

Ethics and Integrity Reporting Policy

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 outlines the Company’s procedures for reporting, reviewing, responding to, and retaining records of complaints of misconduct. The Company encourages employees and external parties including partners, customers, and vendors, to report misconduct immediately.

Reportable misconduct in scope of this Policy includes material 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 Trust Officer or Chief People Officer (“CPO”). The Company also provides a platform (the “[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 Chief Trust Officer, 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.

Ethical Matters. Reports regarding Ethical Matters are overseen by the Nominations and Governance Committee (the “NGC”) of the Company’s Board of Directors (the “Board”). The Chief Trust Officer notifies the NCG Chair of reports, and if determined material by the Chair, all members of the NCG are notified. The Company provides NGC with adequate resources to complete its investigation. The NGC 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 Chief Trust Officer notifies the Audit Committee Chair of reports, and if determined material by the Chair, 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.

Other Matters. Reports regarding a human resource issue or other Company policy issue are investigated by the Chief Trust Officer and CPO and shared with the NGC or Audit Committee, as appropriate. All other reports are referred to the appropriate internal Company department for resolution.

RESPONSE

Prompt and appropriate corrective actions are taken in response to reported misconduct at the direction of the Chief Trust Officer, CPO, NGC, or Audit Committee, as appropriate. 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 Chief Trust Officer maintains a log of all reports and periodically shares a summary of such reports with management, NGC, or Audit Committee, as appropriate.

ADMINISTRATION

This Policy is administered and enforced by the Chief Trust Officer and CPO at the direction of the Board and is reviewed periodically. 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 and formal complaints can be submitted using the below contact information.

CONTACT INFORMATION

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REPORTING HOTLINE

Visit <https://integritycounts.ca/org/commvault> to confidentially and anonymously report a concern.

To confidentially report a concern, email HumanResourcesComplaints@commvault.com or commvault@integritycounts.ca, or call the Employee Ethics Hotline at [put the US and Indian numbers].