



Questionnaire: ServiceNow – Armis

MN-25004

Deadline to respond: 23 February 2026

The Australian Competition and Consumer Commission (**ACCC**) is currently assessing ServiceNow, Inc.'s (**ServiceNow**) proposed acquisition of 100% of the issued shares in Armis Security, Ltd (**Armis**) (the **Acquisition**).

For further information about the ACCC's assessment of the Acquisition, see the ACCC's [Acquisitions Register](#).

The ACCC is assessing the impact of the Acquisition on competition and is seeking your views. The ACCC invites you to provide submissions or information in response to the questions below by **23 February 2026** via email to mergers@accc.gov.au with the title *Submission re: ServiceNow - Armis*. The ACCC must complete its assessment within strict statutory timelines which also impacts the time available for consultation.

If you would prefer to speak to a member of the ACCC case team, please email mergers@accc.gov.au with the title *Request for call re: ServiceNow - Armis*. Someone from the case team will contact you to find a suitable time for a call.

Please note that:

- This request is made in accordance with section 51ABZZD(2)(a) and (c) of the *Competition and Consumer Act 2010* (Cth) (the **Act**). This means that while the ACCC may take into account submissions or information received after the due date, it is not required to do so.
- In responding to the questions below or when providing a submission, please highlight and/or mark any confidential information and indicate why the information is confidential (as brief reasons in footnotes in your response or submission, or in a separate document such as the ACCC's [confidentiality claims template](#)). The standard terms on which the ACCC accepts confidential information are outlined at the end of this document.

Questions – please answer all questions that are relevant to your business

General questions

1. Provide a brief description of your business or organisation, including:

- any commercial relationships with ServiceNow and/or Armis, and
- whether you consider your business competes with either of those businesses, and if so, identifying which of your products/services compete with which of their products/services.

2. Outline any concerns regarding the impact of the Acquisition on competition.

3. Do you think the Acquisition would enable ServiceNow to obtain access to any competitively valuable data that they would not otherwise have had access to?

Questions for suppliers of IT operations management (ITOM) software

4. Please describe your own, ServiceNow's and its main competitors' positions in the ITOM software category.

5. Does your business offer operational technology (**OT**) operations management (**OTOM**) products, OT security products and/or continuous threat exposure management (**CTEM**) products as part of (or 'add-ons' to) your business's ITOM software offering? If so, are these products provided directly by your business or through third party integrations?

6. Does your ITOM product include agentic AI functionality, or offer this as an 'add-on'? How important is that functionality to your customers?

Question for suppliers of OT security products

7. Please describe your own, Armis', and its competitors' positions in this category, and identify if your products are able to integrate/interoperate with any ITOM or OTOM products.

Questions for customers of OT security products

8. Please describe Armis', ServiceNow's and key competitors' positions in OT security.

9. Does your business use an OTOM product? Are the OT security products you use integrated into/interoperable with that OTOM product(s)?

10. Which OT security provider do you currently use and how easily could you switch providers?

Question for customers of ITOM software

11. Describe ServiceNow's market position, and that of its key competitors in ITOM software. Is there anything that sets ServiceNow apart?

Question for CTEM customers

12. Are ServiceNow and Armis close competitors in the supply of CTEM products?
Who are the key competitors in this space?

Question for OTOM customers

13. Describe ServiceNow's market position, and its key competitors in OTOM. Is there anything that sets ServiceNow apart?

Confidentiality of responses

During the ACCC's assessment of a notified acquisition, the ACCC may receive information that is properly regarded as being confidential, and which is provided to the ACCC in confidence. The ACCC is committed to treating this information responsibly and in accordance with the law. The ACCC understands the importance of confidentiality to parties involved in a notified acquisition, as well as to third parties that provide information to the ACCC.

The standard terms on which the ACCC accepts confidential information are:

- there is no restriction on the internal use, including future use, that the ACCC may make of the confidential information consistent with the ACCC's statutory functions
- confidential information may be disclosed to the ACCC's external advisors and consultants on condition that each such advisor or consultant will be informed of the obligation to treat the information as confidential, and
- the ACCC may disclose the confidential information to other third parties if compelled by law or in accordance with section 155AAA of the Act. This includes disclosures made in the performance of official duties or functions, which include transparency requirements which are part of the merger control regime.

For further information on confidentiality, see the ACCC's [interim merger process guidelines](#).