



Pure Storage Partner Code of Conduct

January 2024



Wendy Stusrud, Vice President, Global Partner Sales

Pure Storage expects our partners to adhere to the highest ethical principles in conducting their business and to avoid engaging in any activity that involves even the appearance of impropriety. “You” refers to your organization as an authorized Pure Storage partner, and to your directors, officers, agents, contractors, consultants, and employees. You have a critical role in protecting the trust which investors, customers, colleagues, and the global business community place in Pure Storage and our partners.

This Code applies to you and your personnel in all of your activities related to your business relationship with Pure Storage throughout the world. You will ensure that this Code is given to your personnel who work with Pure Storage personnel or market Pure Storage products or services. Any violation of this Code will result in disciplinary action up to and including termination of your status as a Pure Storage partner.

This Code defines minimum standards of business conduct and acceptable business practices. If local laws and regulations are more permissive than this Code, you are expected to comply with the Code. If local laws and regulations are more restrictive, you must always comply with those legal requirements. Pure Storage expects that you have in place a code of conduct for your personnel that addresses topics similar to those contained in this Code.

On behalf of Pure Storage, thank you for your partnership and your contributions to our business. We owe our success to your support and we look forward to working together to create a better world as we deliver the modern data experience to our customers.

Wendy Stusrud

Vice President, Global Partner Sales



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Bribery and Corruption

Pure Storage has zero tolerance for bribery or corruption of any kind.

You must comply with all applicable federal, state, and local anti-bribery laws, including but not limited to the United States Foreign Corrupt Practices Act, the U.S. Federal Procurement Integrity Act, and the U.K. Bribery Act of 2010. You must not, directly or indirectly, make, offer, or authorize the payment of any money, gift, bribes, kickbacks, or anything of value to anyone (this includes gifts, travel, meals, and entertainment), including foreign or government officials, employees, or representatives of any government, company, or public or international organization, or to any other party, if such payment is intended, or could be perceived as intended, directly or indirectly, to improperly influence or obtain any unfair competitive advantage. You must fully comply with any rules regarding tender and bid processes. You may not offer employment, including unpaid positions, to government employees or officials or their family members if doing so would violate applicable laws. You must not use any Pure Storage funds (including MDF, rebates, and special discounts) entrusted to you for any purpose other than that which is specifically authorized and intended.

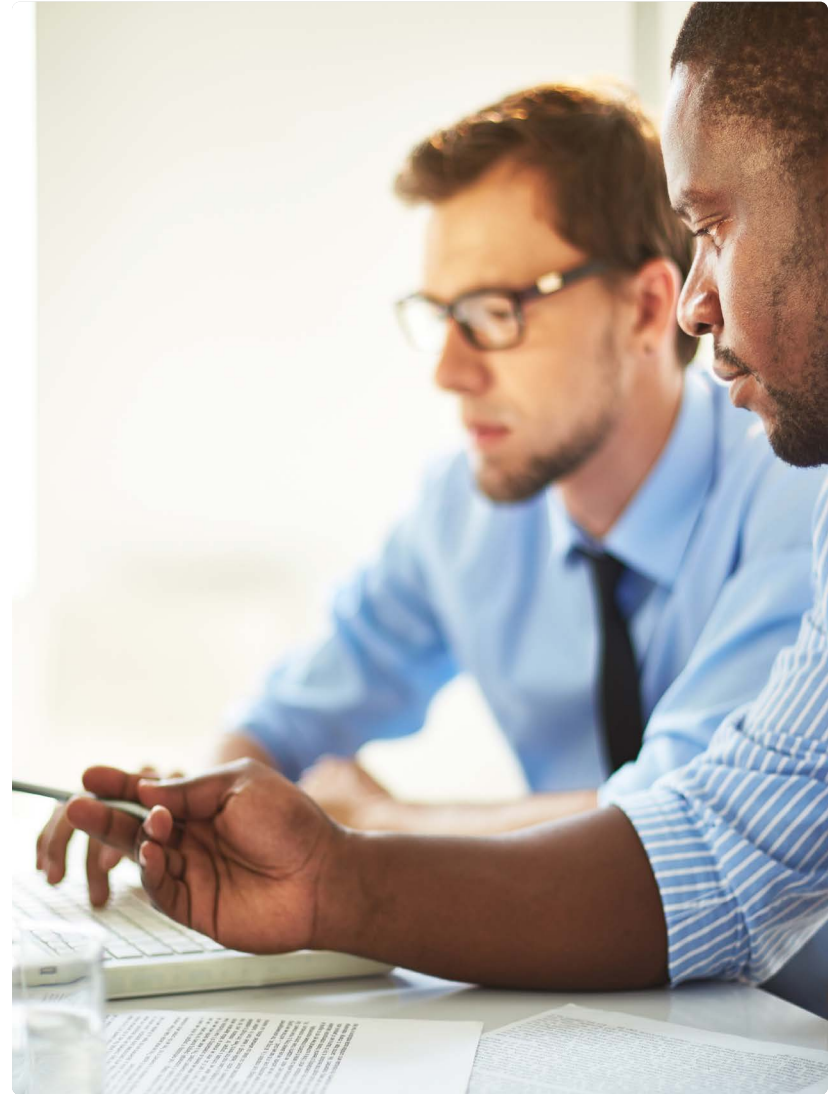
Additionally, Partners must perform due diligence on and may not work with or interact with any third-party or individual that is suspected of or engages in corrupt activities such as bribes, kickbacks, or fraud.



