# Commodult FY25 Sustainability Report

Partners in Resiliency



# Contents

#### INTRODUCTION

About This Report		
A Letter From Our Leadership		
Quick Facts		
Company Policies		
Sustainability Policy and Leadership		
Materiality Assessment and Topics		
About Commvault, Our Business, and Values		
Innovation at Commvault		



# GOVERNANCE

)3

03

04

05

06

07

80

10 11

Board Oversight
Board Leadership
Business Ethics
Human Rights
Supplier Code of Conduct
Cybersecurity and Data Privacy
Cybersecurity
Data Privacy
Cyber Resilience Council
Principles for Responsible AI

#### ENVIRONMENT Environmental Management Climate Action and Resiliency GHG Emissions Profile GHG Assessment Climate-Related Financial Disclosures Products and Services Contact Us

43 44 APPENDIX 45 SASB Index Data

# 12 SOCIAL

13

14

15

16

17

19

20

21

22

35 38

39 40

41

34

#### 25 **Our People** 26 **Employee Satisfaction** 27 Employee Learning and Development Pathways to Learning 28 Workplace Health and Safety 29 Employee Compensation 30 **Employee Benefits** 31 32 Corporate Citizenship and Philanthropy Additional Resources 33





24

# About This Report

Sustainability is a key underpinning of business continuity and resilience. For five years, Commvault has implemented new initiatives, launched innovative campaians, and undertaken new projects focused on sustainability. This year, we took a deep look at our past sustainability efforts and reporting initiatives to evaluate alignment with our business objectives, evolving markets, and shifting stakeholder landscapes.

In FY25, we continued to advance our sustainability program and build on our foundation. Through it all, we have learned what it means to be good stewards of the trust our customers, employees, partners, and investors place in us.



#### FOCUSED REPORTING

This year, we evolved from a general Corporate Social Responsibility Report, toward a dedicated Sustainability Report complemented by enhanced engagement and communication relating to business continuity and resilience.

Our motivation is to make meaningful information accessible to all stakeholders. Our Sustainability Report helps prepare us to comply with emerging regulations.



#### DYNAMIC MATERIALITY

Market dynamics, regulatory frameworks, social interests, and environmental realities are rapidly evolving. This impacts how we think about these issues with respect to materiality 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.

In 2025, we are expanding our dynamic materiality process to introduce considerations of double materiality and provide our teams with a fulsome perspective of impact. Our most recent materiality assessment and more details about how we are evolving this process are included in this report.



#### TRACKING PROGRESS

In 2024, we set certain goals related to sustainability objectives. Now, in 2025, we can track the progress of such objectives and draw insights from patterns and trends.

We continuously review our sustainability objectives for alignment with our business development objectives and remain open to setting new goals as our business and stakeholders evolve.





### Advancing Resilience for its Customers, Partners, and Communities

#### Dear Stakeholders,

Whether it is technological advances like AI, evolving global regulations, or malicious emerging cyberthreats, organizations today are grappling with a relentless pace of change. To keep business continuous, these organizations need a sophisticated, scalable approach to security and resilience that spans an entire hybrid or multicloud ecosystem.

With innovation and automation at the heart of what it does, Commvault empowers thousands of organizations to detect threats, take decisive action, and recover data, applications, and environments to quickly get its customers back to business. This commitment extends to our entire ecosystem—employees, partners, suppliers, and shareholders—as we collectively build toward cyber resilience.

Commvault's latest Sustainability Report explores our comprehensive program and dynamic materiality assessment, focusing on three critical areas:

**Cybersecurity Excellence:** With seemingly unbridled growth in AI capabilities and heightened geo-political tensions, cybersecurity is more important than ever. Our innovative and highly scalable platform enables customers to rapidly recover and achieve cyber resilience amid escalating threats.

**Climate Action & Resilience:** While we are in an electricity-dependent industry, we maintain a relatively low emissions profile. Nevertheless, we're committed to reducing emissions across our operations and partnering with organizations that share our environmental values. Beyond our greenhouse gas (GHG) emissions profile, our team remains focused on understanding the climate-related financial risks our organization and partners may face, including both physical and transitional risks.

