

COHESITY

Cohesity Supplier Code of Conduct (Global)

BACKGROUND

Cohesity, Inc. (“**Cohesity**”, including our affiliates) is committed to doing business honestly and ethically everywhere we operate. This commitment extends to our suppliers. Likewise, we expect our suppliers to act honestly, ethically, and legally in all dealings with Cohesity, and with our employees, customers, business partners, and government officials.

SCOPE

This Supplier Code of Conduct applies to Cohesity Suppliers, vendors, contractors, consultants, and third-parties, encompassing all entities and individuals directly or indirectly providing goods, services, or materials to Cohesity. All Cohesity Suppliers are required to read and comply with these standards and to ensure that the requirements are communicated, understood, and followed by their employees, agents, and any other parties involved in providing goods, services or materials to Cohesity. These standards are intended to supplement the requirements and terms outlined in your existing Cohesity supplier / vendor agreement(s). *A violation of this Supplier Code of Conduct could constitute a breach of your agreement(s) with Cohesity and may result in termination of your status as a Cohesity Supplier.*

ANTI-BRIBERY & ANTI-CORRUPTION

Cohesity has zero tolerance for bribery, kickbacks, and corruption. Suppliers must not offer, give, promise, or authorize the giving of anything of value, including but not limited to money, a favor, a fee, a job, entertainment, a gift, a loan, a rebate, a reward, a payoff, travel expenses, charitable donations, or products, to anyone to obtain any business, to improperly influence any act or decision, or to otherwise gain an improper advantage.

Suppliers must comply with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and all local anti-bribery laws (together, “Anti-corruption Laws”). Cohesity also prohibits Cohesity suppliers, or their representatives or employees, from offering or providing cash or noncash gifts, kickbacks, or entertainment to any Cohesity employee for any improper purpose, such as influencing him or her to take a course of action.

Third parties engaged by suppliers must not engage or contract with any third party regarding any Cohesity-related business that engages in, or is suspected of engaging in, bribes, kickbacks, improper payments or any other conduct that may violate Anti-corruption Laws. Suppliers may comply with this requirement by conducting appropriate risk-based diligence on any third party that the supplier may engage regarding Cohesity-related business to ensure that such third party complies with Anti-corruption Laws. All employees,

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agents, representatives, subcontractors, or other parties who have been or will be engaged by a supplier in connection with Cohesity-related business must agree to comply with ethics and compliance standards that are no less stringent than those embodied in this Supplier Code of Conduct.

FINANCIAL INTEGRITY AND ACCOUNTING

Suppliers are required to uphold the highest standards of financial integrity and transparency in all business transactions. Suppliers must maintain accurate and complete financial records related to their agreements with Cohesity, all transactions related to sales of Cohesity products and services, and all transactions or other expenditures with respect to any Cohesity-related business. Suppliers are expressly prohibited from engaging in false and/or misleading accounting practices, including but not limited to creating "slush funds" or similar improper financial practices. Such practice may also violate applicable laws, including Anti-corruption Laws. Cohesity employees and Suppliers must not engage in the creation or preparation of any misleading or inaccurate transactional documentation or the falsification of any type of transactional documentation relevant to Cohesity-related business. Suppliers should refuse any request by any Cohesity employee to create misleading, inaccurate or false documentation, including to "park funds" or misrepresent the intended use for funds. Any requests by a Cohesity employee to engage in unethical conduct should be reported to Cohesity through one of the methods specified at the end of this Supplier Code of Conduct. Business records must be maintained in accordance with record retention policies and all applicable laws and regulations, including where relevant, Sarbanes-Oxley and Internal Revenue Service requirements.

ANTI-MONEY LAUNDERING LAWS

Suppliers must become familiar with and comply with all relevant laws and regulations in the United States and in applicable local foreign jurisdictions, including United States anti-money laundering laws, import and export laws and regulations, and laws and regulations involving customs and taxation.

