

# Respect at Work Policy

## PURPOSE

Commvault Systems, Inc. and its affiliates and subsidiaries (the “Company”) strives to create and maintain an inclusive work environment where people are treated with dignity and respect and feel a sense of belonging. In compliance with applicable federal, state, and local laws and regulations, the Company has established the Respect at Work Policy (the “Policy”) to prevent, detect, and correct discrimination and harassment in the work environment.

## SCOPE

**Personnel.** All employees, contractors, representatives, interns, and temporary workers of the Company are expected to comply with this Policy and take appropriate measures to prevent prohibited conduct and confirm that such conduct is reported and does not persist.

**Managers.** Managers have a critical role to play in creating a safe work environment. Managers must proactively foster a culture where Personnel feel comfortable reporting issues without fear of retaliation. Managers who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to Human Resources, are in violation of this Policy and subject to disciplinary actions, including termination.

**Work Environment.** The work environment includes any location in which Company business is being conducted (whether during or after normal business hours, and whether at a Company owned or leased property or offsite at another premise), in-person and virtual interactions, and Company-affiliated events and activities.

## PROHIBITED CONDUCT

**Discrimination.** The Company prohibits discrimination in the provision of employment opportunities, benefits or privileges, work conditions, or performance evaluations or standards; where the basis of that discriminatory treatment is, in whole or in part, due to an individual’s race, ethnicity, color, national origin, sex, gender, gender identity or expression, sexual orientation, marital status, registered domestic partner status, citizenship status, religion, age, physical or mental disability, medical condition, , pregnancy and related medical conditions, genetic characteristics and information, ancestry, caste, reproductive health decisions, military and veteran status, or any other legally protected category.

**Harassment.** Harassment of any kind, including sexual harassment, is prohibited. Harassment is verbal, visual or physical conduct that denigrates or shows hostility or aversion toward an individual. Harassment includes, but is not limited to; epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; or written or graphic materials that are placed in the work environment.

**Sexual Harassment.** Sexual harassment occurs when unwelcomed sexual advances, requests, and other verbal or physical conduct of a sexual nature are used to make employment decisions or otherwise create an intimidating, hostile, or offensive work environment.

The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this Policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks, and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal sexual harassment includes the distribution, display, or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, emails, photos, text messages, or internet postings; other forms of communication that are sexual in nature and offensive.
- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault.

**Consensual Employee Relationships.** The Company strongly encourages Personnel to disclose relationships to the Human Resources Department, particularly those between managerial and subordinate employees, so that appropriate measures can be taken to assure mutual consent is present and avoid potential adverse effects in the work environment.

**Retaliation.** Retaliation against anyone for cooperating with or participating in an investigation involving possible violations of the law or this Policy is prohibited. Retaliation includes, but is not limited to; termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit.

## REPORTING PROCEDURES

**Speak Up.** The Company strongly encourages Personnel and their managers to immediately report actual or suspected instances of misconduct, including misconduct directed at others and misconduct committed by someone not employed by the Company.

**Reports.** Confidential reports can be made to the Human Resources leadership team, Chief People Officer and Chief Trust Officer by emailing [HumanResourcesComplaints@commvault.com](mailto:HumanResourcesComplaints@commvault.com). Individuals may also submit confidential or anonymous reports to the Company's Ethics and Integrity Reporting Platform by emailing [commvault@integritycounts.ca](mailto:commvault@integritycounts.ca), by visiting <https://integritycounts.ca/org/commvault>, or by calling the regionally-appropriate hotline number. More information on the Ethics and Integrity Reporting Platform can be found in the Ethics and Integrity Reporting Policy.

**Investigation.** After a report is received, or the Company otherwise becomes aware of a possible violation of this Policy, a fair, timely, thorough, and objective investigation is undertaken so that the Company can reach reasonable conclusions based on all available information. Individuals named in the reported misconduct are not involved in leading the investigation of the matter. All parties involved in the report are expected to cooperate in the investigation and the Company may also speak with witnesses to the misconduct, if available.

**Prevention and Outcome.** The Company determines a reasonable course of action to prevent misconduct from continuing by balancing the rights of the parties involved. At the conclusion of the investigation, all parties are advised as to the outcome of the investigation and next steps.

DISCIPLINARY PROCEDURES

**Disciplinary Actions.** At the conclusion of an investigation where misconduct is confirmed to have occurred, the Company takes immediate and appropriate disciplinary actions, including but not limited to sensitivity training, referral to outside counseling, warnings, reprimands, withholding of a promotion or pay increase, reassignment, suspension without pay, compensation adjustments, or termination.

**False Claims.** If the investigation determines that a report is intentionally false and malicious, disciplinary action will be taken against the complaining Personnel.

**Non-Retaliation.** Anyone who retaliates against a person for participating in an investigation will be subject to disciplinary action, up to and including termination.

**Good Faith Claims.** Reports made in good faith, even if they are erroneous or cannot be substantiated, will not be grounds for disciplinary action.

TRAINING

The Company requires its employees to take the Respect at Work training upon hire and annually thereafter. Employees with specialized requirements based on their location or role are expected to fulfill their training obligations in accordance with applicable law.

ADMINISTRATION

**Ownership.** This Policy is owned by the Corporate Trust 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.

**Inquiry.** General inquiries regarding use of this Policy may be directed to [compliance@commvault.com](mailto:compliance@commvault.com).

REVISION HISTORY

Revision	Date	Author(s)	Approval	Change
V1.0	July 2024	L. Flynne	Compliance	Annual Review
V1.1	June 2025	S. Vardhan and S. Ali	Corporate Trust	Annual Review