**Talent Development & Engagement:** Our people are our greatest asset. Guided by our desire to recruit, retain, and advance the best talent possible, our programs foster a community where team members are respected, valued, and supported as they strive to reach their full potential. By empowering our people, we strengthen our ability to deliver exceptional value to customers and communities.

Innovation and resilience remain our constants. We pledge to continue as your trusted partner in the communities where we live, work, and depend on one another. We'll share our progress regularly, and we invite you to explore Commvault's sustainability program, goals, and achievements in this report.

Sincerely,

#### Martha Helena Bejar

Director, Chair of Commvault's Nominations and Governance Committee

#### COMMVAULT OVERVIEW

- Total Revenue in FY 2025: \$995,619,000
- >1,500 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
- 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 Al Policy

#### SOCIAL

Employee Engagement and Development

- Total employees: 3,262
- Total hours training and development: 260,000 +
- O 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: 638 metric tons CO<sub>2e</sub>
- Scope 2 Emissions: 8,942 metric tons CO<sub>2e</sub>
- Scope 3 Emissions: 6,327 metric tons CO<sub>2e</sub>
- Emissions Intensity: 9.6 metric tons CO<sub>2e</sub>/\$MM USD Revenue
- Founding advisor to the Net Zero Institute

#### CYBERSECURITY AND DATA PRIVACY

- Executive management communicates cybersecurity risks to the Audit Committee and Board by way of the Enterprise Risk Management Committee (ERMC). The ERMC is responsible for the implementation, maintenance, and execution of our enterprise risk management program. The Executive Security Council (ESC) is responsible for significant operational decisions in the event of an active cybersecurity incident.
- ISO/IEC 27001
- FedRAMP High
  Authorized
- SOC 2 Type II
- FIPS 140-2
- NIST 800-53 CP9 & CP10CJIS
- IRAP
- HIPAA

PCIDSS

# Quick Facts

This table provides an overview of key sustainability figures and facts at Commvault for FY 2025.

For a comprehensive understanding of our sustainability program and policies including all metrics, please continue to the full report.



# **Company Policies**

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

Corporate

Accounting Policy

Anti-Bribery Policy

Anti-Corruption Policy

Anti-Discrimination Policy

Anti-Harassment Policy

Anti-Money Laundering Policy

Anti-Trust and Anti-Competition Policy

Board Committee Charters

Board Membership Criteria

Code of Ethics

<u>Code of Ethics for Senior</u> <u>Financial Officers</u>

Commvault Benefits Resource

Commvault Trust Center

Compensation Philosophy

Compliance Reporting Platform

<u>Corporate Bylaws</u>

<u>Corporate</u>

Governance Guidelines

.

<u>Governance Webpage</u> Customer Data Privacy Policy

Cyber Resiliency Council

Employee Compensation Policy Environmental

<u>Grievance Mechanism</u>

Environmental Management Policy

Equal Employment Opportunity Policy

Ethics and Integrity Reporting

<u>Freedom of Association and</u> Collective Bargaining Policy

FY 2024 Annual Proxy

U.S. Severance Policy

<u>Grievance Procedures Related</u> 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

<u>Non-Discrimination</u> <u>Policy/Elimination of</u> 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

# Sustainability 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 us.

"At Commvault, we meet change head-on in how we responsibly run and sustain our business while delivering innovation and value for our customers." Led by Danielle Sheer, Chief Trust Officer, Meg Cavanaugh, Deputy General Counsel, Saadia Ali, Corporate Counsel, and Aakanksha Kashyap, ESG Specialist, Commvault's sustainability program engages and collaborates across Commvault to support program evolution.

Commvault's sustainability program is overseen by our ERMC. This chain of accountability stretches from individual team members to the Board of Directors, which is informed of sustainability program developments quarterly through the Nominations and Governance Committee.

Martha Helena Bejar, Director, Commvault



# Materiality Assessment

Actionable sustainability is grounded in materiality. Material sustainability issues and developments represent risks, opportunities, and impacts. Our Dynamic Materiality Assessment process accurately prioritizes such issues and developments.

In FY 2025 we further enhanced our Dynamic Materiality Assessment process for synergies with the pace of change in market dynamics, regulatory frameworks, social interests, and environmental realities. Our process includes an annual assessment and continuous monthly monitoring giving us real-time visibility into issues and developments.

