

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

VERSION 1.6
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PURPOSE

Everpure, Inc. (“Everpure”) has implemented the Anti-Bribery and Anti-Corruption (“ABAC”) Policy to ensure compliance with U.S. and international anti-bribery and anti-corruption laws and regulations around the world.

The ABAC Policy applies globally to all directors, officers, employees, and contractors of Everpure or its subsidiaries, as well as any third parties with whom we do business. This means we expect our agents, consultants, representatives, suppliers, vendors, resellers, distributors, advisors, and other business partners to comply with the principles contained in this policy. Please report all questions or concerns to the Everpure Legal Compliance team either in person or by emailing legal@purestorage.com. Reports may also be submitted anonymously by using the Everpure hotline number 1-800-461-9330 or by submitting your concern online at <https://everpure.integrityline.com/>.

WHAT YOU MUST KNOW

Everpure has zero tolerance for bribery. You are strictly prohibited from promising, offering, providing, or authorizing cash payments or anything else of value directly or indirectly to any person, including through a third party intermediary, to achieve an improper purpose related to Everpure’s business.

Everpure has zero tolerance for self-dealing. You are strictly prohibited from requesting, agreeing to receive, or accepting money or anything else of value from any person to achieve an improper purpose related to Everpure’s business. This includes soliciting kickbacks or other payments or benefits from Everpure’s partners, vendors, or customers.

Everpure maintains accurate books and records. You must comply with all of Everpure’s internal controls, especially those designed to (i) ensure accurate and complete records and financial reports, or (ii) otherwise prevent corruption, self-dealing, embezzlement, fraud, or other improper activities.

There are no exceptions, regardless of our competitors’ behavior or local practices. Failure to comply with this policy may result in disciplinary action, including termination or dismissal from employment, and you may be personally liable for civil and criminal penalties, depending on the jurisdiction in which you live.

ANTI-BRIBERY DEFINITIONS AND PROHIBITIONS

U.S. laws prohibit improper payments to domestic government officials. This broadly means promising, offering, providing, or authorizing the transfer of **money or anything of value** directly or indirectly to a government official **to achieve an improper purpose**, which can include, among other things, influencing any act or decision of the recipient in their official capacity (such as the award of a contract) or securing any improper business advantage. In addition to traditional *quid pro quo* (“this for that”) bribery, federal law also prohibits illegal gratuities, which are benefits given to a public official in relation to an official act, but without an explicit *quid pro quo* agreement. For example, a lavish gift thanking a federal official for an official act could be considered an illegal gratuity.

U.S. law also strictly prohibits U.S.-based companies from bribing foreign government officials. The central U.S. law governing foreign bribery is the Foreign Corrupt Practices Act (“FCPA”). The FCPA has a broad sweep and prohibits conduct that you may not associate with “traditional” bribery, in particular:

- **The FCPA takes a broad definition of a “foreign government official.”** Under the law, a foreign official includes elected and appointed government officials such as senators, civil servants, and government agents, but it also **includes employees of state-owned entities** such as public universities, state hospitals, public utilities, national banks, sovereign wealth funds, and any company where the government has a controlling ownership stake even if those companies compete in the marketplace with private companies. **This means that the offer of a bribe to an employee of a state-owned or state-controlled entity is no different under the law than the offer of a bribe to an elected official.** You should be mindful that in many countries, the government plays a much larger role in industry than it does in the United States, and you should not assume that a company is a private enterprise merely because its equivalent in the United States would be or because it competes in the marketplace like a private company. If you are ever in doubt, please reach out to legal@purestorage.com.
- **The FCPA likewise takes a broad definition of what can count as a “thing of value” offered as a bribe.** In addition to direct cash payments, a bribe under the FCPA can include: offering or promising employment (including internships) to friends and family of government officials; **lavish meals, travel, and entertainment;** charitable or political donations to organizations associated with a government official; support obtaining immigration visas; competitive business information; and any other benefit that could be exchanged for an official act.

In addition to the restrictions under U.S. law, almost all countries, including Australia, Canada, China (Hong Kong), Germany, Singapore, the Netherlands, and the United Kingdom, have their own anti-bribery laws. The existence of all of these laws means that there is potential for Everpure or an individual to face liability in several countries for the same single act of corruption.

