




2021 ESG REPORT
OUR OPERATIONS



Confidence in Our Operations

Ethical Business Practices

Pure prides itself on our commitment to ethics throughout all of our business activities. From our Board of Directors to our supply chain partners, we promote stringent measures to ensure ethical behavior and decision-making to ensure we operate with honesty, integrity, and respect for others.

Ethical business practices are central to Pure's mission and business success, and are critical to developing and maintaining relationships with our customers, our partners, and the communities we serve. Our [Code of Conduct](#) and other policies are the foundation of an equitable and inclusive workplace.

Pure's Chief Legal Officer oversees ethics and reports directly to the CEO.

The Chief Legal Officer also provides quarterly presentations to the Board of Directors and the Audit Committee on Pure's ethics, integrity and compliance program.



Corporate Governance

Pure's Board of Directors understands the importance of sound governance. All of Pure's standards and policies contribute to an ethical and inclusive business and workplace. Our Board of Directors is currently composed of 10 directors, including Chairman and CEO, Charles Giancarlo. The Board oversees the management of the company's business and serves as a prudent fiduciary for the shareholders. The Board contains three committees that meet at least quarterly to receive and discuss updates on topics within each committee's purview.

Our [Corporate Governance Guidelines](#) guide our Board's activities and provide the structure within which our directors and management can effectively pursue Pure's business objectives. The Board also receives annual updates on ESG initiatives and information on the impact of the [Pure Good Foundation](#).

For more information about our governance policies and practices, please visit our [Corporate Governance webpage](#).

Pure's Board Committees

Audit and Risk Committee

Oversees Pure's corporate accounting and financial reporting processes, monitors for enterprise risks, and provides oversight of Pure's environmental sustainability efforts.

Compensation and Talent Committee

Reviews and determines compensation to be paid to Pure's executive officers and directors, and provides oversight of Pure's Human Capital Management, DEI, and talent acquisition, development, and retention efforts.

Nominating and Corporate Governance Committee

Recommends corporate governance practices, periodically reviews and assesses our Corporate Governance Guidelines, and identifies and recommends candidates to serve as directors at Pure.



Code of Conduct and Related Policies

To foster a culture of ethical decision-making, we expect all of our employees and business partners to adhere to our [Code of Conduct](#), which sets forth Pure's key values of integrity, honesty, and respect for others. Available in 10 languages, the Code of Conduct applies to all Pure employees, officers, and Board members, and we expect contractors, partners, service providers, customers, suppliers, and vendors to abide by the same values and principles when working on behalf of Pure.

The Code of Conduct covers a variety of important topics, including:

- Conflicts of interest
- Antitrust and competition
- Workplace conduct
- Insider trading
- Accurate records and financial reporting
- Protecting Pure's confidential materials and intellectual property



Driving Ethical Conduct and Practices

As part of new employee onboarding, and in January of each calendar year, all Pure employees acknowledge receipt of and agree to abide by the following:

- Code of Conduct
- Anti-Bribery and Anti-Corruption Policy
- Zero Tolerance for Workplace Harassment Policy
- Insider Trading Policy
- Information Security Policy
- Import/Export Statement

In addition to Pure's Code of Conduct and policies mentioned above, Pure also has a [Statement Against Slavery and Human Trafficking](#) and a [Policy on Conflict Minerals](#).

As part of Pure's focus on **ethical behavior and business practices**, all employees complete annual mandatory training on the Code of Conduct, anti-discrimination and harassment, and privacy. Pure also requires annual supplemental business integrity and anti-bribery and anti-corruption training for the Sales and Finance teams. In 2020 and 2021, Pure did not have any confirmed incidents of bribery or corruption.

Pure's partners are expected to follow a similar Code of Conduct, which provides business expectations and guidance to our channel and reseller partners, including a mandate that they follow the [Responsible Business Alliance Code of Conduct](#). The Partner Code of Conduct is available in several languages.

Pure also expects its manufacturing suppliers to follow the Responsible Business Alliance framework as a way to improve social, environmental, and ethical standards through global supply chains. For more detail, see the [Sustainable Supply Chain](#) section of this report.

In 2022, we will issue a Purchasing Code of Conduct for all of our non-manufacturing suppliers.