With this visibility, we carefully consider each issue and development in relation to our operations and strategic plans to determine materiality.



## 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 IFRSA 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 sustainability 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;
  - Industry group associations, professional development participation, and conference proceedings.
- **3. Incorporates** news monitoring service wherein a curated list of 140+ sustainability-related issues are monitored to track issues and developments over time, allowing us to understanding the shifting landscape and introduce considerations of double materiality.



# Material Topics

Our Dynamic Materiality Assessment is designed relative to our operations and strategic plans. The resulting FY 2025 material themes are consistent with FY 2024, including:

### Governance

 $\checkmark$ 

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

### Social

 $\checkmark$ 

- Employee Engagement, Development, and Belonging
- Community Development

### Sustainability

 Climate Action and Resiliency

 $\checkmark$ 

 Environmental Management and Resource Stewardship



# What makes a topic material?

A topic is material to Commvault in two ways. One, if the topic can be reasonably anticipated to impact business operations and market outcomes directly, or within one degree of separation, over an actionable timeline. Or two, 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.



## About Commvault

Commvault (NASDAQ: CVLT) is the gold standard in cyber resilience, helping more than 100,000 organizations keep data safe and businesses resilient and moving forward. Today, Commvault offers the only cyber resilience platform that combines the best data security and rapid recovery at enterprise scale across any workload, anywhere—at the lowest TCO.

### **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 promote 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.

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



# Innovation at Commvault

2024 CyberSecurity

Cleanroom Recovery -

for Excellence

Breakthrough Awards

2024 NJBIA and New Jersev

**Business Magazine Awards** 

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.

#### 2024 CRN Storage 100

40 Coolest Data Recovery/ Observability/Resiliency Vendors

2024 Cloud Security Awards Commvault – Finalist: Best Cybersecurity Solution

Global Infosec Awards 2024 Trailblazing Cyber Resilience

2024 CRN Women of the Channel

2024 Channel Marketing Leaders Kristin Heisner, Senior Director, Global Partner Marketing

#### New Jersey League of Conservation Voters 10th Annual Gala

Commvault and Martha Delehanty, Chief HR Officer - Sustainability Award

#### 2024 SaaS Awards

Commvault Cloud - Shortlist: Best Security Innovation in a SaaS Product (B2B – Enterprise) Zinnov Awards 2024 Commvault - Excellence in

#### 2024 CRN Tech Innovators Awards

Commvault Cloud, powered by Metallic Al - Finalist: Data Protection, Management and Resiliency

#### 2024 CRN Top 100 Executives

2024 Women's Choice Award

Top 25 Technology Disruptors

Best Companies to Work for

2024 SC Awards

Executive of the Year

Women, Inclusion & Millennials

Cleanroom Recovery - Winner:

Ransomware Recovery Solution

Security Awards 2024

Best Business Continuity/Disaster/

Tahawultech CISO 50 & Future

Best Cyber Resilience Leader of the Year

2024 CRN Women of the Year

Kristin Heisner – Finalist: Marketing

2024 CRN Products of the Year Commvault Cloud powered by Metallic Al - Finalist: Data Protection, Management and Resiliency

#### 2024 InfoWorld Technology of the Year Awards

Clumio, AWS Backup as a Service - Finalist: Cloud Backup and Disaster Recovery

## 2024 HR Department of the Year Awards

2024 HR Awards for Excellence Winner: Technology, Large HR Department

2024 HR Awards for Excellence Winner: Social Responsibility

Commvault - 2024 Department of the Year

2024 Cloud Awards Commvault Cloud - Shortlist: Se

Innovation of the Year (Enterprise)

2024 CRN Channel Women on the Rise

#### Women in Tech Global Awards 2024

Vidya Shankaran, Field CTO, Emerging Technologies - Winner: CIO/CTO of the Year Award

#### 2024 Channel Marketing Association Excellence Awards

Kim Wyzykowski - Excellence List Bryan Broderick - Rising Star Award Kristin Heisner - Visionary Award

