



FY24 ESG Report

Partners in Resiliency



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About This Report

We published Commvault’s first Corporate Social Responsibility (CSR) Report in 2020. Since then, we have implemented new initiatives, launched innovative campaigns, and undertaken new projects. Through it all, we have learned what it means to be good stewards of the trust you place in us. We don’t take this trust for granted. This year we took a deep look at our past sustainability efforts and reporting initiatives to evaluate their alignment with our business objectives, evolving markets, and shifting stakeholder landscapes. We want to hold true to our values and optimize our efforts for the impacts we want to have at Commvault and in the communities we engage.

We are partners in resiliency. From this self-reflection we have implemented the following improvements:



FOCUSED REPORTING

We launched a focused reporting strategy so that we can better communicate material information to distinct audiences.

This new strategy moves away from a catch-all CSR Report and moves toward a dedicated ESG Report complemented by enhanced engagement and communication relating to Employee & Community Relations on our [website](#). Our motivation is to make meaningful information accessible to every stakeholder.



DYNAMIC MATERIALITY

Market dynamics, regulatory frameworks, social interests, and environmental realities are rapidly evolving, which impacts whether we consider issues material to our business.

We’ve adopted an approach to materiality assessments which evolves with these factors so we can work with fresh information and insights when planning and setting objectives. Our most recent materiality assessment and more details about how we are evolving this process are [included here](#).



FUTURE OBJECTIVES

Past reporting has largely focused on the past year’s developments and outcomes without addressing our strategy to influence our future.

This year’s report is the first under our Partners in Resiliency ESG Program and it is carefully crafted to provide an overview of our past performance and outcomes as well as insight into our longer-term planning and objectives.



A Letter From Our Leadership

Partners in Resiliency

The world around us is constantly and often unpredictably in motion. Markets ebb and flow. Geopolitical issues ripple beyond borders. Environmental, social, and cyber risks require bold new approaches. New global regulations require significant levels of governance and risk management.

As the pace of change accelerates, it's imperative that we stay steadfast and adaptable, stepping up to provide guidance amidst these shifts. Often through our innovation, with the voice of our customers in the forefront, Commvault is the driver of these changes. At Commvault, we're actively managing and nurturing our business, all the while striving to innovate and deliver value to our stakeholders.

Our strength in innovation, adaptability, and resilience as an organization helps thousands of organizations detect, act, and rapidly recover their data in the event of a cyberattack or data disruption. This extends to collaborating with employees, partners, suppliers, and shareholders to ensure our ecosystem and communities are all working towards cyber resilience. After all, we are all interconnected—partners in resiliency.

Commvault's latest ESG report dives deep into this partnership and showcases our comprehensive program and dynamic materiality assessment, with particular focus on three issues:

First, **Cybersecurity** has never been more critical in a world where hackers and bad actors are launching ransomware attacks every 19 seconds. Commvault's unique innovative and highly scalable platform empowers customers to rapidly recover from these attacks to achieve cyber resilience in a world of increasing threats.

Next, with **Climate Action and Resiliency** as a priority, Commvault is proud to report its inaugural GHG emissions and efficiencies in our operations. While we are electricity-dependent in an emissions-intensive industry, we are not a high-emitting operation. Still, we focus on reducing our emissions in all areas of operating our business, and partnering with organizations that share our philosophy.

Finally, our **Employee Development and Engagement** program is critical for building and maintaining a diverse and inclusive team where individuals belong, develop, and excel to meet their full professional and leadership potential. Empowering our team members is what sustains us and enables us to deliver for our customers and communities.

Innovation and resilience must be constant. We will continue to be your partner in the communities we live, work, and depend on. We'll share highlights along the way. In the meantime, please read on about Commvault's ESG program, goals, and progress to date.

Best,

Martha Helena Bejar

Director, Chair of Commvault's Nominations
and Governance Committee

ESG Fact Sheet

This table provides an overview of key ESG figures and facts at Commvault for FY 2024. For a comprehensive understanding of our ESG program and policies including all metrics, please continue to the full report.

COMMVault OVERVIEW

- Total Revenue in FY 2024: \$839,247,000
- >1,300 patents issued to Commvault
- Over 100,000 organizations rely on Commvault technology

GOVERNANCE

Governance and Ethics

- Board of Directors: 9 members, 8 are independent
- Board Chair and CEO positions are separate
- Board gender diversity: 27%
- Board ethnic diversity: 36%
- All Board members elected annually
- Company-wide Code of Ethics
- Enhanced Supplier Code of Conduct
- Uphold UN Universal Declaration of Human Rights
- Uphold OECD Guidelines for Multinational Enterprises
- Business ethics and human rights training for all employees
- Whistleblower mechanism for anonymous reporting
- Responsible AI Policy

CYBERSECURITY AND DATA PRIVACY

- Dedicated Chief Information Security Officer and Cybersecurity Oversight Team linking to the Enterprise Risk Management Committee
- Dedicated to being the leader in cyber resilience
- ISO/IEC 27001
- SOC 2 Type II
- PCI DSS
- CJIS
- FedRAMP High Authorized
- FIPS 140-2
- NIST 800-53 CP9 & CP10
- IRAP

SOCIAL

Employee Engagement and Development

- Total employees: 2,882
- Employee Gender Diversity: 73.4% Male, 26.6% Female, <0.1% Non-Binary
- Total hours training and development: 190,000+
- Total turnover rate: 14.0%
- Voluntary turnover rate: 9.5%
- 0 workplace accidents, deaths, or days lost due to injury

ENVIRONMENT

Environmental Management

- No operations in biodiversity-sensitive regions
- Primary data center located in Low-Medium water stress region
- Enterprise-wide recycling programs

Climate Action and Resiliency

- Scope 1 Emissions: 373.2 metric tons CO_{2e}
- Scope 2 Emissions: 10,301.8 metric tons CO_{2e}
- Scope 3 Emissions: 5,142.1 metric tons CO_{2e}
- Emissions Intensity: 12.7 metric tons CO_{2e}/\$MM USD Revenue
- Founding advisor to the Net-Zero Institute

Company Policies

The following policies are **incorporated into our ESG program** and are linked for further consideration:

[Accounting Policy](#)
[Anti-Bribery Policy](#)
[Anti-Corruption Policy](#)
[Anti-Discrimination Policy](#)
[Anti-Harrasment Policy](#)
[Anti-Money Laundering Policy](#)
[Anti-Trust and Anti-Competition Policy](#)
[Board Committee Charters](#)
[Board Gender Diversity Policy](#)
[Board Membership Criteria](#)
[Code of Ethics](#)
[Code of Ethics for Senior Financial Officers](#)
[Commvault Benefits Resource](#)
[Commvault Trust Center](#)
[Compensation Philosophy](#)
[Compliance Reporting Platform](#)
[Corporate Bylaws](#)
[Corporate Governance Guidelines](#)

[Corporate Governance Webpage](#)
[Customer Data Privacy Policy](#)
[Cyber Resiliency Council](#)
[Diversity and Inclusion Policy](#)
[Employee Compensation Policy](#)
[Employee Handbook](#)
[Environmental Grievance Mechanism](#)
[Environmental Management Policy](#)
[Equal Employment Opportunity Policy](#)
[Ethics and Integrity Reporting](#)
[Freedom of Association and Collective Bargaining Policy](#)
[FY 2024 Annual Proxy](#)
[Global Severance Policy](#)
[Grievance Procedures Related to Freedom of Association and Collective Bargaining Policy](#)
[Human Rights Policy](#)
[Information Security Policy](#)

[Insider Trading Policy](#)
[Modern Slavery Act](#)
[No Child or Forced Labor Policy](#)
[Non-Discrimination Policy/Elimination of Discrimination Policy](#)
[Philanthropy, Volunteering, and Charitable Contributions Policy](#)
[Political Contributions Policy](#)
[Principles for Responsible Artificial Intelligence](#)
[Privacy Policy](#)
[Procedures to Ensure Information Security in Outsourced Data Processing](#)
[Responsible Marketing Policy](#)
[Sanctions Guide](#)
[Social Grievance Mechanism](#)
[Supplier Code of Conduct](#)
[Supplier Data Privacy Policy](#)
[Work-Life Balance Policy](#)
[Workplace Health and Safety Policy](#)



ESG Policy and Leadership

At Commvault, our strategy, operations, and ultimately our success is intertwined with, and at times, materially impacted by market dynamics, regulatory frameworks, social interests, and environmental issues and developments beyond our own company.

“At Commvault, we meet change head-on in how we responsibly run and sustain our business while delivering innovation and value for our customers.”

Martha Helena Bejar, Director, Commvault

Led by Danielle Sheer, Chief Trust Officer, and Leah Flynnne, Head of Compliance, Commvault’s ESG program engages with and collaborates across Commvault teams and stakeholders to support program implementation, monitoring, and evaluation.

This chain of accountability stretches from individual team members to the Board of Directors, which is informed of ESG program developments quarterly through the Nominations and Governance Committee (the “Committee”). We plan to further integrate our ESG program with our Enterprise Risk Management processes to continue to codify the chain of accountability.

Materiality Assessment

The core concept of actionable ESG rests with a determination of which ESG issues and developments are material to our operations and advancement. Material ESG issues and developments can represent risks, opportunities, and impacts, and our robust materiality assessment process ensures our program accurately prioritizes these as they are identified.

To this end, we have enhanced our materiality assessment process in FY 2024 to be dynamic and aligned with the pace of change in market dynamics, regulatory frameworks, social interests, and environmental realities. We engaged a specialist third-party ESG services provider to assist in the development and implementation of a Dynamic Materiality Assessment process. A formal materiality assessment is conducted annually and continuously monitored and curated at monthly intervals over the following twelve months. This allows our team to identify material ESG issues and monitor developments across evolving markets, regulatory purviews, social settings, and the environment.

