



ServiceNow - Armis

MN-25004

Phase 1 Determination

Acquisition may be put into effect

12 March 2026

1. Determination and statement of reasons

<p>Notified acquisition</p>	<p>ServiceNow, Inc. (ServiceNow) proposes to acquire 100% of the issued shares in Armis Security, Ltd (Armis) (the Acquisition).</p>
<p>Determination</p>	<p>The Australian Competition and Consumer Commission has determined under section 51ABZE(1) of the <i>Competition and Consumer Act 2010</i> (Cth) that the Acquisition may be put into effect.</p>
<p>Parties to the Acquisition</p>	<p>The acquirer, ServiceNow, is a US-based software company. ServiceNow primarily supplies enterprise software which brings together data, artificial intelligence (AI), company processes, assets and security into a single platform that employees can use for a range of purposes. ServiceNow’s products facilitate organisation workflows by turning fragmented operations into coordinated, autonomous workflows.</p> <p>The target, Armis, is a US-based software company specialising in cyber exposure management and security. Armis’ products help organisations see, protect and manage all points through which an unauthorised user could access a system and extract data.</p> <p>Armis’ products work across so-called ‘cyber-physical system’ environments, primarily focused on operational technology (OT) security. OT describes technology that interacts directly with physical equipment like utility grids, industrial machinery and healthcare equipment. Armis provides a range of security products under its Armis Centrix platform, including products for:</p> <ul style="list-style-type: none"> - asset management and security, - OT/IoT (Internet of Things) security (SaaS and on-premise), - secure remote access, - medical device security, and - early warning.
<p>Overlap and relationship between the parties</p>	<p>The parties each supply enterprise software products in Australia. They overlap in the supply of:</p> <ul style="list-style-type: none"> • continuous threat exposure management (CTEM) software products for IT environments, and • OT security software products. <p>ServiceNow also supplies:</p> <ul style="list-style-type: none"> • IT operations management (ITOM) software, which is used by companies to oversee and manage computing, networking and application resources. CTEM software products are often integrated and interoperable with ITOM software. • OT operations management (OTOM) software, which enhances visibility, health, and serviceability of industrial systems in OT environments, including by enabling rapid incident response and operational resilience. OT security software products are often integrated and interoperable with OTOM software.

	<p>Armis' CTEM products can be integrated with ServiceNow's ITOM products, as well as the products of other ITOM providers who compete with ServiceNow. ServiceNow's ITOM products permit integrations with products supplied by many other CTEM providers.</p> <p>Armis' OT security products can be integrated with ServiceNow's OTOM products, as well as those of other OTOM providers who compete with ServiceNow. ServiceNow's OTOM products permit integrations with products supplied by other OT security providers.</p>
<p>Reasons for determination</p>	<p>When making a determination in Phase 1, the ACCC undertakes a competition assessment and considers whether it is appropriate for an acquisition to be approved or subject to further assessment in Phase 2 in accordance with section 51ABZJ of the <i>Competition and Consumer Act 2010</i> (Cth) (the Act). In doing so, the ACCC must have regard to the object of the Act and all relevant matters, including the interests of consumers.</p> <p>For more information about the ACCC's approach to considering notified acquisitions, see the ACCC's merger assessment guidelines and interim merger process guidelines.</p> <p>In conducting its competition assessment, the ACCC has considered the information and documents that were submitted with the notification form as well as further information provided by the parties, publicly available information and feedback from market participants.</p> <p>The ACCC has determined that the Acquisition may be put into effect as it considers that the Acquisition is unlikely to have the effect of substantially lessening competition in any market in Australia. In reaching its decision, and based on the material before it, the ACCC makes the following findings.</p> <ul style="list-style-type: none"> • The parties are not close competitors in the supply of CTEM software or OT security software. • Post acquisition, the combined entity would continue to face competition in the supply of both OT security software and CTEM software from a number of alternative providers. • ServiceNow would be unlikely to have the ability and incentive to foreclose Armis' competitors through, for example, limiting the interoperability of its ITOM platform with Armis' competitors' products. This is principally because such a foreclosure strategy is likely to damage ServiceNow's reputation and customer relationships, and not be profitable. ServiceNow's key value proposition to its customers is in providing an agnostic, interoperable platform for an organisation's workflows which affords significant choice to its customers. Market feedback confirmed this is valued highly. Information provided by the merger parties, and confirmed by market inquiries, also indicate that ServiceNow's APIs are built on universally accessible protocols. • The merged entity would be unlikely to have the ability and incentive to foreclose ServiceNow's competitors that use Armis' products, for example, through restricting the interoperability of Armis' products with ServiceNow's rivals. There are a range of CTEM and OT security alternatives to Armis' products in Australia. Customers would be able to

	switch to such products should ServiceNow attempt to limit Armis' interoperability with ServiceNow's rivals.
Applications for review	A notifying party, or other person who has been allowed to do so by the Australian Competition Tribunal, may apply for review if they are dissatisfied with the determination. Pursuant to section 100C of the Act, applications for review of the determination are to be made to the Australian Competition Tribunal before the end of 14 calendar days after this statement of reasons was included on the ACCC's Acquisitions Register. To confirm whether there has been any application for review, please contact the Australian Competition Tribunal.

Determination made by a division of the Commission constituted by a direction issued pursuant to section 19 of the Act