

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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## PURPOSE

Pure Storage, Inc. ("Pure Storage") 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 Pure Storage 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 Pure Storage's Legal Compliance team either in person or by emailing [legal@purestorage.com](mailto:legal@purestorage.com). Reports may also be submitted anonymously by using Pure Storage's hotline number 1-800-461-9330 or by submitting your concern online at <https://purestorage.com/speakup>.

## WHAT YOU MUST KNOW

**Pure Storage 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 Pure Storage's business.

**Pure Storage 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 Pure Storage's business. This includes soliciting kickbacks or other payments or benefits from Pure Storage's partners, vendors, or customers.

**Pure Storage maintains accurate books and records.** You must comply with all of Pure Storage'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](mailto: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 Pure Storage or an individual to face liability in several countries for the same single act of corruption.

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

Pure Storage 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. Pure Storage 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](mailto: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, Pure Storage 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 Pure Storage’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 Pure Storage’s business (for example, the award of a contract).



You must consult with Pure Storage's Legal Compliance team (either in person, by call, or via email at [legal@purestorage.com](mailto: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 Pure Storage'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 Pure Storage-branded gifts of moderate value such as plastic pens, T-shirts, coffee mugs, toys, or hats embossed with Pure Storage's logo. Such gifts will generally not violate anti-bribery laws because their purpose is the legitimate promotion of Pure Storage's brand.
- Pure Storage 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. Pure Storage should not pay for meals, events, travel, or entertainment where Pure Storage employees, Pure Storage partners, or other Pure Storage representatives will not be present. Likewise, the agenda of Pure Storage-sponsored seminars and other events should be primarily business related.
- Legitimate promotions build Pure Storage's brand and business relationships between Pure Storage and its partners and customers. As such, gifts, travel, meals, and entertainment cannot be provided to spouses, children, friends, or other relatives of Pure Storage 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, Pure Storage, 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](mailto: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**

Pure Storage 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](mailto: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 Pure Storage 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 Pure Storage 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](mailto: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](mailto:legal@purestorage.com)) immediately if you learn of any Pure Storage 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 Pure Storage 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 Pure Storage-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 Pure Storage'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 Pure Storage'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 Pure Storage's business.

You must carefully scrutinize activities, interactions, and transactions to avoid violations such as the above, and notify Pure Storage's Legal Compliance team ([legal@purestorage.com](mailto:legal@purestorage.com)) or Pure Storage's Internal Audit team ([ia@purestorage.com](mailto:ia@purestorage.com)) if you observe any of these types of practices in the course of Pure Storage's business. Please note that this is not an exhaustive list. You must also cooperate with Pure Storage'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 Pure Storage from engaging in self-dealing such as soliciting or accepting bribes, kickbacks, or other improper payments/benefits from Pure Storage's vendors or other persons in relation to our business. For instance, a violation of this policy will occur if you cause Pure Storage 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 Pure Storage's Legal Compliance team. For example, you must notify the Compliance Officer if you are aware of any (i) Pure Storage employee or relative of that employee who is a government official responsible for regulating Pure Storage or (ii) Pure Storage vendor that is wholly or partially owned by you, a member of your family, or a personal friend.

## **MONEY LAUNDERING**

Pure Storage 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). Pure Storage 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 Pure Storage's Legal Compliance team [legal@purestorage.com](mailto: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 Pure Storage 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, Pure Storage 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 Pure Storage. The nature, content, and frequency of that training will be determined by Pure Storage based on your risk profile. All employees are required to review and certify key Pure Storage 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 Pure Storage's Code of Conduct and other corporate, regional, or local policies and procedures.

## **CERTIFICATION**

Pure Storage 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 Pure Storage's Legal Compliance team either in person or at [legal@purestorage.com](mailto:legal@purestorage.com). You can also reach out to Pure Storage's Chief Compliance Officer either in person or via email at [complianceofficer@purestorage.com](mailto:complianceofficer@purestorage.com).

Reports may also be submitted anonymously by using Pure Storage'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. Pure Storage 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 Pure Storage 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, Pure Storage Legal, or Pure Storage's Employee Relations team know. Retaliation of any kind will not be tolerated and will result in termination of employment from Pure Storage or, for partners and suppliers, termination of your business relationship with Pure Storage.

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
1.5	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	

