

# Anti-Bribery and Anti-Corruption Policy

## PURPOSE

Commvault Systems, Inc. and its affiliates and subsidiaries (the “Company”) has established this Anti-Bribery and Anti-Corruption Policy (this “Policy”) to establish standards and expectations for complying with global laws and regulations related to bribery and corruption, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

## SCOPE

This Policy applies to all employees including directors and officers of the Company, as well as independent contractors, channel partners, consultants, agents and other parties with whom the Company does business in all countries, states, and territories where the Company conducts business (collectively, “Personnel”).

## DEFINITIONS

**Bribery.** Offering, promising, giving, soliciting, or receiving anything of value with the intent to influence a decision or to gain an improper or unfair advantage, directly or indirectly, or attempting or authorizing any of the foregoing. For illustrative purposes, anything of value may be cash, gifts, donations, discounts, services, loans, special privileges, etc.

**Corruption.** Misuse of entrusted authority, position, or influence through improper or unlawful means to obtain, retain, or direct business, secure any other improper advantage, or confer a benefit on oneself or any other person or entity.

**Government Official.** Any officer or employee of a government entity, department, agency, or instrumentality, including any state-owned or state-controlled enterprise; any political party, party official, candidate for a public office; and any person acting in an official capacity for or on behalf of any of the foregoing.

**Third Party.** Channel partners, suppliers, service providers, contractors, advisors, consultants, lobbyists, marketing and sales agents, and any other external entities or individuals that have business interactions with the Company and are not under the Company’s direct control.

## POLICY

**Engaging with Government Officials.** The Company and global anti-bribery and anti-corruption laws strictly prohibit Personnel from offering, promising, or giving anything of value, regardless of the amount, or procuring an improper or unfair advantage from Government Officials directly or indirectly. The Company applies heightened scrutiny to anything of value provided to or received from Government Officials. Please see our Gifting and Entertainment Policy for further information.

**Engaging with Third Parties.** The Company and global anti-bribery and anti-corruption laws strictly prohibit Personnel from offering, promising, or giving anything of value, regardless of the amount, or procuring an improper advantage from any Third Party, directly or indirectly. Further, Third Parties are required to comply with anti-bribery and anti-corruption laws and may be required to demonstrate compliance by their subcontractors, consultants, agents or representatives. The Company may seek to suspend or terminate any Third-Party contract immediately if the Company believes in good faith

that such Third-Party has violated any such laws. The Company must conduct appropriate due diligence prior to engaging any Third Party as described in our Third-Party Risk Management Policy.

**Recordkeeping.** The Company is committed to maintaining books, records, and accounts that, in reasonable detail, accurately and fairly reflect all transactions and dispositions of Company assets. All payments, receipts, and other transactions must be properly authorized, fully and accurately documented, and recorded in a timely manner. Personnel may not create or maintain off-book accounts or funds, make or approve false, misleading, incomplete, or mischaracterized entries, record non-existent expenditures or inaccurately describe the purpose of any transaction, submit or approve inaccurate expense reports or invoices, or circumvent or evade the Company's internal accounting controls.

**Business Courtesies.** The Company allows for the provision of entertainment and hospitality items ("Business Courtesies") to business associates including Government Officials in controlled circumstances. Business Courtesies must be reasonable and should not create the appearance of an implied obligation that the giver is entitled to any preferential treatment such as favorable contract terms, expedited approvals, or exclusive access to resources or information. Refer to the Gifting and Entertainment Policy for details.

**Political Contributions.** The Company does not support any specific political party and does not have any political affiliation. Personnel are prohibited from making political contributions on behalf of the Company either directly or indirectly.

**Charitable Contributions and Sponsorships.** The Company reviews charitable contributions and sponsorships for bribery or corruption risk.

**Training and Awareness.** All Personnel are required to complete the mandatory Anti-Bribery and Anti-Corruption training at the time of hire and annually throughout their term of employment.

## ADMINISTRATION

**Ownership.** This Policy is owned by Compliance Team and reviewed at least annually. The Company reserves the right to change this Policy at any time and publishes the current version to the Company's Intranet. General inquiries regarding use of this Policy may be directed to [compliance@commvault.com](mailto:compliance@commvault.com). All exceptions to this Policy are tracked in the Company's risk register and reviewed periodically.

**Reporting & Enforcement.** Individuals may report potential or actual violations of this Policy to [compliance@commvault.com](mailto:compliance@commvault.com). Confidential and anonymous reporting is available through the Company's Ethics and Integrity Reporting Platform by visiting <https://integritycounts.ca/org/commvault> or emailing [commvault@integritycounts.ca](mailto:commvault@integritycounts.ca). The Company prohibits retaliation against any individual who makes a good faith report. Violations of this Policy may result in disciplinary action, up to and including termination of employment or contractual relationship.

**REVISION HISTORY**

<b>Revision</b>	<b>Date</b>	<b>Author(s)</b>	<b>Approval</b>	<b>Change</b>
V1.0	May 2024	S. Vardhan	Legal	Initial Version
V1.1	June 2025	S. Vardhan	Corporate Trust	Annual Review
V1.2	April 2026	S. Ali and G. Pellegatto	Corporate Trust	Annual Review