Cathy Moncayo - Visionary Award

#### 2025 CRN Cloud 100

20 Coolest Cloud Storage Companie

Great Place to Work® 2025 Commvault India COE

#### Reseller Middle East Partner Excellence Awards 2024

Best Cyber Resilience and Business Continuity Vendor of the Year

#### 2025 CRN Channel Chiefs

Alan Atkinson, Chief Partner Officer Chad Blackwell, Vice President, Americas Partner Organization

### 2025 SLEDIE Awards

Most Credtive Event Exhibit

#### 2025 CRN Channel Chiefs

Jamie Farrelly, Vice President, EMEAI Channel Sales

#### Jombay WOW Workplace Awards 2025

IT, ITeS, and GCC - Top 75

#### 2025 Cybersecurity Excellence Awards

Commvault Cloud Platform -Cloud Workload Protection

2025 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 <u>Supplier Code of Conduct</u>.

# Board Oversight

Our Board of Directors sets the tone for the culture and structure of decision-making that we strive to advance at Commvault. We value independence and accountability. Our Board of Directors consists of nine (9) members, eight (8) of whom are independent, with diverse backgrounds and skill sets, and all potential new directors are evaluated according to our <u>Board Membership Criteria</u>.

Commvault's <u>Corporate Governance Guidelines</u> 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 contributing, 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.

© 2025 Commvault

Commvault

### 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 Comp



Charles Moran Director



Allison Pickens Director



Shane Sanders Director, Chairs Audit



Arlen Shenkman Director, Chairs Ops





GOVERNANCE

# 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 below 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 <u>Commvault Corporate</u> <u>Governance Center</u>.

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

### Our Board of Directors are stronger with:

01	02	
<u>Compensation</u> <u>Committee</u>	Operating Committee	
03	04	
Audit Committee	Disclosure Committee	
05		
Nominations and Governance 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 all applicable laws and with the highest standards of professional and ethical behavior for all employees, contractors, suppliers, 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 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 sign-off on 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. All employees and third parties are able to report instances of unethical behavior, including bribery, anonymously and confidentially at all times.

The <u>platform</u> 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 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 <u>Human Rights Policy</u> is clear in setting our expectations and applies to all Commvault employees, contractors, and associated company representatives.

Our Human Rights Policy builds from our <u>Code of Ethics</u>, which addresses elements such as our commitment to anti bribery, anti corruption, sanctions compliance, 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 suppliers, are encouraged to collaborate with us to adopt and maintain a policy similar in nature to our policy, in line with our newly enhanced Supplier Code of Conduct (see next page).

### **Conventions and Principles**

Our commitment to respecting and advancing human rights is aligned with 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 <u>Supplier Code of Conduct</u> to highlight the guiding principles which are fundamental to our business practices. In FY 2025, we enhanced our policy again to facilitate supply chain monitoring and information sharing. Our Supplier Code of Conduct applies to all of our suppliers and we encourage them to integrate these principles across their business. Commvault employees are trained in our Code of Ethics and 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 the Supplier Code, a contractual obligation, law, or regulation. Anonymous and confidential reports, by employees, stakeholders, or any third parties may also be submitted to <u>Commvault's Ethics and Integrity Reporting platform</u> 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
- Reporting Procedures and Retaliation Protection



#### ENVIRONMENTAL SUSTAINABILITY

Climate risk and environmental sustainability continue to be areas of great importance when considering business strategy, operational continuity, 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, GHG emissions, waste volume, water usage, impacts on biodiversity, and responsible resource development. Suppliers should be able to demonstrate how they follow best practices toward developing and implementing programs that reduce or offset negative impacts to the environment.

Understanding how our operations affect the surrounding environment reduces the likelihood that an unprecedented climate event or dwindling natural resource supply will take any organization in our supply chain by surprise, avoiding unnecessary supply chain disruptions.



#### DATA PRIVACY AND SECURITY

As valued partners in achieving our business goals, suppliers must implement privacy and security controls for data protection.

Our Privacy Policy extends to our suppliers. Suppliers must implement their own privacy policies to govern their use of personal data. 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. Suppliers holding sensitive data are required to maintain a third party attested security certification (e.g., ISO 27001).