GIFTS AND HOSPITALITIES FOR DOMESTIC (U.S.) OFFICIALS

Everpure’s policy prohibits providing **any** gifts, entertainment, travel, meals, or other benefits to **any** U.S. public sector customers, including without limitation federal, state, county, municipal, or other local officials and employees of any public sector entity. **You are prohibited from offering or providing any such benefits to a domestic government official either directly or indirectly through a third party** such as a partner or marketing vendor. Providing such benefits can be a violation of federal, state, and/or local laws. Everpure will not reimburse any such expenses and you could be subject to disciplinary or legal action for providing them.

Please refer to the Gifts section of our [T&E Policy](#) for further details.

If you have any questions or concerns about this policy or about whether a particular individual is a domestic official, you should email legal@purestorage.com.

GIFTS AND HOSPITALITIES FOR OTHER SCENARIOS: FOREIGN (NON-U.S.) OFFICIALS

U.S. law limits but does not prohibit U.S. companies from providing reasonable gifts and hospitalities to foreign officials as part of legitimate business promotional activities. In accordance with the law, Everpure allows you to provide gifts and other hospitalities to foreign government customers and partners, but you must take extra care that such benefits are legal, reasonable, intended as a legitimate business promotion, and in line with Everpure's commitment to business integrity. This is particularly the case when providing a benefit to a person who is responsible for making decisions in relation to Everpure's business (for example, the award of a contract).

You must consult with Everpure's Legal Compliance team (either in person, by call, or via email at legal@purestorage.com) regarding our strict guidelines around providing any benefit to employees, officials, or agents of any foreign government, political party, state-owned entity, or public international organization—whether directly or through a third party such as a marketing vendor or a partner. The Legal Compliance team will work with you to ensure your gift or other benefit is not a prohibited scenario and is otherwise legal and acceptable under Everpure's policies. Remember: employees of foreign state-owned and state-controlled businesses may not seem like traditional government officials, but the law applies to them with equal force.

The Legal Compliance team will approve these requests on a case-by-case basis. Here are some general guidelines that may be helpful in planning your gift or event:

- The best gifts are Everpure-branded gifts of moderate value such as plastic pens, T-shirts, coffee mugs, toys, or hats embossed with Everpure's logo. Such gifts will generally not violate anti-bribery laws because their purpose is the legitimate promotion of Everpure's brand.
- Everpure cannot and will not pay for government officials to take trips or vacations. Any travel, meals, and entertainment we provide must be reasonably priced for the relevant location and serve legitimate business purposes. Everpure should not pay for meals, events, travel, or entertainment where Everpure employees, Everpure partners, or other Everpure representatives will not be present. Likewise, the agenda of Everpure-sponsored seminars and other events should be primarily business related.
- Legitimate promotions build Everpure's brand and business relationships between Everpure and its partners and customers. As such, gifts, travel, meals, and entertainment cannot be provided to spouses, children, friends, or other relatives of Everpure customers and business partners.
- Gifts cannot be in cash or cash equivalents (including gift cards).
- Gifts, travel, and entertainment are more likely to give the appearance of impropriety if they are repeatedly given to the same people.
- As a general rule, Everpure, Inc. does not make political contributions to any political candidates, campaigns, ballot initiatives, referendums, or parties. If you are solicited for such a contribution, you should reach out immediately to legal@purestorage.com.

Please refer to the Gifts section of our [T&E Policy](#) for further details.

In addition to complying with the FCPA, you must also ensure that the provision of a gift or other benefit does not violate local laws or policies that apply in the country where the recipient of the benefit is located. Some countries impose express limits on the value of gifts/benefits that a recipient can accept; other countries ban such gifts/benefits altogether, even if given with no corrupt or improper intention. The Legal Compliance team can help guide you in determining what is appropriate under local law.

FACILITATING, EXPEDITING, OR SPEED PAYMENTS

Everpure also prohibits all improper payments or benefits, including so-called grease, speed, or facilitating payments provided to government officials in their personal capacity to expedite or secure routine government actions, including the granting of permits, licenses, and police services.

