Everpure

Code of Conduct

2027

Message from Charlie

Hello Everpure Team,

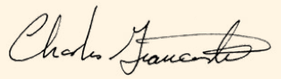
Everpure is the only company that invests in data storage and management as high technology while our competitors treat it as a commodity. This strategy will propel us to be not only the technological leader, but the market share leader in this $60B+ industry. Staying true to our company culture and values is crucial for achieving this goal. Our continued growth into one of the most respected and admired brands in technology will be a result of maintaining our focus on our guiding principles: integrity, honesty, innovation, and respect for others.

At Everpure, conduct counts. Our Code of Conduct should be your lodestar for how to act when carrying out business on behalf of Everpure. Our Code is a reference document for you to familiarize yourself with and refer to frequently. We are all held accountable for acting within these guidelines and upholding our standards. The Code also identifies additional resources available to assist you in making ethical decisions, including raising questions or concerns to your manager, Everpure Legal and Human Resources, or through our hotline or web portal. We have zero tolerance for retaliation, so feel comfortable and encouraged to speak up if you have concerns or questions, as outlined in our Code.

Integrity is table stakes at Everpure, and we expect every Everpure employee to act with integrity both inside and outside the company. Lapses in integrity have no place here and—to put it simply—will not be tolerated.

I expect each and every team member to uphold our values and commitments every day. Embracing our principles and values ensures our collective success as we build a world-class global company. I look forward to working with you and continuing to make Everpure a great place to work.

Thank you,



Charlie Giancarlo, Chairman & CEO

Conduct Counts

1 **Integrity in everything we do**.
If an action seems wrong, it is wrong. If something feels off to you, you must speak up. Check with your manager, Everpure Legal, your Human Resources Business Partner, Everpure Finance, or other appropriate organization listed in the Speak Up! section of this Code.

2 **Integrity means doing the right thing, and doing things right**.
It means operating in the customer's interest, in the interest of Everpure, and in compliance with global laws and regulations—not in your own self-interest.

3 **Treat others with respect**.
We encourage direct discussions on business issues, even when that means respectful disagreement. The diverse views and experiences of our highly talented global workforce provide Everpure with the business advantage that can only come from a broad comparison of ideas, and mutual respect is how we win together.

4 **Win the right way**.
At Everpure, we are fierce competitors, but we win our business the right way. We never engage in corrupt, anti-competitive, self-dealing, or unfair trade practices of any kind.

5 **Be honest and transparent in all financial matters**.
As an employee of Everpure, you are accountable for accuracy and complete honesty in any report that impacts Everpure financial reporting.

6 **Be a global citizen**.
Everpure has firm commitments to respect human rights and does not tolerate any form of forced labor in our supply chain. Likewise, we are committed to continually reducing our environmental impact through the innovations in our products, our operations, and throughout our supply chain.

7 **Respect confidentiality and privacy**.
Everpure employees have obligations to protect any private data entrusted to the company and to protect the confidentiality of Everpure information from disclosure.

8 **Safeguard our information security**.
Protecting the company also means strictly following our information security policies and guidelines whenever you are using Everpure systems.

9 **Prevent waste and protect the company**.
Integrity also means protecting Everpure assets, ensuring their efficient use, and preventing waste.

10 **When in doubt, speak up!**
Everpure employees are expected to come forward with suspected violations of this Code using any of the avenues described in the Speak Up! section of this Code.

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Our Code

Why We Have a Code

Everpure is founded on integrity and mutual respect

We are steadfast in our commitment to live out these principles through our core values—persistence, creativity, teamwork, ownership, and customer-first. We are passionate about maintaining the highest standards of business conduct and ethics, guided by this Code of Conduct. Our Code reflects our business practices and behavioral principles, and it will help guide you in preserving our reputation and values.

As Everpure continues to grow, we need to evolve and improve in everything we do. If you have suggestions for how we can improve this Code of Conduct, please send them to legal@purestorage.com or to any of the other resources listed in our Speak Up! section.

Our Code Applies to All

Our Code applies with equal force to all Everpure employees, contractors, officers, and board members

We also require that our partners, suppliers, and vendors abide by these standards when working on behalf of Everpure. Our requirements for partners and suppliers are further outlined in our Partner and Supplier Codes of Conduct.

This Code—in addition to our policies and procedures—lays out our key expectations and rules for ethical conduct. We also trust and expect you to apply common sense and act in accordance with our core values at all times, even without explicit guidance.

Violations of these standards may result in disciplinary action, which ranges from a warning to termination of employment and, in appropriate cases, legal action or referral to law enforcement.

Speak Up!

Asking for advice and raising concerns

Employees who have questions about this Code or about whether certain conduct could be improper or unlawful should seek advice and clarification. Employees most often seek advice in the first instance from their manager, but there are many alternative avenues available to employees, such as their Human Resources Business Partner, Everpure Legal, Everpure Employee Relations, or any of the other resources listed in this Code. Everpure contractors may seek advice from their managers or use the Everpure Speak Up portal.

Raising concerns about suspected or potential violations of this Code, Everpure policies, or the law is critical to our ability to identify problems early on and take corrective action. Everpure employees and business partners are empowered and expected to report any suspected violations through any of the reporting avenues described in this Code. The reporting avenues described in the "How to speak up and report concerns" sidebar are also available to third parties with no relationship to Everpure who may become aware of suspected violations.

Everpure people managers have special obligations to foster a culture of integrity and encourage their teams to report and discuss their concerns. People managers also have an obligation to immediately speak up if they suspect, hear of, or see possible violations of this Code. This means if you are a people manager and one of your reports raises a concern to you, you should listen attentively, and then escalate their concerns to Everpure Legal or Human Resources.