© 2025 Commvault

# Cybersecurity and Data Privacy

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

### **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 and data privacy trainings upon joining the company and annually thereafter. 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:

90%

of newly hired employees completed Security Awareness training.

100%

of current employees completed Security Awareness training.

# Cybersecurity

### Training

Led by the Chief Security Officer (CSO), Commvault's cybersecurity program leverages the National Institute of Standards and Technology (NIST) Cybersecurity Framework, with the primary objective of securing systems and data from cyber threats. We partner with leading cybersecurity partners and adopt industry best practices and security technologies. We have established a Security Incident Response Plan (SIRP) which outlines our processes for incident preparation, detection, analysis, containment, eradication, and post-incident analysis.

In addition to the SIRP, we maintain 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. We partner with third party service providers to enhance our monitoring and response capabilities, facilitate readiness activities including tabletop exercises, and perform various methods of cybersecurity penetration testing. All employees are required to undergo annual security awareness training on current and potential cybersecurity threats and report suspicious activity. We also assess third-party service provider cybersecurity controls and include security and privacy terms in contracts as appropriate.

## Leadership

Commvault's Board of Directors provides oversight of Commvault's enterprise risk management strategy, including cybersecurity. The Audit Committee receives quarterly briefings on the security program from the CSO and briefings on the ERMC and ESC from the Chief Trust Officer. 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 CSO.

### Accountability

Commvault's executive management team is responsible for Commvault's cybersecurity risk management strategy, operational decision-making, and incident preparedness and response. Management is responsible for cybersecurity risks being properly communicated through the ERMC, the ESC, and regular reporting to the Audit Committee and Board. The ERMC, comprised of the Chief Trust Officer, Chief Financial Officer, Chief Accounting Officer, Chief Information Officer, CSO, and Senior Vice President 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 ESC, comprised of the Chief Executive Officer, CSO, Chief Financial Officer, Chief Information Officer, Chief Product Officer, Chief Trust Officer and Deputy General Counsel is responsible for the significant operational decisions in the event of an active cybersecurity incident. The ESC meets as needed, with the Audit Committee Chair as an optional attendee, to provide counsel and foster productive communication between Management and the Board.

• NIST 800-53 CP9 & CP10

### Compliance

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

- ISO/IEC 27001
- FedRAMP High Authorized CJIS
- SOC 2 Type II
  IRAP
- FIPS 140-2 HIPAA
- PCI DSS







#### COMMVAULT FY25 SUSTAINABILITY REPORT

# Data Privacy

### Leadership

The Audit Committee 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 Director of Compliance. Commvault has 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 <u>Privacy Policy</u> details how we manage privacy across all data processing stages for our products, services, and operations, for 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: (i) demonstrate robust privacy measures before sharing personal data, (ii) use personal data only for approved purposes, and (iii) protect personal data from unauthorized access through effective security practices.

### Compliance

Using the European Union's General Data Protection Regulation (GDPR) as the gold standard 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.



© 2025 Commvault

# 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 resilience for all. The world is interconnected, and we all work together to make it safer.

Our <u>Cyber Resilience Council</u> 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 resilience 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 <sup>Member</sup>



Nancy Wang Member



Shawn Henry <sup>Member</sup>



Roland Cloutier Member



GOVERNANCE

# Responsible Artificial Intelligence

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

Al presents the promise of transforming our methods of collaboration and communication, our cognitive processes, and our approaches to creativity and progress. However, as with any profound technological shift, we must navigate both its promising potential and inherent 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 to enhance cyber resilience against AI-driven threats, we are mindful to do so responsibly. We leverage AI ethically, transparently, equitably, and safely. Our <u>Principles for</u> <u>Responsible Artificial Intelligence</u> are our first step in this collaborative undertaking.



# Our AI Principles



#### TRANSPARENCY AND EXPLAINABILITY

Al 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 our use of Al and Al generated decisions.



#### **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 based on race, gender, age, or any other protected characteristic.



#### DATA PRIVACY AND SECURITY

We embed privacy and security by design principles into our Product Development Life Cycle (PDLC) and adhere to rigorous data protection measures for the highest standards of data security throughout the Al lifecycle.