ESG issues and developments identified by the Dynamic Materiality Assessment process are carefully considered in relation to our operations and strategic plans to determine which are material, and to what degree.



Our Commvault Materiality Assessment Process

1. **Indexes** considerations of industry-level materiality by leading voluntary reporting frameworks and standards, such as SASB Standards of the IFRS Foundation, the United Nations Global Compact, The Sustainable Development Goals (SDG), and the Global Reporting Initiative (GRI), as well as the frameworks and methodologies of reputable ESG rating agencies.
2. **Integrates** insights from continuous stakeholder engagement opportunities, including but not limited to:
 - Investor relation calls and engagements;
 - Employee satisfaction and sentiment surveys;
 - Employee Resource Groups and respective communities of engagement;
 - Industry group associations, professional development participation, and conference proceedings.
3. **Incorporates** a news monitoring service wherein a curated list of 125+ ESG-related issues are monitored across global social and news media outlets to track issue development over time, including considerations of issue salience, urgency, and endurance.

Materiality Assessment

In FY 2024, our materiality assessment process and our consideration of the dynamics of each issue relative to our operations and strategic plans identified a series of topics, organized by the following themes:

- 

Governance

 - Governance and Business Ethics
 - Cybersecurity and Data Privacy
 - Responsible AI
 - Supplier Code of Conduct
- 

Social

 - Employee Engagement, Development, and Belonging
 - Community Development
- 

Environment

 - Climate Action and Resiliency
 - Environmental Management and Resource Stewardship



What makes a topic material?

A topic is material to Commvault if it can reasonably be anticipated to impact company operations and market outcomes directly, or within one degree of separation, over an actionable timeline, or if Commvault is measurably contributing to the continued development of an issue which could be reasonably anticipated to result in regulatory or legislative interest if the scale or severity of the impact were to be maintained or increased.



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

About Commvault

Commvault (NASDAQ: CVLT) is leading the next generation of data protection to help businesses stay ahead of the modern threat landscape by protecting all data across all workloads, wherever data lives—on-premises, in apps, in the cloud, or over SaaS.

Our industry-defining unified platform takes a proactive approach to secure your data, help catch threats, reduce the impact of intrusion, minimize data loss, and recover quickly. We give you full visibility into your data and clean backups at all times—with rapid, cross-platform data recovery. Ongoing industry leadership and innovation are why more than 100,000 organizations have trusted Commvault with their data for over a quarter century. Simply put, Commvault is data, protected.

Our Business

At Commvault, we seek to lead by example, modeling responsible, sustainable, and ethical business practices across our global operations. Our high-performance culture is rooted in sound corporate governance that enables us to deliver on our commitments to customers and partners and ensure business integrity.

Our Values

Our values are the foundation of our company culture and fuel our commitment to show up each day for our stakeholders.

These values shape our daily interactions, power our passion for technical excellence and outstanding customer service, and support our overarching commitment to responsible, sustainable, and ethical business practices.

We Connect. We listen. We act. We trust. We make the world feel smaller by uniting people everywhere.

We Inspire. We innovate. We disrupt. We dream big and work hard so we can play harder with our friends and families.

We Care. Seriously! We care about our people and our planet. We speak human and celebrate diversity, so we can show up as our best selves every day.

We Deliver. We keep our promises and stand by our commitments, always. We say what we do and do what we say.

Innovation at Commvault

We encourage innovation at both an organizational and technical level, helping our customers and partners accelerate their journey to the cloud and giving us a critical edge in a competitive industry. Last year, we continued to develop and enhance our already award-winning products and services, and we are proud of the recognition we have received.

2023 CRN Storage 100

The 40 Coolest Data Protection/Management/Resilience Vendors

#1 PeerSpot Solution for Best Container Backup Software Tools

Metallic – #1 ranked solution for PeerSpot reviews

2023 Cloud Security Awards

Metallic ThreatWise – Shortlist: Cloud Security Innovator of the Decade

Metallic ThreatWise – Shortlist: Best Security Solution for Data Management

2023 OnCon Icon Awards

Danielle Sheer – Top 50 Corporate Counsel Award

Robert Tafeen – Top 50 Data & Analytics Professional Award

2023 KuppingerCole Leadership Compass: Cloud Backup for Ransomware Protection

Overall Leader, Product Leader, Innovation Leader, and Market Leader for Metallic DPaaS

2023 CRN Women of the Channel

14 Global Executives

Fearless 50 Customer-led Marketing Leaders for 2023

Anna Griffin, CMO

2023 GigaOm Radar for Hybrid Cloud Data Protection: Large Enterprises

“Leader” and “Outperformer”

Great Place to Work

Top 50 India's Great Mid-size Workplaces™ 2023

Zinnov Awards 2023

Tech Titan for Excellence in Talent Management in the Hybrid Age

2023 CRN Top 100 Executives

Sanjay Mirchandani, CEO – Top 25 Disruptors

2023 Gartner® Magic Quadrant for Enterprise Backup and Recovery Software Solutions

Leader – Enterprise Backup and Recovery Software Solutions

2023 CRN Women of the Year Awards

Gwen D'Arcy – Finalist: Hidden Gem of the Year

2023 Stratus Awards for Cloud Computing

Top Cloud Security Service Organization

2023 Gartner® Critical Capabilities for Enterprise Backup and Recovery Software Solutions

Highest Product Scores for Six Out of Seven Use Cases

2023 CyberSecurity Breakthrough Awards

Threat Detection Solution Provider of the Year

2023 CRN Products of the Year Awards

Commvault Platform – Finalist: Data Protection, Management and Resiliency

2023 Inc. Power Partners Awards

Privacy & Security

2023 OnCon Icon Awards

Top 50 Executive Team Award

Top 50 Corporate Counsel Team Award

2023-2024 Cloud Awards

Commvault – Shortlist: Best Cloud Data Management Solution

Women in Tech Global Awards 2023

Vidya Shankaran, Field CTO, Emerging Technologies – Finalist: CIO/CTO of the Year Award

Prashanti Koti, Chief of Staff, Engineering – Winner: Women in Tech Community Award (Individual/Public Voting)

2023 CRN Channel Women on the Rise

Ines Helou

2023 TechTarget Storage Products of the Year

Commvault Data Protection Platform – Silver: Top Backup and Disaster Recovery Services

2024 CRN Cloud 100

20 Coolest Cloud Storage Companies

2024 CRN Channel Chiefs

Alan Atkinson, Chief Partner Officer

Chad Blackwell, Vice President, Americas Partner Organization

2024 CRN Partner Program Guide

5-Star Rating

01

Governance

Our approach to being a responsible leader in the cyber resilience industry is rooted in our commitment to earning your trust. Our majority independent Board of Directors sets the stage for that trust with accountable oversight. We deliver on our employees' and partners' fidelity through our evolving Code of Ethics and continuous learning to advance cybersecurity protocols and practices. We are committed to advancing trust in the industry through Human Rights. We promote confidence in our third-party suppliers with our enhanced [Supplier Code of Conduct](#).

Board Oversight

Our Board of Directors set the tone for the culture and structure of decision-making that we strive to advance at Commvault. We value independence, diversity, and accountability. Our Board of Directors consists of nine (9) members with diverse backgrounds and skill sets, and all potential new directors are evaluated according to our [Board Membership Criteria](#).

Commvault's [Corporate Governance Guidelines](#) establish board structure, responsibilities, appointments and committees, compensation, executive review and oversight, and continuing director education. The Guidelines benefit the directors by clearly stating the culture and structure of governance to which they are continuing, and benefit all employees, shareholders, and stakeholders seeking to better understand how decisions are made, shaped, and influenced at Commvault.

The Board of Directors sets a high standard for the company, serving as a prudent fiduciary for shareholders and oversight of the Company's business.

Our Board Members



Sanjay Mirchandani
Director, President, and Chief Executive Officer



Nicholas Adamo
Chairman



Martha Helena Bejar
Director, Chairs NGC



Keith Geeslin
Director



YY Lee
Director, Chairs TMCC



Charles Moran
Director



Allison Pickens
Director



Shane Sanders
Director, Chairs Audit



Arlen Shenkman
Director, Chairs Ops

Board Leadership

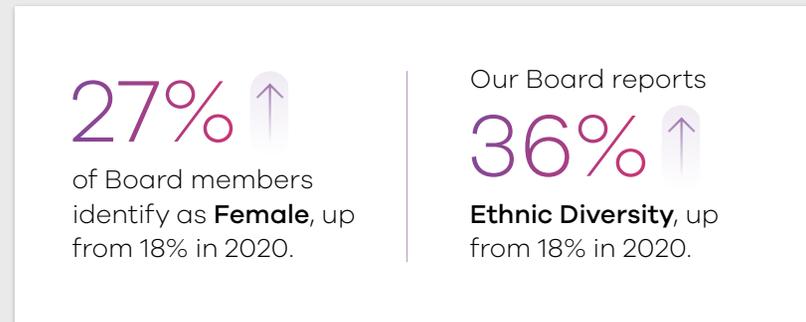
At Commvault, we believe in strong leadership at the Board level.

To fulfill its responsibilities and to discharge its duty, the Board of Directors operates with the listed Committees, each chaired by an Independent director, and follows the charters, procedures and standards set forth in specific guidelines for each Committee accessible in the Commvault Corporate Governance Center.

