

# Environmental Management Policy

## COMMITMENT

Commvault Systems, Inc. and its affiliates and subsidiaries (the "Company") has established this Environmental Management Policy (the "Policy") to formalize its commitment to appropriate environmental management objectives in its global business operations and supply chain.

## APPROACH

The Company understands that developments in environmental systems and how the Company engages therein can represent both risks and opportunities. Management of such risks and opportunities ("Environmental Management") is accomplished within the Company's Environmental, Social, and Governance ("ESG") program and integrated with the Company's enterprise risk management strategy.

## RISKS

The Company is committed to identifying, mitigating, and adapting to risks developing from changes in environmental systems, including to social and regulatory responses to such changes. Risks may include, but not be limited to:

- Access to critical resources;
- Variability in resource availability;
- Variability in resource costs;
- Acute impacts to infrastructure owned or operated by the Company, or upon which the Company is dependent;
- Increased compliance costs with emergent regulatory mandates;
- Changes in unsafe working conditions; and
- Impairment of goodwill.

## OPPORTUNITIES

The Company's strategic objectives for Environmental Management include:

**Regulatory Compliance.** Compliance with applicable legal and regulatory requirements, including those promulgated by the Environmental Protection Agency ("EPA"), the Occupational Health and Safety Administration ("OSHA").

**Alignment with Sustainability Standards.** Alignment to widely recognized environmental sustainability standards, such as Sustainability Accounting Standards Board ("SASB") for Software and IT Services, Global Reporting Initiative (GRI), Task Force on Climate-Related Financial Disclosures (TCFD) and stakeholder ESG-related interests.

**Program Improvement.** Continual improvement of Environmental Management and ESG program performance through periodic risk reviews.

**Employee Training.** Provision of training and resources to employees on this Policy and related Environmental Management processes.

**Supply Chain Monitoring.** Monitoring of the supply chain for adoption of appropriate Environmental Management policy and processes.

## KEY FOCUS AREAS

This Policy addresses Environmental Management practices in a comprehensive manner, with the following key focus areas identified as material to the Company's operations. The Company remains focused on these areas, but not exclusively:

**Climate Action & Resiliency.** The Company is committed to understanding and managing its impacts toward climate change as well as enhancing the Company's resiliency to climate change-induced risks. The Company's approach to climate action and resiliency is guided by the following principles:

- The Company recognizes the Intergovernmental Panel on Climate Change (IPCC) as a meaningful source of climate change resource and scenario modelling;
- The Company favors actual emissions reductions over emissions offsets or credits;
- The Company is committed to transparently reporting its greenhouse gas (GHG) emissions aligned with widely recognized reporting frameworks and applicable regulatory mandates;
- The Company is committed to developing climate action commitments supported by clear GHG emissions reduction targets across an actionable timeline, including interim goals and objectives, as applicable.
- The Company is committed to collaborative engagement with suppliers, partners, and stakeholders to enhance community resiliency.

**Water Security.** The Company understands that data centers, whether owned or engaged by the company, may divert substantial volumes of water for cooling purposes. The Company is committed to understanding the water stress indicators of the regions wherein it operates or benefits from data centers.

**Biodiversity.** The Company understands that all companies have nature-based dependencies, impacts, risks, and opportunities and is committed to developing an understanding of these as they relate to company operations and supply chain dynamics.

**Responsible Resource Use.** The Company is committed to the efficient use of resources and the responsible development and processing of resources across its operations. The Company encourages suppliers to adopt an equivalent Policy and the Company reserves the right to monitor the supply chain for such.

## ADMINISTRATION

**Ownership.** This Policy is owned by the ESG Team and reviewed at least annually. The Company reserves the right to change this Policy at any time and publishes the current version to the Company's Intranet. General inquiries regarding use of this Policy may be directed to [esg@commvault.com](mailto:esg@commvault.com). Exceptions to this Policy must be approved by the Company's Chief Trust Officer.

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

REVISION HISTORY

Revision	Date	Author(s)	Approval	Change
V1.0	Mar 2024	L. Flynnne	Legal	Initial version
V2.0	Jul 2024	L. Flynnne	Board	Annual review
V2.1	Jun 2025	A. Kashyap and S. Vardhan	Board	Annual review