How to speak up and report concerns

- Your manager or Human Resources Business Partner
- Everpure Employee Relations
- Everpure Legal: legal@purestorage.com
- Everpure Chief Compliance Officer: complianceofficer@purestorage.com
- Speak Up portal: everpuredata.com/speakup
- Everpure Internal Audit: ia@purestorage.com

No retaliation

If something concerns you, we need to know. We have zero tolerance for retaliation or threats of retaliation of any kind against good faith reporters. If you believe you may be the subject of retaliation, please let your Human Resources Business Partner, Everpure Legal, or the Everpure 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 their business relationship with Everpure.

What to expect when reporting a violation or suspected violation

Whichever avenue you choose to report your concerns, you will be contacted within two business days regarding next steps from either our Employee Relations or Legal Compliance team. All concerns are thoroughly investigated, but what the investigation looks like will depend on the specific facts of the matter and the types of concerns raised. Our investigators will work with you and make every effort to keep the investigation as confidential as possible and as allowed by law. Depending on the facts of the case, we may not be able to share details of the resolution with you to protect the privacy of other parties involved. For more detailed explanations of the process and other resources about reporting, please review the Employee Relations Investigations Process Overview and/or visit the Employee Relations HUB Page.

How We Treat Each Other

Integrity and Respect

The foundation of our culture

Integrity and respect are the cornerstone of how we operate at Everpure. Whether you are on Everpure premises, acting on behalf of Everpure with third parties (like our customers, partners, and vendors), or wearing the Everpure logo to run your errands, you represent Everpure in all you say and do. The reputation and success of Everpure depend on you and your ability to act ethically and respectfully at all times.

Everpure employees are expected to treat one another and our business partners and customers with respect and professional courtesy at all times. We have a dynamic and innovative culture of creative, talented professionals who stand out from the crowd, and we expect all of our employees to foster this environment by bringing their ideas to the table and encouraging one another to innovate and succeed together. Professional debate and discussion—including disagreement—of ideas and differing perspectives is paramount to the innovation process. By contrast, bullying, discrimination, harassment (including, but not limited to, sexual harassment), and other harmful conduct have no place at Everpure. Failure to meet common standards for respectful conduct can result in negative employment consequences, including termination of employment.

Discrimination, Harassment, and Bullying

Everpure is committed to a culture of integrity, professionalism, and respect

We expect all of our employees, and anyone we do business with, to actively foster an inclusive work environment that is free from harassment (including but not limited to, sexual harassment), discrimination, or bullying of any kind. Respectful, professional conduct furthers our vision, promotes productivity, minimizes internal disputes, and bolsters our already stellar culture.

As part of our commitment to diversity and inclusion, Everpure expects every employee and contractor to show respect for all co-workers, customers, partners, suppliers, vendors, and anyone else with whom we do business. All Everpure employees and contractors are expected to regularly complete anti-harassment and anti-discrimination training as a condition of employment or work engagement. Everpure absolutely prohibits harassment or discrimination on the basis of race, ethnicity, color, religion (including religious dress and grooming practices), sex, gender identity, gender expression, sexual orientation, national origin, ancestry, age, marital status, military or veteran status, genetic information, any physical or mental disability (whether actual or perceived), taking protected leaves (e.g., maternity leave, parental leave, sick leave, and disability leave), pregnancy, childbirth, or other related medical conditions. For more information, please see our Anti-Discrimination, Harassment, and Bullying Policy.

For more information, please see our Speak Up Policy. Reports of harassment (including, but not limited to, sexual harassment), discrimination, and retaliation will be promptly, effectively, thoroughly, and objectively investigated. Disciplinary action up to and including termination of employment will be taken on a case-by-case basis, as appropriate and based on the outcome of any investigation. For more details, see “What to expect when I report a violation or a suspected violation” in the Speak Up! section.

Any type of bullying is prohibited

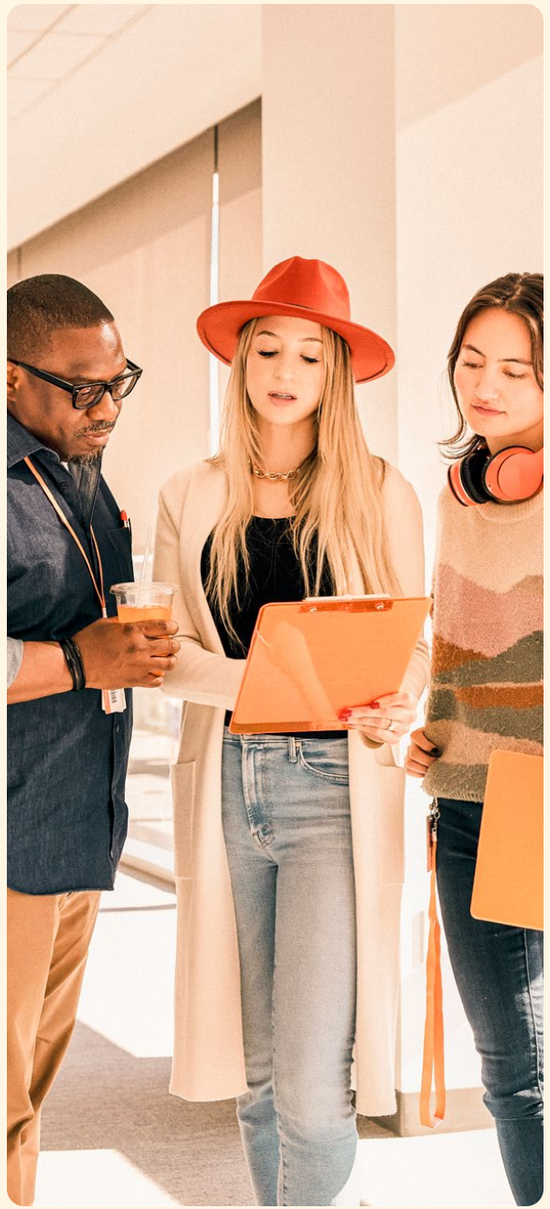
Examples of prohibited bullying include:

- Screaming
- Name-calling
- Stealing
- Threatening, intimidating, or cruel behaviors
- Deliberately humiliating a person
- Retaliation or stealing work credit

We encourage you to immediately report bullying incidents to a manager, your Human Resources Business Partner, Employee Relations, or any of the other reporting resources identified in this Code.

