

DOMO, INC.
WHISTLEBLOWER POLICY

(Adopted on May 31, 2018 and effective as of the closing of the
Company's initial public offering)

1. POLICY OVERVIEW

The purpose of this Whistleblower Policy (“**Policy**”) is to ensure all directors, officers, employees, consultants, contractors and agents of Domo, Inc. and its subsidiaries (“**Company**”) embrace a culture where anyone who becomes aware of what he or she reasonably believes is or could be (i) a failure in accounting, internal accounting controls or auditing matters, (ii) fraudulent financial information, or (iii) a known or suspected violation of the Company's Code of Business Conduct and Ethics (“**Code**”), can raise his or her concern about (i), (ii), or (iii) (hereinafter “**Complaint**”) free from harassment, discrimination or retaliation. This Policy encourages you to raise any Complaint as soon as possible.

The Audit Committee has established this Policy for:

- receiving, investigating and retaining Complaints; and
- enabling Company employees to confidentially and anonymously submit Complaints.

2. SUBMITTING COMPLAINTS

Non-employees may submit Complaints by mail to:

Domo, Inc.
772 East Utah Valley Drive
American Fork, UT 84003
Attn: Chief Legal Officer

Employees may submit Complaints in one of the following ways (confidentially and anonymously, if you wish):

- (i) To the Chief Legal Officer via regular email at ChiefLegalOfficer@domo.com.
- (ii) If your Complaint relates to accounting, internal controls or auditing matters, or if the Chief Legal Officer is implicated by the Complaint, then you may contact the Board's Audit Committee via regular email at AuditCommitteeChair@domo.com. You may also contact Lighthouse Services, an outside company. You may report your Complaint to Lighthouse Service using either the website, email or toll-free number on an anonymous basis; however, the investigation may be more effective in obtaining follow-up or clarifying information if you identify yourself. If you make an anonymous report then please provide as much detail as possible, including copies of any relevant documents. Lighthouse Services' website is www.lighthouse-services.com/domo and email address is reports@lighthouse-services.com (Domo's name should be included in any report submitted via email). In addition, you can contact Lighthouse Services using the following toll-free numbers:
 - Direct Dial
 - English speaking USA and Canada: 855-620-0002
 - Spanish speaking USA and Canada: 800-216-1288
 - French speaking Canda: 855-725-0002
 - Spanish speaking Mexico: 01-800-681-5340

- AT&T USADirect
 - All other countries: 800-603-2869 (must dial country access code)

Lighthouse Services' website and toll-free hotlines are available 24 hours per day, seven days per week. Lighthouse Services provides any Complaints it receives to the Chief Legal Officer, Chief Financial Officer and Vice President of Human Resources; provided that such recipients do not receive any complaints in which they are implicated.

The Company will also publish these two methods for submitting Complaints on the Company's internal and external websites. You may use any of these methods anonymously and with confidence your Complaint will be treated confidentially.

When you submit a Complaint please include at least the following items:

- a description of the Complaint;
- the period of time when you or another person observed the Complaint; and
- any steps you or another person have taken to investigate the Complaint, including reporting it to a supervisor and the supervisor's actions (if any).

When submitting a Complaint you have the option to include your identity and contact information, which are helpful if an investigation requires additional information. However, you are not required to provide your identity if you choose to remain anonymous. Please note, however, that if you do not provide contact information and your submitted Complaint does not contain sufficient information then it may be difficult for the Company or an outside party to investigate the matter fully. Therefore, please ensure your submitted Complaint is as complete and thorough as possible.

Except for Complaints sent directly to the Audit Committee or requested by you to be forwarded in confidence to the Audit Committee, all Complaints are sent to the Chief Legal Officer's office for treatment as set forth below.