Integrity and Transparency

We expect financial integrity and transparency in all Pure Storage transactions.

Any documentation, information, and submissions that you provide to Pure Storage, other Pure Storage partners, and our joint customers must be complete, accurate, and not misleading in any way. This information includes, but is not limited to, point of sale reporting, purchase orders, sales reporting, special bid or pricing requests, rebate requests, and reimbursement requests. You may not create or maintain on behalf of Pure Storage bank accounts, funds, or pools of funds (including, for example, cash kept in a safe or a hidden account). You must disclose all parties involved in every transaction. Unless otherwise agreed by Pure Storage, all payments to Pure Storage must be made by the legal entity that is obligated to make those payments as referenced on relevant order documentation or agreement unless otherwise agreed by Pure Storage. You may not keep or maintain “off book” spreadsheets or other documents that are utilized to track activity in cash funds, credits, or discounts, etc. For partners who are designated as “direct” and for any direct sales, when you place an order with Pure Storage, you represent that you have in hand a valid documented purchase order from the end user consistent with your order submitted to Pure Storage.



Side Agreements

Unauthorized side agreements are strictly prohibited.

You must not make or attempt to make any written or oral agreements, arrangements, or commitments on behalf of Pure Storage, including product feature commitments, without written authorization from Pure Storage.

Fair Competition

Pure Storage competes fairly, and we expect you to compete fairly.

You must comply with all applicable antitrust and competition laws and regulations. It is not permissible for you to do or attempt to do any of the following: 1) agree with other partners or companies to fix or control prices for offerings; 2) agree with other companies to boycott suppliers or customers; 3) agree with other companies to divide or allocate markets or customers; or 4) coordinate bids among competitors.

Not Permissible

- Agreeing with other partners or companies to fix or control prices for offerings
- Agreeing with other companies to boycott suppliers or customers
- Agreeing with other companies to divide or allocate markets or customers
- Coordinating bids among competitors



Conflicts of Interest

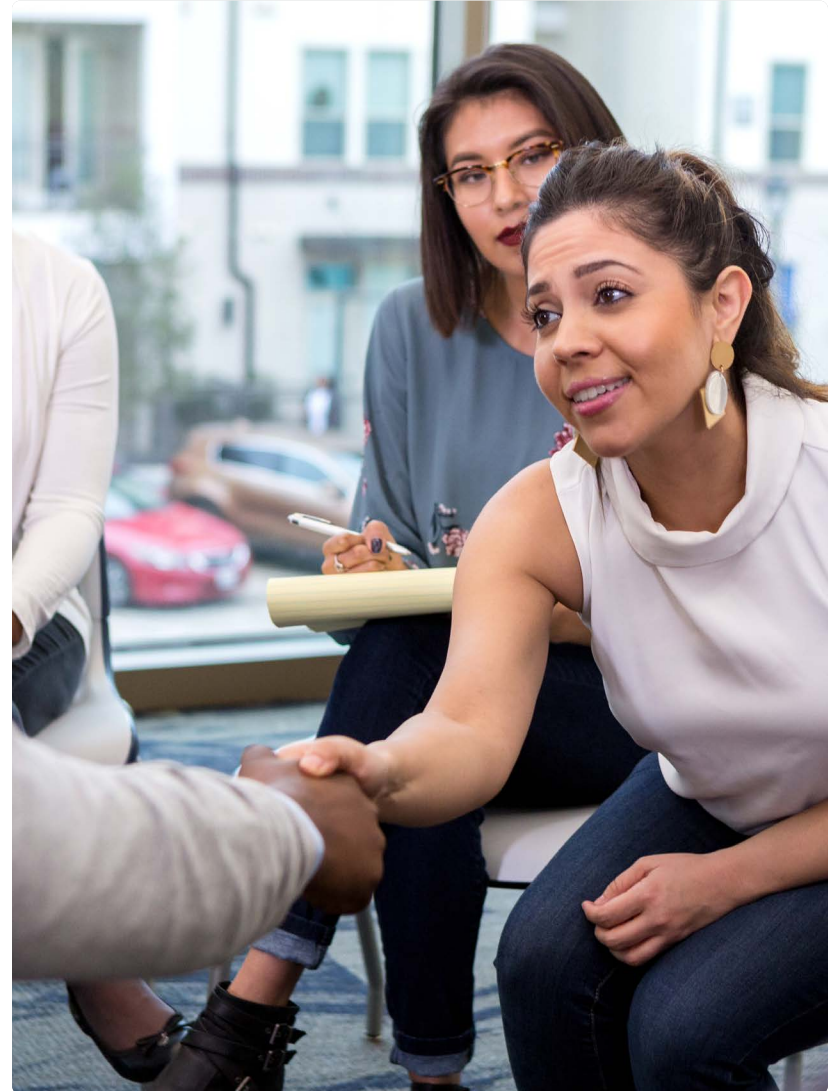
Pure Storage has zero tolerance for self-dealing of any kind.