Relevant links

- Employee Relations HUB Page
- Speak Up Policy
- Anti-Discrimination, Harassment, and Bullying Policy
- Supplier Code of Conduct
- Partner Code of Conduct
- Equal Employment Opportunity



Keeping a Safe and Healthy Place

Everpure is committed to a violence-free work environment

We do not tolerate violence or the threat of violence in our offices, other places of work, or in work-related situations, including virtual meetings and Everpure events.

You may not bring any weapon—such as a gun, knife, or taser—into any Everpure office, a customer or partner site, or any event sponsored by Everpure. Actual violence, threats of violence, or carrying weapons in connection with your work at Everpure can result in adverse employment action, including termination and referral to law enforcement. You must report any suspicious activity at any Everpure office to Everpure Physical Security & Safety immediately, by Slack, email, or in Santa Clara by calling 650-243-0349. In case of potential violence or danger, immediately contact local law enforcement and then report it to your manager, Human Resources Business Partner, Employee Relations, or Everpure Legal.

Commitment to Inclusion and Nondiscrimination

Everpure is a company driven by innovation and creativity

We maintain our drive and vision by valuing unique perspectives and celebrating our employees' wide range of perspectives, professional backgrounds, and life experiences. We create teams that foster relationships that are unconditionally inclusive and bring out the best of our individuals.

Our employee resource groups (ERGs) serve a critical role in advancing inclusion at Everpure. ERGs build connections, foster a strong sense of community, and provide development opportunities for our employees. In many ways, they are the fabric of our inclusive culture. All Everpure employees are encouraged to join ERGs as community members and allies.

For immediate threats to health or safety

Contact local law enforcement and Everpure Physical Security & Safety at physicalsecurityandsafety@purestorage.com, on Slack, or in Santa Clara by calling 650-243-0349.

You are an Everpure representative

The health and safety of our employees are paramount. We trust our employees to exercise prudent judgment when it comes to consuming alcohol. You represent Everpure—whether in the office, at an after-hours work activity, an offsite, or event sponsored by Everpure. Never drink to the point of impairment, inappropriate behavior, or in a way that endangers the safety of yourself or others. Failure to meet our high standards for the health and safety of our employees can result in negative employment consequences, including termination of employment.

We also expect all employees to comply with applicable federal, state, and local laws regarding drugs if engaged in Everpure business. You may never engage in the unlawful manufacture, distribution, dispensing, possession, sale, or use of a controlled substance in the workplace. Failure to comply can result in negative employment consequences, including termination of employment.

Relevant links

- Environmental Health and Safety Policy

Conducting Business with Integrity

Compliance with Laws and Regulations

At Everpure, we follow the law

We are a global company, and our success depends on operating within legal requirements and cooperating with local, national, and international authorities. As an Everpure employee, you are required to understand the laws, rules, and regulations applicable to Everpure generally and in particular to your job responsibilities. This Code and many of our policies provide detailed guidance on certain areas of the law, but your violation of any law in connection with your employment can result in termination of employment and even referral to law enforcement. If you have a question or need advice about legal compliance, seek answers from your manager or Everpure Legal, or reach out directly to legal@purestorage.com.

Avoiding and Disclosing Conflicts of Interest

Everpure employees are expected to act at all times in the best interest of the company

Any kind of self-dealing is strictly prohibited. This means you must avoid influences that conflict with the interests of Everpure or any relationship that might deprive Everpure of your undivided loyalty in the company's business dealings. Not every conflict can be avoided, so transparency should be your guiding value. Undisclosed conflicts of interest can have serious adverse repercussions for your employment at Everpure, including termination from employment. Conflicts of interest can arise in many different situations, but the most common are described in the following subsections.

Side businesses

Our employees are creative, talented, and dynamic individuals with many talents. Whether it is a side business or a passion project, having a second source of employment or an ownership stake in a small business that you work on with your own resources and on your own time may be acceptable depending on the time commitment, nature of the work, who your customers are, and other factors. All requests to participate in a side business must be reviewed and approved by Everpure Legal (legal@purestorage.com) and your manager. Please note that working for a competitor will always be forbidden and that with a few rare exceptions, you are also generally prohibited from working for or in connection with a customer, vendor, supplier, or partner.

Romantic or family relationships

Having a close romantic or family relationship with another Everpure employee or with owners or employees of Everpure vendors, partners, or customers may be a conflict of interest. For example, if you have a parent, romantic partner, spouse, sibling, or child who also works at Everpure or is applying for employment at Everpure, you must notify Everpure Legal immediately to discuss the potential conflict and make sure that appropriate safeguards are in place. Likewise, if you have a close family member who works at an Everpure partner or an Everpure vendor, especially if that family member is an owner or controller of that company, you must disclose that relationship to Everpure Legal (legal@purestorage.com). If you are concerned about a family relationship conflict, you should err on the side of disclosure.