3. COMPLAINT TREATMENT

The Company will log Complaints related to accounting and auditing on an accounting and auditing matters log which includes, among other things, the date the Company received the Complaint, a description of the Complaint, the name of the reporting person (if provided) and the result of an investigation into the Complaint. The Company shall acknowledge receiving the Complaint, within reasonable time after receipt, if the person who submitted the Complaint provided sufficient information for the Company to reply.

The Company will log all other Complaints, including suspected Code violations, separately from the accounting and auditing matters log, as well as forward them to the appropriate person or department for investigation, unless the Chief Legal Officer chooses other treatment (for example, if a Complaint involves a finance employee or an executive officer).

For Complaints not initially directed to the Audit Committee, the Chief Legal Officer will report material Complaints promptly to the Chairperson of the Audit Committee. The Chief Legal Officer will also provide the Audit Committee with a quarterly report of all received Complaints and their investigations.

Except for Complaints the Audit Committee feels require special treatment, the Chief Legal Officer will review, direct and oversee the resolution of Complaints, engaging other parties as appropriate.

The Audit Committee may request special treatment for a Complaint and may assume the direction and oversight of an investigation into it (with whatever assistance the Audit Committee deems appropriate). The Audit Committee shall request special treatment for significant accounting or auditing

matters such as allegations of fraud or allegations of accounting or auditing matters or those involving executive officers.

The Audit Committee shall request special treatment for, investigate, and determine appropriate disciplinary action if a Complaint relates to a Board member or an executive officer. The Audit Committee may designate others to conduct or manage such investigation on its behalf.

When appropriate, the Chief Legal Officer or Audit Committee will report the results of investigations into Complaints, including corrective actions, to the person who submitted the Complaint if that person provided sufficient information for the Company to reply, maintaining the person's anonymity to the fullest extent possible.

The Chief Legal Officer shall retain Complaints, the accounting and auditing matters log, and all other related documentation as required by law.

If you submit a Complaint the Company will maintain your confidentiality to the fullest extent possible, as permitted by applicable law and subject to their right to engage in the activities described in Section 5 below.

See the Company's Code of Business Conduct and Ethics for Company procedures pertaining to Complaint investigations and possible disciplinary actions.

4. WHISTLEBLOWER PROTECTIONS

The Company prohibits reprisal, threats, discrimination, harassment, retribution, or retaliation in any way against any person who has in good faith reported a Complaint, or against any person who assists in any investigation or process with respect to such Complaint. If you believe you are or have been subjected to reprisal, threats, discrimination, harassment, retribution, or retaliation for having submitted a Complaint or for participating in an investigation related to a Complaint then immediately report the issue to the Chief Legal Officer, an executive officer, or any supervisor. The Company will promptly and thoroughly investigate any assertion that a manager, supervisor, or employee is involved in discrimination, retaliation, or harassment related to you reporting or the Company's subsequent investigation of a Complaint. The Company will not tolerate discrimination, retaliation, or harassment; if such behavior is substantiated then the Company will take appropriate action, up to and including termination.

5. PROTECTED ACTIVITY NOT PROHIBITED

The Company will not in any way limit or prohibit you from filing a charge or complaint with, or otherwise communicating or cooperating with or participating in any investigation or proceeding that may be conducted by any federal, state or local government agency or commission, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission, the Occupational Safety and Health Administration, and the National Labor Relations Board. You may disclose documents or other information to such government agencies, as permitted by law, without giving notice to, or receiving authorization from, the Company. You may also accept an award from any government agency for information provided to them. However, you should take reasonable precautions to prevent the unauthorized use or disclosure of any Company Proprietary Information (as defined under the Company's Proprietary Information and Inventions Agreement) to any parties other than the applicable government agency(s), and you should not disclose any Company attorney-client privileged communications. None of the agreements with the Company that you entered into, or any of the policies to which you are subject, should be interpreted or understood to conflict with this Policy.

* * *

The Company is committed to continuously reviewing and updating its policies and procedures. It reserves the right to amend or terminate this policy at any time and for any reason.