#### RELIABILITY, SAFETY, AND CONTROL

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



#### HUMAN-CENTERED APPROACH

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



#### ETHICAL COLLABORATIONS

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

# 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 attract new talent and advance a strong sense of belonging commensurate with the wide variety of communities we serve helps us differentiate ourselves from the competition in an industry that competes fiercely for top talent.



# Our People

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

## **Global Workforce Distribution**

As of FY 2025, our workforce is people strong and stretches across the globe, including: 1,437 people in the 1,271 APJ region (International East) people in the Americas 554 (North and people in the South America) EMEA region (International West)



# **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 customized to emergent developments.

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

₿83%

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

### Net Promoter Score

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

**84%** 

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 seventh consecutive year in FY 2025 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.

### Learning and Development Team

Our commitment is led 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 their professional and technical potential. Our dedicated Learning and Development Team provides the focus and resources we need to deliver on this commitment.

Throughout FY2025, our employees, partners and customers participated in over 1,400 training programs, totaling more than 260,000



# 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.

#### COMPLIANCE AND ETHICS

 $\langle \checkmark$ 

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.

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

#### **TECHNICAL TRAINING**

Our technical support training is designed equip employees 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 that reinforce key technical and soft skills, keeping everyone up to date. Our support team is well-prepared to tackle any challenge.

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.

# Workplace Health and Safety

# S

### 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.

# ā tā

### Compliance

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

# 

## Safety

For FY 2025, 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 <u>Compensation Philosophy</u> guides us in compensating our employees fairly and equitably.

- **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 <u>Human Rights Policy</u>.
- Workforce Restructuring & Severance: In the unfortunate event that workforce restructuring should be required, our approach to employee termination and severance is guided by our internal policies.



# Employee Benefits

For a comprehensive understanding of the various benefits we offer our employees, please visit the <u>Commvault Benefits Resource</u>. We are proud of the holistic nature of the benefits we offer and are engaged with employees to take care that 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



# 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 <u>Code of Ethics</u>. 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.





# 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 <u>Commvault Benefits Resource</u>.

Values and Engagement: Insight into our values and community
 engagement can be found on <u>our website</u>.

Additional Requests or Interest: Readers are encouraged to contact Commvault's <u>Global Head of Total Rewards</u>.



03

# Environment

Our approach to sustainability is rooted in our Environmental Management Policy and integrated with our enterprise risk management program. This helps us identify risks that changing environmental systems may present to our business operations and communities. With an eye to the built environment, water and natural resource dependency, and the growing need for climate resiliency, we remain acutely aware of the larger systems we are part of and are committed to sustainability.



# 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; and
- To enhance the resiliency of our operations to adapt to ever-evolving environmental risk factors.

As environmental management at Commvault is guided by our sustainability 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 <u>Environmental Management Policy</u> and operationalized in close collaboration with the Facilities and Finance teams.









#### COMMVAULT FY25 SUSTAINABILITY REPORT

ENVIRONMENT

### **Built Environment**

Commvault headquarters and primary data center location at Tinton Falls, New Jersey, U.S. 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 suppliers to properly recycle and dispose of IT equipment.

Total Waste to Landfill: 123.4 metric tons\*

Total Waste Diverted from Landfill: 58.2 metric tons\*

#### Total E-Waste Recycled: 9.8 metric tons\*

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 have brought a focus to the importance of water security. As a cyber resiliency company, we do not consume much water beyond regular office functions, however our data centers are dependent on access to water for cooling purposes, as discussed below.

# Biodiversity

The Taskforce on Nature-Related Financial Disclosures (TNFD) that were released this past year are 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. As the disclosure guidelines are refined and codified, we are working toward a more detailed understanding of our nature related dependencies, impacts, risks, and opportunities.






#### COMMVAULT FY25 SUSTAINABILITY REPORT

ENVIRONMENT

### Suppliers

Our <u>Supplier Code of Conduct</u> 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 our solutions. Data centers require significant cooling resources and favor water cooling technologies to assist in reducing the demand for electricity and additional GHG emission by extension.

Our primary data center is located in our LEED-certified facility in Tinton Falls. 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 availability or accessibility develop.