The Nominations and Governance Committee is responsible for oversight of our ESG strategies and initiatives, corporate governance, succession planning and nominating processes. Management provides quarterly ESG updates to the Nominations and Governance Committee and updates the full Board at least once annually.

Our Board of Directors are stronger with:

- [Talent Management and Compensation Committee](#)
- [Nominations and Governance Committee](#)
- [Operating Committee](#)
- [Audit Committee](#)
- [Disclosure Committee](#)



All Directors of the Board are elected annually. Commvault is a member of the National Association of Corporate Directors which expands our director education program.

Business Ethics

We are committed to integrity. Across our global footprint, we conduct our business in accordance with applicable laws and with the highest standards of professional and ethical behavior for all employees, contractors, vendors, and other third parties working on our behalf. Commvault does not tolerate bribery, corruption, discrimination, fraud, harassment, violence, or retaliation of any kind. The Audit Committee of the Board of Directors is responsible for overseeing our Ethics and Compliance programs.



Principled

We communicate our expectations broadly. When new employees join our team, they complete onboarding training including relevant elements of the listed policies and guidelines.

Once onboarded, all employees undertake additional periodic training relevant to their roles and responsibilities.

This includes acknowledgement of signoff and acknowledgement of ongoing compliance with our policies.



Accountable

We encourage all employees to inform us of occurrences where they believe our actions have not met our own standards. Commvault maintains an Ethics and Integrity Reporting Policy, also known as the whistleblower policy.

This includes all employees and third parties to communicate instances of unethical behavior, including bribery, anonymously and confidentially at all times.

The [platform](#) is available in a variety of languages and accessible online or by telephone at **1-866-921-6714**.



Focused

We maintain rigorous internal controls to facilitate appropriate record keeping, approval procedures, and ethical behavior across the company.

Additionally, our internal audit team evaluates bribery and corruption as a risk area and reviews internal control performance.



Ethics and Compliance Programs

[Anti-Bribery Policy](#)

[Anti-Competition and Anti-Trust Policy](#)

[Anti-Corruption Policy](#)

[Anti-Discrimination Policy](#)

[Anti-Harassment Policy](#)

[Anti-Money Laundering Policy](#)

[Code of Ethics for Senior Financial Officers](#)

[Corporate Bylaws](#)

[Corporate Governance Guidelines](#)

[Employee Handbook](#)

[Environmental Management Policy](#)

[Ethics and Integrity Reporting Policy](#)

[Human Rights Policy](#)

[Insider Trading Policy](#)

[No Child or Forced Labor Policy](#)

[Philanthropy, Volunteering, and Charitable Contributions Policy](#)

[Political Contributions Policy](#)

[Responsible AI Policy](#)

[Responsible Marketing Statement](#)

[Sanctions Guide](#)

[Supplier Code of Conduct](#)

[Workplace Health and Safety Policy](#)

Human Rights

Our approach to business ethics is firmly embedded in respect and advancement of human rights. The Commvault [Human Rights Policy](#) is clear in setting our expectations and applies to all Commvault employees, contractors, and associated company representatives.

Our Human Rights Policy builds from our [Code of Ethics](#), which addresses elements such as our commitment to Anti-Bribery, Anti-Corruption, Sanctions Guide, and Ethics and Integrity Reporting to place a clear focus on our commitment to the prohibition of the use of child or forced labor, human trafficking and all forms of modern slavery. The Commvault Human Rights Policy is aligned with the UK Modern Slavery Act and the Australian Modern Slavery Act in understanding modern slavery risks and definitions.

In implementing our Human Rights Policy, we require all employees, contractors, and representatives to complete relevant training as reflected in our Company Code of Ethics. Third-parties, including vendors and suppliers, are encouraged to collaborate with us to ensure they adopt and maintain a policy similar in nature to our policy, in line with our newly enhanced Supplier Code of Conduct ([see below](#)).



Conventions and Principles

Our commitment to respecting and advancing human rights is aligned with the internationally recognized conventions and principles.

Notably:

- Commvault is committed to, and advances, **the United Nations Universal Declaration of Human Rights**.
- Commvault ascribes to the **United Nations Guiding Principles on Business and Human Rights**.
- Commvault is aligned with the **Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises**.
- Commvault ascribes to the **International Labor Organization Conventions**.

Supplier Code of Conduct

In FY 2024, we enhanced our [Supplier Code of Conduct](#) to highlight the guiding principles which are fundamental to our business practices. Our Supplier Code of Conduct applies to all of our suppliers and we encourage them, to integrate these principles across their own supply chains and service providers. Commvault employees are trained in our Code of Ethics and this Supplier Code of Conduct, among others, and can openly and readily notify Commvault's Compliance Team should they suspect any form of fraud, bribery, conflict of interest, or violation of this Supplier Code, a contractual obligation, law, or regulation. Anonymous and confidential reports, by employees, stakeholders, or any third parties may also be submitted to Commvault's Ethics and Integrity Reporting platform by email, website access, or telephone.

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
- Trade Laws and Sanctions
- 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 follow best practices to develop 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).

Cybersecurity and Data Privacy

As a global cloud data management provider, we are committed to ensuring that the data entrusted to us is secure, private, and managed responsibly. We maintain two programs to help us deliver on our commitment: our Global Information Security Program and our Global Privacy Program. Together, these programs allow us to monitor and mitigate risks, address emerging regulations, and to better serve as a trusted partner for our customers.

Commvault Trust

We believe that every single Commvault employee plays a critical role in delivering on our commitments. All Commvault employees are required to complete security awareness training and data privacy training upon joining the company and periodically throughout their employment. This interactive training requires employees to view, listen, and interact with information across a range of cybersecurity and data privacy risks, and complete knowledge checks on topics such as our policies and best practices.



EMPLOYEE TRAINING

Over the last year, approximately:

99.9%

of newly hired employees completed Security Awareness training.

100%

of current employees completed Security Awareness training.

Cybersecurity

Training

Led by the CISO, Commvault's information security program leverages the National Institute of Standards and Technology (NIST) Cybersecurity Framework, with the primary objective of securing systems and data from cyber threats. Commvault procures security technologies, consistently works to mature the security organization, and partners with security service providers. Commvault has established a Security Incident Response Plan (SIRP), which outlines Commvault's processes for incident preparation, detection, analysis, containment, eradication, and post-incident analysis.

In addition to the SIRP, Commvault maintains a Crisis Management Plan to organize roles and responsibilities in the event of a crisis, a Disaster Recovery Plan to provide guidance in the recovery of systems following an outage, and a Business Continuity Plan to identify alternative means of conducting business in the event of business disruption. Commvault partners with third parties to enhance monitoring and response capabilities and facilitate readiness activities like regular tabletop exercises and penetration testing. All employees are required to undergo annual security awareness training on current and potential cybersecurity threats and report suspicious activity, and we maintain comprehensive cybersecurity insurance policies.

Leadership

Commvault's Board of Directors (the Board) provides oversight of Commvault's enterprise risk management strategy, which includes cybersecurity threats. The Audit Committee of the Board of Directors receives quarterly briefings on the security program from the Chief Information Security Officer (CISO) and briefings on the Enterprise Risk Management Committee (ERMC) and Cybersecurity Oversight Team (CSOT) from the Chief Legal and Compliance Officer (CLCO). The Board is kept apprised of cybersecurity updates through quarterly reporting from the Audit Committee Chair and annual reporting directly to the Board from the CISO.

Accountability

Commvault's Management team is responsible for Commvault's cybersecurity risk management strategy, operational decision-making, and incident preparedness and response. Management ensures cybersecurity risks are communicated through the establishment of the ERMC and the CSOT and regular reporting to the Audit Committee and the Board. The ERMC, comprised of the CEO, CFO, CLCO, CAO, CIO, CISO, and SVP of Engineering, is responsible for the implementation, maintenance, and execution of Commvault's enterprise risk management program.

The ERMC meets quarterly to assess, consider, and manage material risks across the business. The Cybersecurity Oversight Team (CSOT), comprised of the CEO, CFO, CLCO, CIO, and CISO, is responsible for the significant operational decisions in the event of an active cybersecurity incident. The CSOT meets as needed, with the Audit Committee Chair as an optional attendee, to provide counsel and foster productive communication between Management and the Board.

Compliance

We are proud to have completed assessments and achieved a wide variety of industry-leading global security standards, including:

- ISO/IEC 27001
- SOC 2 Type II
- PCI DSS
- CJIS
- FedRAMP High Authorized
- FIPS 140-2
- NIST 800-53 CP9 & CP10
- IRAP



Data Privacy

Leadership

The Audit Committee of the Board of Directors provides oversight of legal risk and enterprise compliance, including compliance with privacy laws. The Audit Committee receives quarterly briefings on the privacy program from the Chief Trust Officer and the Senior Director of Compliance. Commvault has a Global Data Governance Officer and a dedicated privacy team responsible for privacy compliance operations and day-to-day privacy risk management.

Program



Our Global Privacy Program prioritizes individual privacy rights, offering clear insights into our data management through our [Privacy Policy](#) and procedures. Our Privacy Policy details how we manage privacy across all data processing stages for our products, services, and operations, ensuring comprehensive data privacy practices. This includes data inventory, usage, access, storage, retention, handling data subject rights requests, managing cross-border data transfers, obtaining marketing consents, and adhering to data residency laws. We empower individuals with rights to access, rectify, and delete their personal data. We require service providers to demonstrate robust privacy measures before sharing personal data, ensuring they commit to using data only for approved purposes and protect it against unauthorized access through effective security practices.

Compliance

Using the European Union's General Data Protection Regulation (GDPR) as the high-water mark for compliance, our Privacy Program is designed to comply with other privacy standards local to the regions in which we conduct business and operate, including but not limited to the United States, Australia, United Kingdom, and more. Inquiries regarding Commvault's Privacy Policy can be sent to privacy@commvault.com.