CONFLICTS OF INTEREST

The selection of Cohesity Suppliers is based on the quality of their services and their business integrity. Cohesity holds its employees to high ethical standards and requires them to avoid engaging in any activity that involves even the appearance of impropriety or conflict of interest. Suppliers must not ask or encourage Cohesity employees to violate the provisions of integrity at Cohesity. Suppliers must avoid situations, activities, and relationships that may result in an inappropriate conflict or the appearance of a conflict with Cohesity's interests. Suppliers must notify Cohesity if there is an actual or potential conflict of interest with Cohesity or any of its employees. While it is not possible to list every conceivable conflict of interest, a Supplier must disclose to Cohesity if the Supplier (or someone employed by the Supplier) is employed by or has a significant financial interest in Cohesity, or if the Supplier (or someone employed by the Supplier) has a family member who is employed by or has a significant financial interest in Cohesity.

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GIFTS AND BUSINESS COURTESIES

At Cohesity, we build and strengthen our business relationships with transparency and integrity. Cohesity policies prohibit asking for, requesting, or expecting gifts or hospitality in exchange for business favors. Additionally, we avoid giving lavish or frequent gifts or entertainment that could compromise objectivity or create an appearance of impropriety. All business gifts and entertainment must be infrequent and appropriate for the business relationship and culturally appropriate and may not violate laws or regulations. No gift or entertainment should be offered, given, provided, or accepted unless it:

- Is not a cash gift (including gift cards in most cases).
- Is consistent with customary business practices.
- Is not “excessive in value”
- Cannot be construed as a bribe or payoff.
- Does not involve any quid pro quo.
- Does not violate any laws or regulations.

Suppliers are also expected to conduct business with integrity and avoid any actions that could compromise objectivity, fairness, or impartiality. While recognizing the customary exchange of business courtesies, suppliers should exercise prudence in offering or accepting gifts, hospitality or favors. Suppliers are prohibited from offering or accepting gifts that could influence, or be perceived to influence, business decisions. Transparency and disclosure of any significant gifts or business courtesies must be made to Cohesity in a timely manner.

BUSINESS CONDUCT STANDARD

Cohesity is committed to working with Suppliers who demonstrate the highest ethical standards and operate according to legal requirements and accepted economic principles as well as human rights and environmental guidelines. Cohesity prioritizes sourcing from vendors that reflect the values of both Cohesity and our customers. As Cohesity continues to enhance its Environment, Social and Governance (ESG) program, our values-based procurement strategy will focus on climate and environmental protection, diversity, and corporate due diligence on human rights in global supply chains.

We are committed to equal opportunity and to fostering Diversity, Equity, Inclusion, and Belonging (DEIB). We are intentional about building a more diverse, equitable, and inclusive community within Cohesity, where everyone can thrive. This means a culture where everyone has a voice, can be their unique selves, and feels a sense of belonging. We believe that, when diversity, equity, and inclusion are sewn into the fabric of our business and talent practices, we grow our collective creativity, innovation, and personal enrichment. Everyone’s unique background, identity, and experiences are valued and appreciated. The diverse nature of Cohesians all around the world is one of our greatest

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strengths. Additionally, fostering and promoting DEIB is a key component of our ESG commitments. Our global diversity, equity, and inclusion strategies center around community building, recruiting (or attracting) and developing talent, sourcing, and supplier relationships.

SUPPLIER DIVERSITY

Consistent with our corporate values, Cohesity encourages our Suppliers to consider reasonable ways to promote diversity and inclusion in its hiring, business and supply chains in compliance with government, non-government and private industry requirements.

ENVIRONMENT LAWS

Cohesity is committed to conserving, protecting, and respecting the environment. We conduct our operations in compliance with all applicable environmental laws, regulations, and standards and expect our Suppliers to do the same. We encourage our Suppliers to have their own environmental management plan and create internal goals to reduce environmental impact.

