



# Ethics and Integrity Reporting Policy



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## PURPOSE

Commvault Systems, Inc. and its affiliates and subsidiaries (the “Company”) promotes a culture of honest communication and mutual respect. As part of its ethics and compliance program, the Company has established this Ethics and Integrity Reporting Policy (the “Policy”) to provide requirements for reporting and responding to complaints of misconduct.

## SCOPE

This Policy covers the Company’s reporting, review, response, and retention processes related to complaints of misconduct. The Company encourages employees and third parties, including partners, customers, or vendors, to report misconduct immediately.

Reportable misconduct in scope of this Policy includes violations or suspected violations of the Company’s Code of Ethics (“Ethical Matters”), concerns regarding questionable accounting, internal accounting controls, or auditing matters (“Accounting Matters”), and other matters related to human resources or Company policies, as deemed appropriate by management.

## REPORTING

**General:** The Company urges all employees and other concerned parties to report misconduct immediately by contacting the Chief Legal Officer (“CLO”) or Chief People Officer (“CPO”). The Company also provides a platform (“Reporting Hotline”) for confidential and anonymous reporting through an independent third party with trained personnel available 24 hours a day, 7 days a week. Reports made to the Reporting Hotline are investigated by the CLO, CPO, and other parties, as appropriate.

**Confidentiality:** Reports are treated confidentially and are only shared with internal or external parties to the extent necessary to comply with Securities Exchange Commission (“SEC”) requirements and to conduct an adequate review. Individuals named in reported misconduct are not involved in any aspect of investigation of the matter.

**No Retaliation:** The Company will not discipline, discriminate, or retaliate against any employee or concerned party who reports a complaint or concern in good faith. Acts of retaliation must be reported immediately through the processes described in this Policy.

## REVIEW

**Ethical Matters:** Reports regarding Ethical Matters are overseen by the Nominations and Governance Committee (the “N&G Committee”) of the Company’s Board of Directors (the “Board”). The CLO notifies the N&G Committee Chairperson of all reports, and if determined material by the Chairperson, all members of the N&G Committee are notified. The Company provides the N&G Committee with adequate resources to complete its investigation. The N&G Committee may delegate the investigation of Ethical Matters to external legal counsel or external auditors, as appropriate.

**Accounting Matters:** Reports regarding Accounting Matters are overseen by the Audit Committee of the Board. The CLO notifies the Audit Committee Chairperson of all new reports, and if determined material by the Chairperson, all members of the Audit Committee are notified. The Company provides the Audit Committee with adequate resources to complete its investigation. The Audit Committee may delegate the investigation of Accounting Matters to external legal counsel or external auditors, as appropriate.

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**Other Matters:** Reports regarding a human resource issue or other Company policy issue are investigated by the CLO and CPO and shared with the N&G or Audit Committee, as appropriate. All other reports are referred to the appropriate internal Company department for resolution.

## RESPONSE

Prompt and appropriate corrective action are taken in response to reported misconduct at the direction of the N&G or Audit Committee. Directors, officers, and employees in violation of any laws, regulations or Company policies are subject to appropriate disciplinary action, up to and including termination. The CLO maintains a log of all reports and periodically shares a summary of such reports with management and the N&G or Audit Committee.

## ADMINISTRATION

This Policy is administered and enforced by the CLO and CPO at the direction of the Board and is reviewed on a periodic basis. The Company and the Board reserve the right to change this Policy at any time without notice. General questions can be emailed to [compliance@commvault.com](mailto:compliance@commvault.com) and formal complaints can be submitted using the below contact information.

## CONTACT INFORMATION

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## REPORTING HOTLINE

**Web:** <https://integritycounts.ca/org/commvault>

**Email:** [commvault@integritycounts.ca](mailto:commvault@integritycounts.ca)