

Human Rights Policy

PURPOSE

Commvault Systems, Inc. and its affiliates and subsidiaries (the “Company”) has adopted this Human Rights Policy (this “Policy”) to articulate our commitment to the protection and preservation of human rights globally and in the work environment. This Policy sets expectations for conduct and accountability in alignment with the Company’s values and legal obligations.

SCOPE

The Policy applies to employees, directors, officers, contractors, suppliers and representatives of the Company in every country, state, and territory where the Company operates (collectively, “Personnel”).

APPROACH

The Company’s commitment to human rights is embedded in our corporate culture and values, as reflected in the Code of Ethics, Supplier Code of Conduct, and other Company policies. We promote these principles through our actions toward Personnel and the communities and countries in which we live and work. The Policy is guided by internationally recognized human rights standards, including but not limited to:

- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Universal Declaration of Human Rights
- The Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises
- The International Labour Organization’s Conventions.

PRINCIPLES

Community & Belonging. The Company is committed to fostering a workplace culture grounded in equal opportunity, respect, and belonging. The Company prohibits all forms of discrimination, harassment, and retaliation and upholds the protected rights of all individuals.

Recognizing outcome disparities and wanting access to the largest possible talent pool, the Company promotes pay equity in alignment with international frameworks such as the United Nations’ Women’s Empowerment Principles and evolving global disclosure regulations including the EU Pay Transparency Directive and Corporate Sustainability Reporting Directive.

The Company supports the rights of underrepresented and marginalized groups, including indigenous peoples in accordance with International Labour Organization Convention No. 169 and other relevant human rights standards.

Personal Privacy. The Company is committed to ensuring that the data entrusted to us by our Personnel, customers, and partners is handled securely, ethically, and in compliance with applicable data protection laws. The Company's privacy program is built on the principles of transparency, accountability, and respect for individual rights.

The Company's Privacy Policy and related governance frameworks provide transparency into our data collection, use, retention, and transfer practices. We honor individuals' rights regarding their personal data, including the right to access, correct, delete, or restrict processing, where applicable.

Together with our Information Security Policy and technological safeguards, we proactively address the complex and evolving privacy landscape to protect the trust placed in us.

Safety, Health, and Wellness. The safety, health, and overall wellness of the Personnel and their families is a top priority. We operate in accordance with applicable occupational health and safety laws and regulations, and we are committed to providing a safe, respectful, and inclusive work environment for all, whether onsite, remote, or hybrid.

In support of our commitment to holistic wellbeing, we offer our employees a comprehensive set of benefits to promote physical and mental health, work-life balance, financial security, and flexibility. Additional resources are made available to employees through webinars, newsletters, blog posts, and employee resource groups.

Forced Labor, Child Labor, and Human Trafficking. The Company strictly prohibits the use of forced labor, child labor, human trafficking, and all forms of modern slavery in its operations and extended supply chain. The Company complies with all applicable laws and regulations against these activities including but not limited to the UK Modern Slavery Act, the Australian Modern Slavery Act, the US Uyghur Forced Labor Prevention Act, Canada's Modern Slavery Act 2024, and relevant provisions of the EU Corporate Sustainability Due Diligence Directive, and the German Supply Chain Due Diligence Act.

The Company continuously improves its understanding to identify, prevent, and mitigate risks of modern slavery through due diligence practices, supplier assessments, and internal training.

Failure by Personnel to meet Company standards regarding slavery and trafficking results in immediate termination of contracts or employment and remediation.

Work Hours and Wages. The Company complies with all applicable labor, wage, and working time laws and regulations at the local, national, and international level. We compensate our Personnel fairly and competitively, taking into account industry benchmarks and local market conditions. The Company honors all legal requirements regarding working hours, overtime pay, time off, and is firmly committed to providing equal payment for equal work.

Freedom of Association. The Company understands the importance of fair representation in employer-employee relationships and is committed to honoring its Personnel's entitlements to freedom of association, collective bargaining, and other applicable rights. As provided by law, Personnel are free to form or join groups which aim to communicate and protect their best interests. A culture of open communication regarding working conditions without fear of retaliation is fundamental to our collective success.

TRAINING

The Company requires Personnel to complete training that covers the principles outlined in this Policy, as reflected in the Company's Code of Ethics. Personnel with specialized requirements based on their location may be expected to fulfill their training obligations in accordance with applicable law. Personnel with specialized requirements based on their role, such as supply chain management, may be required to complete relevant training as appropriate.

APPLICABILITY TO THIRD PARTIES

The Company strongly encourages its customers, business partners, contractors, vendors, and suppliers to adopt and maintain a human rights policy of similar nature to this Policy, to encourage the continued protection and preservation of human rights around the world.

ADMINISTRATION

Ownership. This Policy is owned by the Corporate Trust Team and Human Resources Team and reviewed at least annually. The Nominations and Governance Committee of the Company's Board of Directors provides oversight of all sustainability initiatives, including this Policy. The Company reserves the right to change this Policy at any time and publishes the current version to the Company's intranet. General inquiries regarding use of this Policy may be directed to compliance@commvault.com. Exceptions to this Policy must be approved by the Company's Chief Trust Officer.

Effectiveness and Public Reporting: The Corporate Trust Team and Human Resources Team evaluate the implementation and outcomes of this Policy annually. The Company's alignment to Sustainability Accounting Standards Board Standards for Software and IT Services provides a standardized set of reporting metrics for material sustainability initiatives. Related achievements and program improvements are reported publicly in the Company's Sustainability Report and the annual proxy statement.

Reporting & Enforcement. Personnel may report potential or actual violations of this Policy to 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. 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.