Board and advisory roles

Serving on boards, especially for non-profits, or in advisory roles can be excellent ways to build on your expertise, become a thought leader, and deepen your professional network. Such roles are generally acceptable, but must be cleared by Everpure Legal. If you are asked to join a board or take an advisory position of any kind, please reach out to Everpure Legal (legal@purestorage.com) immediately to discuss. Please also be aware that there are special rules regarding when you can identify yourself as an Everpure employee as part of your service, and see the Proper Handling of Media Requests and Public Discussions section.

If you think that you may have a conflict of interest with Everpure or are considering entering into a relationship or side venture that you think has the potential to be a conflict, you must immediately disclose that interest to Everpure—ideally before entering into the relationship—and seek guidance from Everpure Legal on whether it will impact your employment at Everpure. Once you have disclosed the potential conflict to your manager and your Human Resources Business Partner, you will need to complete a written request for your potential conflict to be reviewed and cleared by Everpure Legal by emailing legal@purestorage.com. You should keep in mind that with proper safeguards, many conflicts of interest can be disclosed and cleared by Everpure, but some cannot. If a potential conflict of interest cannot be cleared, you would need to either end the conflicting relationship or terminate your employment with Everpure.

Receiving gifts and hospitalities from third parties can be a conflict of interest, too

Accepting gifts and hospitalities from third parties, such as vendors or partners, can create an actual or potential conflict of interest. Receiving nominal branded swag-type gifts (e.g., t-shirts or mugs) from business contacts is generally acceptable, but accepting more lavish gifts can create the appearance of impropriety and is generally prohibited. In particular, Everpure employees are prohibited from accepting gifts of travel, including flights, accommodations, and other perks from vendors without prior approval of the Everpure Chief Legal Officer. You should consult the section on giving gifts Bribery and Corruption section for further details. If you have been offered a gift or hospitality that you have questions about, please reach out to legal@purestorage.com before accepting.

Evaluating a potential conflict of interest

Factors that should be considered are, among others:

- Any potential adverse or beneficial impact on our business, or relationships with a customer, vendor, or other business partner of Everpure
- The nature of Everpure confidential information to which the employee has access
- The extent to which it would result in direct or indirect benefit to the employee or a customer, vendor, or business partner of Everpure
- The impact on the performance, responsibilities or morale of the employee or others at Everpure
- Whether it would enhance or support a competitor's position and the extent to which it would appear improper to an outside observer

Romantic relationships between co-workers

We recognize that romantic relationships can sometimes happen in the workplace. Employees who find themselves in a romantic relationship with another Everpure employee should reach out to their Human Resources Business Partner or the Employee Relations team to disclose the relationship and discuss any potential conflicts of interest. Romantic relationships between a manager and a subordinate or between an employee and another employee who has responsibility for determining the success of another employee, such as a business partner in another function, can create unnecessary risk and uncomfortable work environments. Depending on the circumstances, intra-office relationships may require changes to work arrangements, including reporting structure, organizational changes, or separation from employment.

Bribery and Corruption

Everpure conducts all of its global business with integrity

This means we do not pay bribes or kickbacks or engage in any type of corrupt activity or scheme. Engaging in corrupt conduct of any kind in connection with Everpure business is grounds for termination of employment and referral to law enforcement authorities.

Compliance with global anti-corruption laws

Everpure is a global company, and we comply with all applicable national, state, local, and international anti-corruption laws, including the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act, as well as local anti-corruption laws where we do business.

Meals, gifts, and entertainment

Gifts and hospitalities are a business custom and tradition in many places around the world where Everpure does business, but as an Everpure employee you must be mindful that gifts, meals, and entertainment can easily create an appearance of impropriety. All gifts, meals, entertainment, and travel given by Everpure to a third party must comply with our detailed Travel & Expense Guidelines. Under these guidelines, most gifts and many other categories of spend require pre-approval by Everpure Legal, Everpure Finance, and your VP, with sufficient time built in to obtain such approvals. You should reach out to legal@purestorage.com if you have particular questions or concerns.

Special considerations for government and state-owned customers

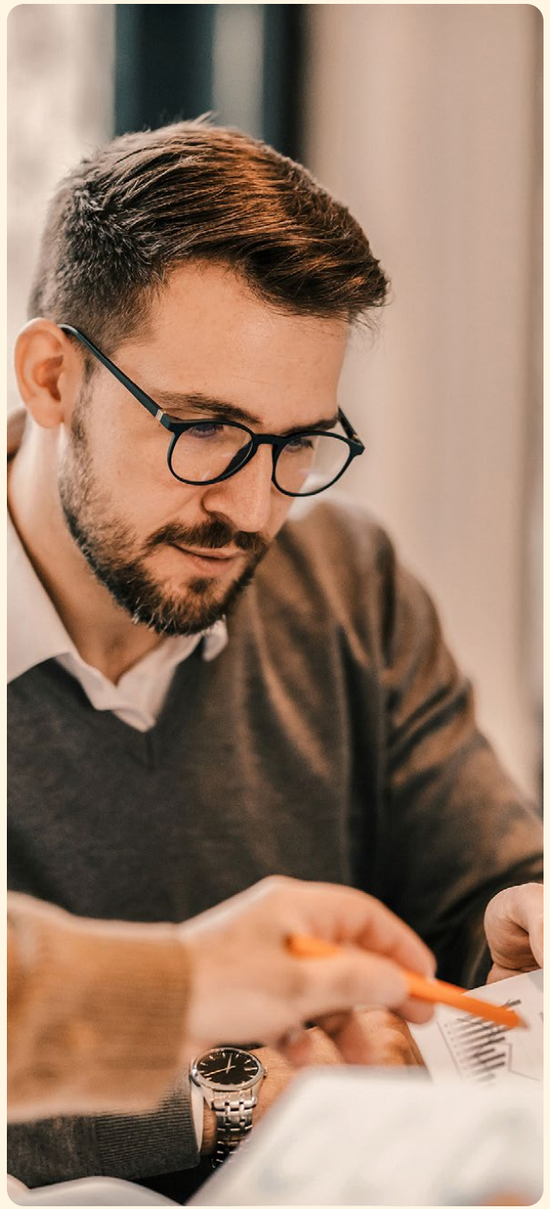
When you interact with public sector customers, you must be especially cautious to avoid even the appearance of impropriety. Gifts and meals that could be acceptable or even typical in the private sector can be illegal or create the appearance of impropriety in the public sector. You should carefully review the Everpure Anti-Bribery and Anti-Corruption Policy before offering any gifts or meals to public sector employees, keeping in mind that most public sector gifting requires pre-approval by Everpure Legal (via a PERC ticket). You are responsible for learning and strictly following special laws and rules around gifting and hospitality for government employees, remembering that these can include employees of government-owned enterprises, even where those enterprises compete in the private market, and that many public sector employees are not allowed to accept gifts or meals or any kind. If you have questions about the rules that apply in your region or to your customers, please reach out to your manager or legal@purestorage.com at any time to discuss.