Speaking Up at Pure

Pure is a Safe Space

Pure employees are empowered to speak up and voice any concerns, including suspected violations of the Code of Conduct. Pure takes all concerns, grievances, and whistleblower reports seriously. We maintain an [anonymous Speak Up hotline](#) with both a dedicated phone number and webform by which anyone—including third parties—can submit concerns. Every concern raised through our platform is thoroughly reviewed, and investigated by Pure's Legal, Human Resources, and/or Internal Audit teams.

Pure's Speak Up platform and all related complaints are managed by our Chief Legal Officer and Legal Team.

In 2021, Pure hosted its first ever, week-long Pure Compliance Club, which showcased innovative training sessions on ethical decision making and current legal topics and expert speakers shared stories of excellence and missteps in corporate compliance. Pure Compliance Club will be an annual event, part of a broader effort to build and maintain a culture of sound and ethical decision making.

In 2020, Pure began conducting a survey measuring how the employees felt about ethics and compliance at Pure.

The 2021 Survey Showed:

95% of more than 2,300 employees who responded to our survey agreed or strongly agreed that Pure “acts on a clear set of core ethical values.”

96% of employees agreed or strongly agreed that executive management sets clear expectations about the need to comply with the Code of Conduct.

93% of employees agreed or strongly agreed that “Pure demonstrates our core values through our transactions with third parties, including partners and customers.”





Environmental Impact

Sustainability Initiatives

Pure reduces our impact on the environment through several initiatives, including: product recycling; reduction of carbon footprint through responsible transportation; and choosing responsible suppliers. Pure strives to reduce the energy and water used to operate our products. This is where our design to lower energy use by our products is important.

Pure is also committed to building a better planet through environmental sustainability and efficiency. Pure complies with all European Union waste regulations from the Electrical and Electronic Equipment (WEEE) Directive, including the Waste Batteries Directive and Restriction of Hazardous Substances (RoHS) Directive.

Pure strives to exceed mandated requirements by providing additional value to our stakeholders. We believe that compliance alone cannot solve our planet's most pressing problems.



Energy, Emissions, and Climate Resilience

As part of our environmental strategy, we are working to quantify and minimize our impact on the environment from our operations and supply chain. As part of our strategy, we also focus on building resilience to the physical risks of climate change.

To support our strategy, our Global Head of Social Impact & Sustainability monitors our GHG emissions, climate strategy and environmental initiatives. The Head of Social Impact & Sustainability reports directly to the Chief Legal Officer, annually to the full Board of Directors, and quarterly to Board Committees on ESG topics, including Pure's environmental impacts.

Energy and Emissions Data for FY20	
Scope 1 Emissions	273 metric tons (t) CO ₂ e
Scope 2 Emissions, Location-based	16,102 t CO ₂ e
Scope 2 Emissions, Market-based	16,236 t CO ₂ e
Scope 3 Emissions	236,170 t CO ₂ e
Purchased Goods and Services	31,354 t CO ₂ e
Capital Goods	3,468 t CO ₂ e
Fuel- & Energy-Related Activities	1,973 t CO ₂ e
Upstream Transportation & Distribution	5,479 t CO ₂ e
Business Travel	14,908 t CO ₂ e
Employee Commuting	10,047 t CO ₂ e
Use of Sold Products	168,844 t CO ₂ e
End of Life Treatment of Sold Products	97 t CO ₂ e
Scope 1 and 2 Market-based Emissions Intensity	4.9 t CO ₂ e per employee
Scope 3 Use of Sold Products Emissions Intensity	65 t CO ₂ e per effective petabyte shipped
Energy consumption	65,018 MWh
Total grid electricity consumption	63,689 MWh
Total fuel consumption from non-renewable resources	1,329 MWh

