

Human Rights Policy

COMMITMENT

Commvault Systems, Inc. (“Commvault” or the “Company”) has adopted a Human Rights Policy (the “Policy”) to demonstrate our commitment to the protection and preservation of human rights globally and in the work environment. The Policy applies to employees, contractors, and representatives of the Company at any location in which Company business is being conducted.

APPROACH

Commvault’s commitment to human rights is embedded in our culture and values; as reflected in the Code of Ethics, Company policies, and actions toward employees, contractors, representatives, business partners, suppliers, and the communities and countries in which we live and work. The Policy is informed by the fundamental principles of human rights, as enumerated by recognized public conventions, 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, and the International Labor Organization’s Conventions.

PRINCIPLES

Diversity, Equity, and Inclusion. We are committed to fostering a culture of equal opportunity and prohibit discrimination, harassment, and retaliation of any kind. With Diversity, Equity, and Inclusion (DE&I) as core tenets of our business, we currently maintain several Employee Resource Groups (“ERGs”) to drive DE&I initiatives. We aim to promote diversity of gender, race, sexual orientation, disability, and other factors during the hiring process, develop business practices that promote gender equity with consideration of the United Nations’ Women’s Empowerment Principles, and protect the rights of minority groups and women, including indigenous peoples in accordance with International Labor Organization Convention No. 169., among other protected classes.

Personal Privacy. We are dedicated to ensuring that the data entrusted to us by our employees and customers is secure, private, and managed responsibly. Our global privacy program honors the individual’s right to personal privacy, by providing transparency into our data management practices through our Privacy Policy and related procedures. Together with our global information security policies and technologies, we address the complex and ever-changing threat and regulatory landscapes to protect privacy.

Safety, Health, and Wellness. The safety, health, and wellness of Commvault employees and their family members is vitally important to us. We operate in accordance with applicable safety laws and procedures to ensure we provide a safe work environment for all. 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 ERGs.

Forced Labor, Child Labor, and Human Trafficking. Commvault strictly prohibits the use of forced labor, child labor, human trafficking, and all forms of modern slavery in its operations, and complies with all applicable laws and regulations against these activities. In consideration of the UK Modern Slavery Act and the Australian Modern Slavery Act, Commvault continuously improves its understanding of modern slavery risks to enhance its program. Employees, contractors, suppliers, or representatives who fail to meet Company standards regarding slavery and trafficking are subject to immediate cancellation or termination.

Work Hours and Wages. We comply with all applicable state, federal, and international labor, wage, and working hour laws and regulations. We compensate employees competitively relative to the industry and local labor market, honor all legal requirements regarding working hours, overtime pay, and time off, and are firmly committed to providing equal payment for equal work.

Freedom of Association. Commvault understands the importance of fair representation in employer-employee relationships and is committed to honoring its employees' entitlements to freedom of association, collective bargaining, and other applicable rights. As provided by law, employees 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.

REPORTING

Employees, contractors, representatives, and other parties are strongly encouraged to report any potential or actual human rights risks or concerns through the Company's grievance reporting process. Reports should be submitted to the Human Resources Department, or a confidential or anonymous submission can be made to the Company's ethics and integrity reporting hotline by emailing commvault@integritycounts.ca

TRAINING

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

APPLICABILITY TO THIRD PARTIES

Commvault 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 ensure the continued protection and preservation of human rights around the world.

ADMINISTRATION

Implementation. This Policy is developed and maintained by Commvault's Legal and Human Resources Departments. The Nominations and Governance Committee of the Company's Board of Directors provides oversight of all Environmental, Social, and Governance ("ESG") initiatives. Commvault employees, contractors and representatives are responsible for upholding the principles in this Policy during all business operations and are required to report potential or actual Human Rights issues immediately to the Human Resources Department or through the reporting hotline.

Effectiveness and Public Reporting: The Legal and Human Resources Departments evaluate the implementation and outcomes of this Policy annually. Commvault’s alignment to Sustainability Accounting Standards Board (“SASB”) Standards for Software and IT Services provides a standardized set of reporting metrics for material ESG initiatives. Related achievements and program improvements are reported publicly in the Company’s Corporate Social Responsibility Report and the Annual Proxy Statement.