



Supplier Code of Conduct



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To Our Valued Suppliers

SUPPLIER CODE OF CONDUCT

We Connect. We Inspire. We Care. We Deliver.

Our values serve as the foundation of Commvault's company culture and fuel our commitment to show up every day for our customers, partners, colleagues, and peers. We strive to make positive contributions to society by upholding responsible, sustainable, and ethical business practices throughout our global operations, including with our supply chain and service providers.

Commvault Systems, Inc. and its affiliates and subsidiaries ("Commvault") have established this Supplier Code of Conduct ("Supplier Code") to highlight the guiding principles fundamental to our business practices and are expected to be upheld by all our Suppliers.

We expect all our "Suppliers," including all third-party firms or individuals providing products or services to Commvault, to integrate these principles into their own governance programs and in turn, encourage their suppliers to do the same. Through these actions, we hope to foster greater shared accountability for conducting business with the highest standards of ethics and integrity.

The Supplier Code covers Ethics & Compliance, Environmental Sustainability, and Data Privacy & Security, providing clear guidelines for Suppliers to operate in accordance with all applicable laws, regulations, ethical, and industry standards.

Supplier Commitments

Complementary to Commvault's [Code of Ethics](#), our expectations and guiding principles of the Supplier Code are set forth below. More about Commvault's [Corporate Governance](#), [Corporate Social Responsibility](#), and [Data Privacy and Security](#) programs can be found on our website.

Our Expectations

We expect our Suppliers to endeavor to meet the following minimum commitments to support the continued success of our business relationships:



Follow the principles of this Supplier Code as they relate to your business relationships with Commvault and general operations;



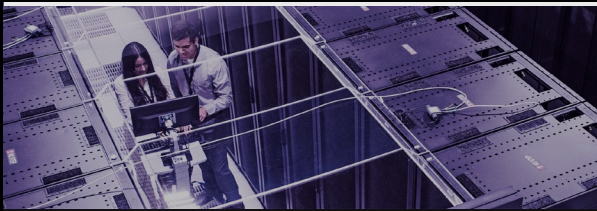
encourage your supply chain and service providers to integrate similar principles within their operations; and



continually strive to meet the highest standards of ethics and integrity when conducting business.



Guiding Principles



ETHICS AND COMPLIANCE

Appropriate policies and procedures must be established and maintained to comply with applicable laws, regulations, and ethical standards, including but not limited to:

- Anti-Bribery and Corruption
- Money Laundering
- Fair Competition
- Trade Laws and Sanctions
- Conflict of Interest
- Human Rights (e.g., modern slavery, forced labor, child labor, human trafficking, freedom of association and collective bargaining, fair wages and hours)
- Workplace Health and Safety
- Diversity and Inclusion (e.g., anti-discrimination and harassment, inclusive hiring)
- Reporting Procedures and Retaliation Protection



ENVIRONMENTAL SUSTAINABILITY

Climate risk and environmental sustainability continue to be areas of great importance when considering business strategy and the future of our world.

While we understand that many countries have adopted legal requirements on environmental sustainability and reporting, we are aware that these may not yet apply to our Suppliers' businesses.

At a minimum, we encourage our Suppliers to understand the impact of their business on the environment, including their relative energy consumption, greenhouse gas emissions, waste volume, water usage, impacts on biodiversity, and responsible resource development.

Suppliers should be able to demonstrate how they follow best practices toward developing and implementing programs that reduce or offset negative impacts to the environment.



DATA PRIVACY AND SECURITY

As valued partners in achieving our business goals, Suppliers must implement privacy and security controls to ensure our data remains protected.

Our Privacy Policy extends to our Suppliers. Suppliers must implement their own Privacy Policies to govern the use of personal data in their operations and through their supply chains. Suppliers processing personal data on behalf of Commvault are required to execute a Data Processing Agreement.

Suppliers are also contractually obligated to maintain adequate security controls to safeguard data. It is preferred that Suppliers holding sensitive company or customer data maintain a third-party attested security certification (e.g., ISO 27001).

Compliance

Commvault employees are trained on our Code of Ethics and this Supplier Code to help ensure the highest standards of ethics and integrity are present in our Supplier relationships and interactions. Commvault conducts due diligence prior to engaging with Suppliers and reserves the right to monitor Supplier compliance with the principles of this Supplier Code and applicable laws and regulations on a continued basis. Issues raised during monitoring procedures are reported to management and reviewed. Non-compliance or violation(s) of this Supplier Code or applicable laws and regulations may result in disciplinary action, including termination of contract.

⚠ Reporting an Issue

We rely on open and honest communication with our Suppliers. If you become aware of a situation that might constitute fraud, bribery, a conflict of interest, or otherwise violate the Supplier Code, a contractual obligation, law, or regulation, please notify Commvault's Compliance Team at compliance@commvault.com. All reports are confidential, and we maintain a zero-tolerance policy for retaliation. Alternatively, an anonymous report may be submitted to Commvault's Ethics and Integrity Reporting Hotline by emailing commvault@integritycounts.ca or accessing the website <https://integritycounts.ca/org/commvault>.