You will not engage in any activity that would interfere with your contractual responsibilities to Pure Storage or that may be perceived as a conflict of interest that could reasonably be likely to interfere with such responsibilities. Conflicts of interest may include, but are not be limited to, Pure Storage personnel being your officers, directors, or shareholders, payment of incentives to Pure Storage personnel, or any economic or family relationship with Pure Storage personnel. In the event you become aware of a conflict of interest or potential conflict of interest, you must promptly notify Pure Storage.

Be Honest

You must deal honestly with our customers.

All statements, communications, and representations to Pure Storage customers must be accurate, complete, and not misleading in any way. All activities funded by Pure Storage MDF must comply with Pure Storage's MDF Guidelines and processes.

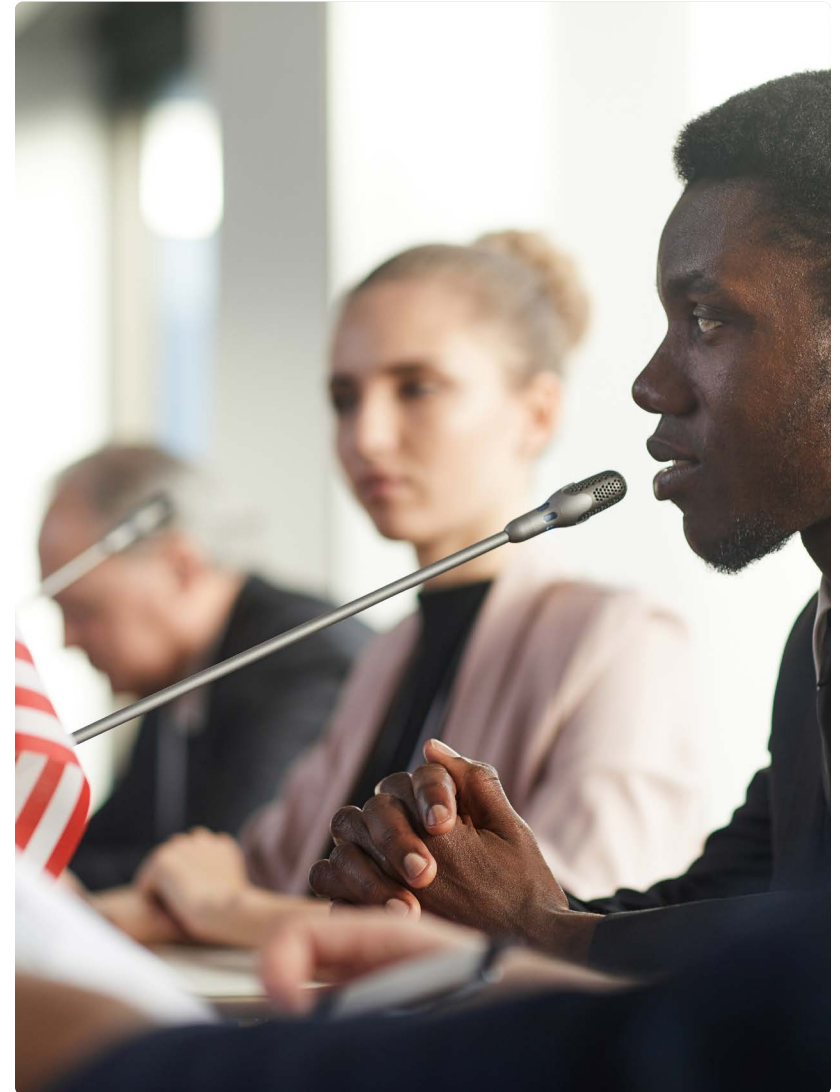


Government Customers