# Climate Action and Resiliency

FY 2024 was our inaugural GHG emissions assessment, which we continued in FY 2025. GHG emissions are contributing to climate change, which is developing as a prominent risk factor and risk multiplier for all businesses and society. 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. It can be difficult to predict when and where such events 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 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 in subnational and national jurisdictions throughout the world. Our carefully developed climate action program can assist Commvault in remaining compliant across this varied interjurisdictional regulatory landscape more efficiently and at lower cost.





COMMVAULT FY25 SUSTAINABILITY REPORT

# GHG Emissions Profile

Climate action and resilience are advanced on a strong foundation of data. Our annual emissions assessment in FY 2025 continued the work of our inaugural assessment in FY 2024 and proceeded according to:

- 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.

We employed the Organizational Operational Control approach to determine the parameters of Commvault's emissions inventory for FY 2025. 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

SCOPE1 GHG EMISSIONS

638 mt CO<sub>2e</sub>

SCOPE 2 GHG EMISSIONS

8,942 mt CO<sub>2e</sub>

SCOPE 3 GHG EMISSIONS\*

6,327 mt CO<sub>2e</sub>

**GHG Emissions Intensity** 

9.6 CO<sub>2e</sub> /\$MM revenue

### GHG Emissions From Data Centers

Owned, leased, or contracted

2,020 mt CO<sub>2e</sub>

\*Scope 3 assessment is a work-in-progress as data collection across suppliers, vendors, and associated stakeholders continues to be improved. For FY 2025, the Scope 3 assessment includes business travel, employee commuting, and key vendors.



# Climate-Related Financial Disclosures

Climate action and resiliency are increasingly integrated into how we think at Commvault. Beyond exploring ways to reduce our GHG emissions in all that we do, we are committed to mitigating and adapting to risks and optimizing opportunities related to climate change and related developments. In FY 2025, we expanded our climate action principles, first reported in FY 2024, into a climaterelated risk identification and management framework. Our approach is based on the final recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), which are now incorporated and reflected within the IFRS Sustainability Disclosure Standards.

### Governance

Commvault's sustainability program is the first line in identifying, reporting, and managing climate-related risks and opportunities. Our sustainability program is developed with knowledgeable leadership and integrates with individuals and teams throughout the organization so we all are operating with a comprehensive understanding of impact.

Developments within the sustainability program are reported regularly to the ERMC, which reports directly to the Nominations and Governance Committee of the Board of Directors. The Board retains ultimate responsibility for overseeing the management strategy for Commvault's climate-related risks and opportunities.

### Strategy

Continuing from FY 2024 into FY 2025, Commvault has identified two climate-related risk factors and one climate-related opportunity which are sufficiently material so as to be integrated into our longer-term strategy development.

#### **Opportunities:**

1. Growing customer interest in our solutions with lower GHG emissions intensities: Customers are increasingly interested in accessing solutions with lower GHG emissions intensities to align with their own climate action strategies and remain compliant with emergent regulations. Commvault's recirculated water-cooled data centers have helped establish our solutions in this space and we remain committed to monitoring GHG emissions intensities of new solutions as we continue to develop and grow.

#### Risks:

- 1. Business disruptions attributable to climate-related weather events: Data runs on electricity, and increasingly severe and common floods, wildfires, and acute storms associated with climate change can threaten the stability of electric grids and transmission. Commvault operates multiple critical redundancies so acute disruptions to electricity supply do not become disruptions to business operations. For planning purposes, we consider this to be a physical risk.
- 2. Increasing costs of electricity attributable to climate action and regulatory responses: In an era of net-zero energy transition in response to accelerating climate change, regional electricity infrastructure is always evolving. Commvault's longer-term strategy development benefits from our ability to plan around appropriate and stable electricity costs. Our teams are mindful of the energy efficiency of our operations and work closely with our utility partners to secure our development trajectories. For planning purposes, we consider this to be a transitional risk.

### **Risk Management**

Commvault's sustainability program has developed a Dynamic Materiality Assessment process (see page 9) allowing Commvault to better understand the impact of the landscape we operate in, including an integrated understanding of our infrastructure and business operations, sales, and supply chain dynamics. By overlaying these insights with the climate change scenario modeling provided by the Intergovernmental Panel on Climate Change (IPCC), our sustainability program can identify and monitor climate-related risks and opportunities and communicate these to the ERMC.

