the avoidance of doubt, these procedures are in no way intended to limit employee reporting of alleged violations relating to accounting or auditing matters to proper governmental and regulatory authorities. Notwithstanding the requirements of any agreement entered into between any director, officer or employee and the Company or included in any policy of the Company applicable to such persons, nothing in those agreements or policies (A) precludes any person from communicating directly with the U.S. Securities and Exchange Commission (“SEC”) or the Financial Industry Regulatory Authority regarding potential issues or concerns, if any, or (B) is intended to, or shall, interfere with any rights of any persons to file a charge or complaint with, communicate with, participate in a proceeding or investigation that may be conducted by, or cooperate with, the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration, the SEC or any other federal, state or local government agency or commission (including providing documents or other information to those agencies); and none of the actions described in (A) or (B) shall constitute a breach of those agreements or policies. Directors, officers or employees do not need prior authorization from the Company to make any such governmental reports or disclosures, and are not required to notify the Company when taking any such action. No confidentiality provision included in any agreement entered into between any director, officer or employee and the Company or included in any policy of the Company shall limit any person’s right to receive an award under any whistleblower or similar governmental program.

7. How You Can Stay Anonymous

Unless precluded by local laws (e.g., if you are in the Netherlands), you may prefer to report your concern or speak to someone in confidence. If this is the case, you may raise your case anonymously on the hotline or raise your case to Human Resources. If you wish to stay anonymous, we will not directly disclose your identity. When you raise a Concern and have stated your wish to stay anonymous, your identity will be kept confidential at all stages of the process and will not be directly disclosed to third parties, including the implicated party(ies). However, there may be cases when disclosure of your identity is required by law, essential to the proceedings (i.e. witness evidence in court proceedings), or indirectly deduced from the facts and circumstances by other parties. We may be required to disclose your identity in any further investigation or subsequent judicial proceedings instigated as a result of the enquiry conducted by the Company.

In such instances, we will discuss possible actions with you prior to disclosing your identity. Moreover, if you remain anonymous to the Company in your reporting (e.g., through the anonymous feature of the hotline), we will not be able to protect your position. In exercising your right to stay anonymous, you should take into account the following factors:

- The severity of the issue,
- The credibility of your Concern,
- The likelihood that your Concern can be confirmed through other sources.

8. What Concerns You Should Raise

- 8.1 This Policy is intended to cover Concerns which are in the public interest and may at least initially be investigated separately but might then lead to the initiation of other procedures (e.g. disciplinary). These Concerns include issues mentioned in the Cvent Ethics Code such as: conflicts of interest, criminal offences, breach of any legal obligation, miscarriages of justice, danger to the health and safety of any individual, damage to the environment, ethical issues, harassment, discrimination, anti-corruption, fraud, or the deliberate concealing of information about any of these. The disclosure of the Concern can relate to current incidents, events in the past, or situations that could occur in the future.
- 8.2 The following is a non-exclusive list (with descriptions) of **examples** of some ethical or legal misdeeds below:

8.2.1 Financial and Business Integrity:

8) Antitrust or Fair Trading

Discussions or agreements with competitors about prices or credit terms, submission of bids or offers, allocation of markets or customers, restrictions on production, distribution or boycotts of suppliers or customers that would result in monopolization or anticompetitive markets.

9) Destruction of Business Records

Statements or actions that encourage or result in unlawful, untimely or intentional destruction or concealment of business records in order to deceive or mislead.

10) Espionage or Sabotage

Actions that result in the gathering, receipt, or acceptance of non-public confidential information or trade secrets about competitors to gain a competitive advantage or the deliberate destruction, disruption or damage to a competitor's equipment or property for competitive advantage or gain.

11) Irregular Accounting Methods, Financial Reporting Practices or Audit Conduct

Making fraudulent statements or deliberate errors in the preparation, evaluation, review or audit of any financial statement of the Company; fraud or deliberate error in the recording or maintaining of financial records of the Company; deficiencies in or noncompliance with the Company's internal accounting controls; misrepresentations or false statements to or by a senior officer of the Company or an accountant regarding a

matter contained in the financial records, financial reports or audit reports of the Company; and deviation from full and fair reporting of the Company's financial condition.

12) Falsification of Financial Records

Statements or actions that encourage or result in false or intentionally misleading entries into accounting, auditing or financial records.

13) Falsification of Business-Related Expenses

The submission of reports or records that overstate business related expenses, are not legitimate business expenses, or violate travel and expense policies.