Cyber Resilience Council

Commvault strives to lead the industry in cyber resilience. Cyber threats are developing as one of the most prominent risk factors globally, and we are committed to helping advance cyber resiliency for our customers, our partners, and businesses and people around the world. The world is interconnected, and we all work together to make it safer.

Supporting our work in cybersecurity our [Cyber Resilience Council](#) is composed of cybersecurity leaders drawn from industry, academia, government, and law enforcement and military backgrounds. We rely on our Cyber Resilience Council to maintain a broad and inclusive perspective of emergent developments in cybersecurity and data and to facilitate our advancement of cyber resiliency more broadly at industry, national, and international scales.

Our Council



Melissa Hathaway

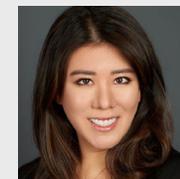
Council Chair

The Council is currently chaired by Ms. Melissa Hathaway, President of Hathaway Global Strategies and former head of the Cyberspace Policy Review for President Barack Obama and the Comprehensive National Cybersecurity Initiative for President George W. Bush.



John Zangardi

Council



Nancy Wang

Council



Shawn Henry

Council



Roland Cloutier

Council

Responsible Artificial Intelligence

AI holds the potential to play a transformative role in our future.

Recent advances in AI have provided us with a glimpse of the transformative potential of this technology. AI holds a promise to bring about new ways to work and connect, new ways to think and process, and new ways to innovate and develop. Yet, as with all transformative change, there are opportunities and risks.

At Commvault, we are developing and applying AI technologies to enhance cyber resilience. Our Commvault Cloud solution powered by

Metallic AI combines machine learning and generative AI to deliver risk detection, readiness, and cloud-scale recovery with speed.

As we develop AI solutions and help our customers and partners enhance their resilience against AI-driven threats, we are mindful to do so responsibly. We collectively must ensure AI is ethical, transparent, equitable, and safe. Our [Principles for Responsible Artificial Intelligence](#) are our first step in this collaborative responsibility.

Our AI Principles



TRANSPARENCY AND EXPLAINABILITY

AI systems should not be enigmatic black boxes, but rather should be transparent and understandable to all users and stakeholders. This means providing clear explanations for AI-generated decisions whenever appropriate.



BIAS MITIGATION AND FAIRNESS

Recognizing that AI technologies can inadvertently perpetuate biases and discrimination, we take great care to design AI systems in a manner that minimizes biases and avoids discriminatory practices on race, gender, age, or any other characteristics.



DATA PRIVACY AND SECURITY

We embed privacy and security by design principles into our Software Development Life Cycle (SDLC) and adhere to rigorous data protection measures, ensuring the highest standards of data security throughout the AI life cycle.



RELIABILITY, SAFETY, AND CONTROL

AI systems should be reliable, safe, and under human control. We incorporate explicit design principles to contain control over AI systems, allowing for a kill-switch or similar mechanisms to shut down the system in case of emergencies or unexpected behavior. Human judgment remains paramount.



HUMAN-CENTERED APPROACH

AI should augment human capabilities, not replace them. A human-centered approach is at the core of our AI development philosophy. We actively seek to collaborate with users and stakeholders to ensure that our AI solutions align with their needs, values, and aspirations.



ETHICAL COLLABORATIONS

In all our collaborations, we conduct thorough evaluations and due diligence to ensure that our partners and service providers share our commitment to responsible AI practices.

02

Social

Our approach is to attract the best candidates, retain the highest performers, and continue to engage and develop our amazing team members. Led by our Human Resources and Global Learning and Development teams, we remain committed to delivering excellence in Employee Learning, Training, and Development, Workplace Health and Safety, and Employee Compensation and Benefits. Our dedicated efforts to identify and remove bias in hiring allow us to attract new talent and continue to advance a strong sense of employee diversity and belonging commensurate with the wide variety of communities we serve.

Our People

People are our number one asset, and we build resiliency by investing in our people.

Global Workforce Distribution

As of FY 2024, our workforce is

2,882 people strong and stretches across the globe, including:



Global Workforce Turnover

We are committed to engaging and developing our global workforce, and the success of our efforts is reflected below:

In FY 2024, we had a total turnover rate of

14.0% ↓

which is down from **21.7% in FY 2023.**

We had a voluntary turnover rate of

9.5% ↓

which is down from **16.6% in FY 2023.**

We aim to continue to improve these numbers as we seek new ways to develop and engage our people.

Employee Satisfaction

Pulse Survey

We have developed a comprehensive Employee Satisfaction Survey, called our Pulse Survey, to help us stay connected with what matters most to our team. Our Pulse Survey is conducted annually and includes core satisfaction and engagement questions as well as a series of questions which are customized to emergent developments either within Commvault, within our communities, or across the world.

We are proud that our Employee Satisfaction Survey process achieves a response rate of:



Therefore, we are confident that we are making plans with valuable input from members across all of our teams.

Net Promoter Score

Our employee Net Promoter Score (eNPS) remains strong and is currently standing at an impressive



This score indicates that our people would recommend working at Commvault, which is a strong indicator of employee satisfaction.

Great Place to Work India

Commvault received the Great Place to Work India certification for the sixth consecutive year in FY 2024 and was recognized by Great Place to Work in the Health and Wellness category as a Top 40 organization in India.

Employee Learning and Development

Programs and Participation

At Commvault, continuous learning and development are critical elements of our culture. All employees and eligible contractors participate in various training opportunities. Beyond our mandatory training programs, employees are encouraged or nominated to undertake additional training and development relevant to their individual job responsibilities. We also provide micro-learning programs on diverse and inclusive workplaces and additional relevant topics as they occur.

Learning and Development Team

Our commitment is lead by our Learning and Development Team under the guidance of Namrata Atukuri, Global Head of Learning and Development. We use a variety of channels and platforms to offer training and education to our employees, including a mix of live, virtual, on-demand, and e-learning programs. We are committed to working with our employees to help them develop the professional and technical potential they want to achieve, and our dedicated Learning and Development Team provides the focus and resources we need to be able to deliver on this commitment.

Throughout FY 2024, our employees participated in:

1,200+ formal training programs, which totals more than **190,000+** formal training hours, along with additional hours in self-directed and voluntary learning.

Pathways to Learning

Our learning and development pathways are numerous, and **include:**

LEADERSHIP TRAINING

We have developed Leadership Training programs, including training on core manager skills, team engagement, and people leadership. Each program is sponsored by a senior Commvault executive, and each participant is supported by their respective manager through one-on-one meetings and specific on-the-job assignments.

A full 100% of participants, when surveyed, would recommend the program to others and self-report double digit gains in before and after scores in areas of engagement, role clarity, and team productivity.

PERFORMANCE REVIEWS

Our employee performance review feedback process is an extension of learning and developing, helping empower our people to be their best.

Every Commvault employee has a unique set of performance metrics based on their role and their performance against these metrics helps determine bonuses, base pay increases, and promotions. Managers and employees have regular one-on-one conversations as well as performance reviews to discuss progress against goals and provide feedback and opportunities to learn and grow.

MENTORSHIP

We continue our successful mentorship program, established in 2021, connecting employees with interactive, hands-on mentors who provide support and guidance.

Structured around one-to-one meetings or leader-led circles, the program offers mentees the opportunity to learn, ask questions, and engage with mentors.

INTERNSHIP

We believe it is never too early to start learning. We maintain dedicated internship programs with the goal of empowering students and early-career individuals with the technical capabilities and knowledge they need to succeed.

Our internship programs are global in reach and we collaborate with community partners, including Break Through Tech and Opportunities for a Better Tomorrow (OBT), to ensure diverse and inclusive participation, targeting students and individuals from underrepresented or underserved communities.

COMPLIANCE AND ETHICS

Compliance and ethics training prepares our employees to navigate legal and ethical issues they might encounter in their roles.

Our mandatory compliance training program educates them on relevant laws, regulations, and company policies, while fostering a culture of ethical decision-making. This reduces risk, strengthens trust, and fosters a culture of integrity.

TECHNICAL TRAINING

Our technical support training is designed equip staff with the right skills for success. The program focuses on three pillars:

Comprehensive Onboarding that includes soft skills for customer interaction and technical paths tailored to Commvault technology;

Quarterly Deep Dives that includes in-depth modules on new Commvault software/SaaS releases, essential systems, and processes; and

Microlearning Boosts of short videos and quizzes reinforce key technical and soft skills, keeping everyone up-to-date. This ensures our support team is well-prepared to tackle any challenge.

Workplace Health and Safety



Holistic

We are committed to ensuring Commvault remains a safe workplace respectful of health and wellness in all its forms, including physical, social, mental, and emotional well-being. Our holistic approach has been developed, and will continue to be enhanced, through direct engagement with our employees.



Compliance

We operate in accordance with applicable safety laws and procedures across the various jurisdictions where we are engaged, and we supplement these by extending our holistic employee wellbeing program to all employees, regardless of location, as set forth in our [Workplace Health & Safety Policy](#).



Safety

For FY 2024, Commvault is proud to report that we operated with no lost days due to injuries, and no workplace deaths or fatalities, continuing our long tradition of being a safe and secure place of work.