Please note that government agencies may impose official fees that may be paid directly in the name of a governmental entity or enterprise itself, as set out in published fee schedules or other official documents, and for which an official government receipt is collected. Payments provided for the benefit of government officials in their personal capacity (i.e., not deposited in an official account belonging to a government) will violate this policy.

If you have questions or concerns about whether a payment is an appropriate official fee or a facilitation payment, you should consult the Legal Compliance team (legal@purestorage.com).

INTERMEDIARIES AND BUSINESS PARTNERS

You cannot circumvent the law or this policy by offering or providing corrupt benefits through third parties such as agents, consultants, representatives, suppliers, vendors, resellers, distributors, charities, advisors, and other business partners (collectively “**Intermediaries**”). In the eyes of the law, such payments are no different than payments made directly to a government official. You and Everpure can be held liable even if you do not expressly authorize or instruct an Intermediary or other person to pay a bribe but have knowledge that they will do so.

Given these risks, this policy prohibits you from working with corrupt or disreputable Intermediaries. Throughout any relationship with an Intermediary for which you are responsible, you must monitor their performance to ensure that they do not engage in corrupt activities.

Charitable donations or sponsorships (such as charity golf tournaments and galas) or other community support made on behalf of the Company must be for a bona fide charitable purpose and directed to a legitimate organization that has been vetted and approved as a Everpure vendor. Any sponsorship or donation that could create even an appearance of corruption or impropriety is strictly prohibited.

The Legal Compliance team (legal@purestorage.com) can guide you on the types of red flags that you should monitor before and after engaging an Intermediary.

You **must** notify the Legal Compliance team (legal@purestorage.com) immediately if you learn of any Everpure Intermediary or other contractor engaging in corrupt or other improper practices.

FCPA ACCOUNTING REQUIREMENTS: ACCURATE BOOKS AND RECORDS

In addition to its anti-bribery provisions, the FCPA requires publicly traded companies like Everpure to maintain accurate books and records and effective internal controls. These provisions are broadly interpreted to capture corrupt conduct short of *quid pro quo* bribery. For example, violations of these requirements can occur if you falsify expense reports to conceal the identities of government officials who attended a Everpure-sponsored event or if you accept a falsified invoice from a vendor that makes a facilitation payment appear like legitimate business expenses.

Some examples where accounting violations may occur include:

- Failing to report a transaction for inclusion in Everpure's financial records;
- Misrepresenting the parties or amounts of money involved in a transaction;
- Falsifying records or knowingly submitting falsified records to disguise a transaction;
- Submitting fake expense receipts for reimbursement;
- Knowingly accepting a falsified invoice or other supporting documents from a vendor;
- Misusing petty cash funds or Marketing Development Funds to make improper payments;
- Abusing discounts to create excess funds in Everpure's commercial channels;
- Failing to monitor ongoing relationships with vendors or resellers to ensure that they do not engage in corrupt or other improper activities in relation to Everpure's business.

You must carefully scrutinize activities, interactions, and transactions to avoid violations such as the above, and notify Everpure's Legal Compliance team (legal@purestorage.com) or Everpure's Internal Audit team (ia@purestorage.com) if you observe any of these types of practices in the course of Everpure's business. Please note that this is not an exhaustive list. You must also cooperate with Everpure's periodic audits and other efforts to ensure that our internal controls are being observed.

SELF-DEALING: KICKBACKS AND CONFLICTS OF INTEREST

This policy also prohibits you and anyone else at Everpure from engaging in self-dealing such as soliciting or accepting bribes, kickbacks, or other improper payments/benefits from Everpure's vendors or other persons in relation to our business. For instance, a violation of this policy will occur if you cause Everpure to overpay a vendor and that vendor shares any portion of that overpayment with you.

You must also disclose any actual or potential conflicts of interest to Everpure's Legal Compliance team. For example, you must notify the Compliance Officer if you are aware of any (i) Everpure employee or relative of that employee who is a government official responsible for regulating Everpure or (ii) Everpure vendor that is wholly or partially owned by you, a member of your family, or a personal friend.

MONEY LAUNDERING

Everpure must comply with all applicable laws concerning money laundering. Though we are not a part of the heavily regulated financial services industry, all employees, third parties (partners, suppliers, customers, vendors, contractors) must uphold our principles of integrity and financial transparency by never directly or indirectly assisting criminals or terrorist organizations; nor acquiring, converting, concealing, using, or possessing criminal funds.