Zero tolerance for all business partners

The Everpure zero tolerance policy for corruption applies with equal force to all of our business partners, as explained in our **Partner Code of Conduct** and **Supplier Code of Conduct**. Under U.S. and international anti-bribery laws, Everpure can be held responsible for the bad acts of its partners and vendors if they are made in connection with Everpure business. If you, as an Everpure employee, suspect or are concerned that a third party may be engaging in corrupt conduct on behalf of Everpure or in connection with Everpure business, you must speak up immediately by reaching out to **legal@purestorage.com** or our Speak Up hotline. Similarly, if you suspect or believe that a business partner of Everpure may be engaging in corrupt or unethical conduct, please reach out to **legal@purestorage.com** immediately.

Relevant links

- Anti-Bribery and Anti-Corruption Policy
- Travel & Expense Guidelines



Accurate Records and Financial Reporting

The Everpure backbone is accuracy

Our corporate and financial books and records serve as the foundation for managing our business and meeting our obligations to customers, suppliers, creditors, employees, and others with whom we do business. We rely on these records to produce accurate and complete reports for our management, stockholders, creditors, and governmental agencies, including the U.S. Securities and Exchange Commission (SEC).

This means that it is critically important that all of our records and accounts accurately, completely, and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs, and expenses, as well as all transactions and changes in assets and liabilities. Making false or misleading entries is strictly prohibited and can result in termination from employment and referral to law enforcement.

We require that:

- No entry be made in our books and records that hides or disguises the nature of any transaction or any of our liabilities, or misclassifies any transactions as to accounts or accounting periods
- Transactions be supported by appropriate documentation
- The terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be provided and reflected accurately in our books and records
- Employees carry out, support, and comply with our system of internal controls
- No cash, credits, or other assets be maintained for any purpose in any unrecorded or “off-the-books” fund.

These rules apply to all official Everpure books and records, including but not limited to:

- Financial statements and public filings
- Travel bookings and expense reports (see the Physical Security and Use of Everpure)
- Purchase requisitions and purchase orders
- Credit notes
- Import/export documentation
- Sales certification
- Tax filings and documentation
- Invoices and sales orders
- Product testing and performance metrics.

Cooperation for all Everpure employees

All employees must cooperate fully with Everpure Finance and Legal, as well as our independent public accountants, respond to their questions with candor, and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete. For employees involved in Everpure sales, this includes timely and accurate completion of your quarterly sales certification. Failure to fully cooperate with such inquiries or to complete your quarterly sales certification in a timely manner can result in disciplinary action, including termination.

Additional reporting resources

You may also report issues or concerns directly to our Internal Audit team at ia@purestorage.com.

Relevant links

- Travel & Expense Guidelines
- Guidance on Purchase Requisitions and Procurement
- Everpure Finance Intranet Page

Respecting Human Rights

Everpure is committed to respecting human rights and fair labor standards in our own business and throughout our global supply chain

Everpure strictly forbids any forced labor, slavery, child labor, unsafe working conditions, conflict minerals, or human trafficking anywhere in its supply chain or in connection with any Everpure business in any way. This rule applies to all Everpure employees and contractors anywhere in our global workforce and to all Everpure suppliers.

In addition to the Everpure Supplier Code of Conduct, Everpure is a member of the Responsible Business Alliances, and Everpure requires all of our employees, contractors, partners, and suppliers to practice the principles embodied in the Responsible Business Alliance (RBA) Code of Conduct, which prohibits the use of forced labor, indentured labor, or involuntary/child labor and human trafficking and requires compliance with global labor standards and applicable laws, including worker health and safety, the environment, and business ethics.

Everpure employees, contractors, partners, and suppliers are expected to raise any concerns about labor or human rights abuses immediately via the company's Speak Up hotline or to legal@purestorage.com.

Relevant links

- Supplier Code of Conduct
- Statement Against Human Trafficking
- Conflict Minerals Statement
- Impact Report

Compliance with Global Export and Trade Rules

Everpure is a global company, and we deliver products, spare parts, and services to customers in many countries around the world

We are committed to complying with all applicable export laws and regulations—including trade sanctions—in all countries where we operate and conduct business, and especially to all global export laws and policies that seek to control nuclear proliferation, missile technology, and/or biological weapons.

Trade and export regulations are complex and often of a technical nature. If you have questions about the compliance of a particular transaction or more general questions about how export laws apply to Everpure and the countries where we do business, we encourage you to reach out directly to our Legal Export and Trade and Traffic teams by emailing export@purestorage.com.

