



Code of Conduct 2025



Message from Charlie

Hello Pure Team,

Pure Storage 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. Pure Storage's 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 Pure Storage, conduct counts. Our Code of Conduct should be your lodestar for how to act when carrying out business on behalf of Pure Storage. 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, Pure Storage 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 Pure Storage and we expect every Pure Storage 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 Pure Storage a great place to work.

Thank you,



Charlie Giancarlo, Chairman & CEO

Conduct Counts

01 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, Pure Storage Legal, your Human Resources Business Partner, Pure Storage Finance or other appropriate organization listed in the [Speak Up](#) section of this Code.

02 Integrity means doing the right thing, and doing things right. It means operating in the customer's interest, in Pure Storage's interest, and in compliance with global laws and regulations—not in your own self interest.

03 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 Pure with the business advantage that can only come from a broad comparison of ideas, and mutual respect is how we win together.

04 Win the right way. At Pure Storage, 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.

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

06 Be a Global Citizen. Pure Storage 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.

07 Respect Confidentiality and Privacy. Pure Storage employees have obligations to protect any private data entrusted to the Company and to protect the confidentiality of Pure Storage's own information from disclosure.

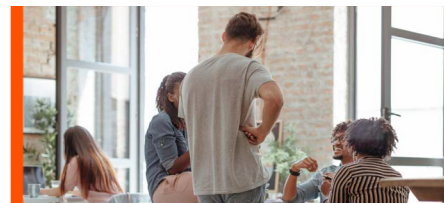
08 Safeguard Our Information Security. Protecting the Company also means strictly following our information security policies and guidelines whenever you are using Pure Storage systems.

09 Prevent Waste and Protect the Company. Integrity also means protecting our company assets, ensuring their efficient use, and preventing waste.

10 When in doubt, Speak Up! Pure Storage 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

Pure Storage 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 will help guide you in preserving our reputation and values.

As Pure Storage 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 below in our [“Speak Up!”](#) section.



Our Code Applies to All

Our Code Applies With Equal Force to All Pure Storage Employees, Contractors, Officers, and Board Members

We also require that our partners, suppliers, and vendors abide by these standards when working on behalf of Pure Storage. 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 range 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, Pure Storage Legal, Pure Storage Employee Relations, or any of the other resources listed below or elsewhere in this Code. Pure Storage contractors may seek advice from their managers or use Pure Storage's Speak Up portal.

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

Pure Storage 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 Pure Storage Legal or Human Resources by reaching out to the contacts below.

How To Speak Up! Report Concerns To:

- Your manager or [Human Resources Business Partner](#)
- Pure Storage [Employee Relations](#)
- Pure Storage Legal: legal@purestorage.com
- Pure Storage Chief Compliance Officer: complianceofficer@purestorage.com
- [Speak Up Tool](#) (web portal with options for anonymous reporting)
- The Audit & Risk Committee of the Pure Storage Board of Directors: auditcommittee@purestorage.com
- Pure Storage 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, 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.

What to Expect When I Report a Violation or a 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 & Respect

The Foundation of Our Culture

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

Pure Storage 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 Pure Storage. Failure to meet common standards for respectful conduct can result in negative employment consequences, including termination of employment.



RELEVANT LINKS

- [Employee Relations HUB Page](#)



Discrimination, Harassment and Bullying

Pure Storage 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, Pure Storage 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 Pure Storage employees and contractors are expected to regularly complete anti-harassment and anti-discrimination training as a condition of employment or work engagement. Pure Storage 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, or any physical or mental disability, whether actual or perceived, taking protected leaves (e.g., maternity leave, parental leave, sick leave, disability leave, etc.), pregnancy, childbirth, or other related medical conditions. For more information please see our [Zero Tolerance for Workplace Discrimination or Harassment 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,” above on [page 08](#).

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

- [Speak Up Policy](#)
- [Zero Tolerance for Workplace Discrimination or Harassment Policy](#)
- [Supplier Code of Conduct](#)
- [Partner Code of Conduct](#)
- [Equal Employment Opportunity](#)

Commitment to Diversity, Equity and Inclusion

Pure Storage Is a Company Driven by Innovation and Creativity

We maintain our drive and vision by valuing unique perspectives and celebrating our employees' diverse backgrounds, cultures, experiences, and ideas, and we create teams that foster relationships that are unconditionally inclusive and bring out the best of our individuals. Pure Storage employees, and especially people managers, are expected to support diversity, equity, and inclusion in our global workforce and culture.

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

Pure Storage ERGs



Coalition

[Learn More](#)



Pride

[Learn More](#)



Women

[Learn More](#)



Rise

[Learn More](#)



Veterans

[Learn More](#)



Able

[Learn More](#)

Keeping Pure Storage a Safe and Healthy Place

Pure Storage 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 Pure Storage events.