Money laundering is the process of disguising funds from criminal activity (including terrorism) as legitimate through: placement into the financial system, layering transactions and obfuscated records, and integration (legitimized appearance of funds). Everpure conducts due diligence on its clients, suppliers, and partners to verify their identities, understand the nature of their businesses, and assess the risk they pose in terms of money laundering.

Example red flags that you should monitor include:

- Potential shell companies
- Requests to pay more than agreed price
- Payments from an unusual account
- Requests to make payments in other currencies than contracted and agreed upon
- Requests to pay in cash
- Payments from a third party not related to the account
- Other payment red flags

Disclose any concerns immediately to Everpure's Legal Compliance team legal@purestorage.com.

VIOLATIONS AND CONSEQUENCES

We firmly believe in conducting ourselves with the highest degree of ethics and integrity. If you violate this policy, it will result in appropriate disciplinary action, including termination or dismissal of employment. Both Everpure and you may be subject to substantial fines—fines frequently run to hundreds of millions of dollars—and penalties for violating these and other anti-corruption laws. In serious cases, you may face imprisonment. In addition, Everpure may face suspension or debarment from government contracts, the loss of U.S. export privileges, and certain other consequences. Bottom line: these actions could be devastating to our business.

TRAINING AND MATERIALS

All designated personnel must undergo anti-corruption training provided by Everpure. The nature, content, and frequency of that training will be determined by Everpure based on your risk profile. All employees are required to review and certify key Everpure policies annually, including this Anti-Bribery and Anti-Corruption (ABAC) Policy.

We encourage all of our business partners to provide training to their personnel as well, and annually we issue anti-corruption training and certification to select business partners globally.

STATUS

This policy does not form part of any employment contract with you and may be amended at any time. This policy should be read in conjunction with Everpure's Code of Conduct and other corporate, regional, or local policies and procedures.

CERTIFICATION

Everpure may require you to certify your compliance with this policy on a periodic basis.

REPORTING/QUESTIONS

You have an affirmative obligation to report all violations of this policy to Everpure's Legal Compliance team either in person or at legal@purestorage.com. You can also reach out to Everpure's Chief Compliance Officer either in person or via email at complianceofficer@purestorage.com.

Reports may also be submitted anonymously by using Everpure's hotline number 1-800-461-9330 or by logging on to <https://purestorage.com/speakup>. However, we encourage you to consider revealing your identity so that we can properly follow up and investigate alleged breaches or violations. Everpure will ensure that appropriate confidentiality measures are taken and will not retaliate against any individual for reporting violations in good faith. Please refer to the Speak Up section of our Code of Conduct for more information.

You must also notify the Legal Compliance team of any corrupt, improper, illegal, or other unusual requests for payments or other benefits made by customers, Intermediaries, vendors, business partners, government officials, or Everpure employees. By reporting such matters, you will enable us to explore options to achieve our business goals without having to interact with such persons or provide improper benefits.

Zero Tolerance for retaliation: If you believe you may be the subject of retaliation, please let your Human Resources Business Partner, Everpure Legal, or Everpure's Employee Relations team know. Retaliation of any kind will not be tolerated and will result in termination of employment from Everpure or, for partners and suppliers, termination of your business relationship with Everpure.

We welcome any questions that you may have regarding the substance and implementation of this policy in your respective sector and/or territory. Please direct such communications to the Legal Compliance team.

APPROVERS

| Date Approved | Approver | Title |
|---------------|----------------|---|
| 10/27/2025 | Jessica Kelman | Director, Global Compliance, Ethics & Privacy |

REVISION HISTORY

| Version | Date of Revision | Author | Summary of Changes |
|---------|------------------|----------------|---------------------------------------|
| 1.6 | April 28 2026 | Jessica Kelman | Rebrand only. No substantial changes. |
| 1.5 | November 2025 | Jessica Kelman | Minor updates and style refresh |
| 1.4 | May 2024 | Jessica Kelman | Minor updates and style refresh |
| 1.3 | January 2020 | Jessica Kelman | |
| 1.2 | November 2019 | Niki Armstrong | |