Keep in mind that violations of trade and export laws can result in serious consequences for the company and you as an individual, including significant fines and jail time. Employees may also be subject to disciplinary action up to and including termination. If you are concerned about a potential violation of export or trade laws, you are obligated to speak up immediately to the resources listed in this Code.

Environmental Stewardship and Responsibility

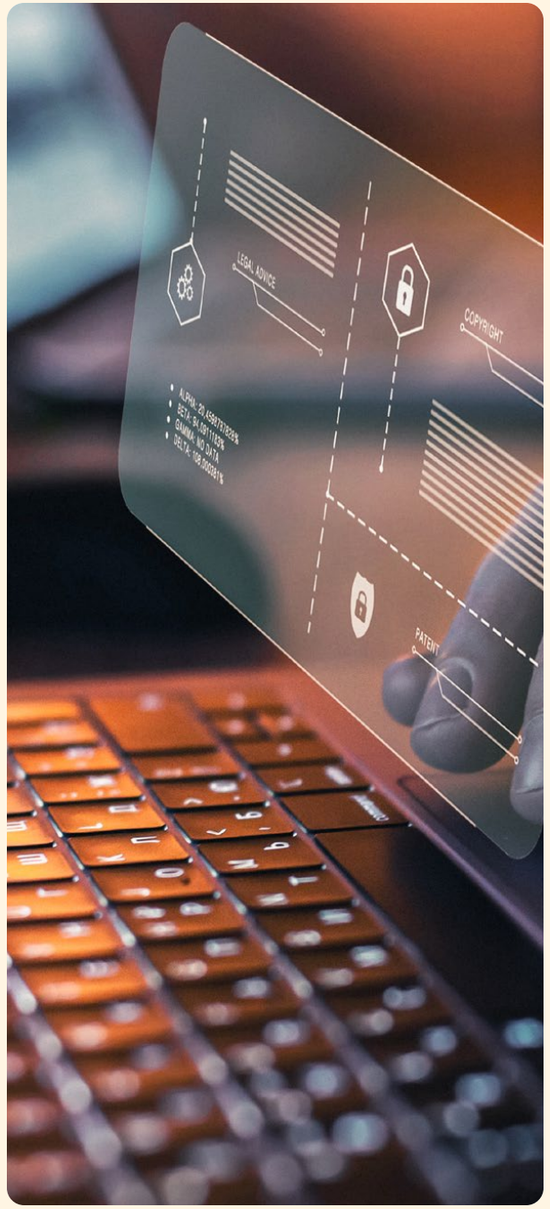
Reducing environmental impact and lowering carbon emissions is part of the core innovation of Everpure products

Our products drive out direct carbon usage by up to 85% when compared to our flash competitors, shrink overall data center footprints for our customers, and reduce product replacements and associated e-waste.

Our environmental stewardship also includes improving the sustainability of our operations. The most significant impacts in this area are related to our offices, data centers, and global supply chain. We are committed to continually increasing our impact on the global effort to fight climate change and reduce carbon emissions.

Relevant links

- Everpure Export Policy Statement
- Environmental Health and Safety Policy
- Impact Report
- Everpure Insider Trading Policy



No Insider Trading

As an Everpure employee, director, or contractor, you are required to abide by federal insider trading and all other laws that protect our investors

If you gain access to confidential (or "inside" or "non-public") information about Everpure business (or about companies with whom we do business) in the course of your employment, you are not permitted to use or share that information for stock trading or for any other purpose except to conduct Everpure business.

This includes sharing that information with third parties ("tipping") who then engage in stock transactions. Everpure employees are also required to abide by periodic "blackout" periods that may impact your ability to sell or buy Everpure stock during certain windows of time. It is your responsibility to understand these obligations and be aware of when the company's trading window is open or closed. Please refer to Everpure Insider Trading Policy for more information.

Protecting Sensitive Data and Respecting Privacy Rights

Safeguarding the personal data provided to us by Everpure customers, employees, partners, and others is critical to building and maintaining trust

Everpure is committed to complying with all applicable data protection laws and has internal and external policies on collecting, processing, and protecting data.

We expect every Everpure employee to take a shared ownership in our commitment to data privacy. All Everpure employees are required to regularly complete data privacy training. In addition, Everpure has a Privacy Council consisting of key stakeholders from each major business unit that meets quarterly to address privacy needs and risks facing the company.

As an Everpure employee, you must not disclose Everpure data outside of the company or to unauthorized parties within the company. If you know or suspect that any personal, confidential, or other sensitive information held by Everpure, or on our behalf by a third party, has been improperly disclosed, breached, stolen, or leaked (even inadvertently), you must contact the Everpure Legal Privacy team immediately by reaching out to privacyatpure@purestorage.com.

Personal data

Personal data is broadly defined to include any data that could make an individual person identifiable. Emails (including business emails), names, and addresses are all personally identifiable information that is subject to protection from disclosure under the various privacy laws governing the regions in which Everpure does business.