Employee Compensation

Our [Compensation Philosophy](#) guides us in ensuring our employees are fairly and equitably compensated, and provides a foundation for our employees to engage in how compensation is determined. Our philosophy:

- ✓ **Competitive Market Position:** We strive to maintain a competitive market position by regularly conducting comprehensive market research and benchmarking.
- ✓ **Performance-Based Pay:** We are committed to recognizing and rewarding individual performance and contribution through the design and planning of salaries and bonuses.
- ✓ **Total Rewards:** We understand that compensation encompasses more than just base salaries. In addition to competitive pay, we offer a comprehensive range of total rewards, including performance-based bonuses, incentives, recognition programs, restricted stock units, a generous employee stock purchase program, retirement benefits, health and wellness benefits, and career development opportunities. This holistic approach allows us to support the overall well-being and professional growth of our employees.
- ✓ **Pay for Performance:** By aligning rewards with measurable objectives and outcomes, we motivate our employees to deliver their best and contribute to the company's success.
- ✓ **Transparency and Fairness:** We are committed to maintaining transparency and fairness in our compensation practices by making our compensation philosophy available to all employees.



COMPENSATION POLICIES

- **Freedom of Association & Collective Bargaining:** Commvault ascribes to the International Labour Organization standards and respects employees' freedom of association and right to collective bargaining, as codified in our [Human Rights Policy](#).
- **Workforce Restructuring & Severance:** In the unfortunate event that workforce restructuring should be required, our approach to employee termination and severance is guided by our [Global Severance Policy](#).

Employee Benefits

For a comprehensive understanding of the various benefits we offer our employees, please visit the [Commvault Benefits Resource](#). We are proud of the holistic nature of the benefits we offer and are engaged with employees to ensure these remain relevant and appropriate. These benefits include, but are not limited to:



Health & Wellness

- Medical, dental, vision, and life insurance
- Tax-advantaged accounts
- Paid sick leave
- Short-term and long-term disability insurance
- Health and wellness program
- Mental health support and resources
- Discounted gym memberships and free fitness app



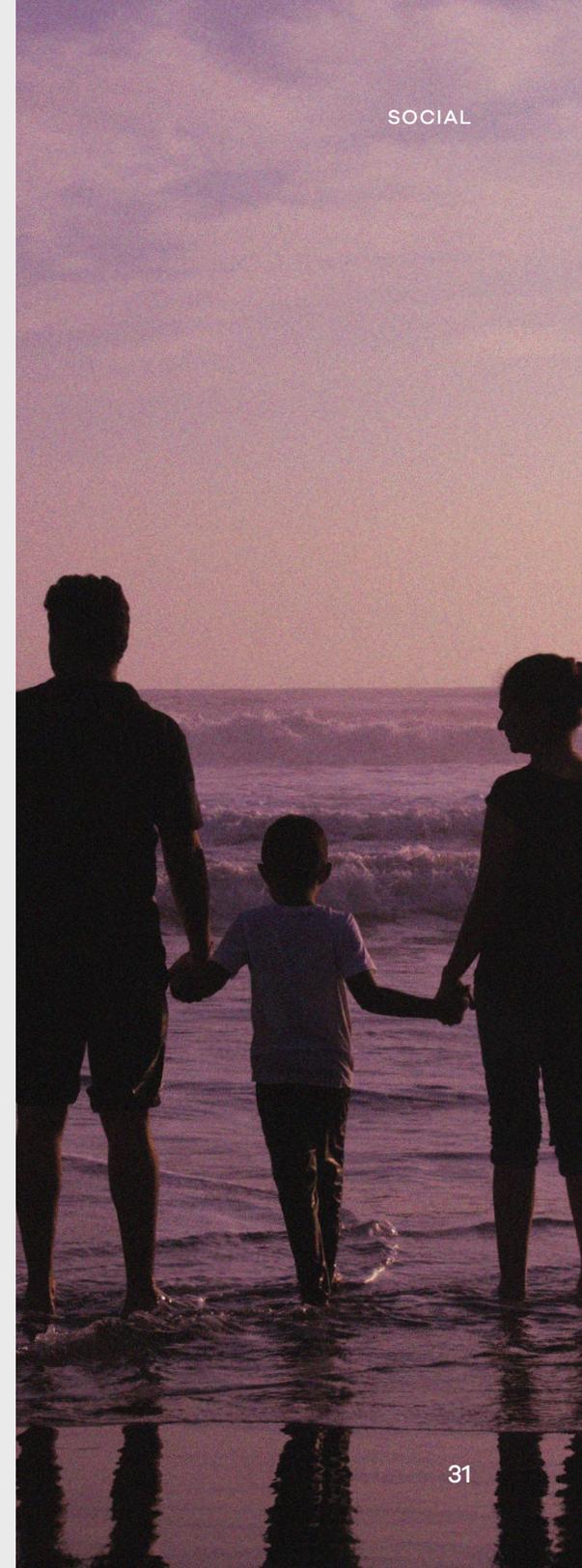
Flexibility When Life Happens

- Unlimited paid time off (PTO) for U.S. employees
- Parental leave
- Dependent care leave
- Bereavement leave
- 401(K) plan, with 50% match up to the first 4% of employee contributions
- Employee stock purchase plan, with discount
- Paid holidays
- We offer a tuition reimbursement program to help cover costs associated with master's, bachelor's, and other accredited degrees for all Commvault employees.
- Employee assistance program



Support at Work

- Flexible work arrangements, including remote work
- Military leave
- Jury duty / witness leave
- Back up care for children, elderly, and pets
- Wellness rooms
- Ergonomic assessments and equipment, including for remote work arrangements
- Business travel insurance program



Employee Diversity and Inclusion

We strive to attract, develop, and retain the best talent. We achieve this by our commitment to inclusive hiring practices working towards eliminating barriers to engagement.

Commvault is an equal opportunity employer. Our [Equal Employment Opportunity Policy](#) reflects our stand against discrimination based on race, color, religion, national origin, sex, age, veteran status, disability, or other legally protected status. Our commitment to Diversity, Equity, and Inclusion (DEI) is codified in our [Human Rights Policy](#).

Our driving focus is on mitigating bias in hiring and we will continue to evaluate each step of our hiring process, from sourcing candidates to the way we interview, to identify areas where bias could potentially become present.

Beyond inclusive hiring, we are also committed to ensuring pay equity for similar jobs. We conduct pay equity assessments on gender and race in the U.S. and on gender globally. Our most recent assessment found no notable inequalities.

We understand that companies that attract, retain, and advance a diverse workforce will be better positioned to develop products and solutions to meet the needs of diverse audiences. In collaboration with our Talent Acquisition and broader hiring teams, our goal is to increase diversity representation across our teams and drive greater accountability with inclusive workforce recruitment and hiring strategies. We are rooted in our commitment to recruit diverse talent through internships and grassroots partnerships to increase the number of women and people of color from underrepresented groups in our tech spaces.

INCLUSIVE HIRING

In FY 2024 we began using a service to analyze our job postings and recruitment materials for unconscious bias and opportunities to enhance inclusive language.

Already, in the four months after initiating this service, job applicants identifying as female have increased to

44.4% 

from 33.2% in the four months prior to initiating the service.

Diversity Metrics

The tables below provide diversity metrics on Global Gender and U.S. Race & Ethnicity. Our efforts to increase female applicants in the recruiting pipeline are reflected in the increased year-over-year population of female non-management employees (29.1% in FY24). We will continue to assess our management roles as we expand leadership development efforts in the future.

Technical Roles

Technical roles require a deep understanding of specific technologies, programming languages, tools, or methodologies. These roles are typically concerned with the development and support of products, services, and critical technical infrastructure.

2024 GENDER (GLOBAL)



Non-Management

Individual contributor

GENDER (GLOBAL)	2021	2022	2023	2024
Male	74.5%	73.6%	73.5%	70.8%
Female	25.5%	26.4%	26.5%	29.1%
Non-Binary	N/A	N/A	N/A	<0.1%
RACE & ETHNICITY (US ONLY)	2021	2022	2023	2024
American Indian or Alaska Native	0.2%	0.1%	0.1%	0.4%
Asian	27.29%	27.01%	25.7%	23.5%
Black or African American	1.97%	1.73%	1.9%	2.3%
Hispanic or Latino	5.32%	6.5%	7.3%	8.1%
Native Hawaiian or Other Pacific Islander	0.1%	0.1%	0.2%	0.2%
White	55.47%	56.04%	56.1%	63.3%
Two or More Races	1.48%	2.03%	1.8%	2.1%

Middle Management

People manager

Senior Management

Director level and above

GENDER (GLOBAL)	2021	2022	2023	2024
Male	72.2%	71.6%	73.8%	76.1%
Female	27.8%	28.4%	26.2%	23.9%

GENDER (GLOBAL)	2021	2022	2023	2024
Male	78.8%	77.8%	76.0%	76.9%
Female	21.2%	22.2%	24.0%	23.1%