* All data collected and verified by WSP



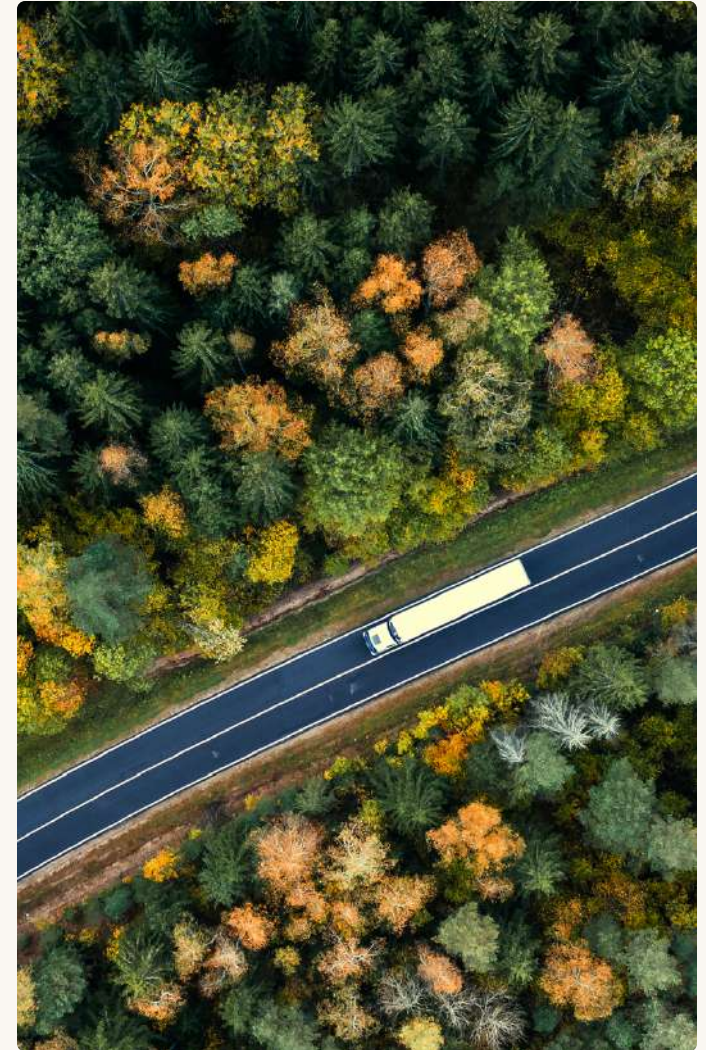
Climate Resilience

To continue providing seamless service to our customers, Pure must ensure our operations, employees, supply chain, and communities are resilient to the impacts of climate change. Pure takes a proactive approach toward climate-related risk mitigation.

The management of climate-related risks is embedded into our enterprise risk management and business continuity planning processes. As part of our current climate resilience strategy, Pure evaluates physical risks to our business from hazards like hurricanes, floods and extreme weather, and creates plans to keep operations running during these events. All Pure contract manufacturers are required to have business continuity plans (BCPs) that Pure reviews on a quarterly basis. Our contract manufacturers' BCPs include management of climate-related physical risks.

Pure's operations team developed a multi-site, multi-continent strategy to enhance resilience at our manufacturing sites. If unforeseen circumstances impact one of our facilities, we can quickly shift production to another part of our manufacturing supply chain. Our flexible, nimble, and responsive supply chain enables us to deliver to our customers when shortages stemming from natural disasters and the COVID-19 pandemic occur. For more detail, see the [Sustainable Supply Chain](#) section of this report.

In 2022, we will develop an enterprise-wide resiliency plan that will specifically consider climate-related impacts to our business and identify proactive opportunities to enhance our climate resilience throughout our operations and supply chain. In the future, we plan to align our climate reporting with the recommendations of the Task Force for Climate-related Financial Disclosures (TCFD). We will report on the progress of our climate program and strategy in our 2022 CDP Climate Change response.



Sustainable Supply Chain

To Pure, a sustainable supply chain means our ability to uphold environmental and labor standards throughout a diverse supply chain while meeting demand for our product. We believe that by building a resilient and ethical supply chain, we can build a stronger product, more resilient supply chain partners, and better serve our communities.

Pure employs robust management and oversight of our supply chain. Our Vice President of Operations is responsible for our supply chain management and reports directly to the CEO. Our operations team reports quarterly to the Board of Directors on sustainable supply chain management. Within both the operations and finance teams, dedicated team members oversee and execute our enterprise risk management and business resiliency processes.

Discover how Pure can help you achieve your own commitment to sustainable business goals.

[Download the Full 2021 ESG Report](#)