Relevant links

- Environmental Health and Safety Policy
- Impact Report
- Everpure Insider Trading Policy
- External Privacy Statement
- Everpure Data Retention and Destruction Standard
- Document Retention and Destruction Schedule and Guidelines
- Privacy@Everpure Intranet Page

Protecting Everpure

Physical Security and Use of Everpure Property

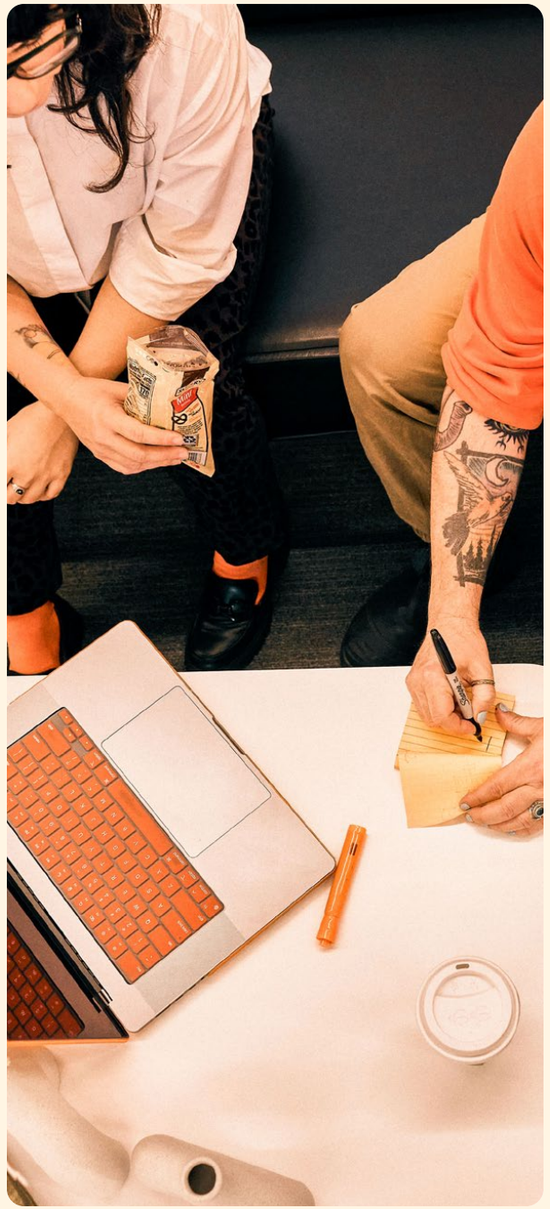
As an Everpure employee, you must protect our assets and ensure their efficient use

Theft, carelessness, and waste have a direct impact on our profitability. Everpure assets, such as office supplies, computer equipment, services, facilities, and buildings, are expected to be used only for legitimate business purposes, although incidental personal use may be permissible. Food and beverages provided by Everpure are intended as a benefit during hours of service to Everpure.

You may not use our corporate name, any brand name or trademark owned or associated with Everpure, or any letterhead stationery for any personal purpose. If you are not sure if a certain use of Everpure assets is allowed, contact your manager.

Expense reporting

Everpure employees should apply the principles of integrity, transparency, and accuracy when expensing charges to the company. You should take care when spending company funds to closely follow Everpure Travel & Expense Guidelines. Failure to report your expenses in an accurate, complete, and timely manner harms the company and may result in your expense reports being rejected. People managers have a further responsibility to carefully review and monitor the expenses of their teams. People managers who approve expenses of their reports without thorough review are failing to meet an important baseline performance expectation and may be subject to discipline. Dishonesty, fraud, or abuse of your expense account can result in discipline, including termination from employment and even referral to law enforcement.



IT Security and Acceptable Use

Everpure operates with the highest standard of information security

Everpure employees, contingent workers, and business partners are expected to do their part to prevent unauthorized access to Everpure systems and to protect the devices and information entrusted to them. This means that Everpure employees and contingent workers must familiarize themselves with our Information Security Policy and Acceptable Use Standard, being mindful that these standards and policies are updated annually, at a minimum.

In addition to following all relevant information security policies and internal controls, Everpure employees must:

- Safeguard passwords and any information or hardware that is assigned to them
- Not use Everpure systems to commit an illegal act or to access or transmit content that is sexually explicit, harassing, offensive, or otherwise unlawful or objectionable
- Connect to Everpure networks only with approved systems and devices
- Not remove or alter any installed security or management mechanisms
- Not introduce any vulnerability or malicious code (e.g., backdoor, virus, trojan, or exploit) into any Everpure system or product
- Not access the internal computer system or other resource of another entity without express written authorization from the entity responsible for operating that resource (i.e., hacking)
- Fully cooperate during a security incident investigation by providing all relevant and accurate information in a timely manner, granting necessary access to systems under investigation and following any other required measures to contain and resolve the incident
- Complete all assigned security awareness training

Because electronic and computing devices are necessary for the performance of many job duties as well as many personal tasks, it is easy to forget that these devices, and the data within, are the sole property of Everpure and must be used only in accordance with Everpure policies. If you use a personal device, such as a mobile phone, to access Everpure systems, the information continues to belong solely to Everpure. Everpure does not actively monitor the systems its employees use, but we reserve the right to do so in accordance with our Investigations Safeguards Standard.

Overseas travel with Everpure equipment

When traveling abroad on Everpure business, you must consult the Expanded Security Region (ESR) Equipment Standard and country list to see whether, based on your destination, you are required to obtain and use special loaner device(s), such as laptops, from the IT Help Desk during your travels. In general, employees are prohibited from taking their Everpure devices or loaners into ESR countries on personal travel. Exceptions to this rule will require executive approval.

Concerned about a security issue

If you believe someone may have gained unauthorized access to Everpure systems or that Everpure confidential information may have been exposed to unauthorized parties, you have an obligation as an Everpure employee to speak up immediately, either through our Speak Up hotline, infosec@purestorage.com, or PERC.

Relevant links

- Information Security Policy
- Acceptable Use Standard
- Investigations Safeguards Standard
- Expanded Security Region (ESR) Equipment Standard

Protecting Everpure Intellectual Property and Confidential Information

Everpure respects the intellectual property rights of others and expects the same in return

With our employees, intellectual property (e.g., patent, trademark, copyright, and trade secrets) is one of our greatest assets, and it is up to every employee to help protect it. If you're developing a product, services, or collateral that uses content, like third-party media, that does not belong to Everpure, you must check with Everpure Legal first.