### Metrics and Targets

The climate-related risks Commvault faces are predominantly associated with our electricity use and provisioning. Our teams monitor our energy use and are committed to enhancing efficiency and resiliency. Energy use metrics are provided in the SASB Index, as appended. Additionally, Commvault is committed to assessing and understanding the organization's GHG emissions profile and to collaborating with value chain partners to continue enhancing the accuracy and comprehensiveness of our GHG emissions assessments. Having disclosed our inaugural GHG emissions assessment in FY 2024, and continued to refine our assessment process in FY 2025, we are now working toward establishing meaningful and actionable emissions reduction targets which are intended to be disclosed through the CDP platform when appropriate.



# Products and Services

Our commitment to improve our climate action and cyber resilience also extends to our products and services that aim to help our customers do the same. Throughout FY 2025, 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 products minimize the amount of data produced and maximize its usage, including:

- 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.

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 Sustainability Programs**

This year, we took the opportunity to evaluate our efforts and successes, measure that success, and re-shape how we communicate. What hasn't changed is our commitment to trust, a foundation that continues to push us forward today.

With the publication of our FY 2025 Sustainability 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 2026 and beyond.

### **Contact Us**



#### ESG TEAM

Aakanksha Kashyap ESG Specialist esg@commvault.com Saadia Ali, Esa., MBA Corporate Counsel saadiaali@commvault.com

#### <u>((</u>\$)) INVESTOR RELATIONS

Michael Melnyk, CFA Head of Investor Relations investorrelations@commvault.com

#### .... REPORT AN ISSUE

Grievances may be reported to the Compliance Team at compliance@commvault.com, or alternatively through Commvault's Ethics and Integrity Reporting hotline.

commvault@integritycounts.ca | 1-866-921-6714 | Website

# Contact Us



# Disclaimer

# Commvault © 2028

#### COMMVAULT FY25 SUSTAINABILITY REPORT

### **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 2025** (April 1, 2024 - March 31, 2025).

# Appendix

Our sustainability 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 sustainability 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 sustainability strategy in 2021 and look forward to continuing this momentum as our sustainability 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	2025
(1) Number of licenses or subscriptions, (2) percentage cloud-based	Quantitative	Number, Percentage (%)	TC-SI-000.A	(1) <b>18,258</b> customers (2) <b>51% subscription</b> (SaaS and term software customers)
(1) Data processing capacity, (2) percentage outsourced	Quantitative	See footnote <sup>1</sup>	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) <b>10,760</b> PB stored (2) <b>0%</b>

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.

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) 84,969 GJ (2) 100% (3) 0%
	(1) Total water withdrawn <sup>*</sup> (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	TC-SI-130a.2	<ul> <li>(1) 6,268 cubic meters (34.7% in region of high or extremely high baseline water stress)</li> <li>(2) 2,118 cubic meters (0% in region of high or extremely high baseline water stress)</li> </ul>
	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 opt-out 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 <u>Privacy Policy</u> .



ТОРІС	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 <u>Privacy Policy</u> .
	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 <u>Commvault Code of Ethics</u> .
	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.



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	Commvault, being a publicly traded company, and doing business both domestically and internationally, must comply with laws and regulations requiring the public discloser of security breaches. Commvault will comply with breach notification laws, disclosing any incidents in a way to comply with those laws. Commvault also has negotiated contractual obligations with certain customers, requiring specific disclosure requirements, and confidentiality agreements in the event of a breach.
	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	(1) Foreign nationals – <b>8.35%</b> (2) Located offshore – <b>62.7%</b> For more information, please see the <u>Global Workforce Distribution</u> section of this report.
	Employee satisfaction survey process	Quantitative	TC-SI-330a.2	Average of 74% response rate to monthly employee satisfaction survey process



TOPIC	ACCOUNTING METRIC	CATEGORY	CODE	RESPONSE/REPORT LOCATION
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 2025 Form 10-K, and within our <b>2024 Proxy Statement</b> .



commvault.com | 888.746.3849 | compliance@commvault.com





© 2025 Commvault. See here for information about our trademarks and patents.