HUMAN RIGHTS, LABOR STANDARDS, AND FAIR LABOR PRACTICES

Cohesity is committed to protecting and promoting human rights wherever we do business. Cohesity expects Suppliers to:

- Support internationally recognized human rights and treat employees fairly, with dignity and respect.
- Comply with all applicable laws and regulations regarding health and safety in the workplace, wages, and benefits.
- Work towards the eradication of human trafficking and slavery and the elimination of child labour in their operations and supply chains.

Additionally, Cohesity expects our Suppliers to support fair labor practices and to create a safe work environment that is also free from harassment and discrimination. Suppliers must also comply with all relevant slavery and human trafficking and other applicable laws in the countries in which they do business.

HEALTH AND SAFETY

At Cohesity, we prioritize the health and safety of all individuals throughout our supply chain. Suppliers are expected to establish and maintain a work environment that ensures the well-being of their employees and aligns with internationally declared human rights. This includes providing adequate training, protective equipment, and measures to prevent accidents and occupational hazards. Suppliers must regularly assess and mitigate risks associated with their operations, fostering a culture of safety awareness. Suppliers must comply with all relevant health and safety regulations, promptly record any incidents, and actively engage in continuous improvement initiatives to enhance workplace safety.

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INTELLECTUAL PROPERTY

Suppliers must respect Cohesity's intellectual property rights and the intellectual property rights of others. Suppliers must comply with all applicable agreements and U.S., local, and all other applicable laws relating to Cohesity's intellectual property rights. Suppliers may not misuse any Cohesity trademarks or copyrighted materials or improperly disclose Cohesity's confidential information or trade secrets. Suppliers also are prohibited from infringing on the intellectual property rights of any third party in the course of providing goods or services. Suppliers must notify Cohesity of any unauthorized use of Cohesity's copyrights, trademarks, trade secrets, proprietary, or confidential information by itself or a third party.

CONFIDENTIALITY

Suppliers are required to implement robust safeguards to protect Cohesity's confidential information, assets and trade secrets. Furthermore, suppliers are prohibited from engaging in any activities that could compromise the confidentiality of Cohesity's proprietary information or the proprietary information of any third party while delivering goods or services to Cohesity.

DATA PROTECTION

Suppliers must handle and disclose personal data and confidential information that they obtain in the course of their business with Cohesity, only as authorized and directed by Cohesity and as required by applicable laws and regulations. Suppliers must protect personal data and confidential information against unauthorized or unlawful use, disclosure, access, loss, alteration, damage, and destruction. Suppliers must, consistent with applicable laws and contractual obligations, notify Cohesity of any unauthorized or unlawful use, disclosure, access, loss, alteration, damage, or destruction of personal data or confidential information obtained in the course of delivering goods or services to Cohesity.

INVESTIGATIONS AND ONGOING MONITORING OF SUPPLIER'S COMPLIANCE

Suppliers must, consistent with applicable laws and contractual obligations, provide reasonable assistance to any investigation by Cohesity of a violation of this Supplier Code of Conduct or of an integrity violation by a Cohesity employee if related to the Supplier's business or applicable laws relevant to their Supplier status. Suppliers must allow Cohesity reasonable access to all documentation concerning the Supplier's compliance with this Supplier Code of Conduct.

APPROPRIATE ACTION

Where Suppliers are found to have violated the requirements set out in this Supplier Code of Conduct, Cohesity reserves the right to terminate any associated agreement or relationship.



NON-RETALIATION FOR REPORTS OF CONCERN

Cohesity expects Suppliers to have a policy and process in place for reporting of workplace concerns that comply with any local and country regulations. All grievances should be investigated in a fair and timely manner. The policy and process should be understandable and transparent and must provide protection from retaliation - for both reporters and for those participating in any related investigations.

REPORTING CONCERNS

For reporting of concerns related to the Supplier Code you should report this activity via the Cohesity EthicsLine at 1-844-989-1481 in the U.S., or via the corresponding web portal at <https://www.cohesity.ethicspoint.com>. Where permitted by law, reports through the Cohesity Ethics and Compliance Hotline or web portal can be made anonymously.