14) Gifts, Bribes and Kickbacks

Payments, payments in kind, gifts, bribes, extensions of credit or benefits extended to or received by customers, employees, suppliers, vendors, competitors, directors, officers, auditors, government employees, government officials or agencies, or other parties that are unlawful, improper, or designed to influence business decisions or political processes.

15) Misrepresentation of Information

Statements or actions that encourage or result in false, intentional misrepresentation or concealment of information in order to deceive or mislead.

16) Trading on Inside Information

The purchase or sale of stock or other securities based on non-public and material information obtained during the course of employment or providing such information to another person who purchases or sells stock or other securities based upon that information.

17) Violation of Stock Exchange Rules

Violations of the rules and regulations of the NASDAQ stock market or any other market on which the Company's securities are traded.

8.2.2 Policy and Process Integrity:

18) Other Statutory and Regulatory Non-Compliance

Concerns related to suspected or actual breach or non-compliance of applicable local, national and international laws including statutes, rules and regulations.

19) Policy on Government Contracts

Company's policy is to comply fully with all applicable laws and regulations that apply to government contracting. It is also necessary to strictly adhere to all terms and conditions of any contract with central, local, state, federal, foreign or other applicable entities.

20) Policy on Selecting Suppliers

To create an environment where our suppliers have an incentive to work with Company, they must be confident that they will be treated lawfully and in an ethical manner. Company's policy is to purchase supplies based on need, quality, service, price and terms.

21) Non-Compliance with Data Privacy and Security Practices

Concerns related to suspected or actual breach or non-compliance of applicable data privacy policies, practices, or laws and regulations (e.g., how a data privacy policy is being implemented).

Notwithstanding the process for raising a concern in Section 5, any suspicions of a security incident (including, among other things, unauthorized disclosure of confidential information, personal data, or customer data) should be IMMEDIATELY escalated to:

- Cvent's General Counsel, Lawrence Samuelson, by contacting him at LSamuelson@cvent.com, and
- Cvent's Chief Information Security Officer, Ben Mayrides, by contacting him at BMayrides@cvent.com.

8.2.3 Harassment and Discrimination:

22) Harassment

Company prohibits any form of harassment prohibited by internal policies, central, local, state, federal, foreign or other applicable laws. Sexual harassment is specifically prohibited in all forms. Harassment is any statement or action that creates a hostile work environment.

23) Discrimination

Company's policy is to strictly prohibit any discrimination prohibited by central, local, state, federal, foreign or other applicable laws. Discrimination is the unjust or prejudicial treatment of different categories of people or things, for example treating individuals differently based on the grounds of race, age, gender, sexual orientation, religion, health status, etc.

9. What Information About You Is Needed

- 9.1 Details about what happened to you, how you were involved, how you observed the Concern, how you overheard the Concern, whether someone told you about the Concern.
- 9.2 Your identity and contact details (unless you choose to remain anonymous), your role in the reported Concern.

10. What Personal Data Will Be Processed

- 10.1 The following personal data may be collected and processed when a Concern is raised: identity and contact details of the person who notifies the Concern (first name, middle name, last name, job title, work phone number, work e-mail address); identity and contact details of the persons involved in the Concern; identity, positions and contact details of the person gathering or processing the alert; the facts reported; your role in the events connected to the Concern; the information gathered when investigating the reported facts; investigation reports; and follow-up communications.
- 10.2 “Sensitive Personal Data” includes personal data revealing or relating to revealing racial or ethnic, origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, data concerning a natural person's sex life or sexual orientation, social security number, government identification numbers (e.g. driver's license, passport), or account logins. Please note that no Sensitive Personal Data should be disclosed while filing. If such data is given in a procedure of raising and notifying the Concern, the Company will not record such data or destroy the carrier of such data immediately. In rare cases when sensitive data is essential for the proceedings, Company will inform the person who provided Company with such data, that the data are regarded as sensitive and will be therefore processed solely for the purposes of the proceedings on the basis of relevant local legal provisions and this Policy.
- 10.3 We will also transfer your personal data to our global Whistleblowing Concern database located in US. The purpose of this transfer is to investigate Concerns raised and determine the necessary action, if any, to be taken to address the same.
- 10.4 The Company are data controllers of your personal data within the meaning of the General Data Protection Regulation.
- 10.5 If you are located in the European Economic Area (“EEA”), the transfer of your personal data outside the EEA is subject to restrictions. Company has taken steps so that your personal data are subject to an adequate level of protection at all Company locations. In order to legitimize the transfer of your personal data outside EEA, we are self-certified to the E.U.-US Privacy Shield and Swiss-US Privacy Shield programs, and we conclude data transfer agreements in accordance with the relevant EU Standard Contractual Clauses. If you would like to obtain copy of such agreement please submit request to the Company (see Section 13, "How to Contact Us").
- 10.6 Any personal data provided while alerting a Concern is collected and processed only in relation to this Concern and is not used for any other purpose.