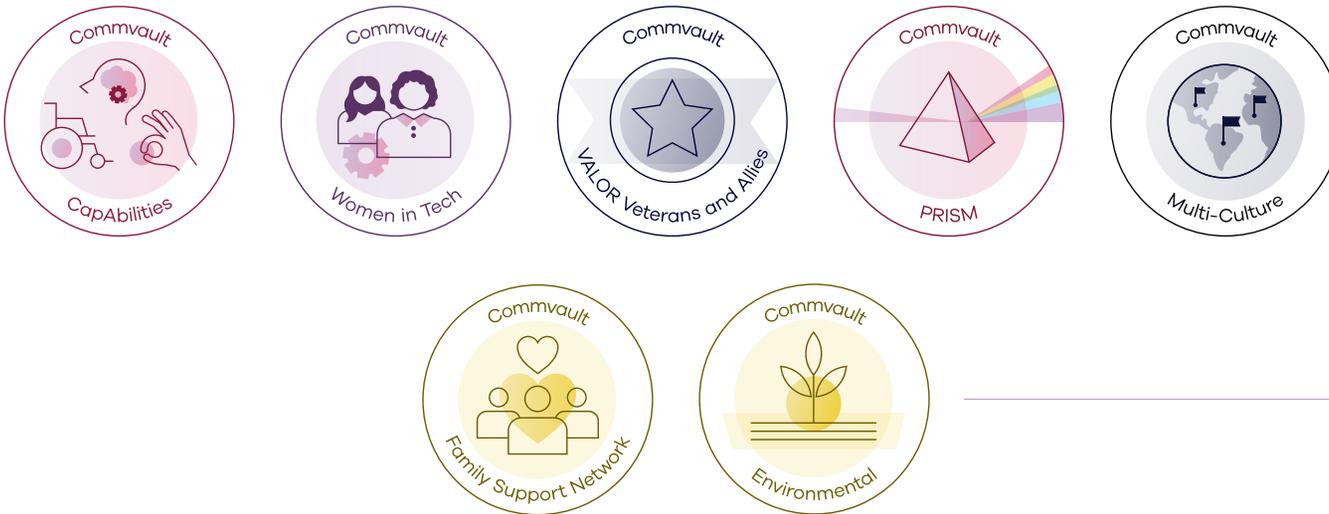
RACE & ETHNICITY (US ONLY)	2021	2022	2023	2024
American Indian or Alaska Native	0.0%	0.96%	1.0%	0.8%
Asian	20.5%	16.35%	18.4%	28.5%
Black or African American	3.8%	0.96%	1.0%	2.3%
Hispanic or Latino	3.8%	6.73%	7.8%	6.1%
Native Hawaiian or Other Pacific Islander	0.0%	0.0%	1.0%	0.6%
White	69.2%	70.19%	65.0%	60.4%
Two or More Races	0.0%	0.0%	1.0%	1.4%

RACE & ETHNICITY (US ONLY)	2021	2022	2023	2024
American Indian or Alaska Native	0.0%	0.5%	0.6%	0.0%
Asian	31.6%	23.7%	20.0%	18.8%
Black or African American	1.0%	1.1%	0.6%	0.6%
Hispanic or Latino	2.0%	3.2%	2.9%	5.5%
Native Hawaiian or Other Pacific Islander	0.0%	0.5%	0.0%	0.0%
White	50.0%	62.4%	70.3%	73.5%
Two or More Races	2.0%	1.6%	0.6%	1.7%

Community Engagement

Community builds resiliency. When facing uncertainty, there is strength in knowing we will be there for each other. Our community engagement efforts are guided by our Employee Resource and Affinity Groups.

Our Employee Resource and Affinity Groups foster cross-cultural learning opportunities, mentoring, and community-building. All Employee Groups are voluntary, employee-led groups designed to foster an inclusive workplace where employees can bring their unique personal attributes, be part of a community of collective thought leaders, and advocate for the advancement of causes and collaborations that are meaningful to them. We support volunteerism and sponsored events as directed through the activities of our Employee Groups.



Employee Resource Groups

- CapAbilities (Disability Inclusion)
- Women in Tech (WIT)
- VALOR Veterans and Allies
- PRISM (LGBTQ+ and Allies)
- Multi-Culture

Employee Affinity Groups

- Family Support Network
- Environmental

Corporate Citizenship and Philanthropy

Caring is at the core of who we are.

We engage in a variety of corporate citizenship and philanthropic efforts to give back to the communities where we live and work. Commvault and its employees support local charity organizations and participate in volunteer opportunities to provide disaster relief, deliver technological resources, promote health and wellness, and champion equality.

We encourage our employees to support the causes they're passionate about and enable them to give back to their communities by using our flexible Time Off policy. This policy allows our team members to take time off for rest, relaxation, recreation, and taking care of themselves, their families, and their communities as needed.

Our charitable contributions and social responsibility are guided by our [Code of Ethics](#). Throughout, we are committed to fostering a 'politics-free' environment at Commvault, as also described in our Code of Ethics. Commvault funds are not used to support any political party, political committee, or candidate. Commvault complies with all laws and regulations governing campaign contributions in any federal, state, or local election, in any country. All team members are free to use their own funds to make individual political contributions in accordance with applicable law. Commvault will not provide reimbursement in any form for political contributions.



SOCIAL



Additional Resources

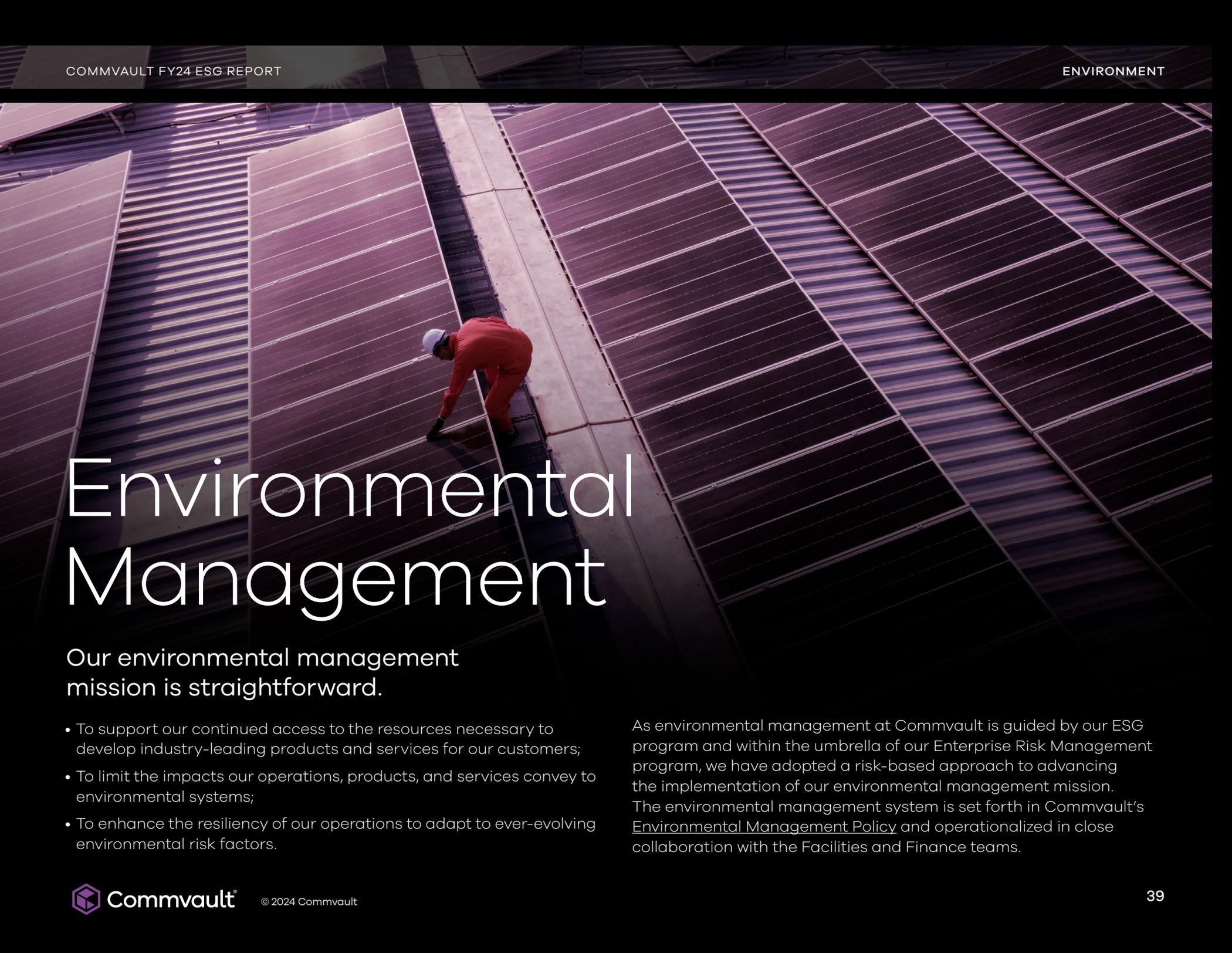
For every discussion started in this report, there are more details, stories, and resources available through Commvault's communication and engagement channels:

- ✓ **Employee Benefit Program:** Current and prospective employees can access information and resources relating to Employee Benefit Programs through the [Commvault Benefits Resource](#).
- ✓ **Inclusion and Diversity:** More information about Inclusion and Diversity at Commvault can be found on our [dedicated webpage](#).
- ✓ **Values and Engagement:** Insight into our values and community engagement can be found on [our website](#).
- ✓ **Additional Requests or Interests:** Readers are encouraged to contact Commvault's [Global Head of Total Rewards](#).

03

Environment

Our approach to sustainability is rooted in our Environmental Management Policy which is purposefully integrated with our Enterprise Risk Management program. This helps us identify risks that changing environmental systems may present to our operations and to the communities we are engaged with. With an eye to the built environment, water and natural resource dependency, and the growing need for concerted climate action, we remain acutely aware of the larger systems we are part of and are committed to sustaining success as these systems shift and evolve.



Environmental Management

Our environmental management mission is straightforward.

- To support our continued access to the resources necessary to develop industry-leading products and services for our customers;
- To limit the impacts our operations, products, and services convey to environmental systems;
- To enhance the resiliency of our operations to adapt to ever-evolving environmental risk factors.

As environmental management at Commvault is guided by our ESG program and within the umbrella of our Enterprise Risk Management program, we have adopted a risk-based approach to advancing the implementation of our environmental management mission. The environmental management system is set forth in Commvault's [Environmental Management Policy](#) and operationalized in close collaboration with the Facilities and Finance teams.