We expect you to observe and comply with special rules and regulations applicable to government customers.

Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with government entities, as well as public sector enterprises that are government-owned, government-controlled, or subject to government procurement rules (“Government Customers”). If you sell to government customers, you must observe all laws, rules, procurement regulations and contract clauses that relate to the acquisition of goods and services by such government customers, whether such sale is direct or indirect, and including marketing or recommendation of Pure Storage products and/or services.

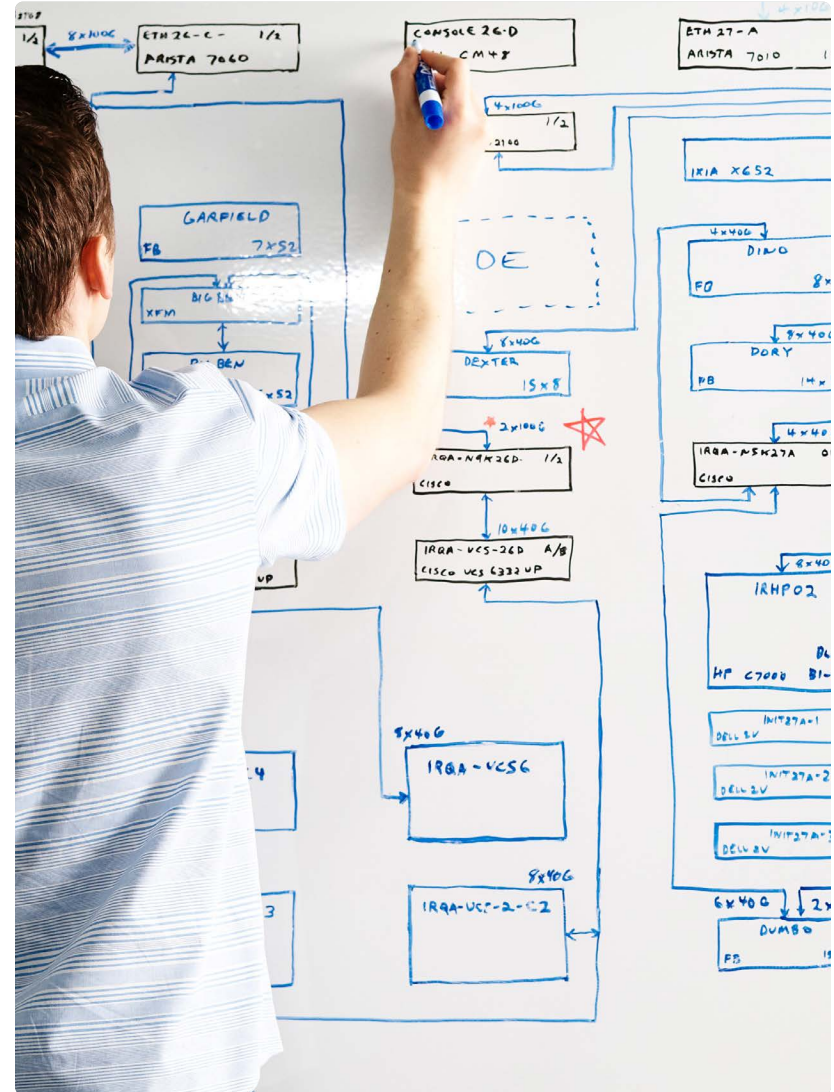
Government Customers also include public sector enterprises (including, but not limited to universities, libraries, hospitals, some utility and telecommunications companies).



Information and Intellectual Property

You must protect Pure Storage's confidential business information and intellectual property.