11. Who Has Access to Your Personal Data

- 11.1 Data controller of the personal data defined in section 9 above is:

The Company (Cvent Holding Corp., and its wholly-operating entities Cvent, Inc., Cvent Europe Ltd., Cvent Deutschland GmbH, Cvent Canada Inc., Cvent

Australia PTY Limited, Cvent Singapore PTE Limited, Cvent India Private Limited, Cvent Nederland B.V., and Cvent España 2019, S.L.U.)

- for the purposes of processing the Concern, and for the purposes of keeping Whistleblowing records including following information on Whistleblowing notifications, such as: number and types of Concerns raised and the outcomes of investigations, feedback from individuals who have used the procedure, complaints of victimization if any; complaints of failures to maintain confidentiality if any; information on other adverse incidents that could have been identified by staff (e.g. consumer complaints)

11.2 Personal data will be disclosed only to the following authorized persons on a need-to-know basis:

11.2.1 Only those persons working for the Company involved in the processing of Concerns raised in the Whistleblowing procedure,

11.2.2 other instances if legally required or necessary to protect our legal rights (e.g., attorneys (or other agents) engaged to represent Company, regulatory agencies).

12. Personal Data Security and Your Rights

12.1 Company maintains appropriate organizational and technical safeguards to protect your personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, use, and all other unlawful forms of processing of your personal data in our possession.

12.2 We use a variety of security measures to secure your personal data, ranging from measures that are organizational (such as a security policy and monitoring assigned authority); technical (such as using passwords to protect documents, login and password protection of workstations and devices); and physical (such as alarm systems).

12.3 Third party data processors may only process your personal data if they are held by contractually binding security and confidentiality safeguards, in accordance with the applicable data protection legislation.

12.4 You have the right to access your personal data and, if necessary, have it amended or deleted or restricted. You have also the right to object to processing based on legitimate interests related to performance of this Policy.

13. How Long Your Data is Retained

13.1 The duration of your data's storage, including any personal data, will not exceed the statute of limitation periods relating to possible proceedings with respect to the Concerns made within the reports. Meanwhile the data will be archived in a dedicated database with restricted access. *Please note that no retaliatory measures (discriminatory or disciplinary actions) shall be taken against persons who raise a Concern in good faith.*

14. How We Protect and Support You

- 14.1 No negative consequences will be drawn against whistleblowers merely for disclosing information. In the event the disclosed information is to their own detriment, the Company shall consider their reporting as a mitigating factor for any potential consequences.
- 14.2 By negative consequences we understand: failure to promote, denial of training, closer monitoring, ostracism, blocking access to resources, unrequested re-assignment or re-location, suspension, disciplinary sanction, bullying, harassment or victimization, dismissal, failure to provide an appropriate reference or failing to investigate a subsequent Concern.
- 14.3 Legal protection should only apply to Staff who act in good faith and thus made reasonable effort to obtain information that authenticate or justify their allegations. However, if the Company concludes that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.
- 14.4 A person reported in an alert shall be specifically informed of this by their employer (a person appointed by the employer whose duties include managing alerts) as soon as practically possible after the alert is recorded. This notification includes:
- 24) the facts of the alert
 - 25) the departments/persons that will receive the report
 - 26) how he/she can exercise his / her rights of access and rectification.

15. How to Contact Us

Company is committed to taking whatever steps necessary to ensure that its practices are in conformity with the requirements set forth in this Policy and the applicable data protection legislation. Should you have any questions about this Policy, please contact:

Cvent Human Resources Department	hrhelp@cvent.com
Cvent Legal Department	legalhelp@cvent.com
Cvent Office Addresses	List available at: https://www.cvent.com/en/contact-us

16. Changes to this Policy

We may alter this Policy. If changes are made to this Policy, Cvent shall notify Staff, and the updated version of Policy will be made available to Staff several days before the changes are effective. This Policy will be posted to Company's employee intranet. Staff may obtain a copy of the updated Policy upon request.

This Policy is effective as of December __, 2021 and replaces any previous versions.

Appendix A

1. United Kingdom/Spain/Netherlands/Germany: 0808-234-1077 (International Toll-Free Service [ITFS])
2. India/Singapore/Australia: 000-800-100-1635 (International Toll-Free Service [ITFS])
3. Canada: 1-877-219-5568, 1-855-326-9719 (Direct Dial)