Built Environment

Commvault headquarters and primary data center location at Tinton Falls, New Jersey, USA is a LEED-certified building optimized for energy efficiency and purposefully developed to minimize the cooling needs of our data center. In efforts to enhance resource efficiency and responsibility, we operate recycling programs for paper, cardboard, plastic, and aluminum waste across our office spaces to divert waste from landfill and partner with licensed recycling vendors to properly recycle and dispose of IT equipment.

We continue to install new water efficient fixtures and sensor faucets to reduce water use and new LED lighting to reduce energy demand as opportunities for equipment repairs and retrofits arise.

By enhancing our resource efficiency, we are minimizing our resource dependency, a factor which adds to our resiliency should variability in resource accessibility develop.

Water Security

Droughts, wildfires, and record high temperatures throughout 2024 have brought a focus to the importance of water security. As a company in the Software & Information Technology (IT) Services Industry, we do not consume much water beyond regular office functions, however our data centers are dependent on access to water for cooling purposes.

Data centers require significant cooling resources and favor water cooling technologies to assist in reducing the demand for electricity and additional greenhouse gas (GHG) emissions by extension. Our primary data center in our Tinton Falls, NJ facility draws water from a region reported as having Low or Low-Medium physical risks (including water stress, water depletion, or seasonal variability) and regulatory risks associated with water access and treatment as defined by the World Resources Institute. We are committed to remaining aware of how our water dependence develops in relation to the aquifers we operate within.

Biodiversity

The Taskforce on Nature-related Financial Disclosures (TNFD) that was released this past year is already shaping how we understand our interactions with biodiversity.

Commvault maintains a relatively light infrastructure footprint with no direct exposure to any biodiversity-sensitive areas as defined by the Key Biodiversity Area Secretariat, co-hosted by the International Union for Conservation of Nature.

We understand that the accelerating decline of biodiversity globally may lead to emergent developments in regulatory frameworks and we are enhancing our resiliency to prepare for such developments while we have the benefit of time on our side. As the TNFD guidelines are refined and codified, we are working toward a more detailed understanding of our nature-related dependencies, impacts, risks, and opportunities.

Suppliers

Our [Supplier Code of Conduct](#) recognizes environmental risks and limited impacts on environmental systems and encourages our suppliers to consider their own supply chains and service providers.

Environmental Considerations for Data Centers

Data is one of the world's most critical assets. As data needs evolve, we recognize the need to change the way we approach data management—both for Commvault and for the products and solutions we provide. Data centers require significant cooling resources and favor water cooling technologies to assist in reducing the demand for electricity and additional greenhouse gas (GHG) emission by extension.

Our primary data center is located in our LEED-certified facility in Tinton Falls, NJ, USA. This data center utilizes free cooling (cold water) processes and intermediate distribution frame (IDF) closets as more energy efficient alternatives to traditional mechanical cooling.

We are committed to minimizing the impacts our data center has on natural environments while also optimizing our data center operations to reduce resource dependence, a factor which adds to our resiliency should variability in resource accessibility develop.

Climate Action and Resiliency

We are proud to have completed our inaugural GHG emissions assessment in FY 2024. GHG emissions are contributing to climate change, which is developing as a prominent risk factor and risk multiplier for all businesses and society and Commvault is committed to building resiliency. We have identified **three key developments** relating to climate change that are material to Commvault:



EXTREME WEATHER

Climate change-induced weather events, such as droughts, wildfires, severe storms, and flooding represent acute risk factors which can be difficult to predict when and where they will occur.

Unabated climate change is anticipated to increase the frequency and severity of these events, making it incumbent upon all businesses to enhance their resiliency.



DATA CENTER ENERGY USAGE

Data centers consume substantial amounts of electricity. Depending upon the source of electricity, these have the potential to result in high-levels of greenhouse gas (GHG) emissions.

It is incumbent upon data center owners, operators, and users to actively manage access to reliable electricity and the emissions resulting from electricity generation.



CORPORATE EMISSIONS

The growing risks associated with climate change coupled with investor interest in access to comparable GHG emissions data is resulting in emergent regulations seeking to mandate the disclosure of corporate GHG emissions data.

Proposed and recently codified regulations are emerging at subnational and national jurisdictions throughout the world. We understand that a carefully developed climate action program can assist Commvault in remaining compliant across this varied inter-jurisdictional regulatory landscape more efficiently and at lower cost.

GHG Emissions Profile

We undertook our first GHG emissions assessment in FY 2024 to provide a baseline understanding of our emissions as we develop meaningful objectives and strategies advancing our climate action and resilience.

The emissions assessment proceeded according to the:

- USA Environmental Protection Agency (EPA) Center for Corporate Climate Leadership Standards;
- Greenhouse Gas Protocol Corporate Standard;
- Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Standard.

The Organizational Operational Control approach was employed to determine the parameters of Commvault's emissions inventory for FY 2024. A comprehensive assessment of Scope 1 and Scope 2 emissions are provided below, as well as an actionable assessment of Scope 3 emissions. We are committed to refining and improving our data collection in collaboration with our supply chain partners as we continue annual GHG emissions assessments.



GHG Assessment

Scopes

SCOPE 1 GHG EMISSIONS

373.2 mt CO_{2e}

SCOPE 2 GHG EMISSIONS

10,301.8 mt CO_{2e}

SCOPE 3 GHG EMISSIONS*

5,142.1 mt CO_{2e}

GHG Emissions Intensity

12.7 mt CO_{2e}
/\$MM revenue

GHG Emissions From Data Centers

Owned, leased, or contracted

4,565.5 mt CO_{2e}

*Scope 3 assessment is a work-in-progress as data collection across suppliers, vendors, and associated stakeholders continues to be improved. For FY 2024, the assessment incorporates data from five Scope 3 categories. Four other Scope 3 categories are deemed not applicable and data collection continues across the remaining six categories.

Climate Action Principles

With a baseline understanding of our Greenhouse Gas (GHG) emissions, our continued commitment to advancing our climate action and resiliency is guided by our following principles (drawn from our [Environmental Management Policy](#)):

- ✓ **Research Leadership:** Climate change research is evolving rapidly and Commvault recognizes the Intergovernmental Panel on Climate Change (IPCC) as a meaningful source of information and scenario modeling.
- ✓ **Prioritizing Emissions Reductions:** GHG emissions offsets or credits can play a role in climate action strategies; however, Commvault is committed to advancing actual emissions reductions prior to emissions offsets or credits, as feasible.
- ✓ **Transparent Reporting:** Commvault is committed to transparently reporting its GHG emissions aligned with widely recognized reporting frameworks and applicable regulatory mandates.
- ✓ **Actionable Commitments:** Commvault's climate action commitments will be supported by clear GHG emissions reduction targets and strategies across actionable timelines, including interim goals and objectives, as applicable.
- ✓ **Collaborative Resiliency:** Commvault is committed to collaborating with suppliers, partners, customers, and stakeholders to advance appropriate climate action and enhance collective resiliency.

Climate Initiatives and Programs

Climate action and resiliency is increasingly integrated into how we think at Commvault, and we are committed to exploring ways to reduce our GHG emissions in all that we do, from simple efforts like switching to LED lights to more complex initiatives such as optimizing water-cooled data centers or seeking collaborative supply chain relationships. Now with a completed inaugural GHG emissions assessment in place, emissions reductions will be an important consideration in all that we do as we develop a comprehensive, actionable, and detailed climate action and resiliency plan informed by leading climate science. In FY 2024, **four initiatives stood out** for their potential benefits moving forward:

GHG Emissions Assessment

We conducted our first GHG emissions assessment in FY 2024. This process not only helped us better understand the sources of our emissions and areas we could improve, but it also helped us establish an internal data monitoring and collection process to make future GHG emission assessments more efficient. At Commvault, we value data-driven decision-making, and we are now in a position to extend this to our climate action and resiliency efforts.

Net-Zero Institute

We are committed to developing actionable strategies to reduce emissions as necessary to help limit global warming to 1.5 C, as targeted by the Paris Agreement. We are aware that achievement of this goal will require much more than broad sweeping commitments and far-off target dates. In this spirit, Commvault is proud to be a founding member of the [Net-Zero Institute](#), represented by our Chief Trust Officer serving as a founding Advisor to the organization. The Net-Zero Institute is a mission-driven non-profit business association based in Massachusetts dedicated to accelerating the corporate transition to a carbon-neutral, net-zero world.

Innovation

Employee commuting is a large component of Scope 3 emissions. Recognizing an opportunity to introduce efficiency to the commuting journeys of many employees, our India offices spearheaded the development of an internal application to assist employees with ride sharing and public transport opportunities for Commvault employees. We look forward to being able to quantify the emissions reductions of this initiative in our next GHG emissions assessment.

EcoVadis Participation

Climate action and resilience will require an economy-wide transition, and it is through supply chain collaborations that we can collectively drive improvement. We have enhanced our ESG reporting and data sharing with our own customers directly and through the EcoVadis supply chain data monitoring platform in FY 2024.

Products and Services

Our commitment to improve our climate action and resilience also extends to our products and services that aim to help our clients do the same. Throughout FY 2024, we continued to drive sustainable change for our customers and partners, optimizing their data footprints by containing data proliferation, limiting data movement, and maximizing data center intelligence.