You must maintain the confidentiality of any confidential information or proprietary information that you obtain in the course of your business relationship with Pure Storage and our joint customers. You must not use Pure Storage's intellectual property (including trademarks, trade secrets, patents, technology, and software) unless properly authorized to do so by agreement. You must not reproduce copyrighted software, documentation, or other materials unless properly authorized to do so. You are responsible for making sure this restriction is understood and followed by your employees and agents and you must also observe any applicable data privacy requirements.





It's the Law

Data Privacy and Data Protection Laws

We expect you to comply with all applicable data privacy and data protection laws. As a Pure Storage partner, you must comply with all applicable data privacy and information security laws when handling sensitive or personal information.

Trade Law

You must comply with all applicable trade law. Products and services often contain technology that is regulated and may only be distributed to authorized end users and always in compliance with any trade embargoes and sanctions. You must have and follow a documented export control program designed to assure compliance with U.S. and all other applicable export and import laws and regulations. Except under license or as otherwise permitted under such laws and regulations, you shall not export, re-export, transfer, divert, release, import, or disclose to any other person or entity, or make any use of any 1) Pure Storage hardware or software or 2) technology relating to Pure Storage's current or future products.



Responsible Business

Respectful Conduct

Pure Storage expects professional, respectful conduct in all dealings. You and your personnel must conduct yourselves in a professional manner while representing Pure Storage products and services in the marketplace. This means treating all persons with dignity and respect in a businesslike manner while marketing, selling, or supporting Pure Storage products and services.

Sustainability

Pure Storage expects partners to conduct business in an environmentally responsible manner, and comply with all relevant environmental laws and regulations.

Harassment and Discrimination

Pure Storage has zero tolerance for harassment or discrimination of any kind. Diversity and inclusion are core values for Pure Storage, and statements or actions of any kind that are harassing, discriminatory, or retaliatory may be grounds for corrective action, including termination of the partner relationship.

Please refer to the [RBA Code of Conduct sections on Humane Treatment and Non-Discrimination / Non-Harassment](#) for further information.



Responsible Business Alliance

Advancing Sustainability Globally

We expect you to treat your workers fairly, minimize your adverse impact on the environment, and safeguard the health and safety of the public. Pure Storage complies with and expects its partners to comply with the standards on social, environmental, and ethical issues set forth in the electronics industry [Responsible Business Alliance \(“RBA”\) Code of Conduct](#).



Your Relationship with Pure Storage

You and Pure Storage are independent contractors, and neither party shall be considered the agent of the other party for any purpose whatsoever. Nothing in this Code shall be construed as establishing a partnership or joint venture between the parties.

You Have a Responsibility to Speak Up

If you become aware of any unethical conduct or dealings in connection with a Pure Storage deal, we expect you to report it to Pure Storage, either through your contacts or directly to Pure Storage Legal Compliance at compliance@purestorage.com. Anonymous reporting avenues are also available to you online at purestorage.com/speakup or by calling our hotline at 1-800-461-9330. Failure to report issues of which you become aware may result in Pure Storage taking remedial action, including termination of the partner agreement.

You Are Subject to Periodic Compliance Audits

Pure Storage has a global channel compliance audit program in place, and may audit compliance with this Code or appoint a third party to conduct an audit to the extent allowed under the terms of your partnership agreement. This includes but is not limited to sample testing your books and records, discount pass-through, and anti-corruption/compliance program materials. Any opportunities for improvement or violations will be reported to the partners' management for their attention and, if appropriate, corrective action.

Pure Storage Will Enforce Compliance with This Code

It is the intention of Pure Storage to terminate its relationship with any partner who does not comply with this Code or, upon discovery of noncompliance, does not commit to a specific plan to achieve compliance. This Code is in addition to the terms of your Agreement with Pure Storage, Inc. and its affiliates and may be changed by Pure Storage from time to time, as indicated by the last revised date, below.

Training Resources

Additional online partner code of conduct and sustainability training resources are available to partners. Please contact compliance@purestorage.com to learn more.



About Pure Storage, Inc.

Pure Storage helps innovators build a better world with data. Pure Storage's data solutions enable SaaS companies, cloud service providers, and enterprise and public sector customers to deliver real-time, secure data to power their mission-critical production, DevOps, and modern analytics environments in a multi-cloud environment. One of the fastest growing enterprise IT companies in history, Pure Storage enables customers to quickly adopt next-generation technologies, including artificial intelligence and machine learning, to help maximize the value of their data for competitive advantage. And with a Satmetrix-certified NPS customer satisfaction score in the top one percent of B2B companies, Pure Storage's everexpanding list of customers are among the happiest in the world.

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purestorage.com

800.379.PURE

