

# Environmental Management Policy

## COMMITMENT

Commvault Systems, Inc. and its affiliates and subsidiaries ("Commvault" or 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

Commvault 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" or "EM") is accomplished within Commvault's Environmental, Social, and Governance ("ESG") program and integrated with Commvault's enterprise risk management strategy.

## RISKS

Commvault 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

Commvault's strategic objectives for Environmental Management include:

- Compliance with applicable legal and regulatory requirements, including those promulgated by the Environmental Protection Agency ("EPA") and Occupational Health and Safety Administration ("OSHA").
- Alignment to widely recognized environmental sustainability standards, such as Sustainability Accounting Standards Board ("SASB") for Software and IT Services, and shareholder and stakeholder ESG-related interests.
- Continual improvement of Environmental Management and ESG Program performance through periodic risk reviews.
- Provision of training and resources to employees on this Policy and related EM processes.
- Monitoring of the supply chain for adoption of appropriate EM policy and processes.

## KEY FOCUS AREAS

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

1. **Climate Action & Resiliency:** Commvault is committed to understanding and managing its impacts toward climate change as well as enhancing the Company's resiliency to climate change-induced risks. Commvault's approach to climate action and resiliency is guided by the following principles:
  - a. The Company recognizes the Intergovernmental Panel on Climate Change (IPCC) as a meaningful source of climate change resource and scenario modelling;
  - b. The Company favors actual emissions reductions over emissions offsets or credits;
  - c. The Company is committed to transparently reporting its greenhouse gas (GHG) emissions aligned with widely recognized reporting frameworks and applicable regulatory mandates;
  - d. 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.
  - e. The Company is committed to collaborative engagement with suppliers, partners, and stakeholders to enhance community resiliency.
2. **Water Security:** Commvault 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.
3. **Biodiversity:** Commvault 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.
4. **Responsible Resource Use:** Commvault 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 Commvault reserves the right to monitor the supply chain for such.

## REPORTING

In the event of a potential or actual Environmental Management issue or to report a concern, please contact the Compliance Team at [compliance@commvault.com](mailto:compliance@commvault.com). The Compliance Team will assist with reported issues that require contact with governing authorities.

## ADMINISTRATION

This Policy is administered and periodically reviewed by Commvault's ESG Team. The Company reserves the right to change this Policy at any time without notice.

## REVISION HISTORY

Revision	Date	Author(s)	Approval	Change
V1.0	3/2024	L. Flynne	Legal	Initial version
V2.0	7/2024	L. Flynne	Board	Annual approval