CONTAINING DATA PROLIFERATION

Significant volumes of data are produced every day. It takes energy to create, use, store, manage, protect, and share this data. Our software minimizes the amount of data produced and maximizes its usage, including:

- More efficient backup storage for traditional datasets, reducing storage requirements
- Identification of Redundant, Obsolete and Trivial (ROT) data
- Use of automated policies to control and delete unnecessary copies
- Archiving of Virtual Machines (VM) and files to reduce primary storage
- Combination of backup and archives to repurpose secondary data
- Elimination of data redundancy and reduction of storage requirements through compression and deduplication

LIMITING DATA MOVEMENT

Our solutions help decrease data movement by removing redundant data before it is transferred to backup servers and allow for one-time backup anywhere through granular recovery.

This limits energy use and lowers emissions for our customers.

MAXIMIZING DATA CENTER INTELLIGENCE

We expanded the workloads supported by our portfolio to reduce operational complexity for our customers and partners. We also extended the global availability of SaaS, enabling customers and partners to benefit from more efficient cloud-delivered SaaS data management. Our cloud and security solutions are energy efficient and reduce onsite storage infrastructure. Key efficiencies include:

- Easy-to-utilize cloud environments that are often powered by renewable energy
- Automated scaling and power management of cloud access nodes
- Use of highly efficient scale-out infrastructure to increase data center storage efficiency through HyperScale X

Our ESG Programs

We have made progress on our ESG programs and initiatives. This year, we took the opportunity to evaluate our efforts and successes, and re-shape how we communicate with key stakeholders. What hasn't changed is our commitment to transparency, trust, and innovation—a foundation that continues to push us forward today.

With the publication of our 2024 ESG Report, we reaffirm our values—We Connect, We Inspire, We Care, and We Deliver—and our commitment to long-term sustainability to advance our efforts and to be a partner in resiliency in FY 2025 and beyond.

Contact Us



ESG TEAM

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INVESTOR RELATIONS

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REPORT AN ISSUE

ESG grievances may be reported to the ESG Team using the contact information provided above, or alternatively through Commvault's Ethics and Integrity Reporting hotline.

commvault@integritycounts.ca | 1-866-921-6714 | [Website](#)

Contact Us



Disclaimer

Report Disclaimer

All financial information has been reported in U.S. dollars. Figures presented in this report may have been approximated or rounded. Forward-looking statements may be included within this report, including projections regarding future performance. All statements that relate to our beliefs, plans, and expectations regarding the future are pursuant to the Safe Harbor provisions of the Private Securities Litigation Reform Act of 1995. Actual results may differ materially due to certain risks and uncertainties. For a discussion of the risks and uncertainties affecting our business, please see the risk factors contained within our SEC filings.

Unless otherwise noted, key performance indicators included within this report are reflective of Commvault's performance through **FY 2024** (April 1, 2023 – March 31, 2024).

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Appendix

Our ESG disclosures are aligned with the Sustainability Accounting Standards Board (SASB) standards, allowing us to provide material, industry-relevant, and comparable sustainability metrics to our key stakeholders.

We remain committed to advancing ESG initiatives and making meaningful progress through collaboration with our employees, customers, partners, shareholders, and communities. We are proud of the advancements we have made since formalizing our ESG strategy in 2021 and look forward to continuing this momentum as our ESG program matures. Thank you for following this journey with us. If you have comments or questions about this report, please [contact us](#).

SASB Index

Software and IT Services

ACTIVITY METRIC	CATEGORY	UNIT OF MEASURE	CODE	2024
(1) Number of licenses or subscriptions, (2) percentage cloud-based	Quantitative	Number, Percentage (%)	TC-SI-000.A	(1) 18,258 customers (2) 51% subscription (SaaS and term software customers)
(1) Data processing capacity, (2) percentage outsourced	Quantitative	See footnote ¹	TC-SI-000.B	(1) Not applicable (2) 0%
(1) Amount of data storage, (2) percentage outsourced	Quantitative	Petabytes, Percentage (%)	TC-SI-000.C	(1) 10,760 PB stored (2) 0%

¹ Data-processing capacity shall be reported in units of measure typically tracked by the entity or used as the basis for contracting software and IT services, such as Million Service Units (MSUs), Million Instructions per Second (MIPS), Mega Floating Point Operations per Second (MFLOPS), compute cycles, or others. Alternatively, the entity may disclose owned and outsourced data-processing needs in other units of measure, such as rack space or data center square footage. The percentage outsourced shall include On-Premise cloud services, those that are hosted on Public Cloud, and those that are residing in Colocation Data Centers.

Sustainability Disclosure Topics and Accounting Metrics

TOPIC	ACCOUNTING METRIC	CATEGORY	CODE	RESPONSE/REPORT LOCATION
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed (2) percentage grid electricity (3) percentage renewable	Quantitative	TC-SI-130a.1	(1) 86,059.33 GJ (2) 100% (3) 0%
	(1) Total water withdrawn (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	TC-SI-130a.2	(1) 18,490 cubic meters (7.1% in regions of High or Extremely High Baseline water stress) (2) 13,990 cubic meters (0% in regions of High or Extremely High Baseline water stress)
	Discussion of the integration of environmental considerations into strategic planning for data center needs	Discussion and Analysis	TC-SI-130a.3	Environmental Considerations for Data Centers
Data Privacy and Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	Discussion and Analysis	TC-SI-220a.1	Commvault takes user privacy seriously and is committed to being transparent about our policies and practices related to behavioral advertising. We only collect and use user data for advertising purposes with the user’s consent, which is obtained through clear and prominent notice and opt-in mechanisms. We also provide users with easy-to-use controls to manage their advertising preferences, including the ability to optout of targeted advertising. Our data collection and use practices are guided by industry best practices and comply with all applicable laws and regulations. We regularly review and update our policies and practices to ensure that they remain effective and align with evolving user expectations and regulatory requirements. For more information, visit Commvault’s Privacy Policy .

Sustainability Disclosure Topics and Accounting Metrics

TOPIC	ACCOUNTING METRIC	CATEGORY	CODE	RESPONSE/REPORT LOCATION
Data Privacy and Freedom of Expression (Cont.)	Number of users whose information is used for secondary purposes	Quantitative	TC-SI-220a.2	Commvault does not use user information for reasons other than those described in our customer agreements and our Privacy Policy. For more information, visit Commvault's Privacy Policy .
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Quantitative	TC-SI-220a.3	None.
	(1) Number of law enforcement requests for user information (2) Number of users whose information was requested (3) Percentage resulting in disclosure	Quantitative	TC-SI-220a.4	None. For background on data privacy policies and practices, please see the Commvault Code of Ethics .
	List of countries where core products or services are subject to government required monitoring, blocking, content filtering, or censoring	Discussion and Analysis	TC-SI-220a.5	Commvault complies with data privacy requirements applicable to data processors under data privacy laws including GDPR, HIPAA, CCPA, and other global regulations applicable where Commvault conducts business and also as per lawful instructions of the data controllers. Our products and services enable our customers and partners acting as data controllers to comply with applicable data privacy laws including GDPR, CCPA, HIPAA, and other global regulations where Commvault conducts business. Our products do not include any functionality that could adversely affect data privacy or freedom of expression.

Sustainability Disclosure Topics and Accounting Metrics

TOPIC	ACCOUNTING METRIC	CATEGORY	CODE	RESPONSE/REPORT LOCATION
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	Quantitative	TC-SI-230a.1	<p>Commvault, being a publicly traded company, and doing business both domestically and internationally, must comply with laws and regulations requiring the public disclosure of security breaches.</p> <p>Commvault will comply with breach notification laws, disclosing any incidents in a way to comply with those laws.</p> <p>Commvault also has negotiated contractual obligations with certain customers, requiring specific disclosure requirements, and confidentiality agreements in the event of a breach.</p>
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion and Analysis	TC-SI-230a.2	Information Security, Data Management, and Privacy
Recruiting and Managing a Global, Diverse & Skilled Workforce	Percentage of employees that are (1) foreign nationals and (2) located offshore	Quantitative	TC-SI-330a.1	<p>(1) Foreign nationals – 8.19%</p> <p>(2) Located offshore – 60%</p> <p>For more information, please see the Global Workforce Distribution section of this report.</p>
	Employee satisfaction survey process	Quantitative	TC-SI-330a.2	Average of 74% response rate to monthly employee satisfaction survey process

Sustainability Disclosure Topics and Accounting Metrics

TOPIC	ACCOUNTING METRIC	CATEGORY	CODE	RESPONSE/REPORT LOCATION
Recruiting and Managing a Global, Diverse & Skilled Workforce (Cont.)	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	Quantitative	TC-SI-330a.3	<p>Gender Diversity</p> <p>(1) Senior Management: 23.1% Female / 76.9% Male</p> <p>(2) Technical Staff: 21.4% Female / 78.4% Male / 0.1% Non-Binary</p> <p>(3) All Others: 29.1% Female / 71.8% Male / <0.1% Non-Binary</p> <p>Racial/Ethnic Diversity</p> <p>(1) US Senior Management: Asian (18.8%), Black or African American (0.6%), Hispanic or Latino (5.5%), White (73.5%), Two or more races (1.7%)</p> <p>(2) US All Others: American Indian or Alaska Native (0.4%), Asian (23.5%), Black or African American (2.3%), Hispanic or Latino (8.1%), Native Hawaiian or Pacific Islander (0.2%), White (63.3%), Two or more races (2.1%)</p>
Intellectual Property Protection & Competitive Behavior	Total amount of monetary losses due to legal proceedings associated with anticompetitive behavior regulations	Quantitative	TC-SI-520a.1	None.
Managing Systemic Risks from Technology Disruptions	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	Quantitative	TC-SI-550a.2	None.
	Description of business-continuity risks related to disruptions of operations	Discussion and Analysis	TC-SI-550a.2	Business continuity risks are discussed in Commvault's 2023 Form 10-K, and within our 2023 Proxy Statement.