Respecting intellectual property rights

We expect employees to respect all laws related to patents, trademarks, trade secrets, copyright, rights of publicity, and other intellectual property and use the company's intellectual property in accordance with our policies or guidelines. This means when you join Everpure as a new employee, you must not bring any property or proprietary or confidential information of your prior employer with you, including documents like emails, slide decks, and spreadsheets, or install them on Everpure systems, including your assigned laptop or mobile device. Likewise, when you leave Everpure, you are forbidden from taking any information with you or from providing Everpure proprietary or confidential information of any kind to your new employer.

Proprietary information

Acquiring proprietary information through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance Everpure interests. If you somehow obtain information that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of the information gathering, consult with Everpure Legal.

Everpure confidential information

As an employee of Everpure, you may learn of information about Everpure that is confidential and proprietary. You also may learn of information before it is released to the general public. We expect that you keep the company's information confidential, as unauthorized use or disclosure of Everpure intellectual property or other confidential information can lead to their loss to competitors or serious loss of value. In addition, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same way you treat Everpure confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company. We expect you to keep confidential and proprietary information confidential unless and until that information is released to the public through approved channels.

You must refrain from discussing confidential or proprietary information with outsiders and even with other employees of Everpure unless those fellow employees have a legitimate need to know the information in order to perform their job duties. Unauthorized use or distribution of this information could be illegal and result in civil liability and/or criminal penalties.

You should also take care not to inadvertently disclose confidential information. Devices and materials that contain confidential information should be stored securely. Unauthorized posting or discussion of confidential information concerning our business, information, or prospects on the internet is prohibited. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas in and around our place of business. All Everpure emails, voicemails, and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of Everpure except where required for legitimate business purposes and only with appropriate confidentiality markings.

What's confidential?

Confidential information includes non-public information that might be of use to competitors or harmful to Everpure or its customers if disclosed, such as business plans, technical strategies, financial information, information related to Everpure products, data and results, inventions, works of authorship, trade secrets, software, patents, patent applications, licenses, suppliers, manufacturers, customers, market data, personnel data, personally identifiable information pertaining to our employees, customers, or other individuals (including, for example, names, addresses, telephone numbers, and social security numbers), and similar types of information provided to us by our customers, suppliers, and partners. This information may be protected by patent, trademark, copyright, and trade secret laws.

Proper Handling of Media Requests and Public Discussions

Everpure employees are not authorized to speak on behalf of the company to the media

This includes speaking with reporters “off the record” or for background or under any terms of confidentiality or secrecy regardless of whether the employee is contacted in a formal or personal capacity. Before you speak to the media about Everpure, you must seek approval from our Chief Legal Officer and/or VP of Global Communications.

If part of your role at Everpure involves contributing to public-facing social media content, such as blogs, wikis, social networks, virtual worlds, or any other kind of social media content, you must familiarize yourself with and follow our Social Media Guidelines.

Many Everpure employees also choose to engage in various social media platforms in a personal capacity on their own time. You should be mindful when using social media that your activities and statements should be consistent with the standards described in this Code of Conduct. If you endorse products or services, make political statements, or endorsements online in an account that identifies you as an Everpure employee, you should clearly state that you are expressing your own personal opinion and not the opinions of Everpure.

You should also be aware that there are special rules for disclosure of company financial information. Everpure discloses material financial information to the public only through specifically designated channels to avoid inappropriate publicity and to ensure that all those with an interest in Everpure will have equal access to information. All inquiries or calls from financial and industry analysts should be referred to Investor Relations (IR@purestorage.com) or to the Everpure Chief Legal Officer.

Our guidelines require, among other things

- Identify yourself honestly and clearly, and state your affiliation to Everpure
- Take care to make sure the information you post is truthful, accurate, and precise (particularly when using metrics and statistical information)
- Ensure the information you provide is complete and does not restate or alter the language of information in a way that would contribute to misunderstandings
- Give proper credit and attribution when you re-post or cite the ideas of others
- Protect confidential company information, including trade secrets and cybersecurity, and do not post publicly anything that should be kept confidential
- Exercise prudent judgment and make sure that any content you post is in line with our core values of honesty, integrity, and respect for others
- If you must respond to competitive claims or statements, be fact-based in your commentary

Relevant links

- Social Media Guidelines
- Trademark Usage Guidelines

Waivers

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of any exchange on which Everpure may list its shares and our Corporate Governance Guidelines, a committee of the Board and will be disclosed to stockholders as required by applicable laws, rules, and regulations.

Quick resources and links

- Pure Storage Policy Center of Excellence
- Pure Storage Published Policies

For policies, guidelines, and standards such as the below, please access our Policy Center of Excellence.

- Acceptable Use Standard
- Anti-Bribery and Anti-Corruption Policy
- Conflict Minerals Statement
- Document Retention and Destruction Schedule and Guidelines
- Employee Relations HUB Page
- Environmental Health and Safety Policy
- Equal Employment Opportunity
- Impact Report
- Expanded Security Region (ESR) Equipment Standard
- External Privacy Statement
- Guidance on Purchase Requisitions and Procurement
- Information Security Policy
- Investigations Safeguards Standard
- Partner Code of Conduct
- Privacy@Everpure Intranet Page
- Everpure Data Retention and Destruction Standard
- Everpure Finance Intranet Page
- Everpure Export Policy Statement
- Everpure Insider Trading Policy
- Social Media Guidelines
- Speak Up Policy
- Statement Against Human Trafficking
- Supplier Code of Conduct
- Trademark Usage Guidelines
- Travel & Expense Guidelines
- Anti-Discrimination, Harassment, and Bullying Policy

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