You may not bring any weapon—such as a gun, knife, taser, etc.—into any Pure Storage office, a customer or partner site, or any Pure-sponsored event. Actual violence, threats of violence, or carrying weapons in connection with your work at Pure Storage can result in adverse employment action, including termination and referral to law enforcement. You must report any suspicious activity at any Pure Storage office to Pure 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 Pure Storage Legal.

For Immediate Threats to Health or Safety:

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



Remember That You Are a Pure Storage 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 Pure Storage—whether in the office, at an after-hours work activity, an offsite, or Pure Storage-sponsored event. 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 Pure Storage 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 Pure Storage, 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 a Pure Storage employee, you are required to understand the laws, rules, and regulations applicable to Pure Storage 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, Pure Storage Legal, or reach out directly to legal@purestorage.com.



Avoiding and Disclosing Conflicts of Interest

Pure Storage 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 Pure Storage or any relationship that might deprive Pure Storage 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 Pure Storage, including termination from employment. Conflicts of interest can arise in many different situations, but the most common are described below:

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 Pure Storage 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 Pure Storage employee or with owners or employees of Pure Storage 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 Pure Storage or is applying for employment at Pure Storage, you must notify Pure Storage 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 a Pure Storage partner or a Pure Storage vendor, especially if that family member is an owner or controller of that company, you must disclose that relationship to Pure Storage Legal (legal@purestorage.com). If you are concerned about a family relationship conflict, you should err on the side of disclosure.

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 Pure Storage 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.



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 Pure Storage Legal. If you are asked to join a board or take an advisory position of any kind, please reach out to Pure Storage Legal (legal@purestorage.com) immediately to discuss. Please also be aware that there are special rules regarding when you can identify yourself as a Pure Storage employee as part of your service, and see the section below regarding Media and Public disclosures.

If you think that you may have a conflict of interest with Pure Storage 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 Pure Storage—ideally before entering into the relationship—and seek guidance from Pure Storage Legal on whether it will impact your employment at Pure Storage. 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 Pure Storage 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 Pure Storage, 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 Pure Storage.

Receiving Gifts and Hospitality From Third Parties Can Be A Conflict of Interest, Too

Accepting gifts and hospitality from third-parties, such as vendors or partners, can create an actual or potential conflict of interest. Receiving nominal branded swag-type gifts (t-shirts, mugs, etc.) from is generally acceptable, but accepting more lavish gifts can create the appearance of impropriety and is generally prohibited. In particular, Pure Storage employees are prohibited from accepting gifts of travel, including flights, accommodations, and other perks from vendors without prior approval of Pure Storage's Chief Legal Officer. You should consult the section below on giving gifts ([Page 18](#)) 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 Pure Storage
- The nature of Pure 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 Pure Storage
- The impact on the performance, responsibilities or morale of the employee or others at Pure Storage
- Whether it would enhance or support a competitor's position; and the extent to which it would appear improper to an outside observer



Bribery and Corruption

Pure Storage Conducts All of Its Global Business With Integrity

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

Compliance with Global Anti-Corruption Laws

Pure Storage 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, and 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 Pure Storage does business, but as a Pure Storage 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 Pure Storage 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 Pure Legal, Pure Finance, and your VP and build in sufficient time 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 consult Pure Storage's [Anti-Bribery and Anti-Corruption Policy](#) closely before offering any gifts or meals to public sector employees, keeping in mind that most public sector gifting requires pre-approval by Pure Storage 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



Pure Storage's zero tolerance 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, Pure Storage can be held responsible for the bad acts of its partners and vendors if they are made in connection with Pure Storage business. If you as a Pure Storage employee suspect or are concerned that a third-party may be engaging in corrupt conduct on behalf of Pure Storage or in connection with Pure Storage 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 Pure Storage 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

Pure Storage's 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, and we rely upon these records to produce accurate and complete reports for our management, stockholders, creditors, and governmental agencies, including the U.S. Securities and Exchange Commission (the "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 of any of our liabilities or mis-classifies 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; and
- 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 Pure Storage books and records, including but not limited to:

- Financial statements and public filings;
- Travel bookings and Expense reports (see more below on [Page 26](#));
- Purchase Requisitions and Purchase Orders;
- Credit Notes;
- Import/Export documentation;
- Sales certification;
- Tax filings and documentations;
- Invoices and sales orders; and
- Product testing and performance metrics.

Cooperation For All Pure Storage Employees



All employees must cooperate fully with Pure Storage 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 Pure Storage 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 or the Audit and Risk Committee of our Board of Directors by email to: auditcommittee@purestorage.com.



RELEVANT LINKS

- [Travel & Expense Guidelines](#)
- [Guidance on Purchase Requisitions and Procurement](#)
- [Pure Finance Intranet Page](#)

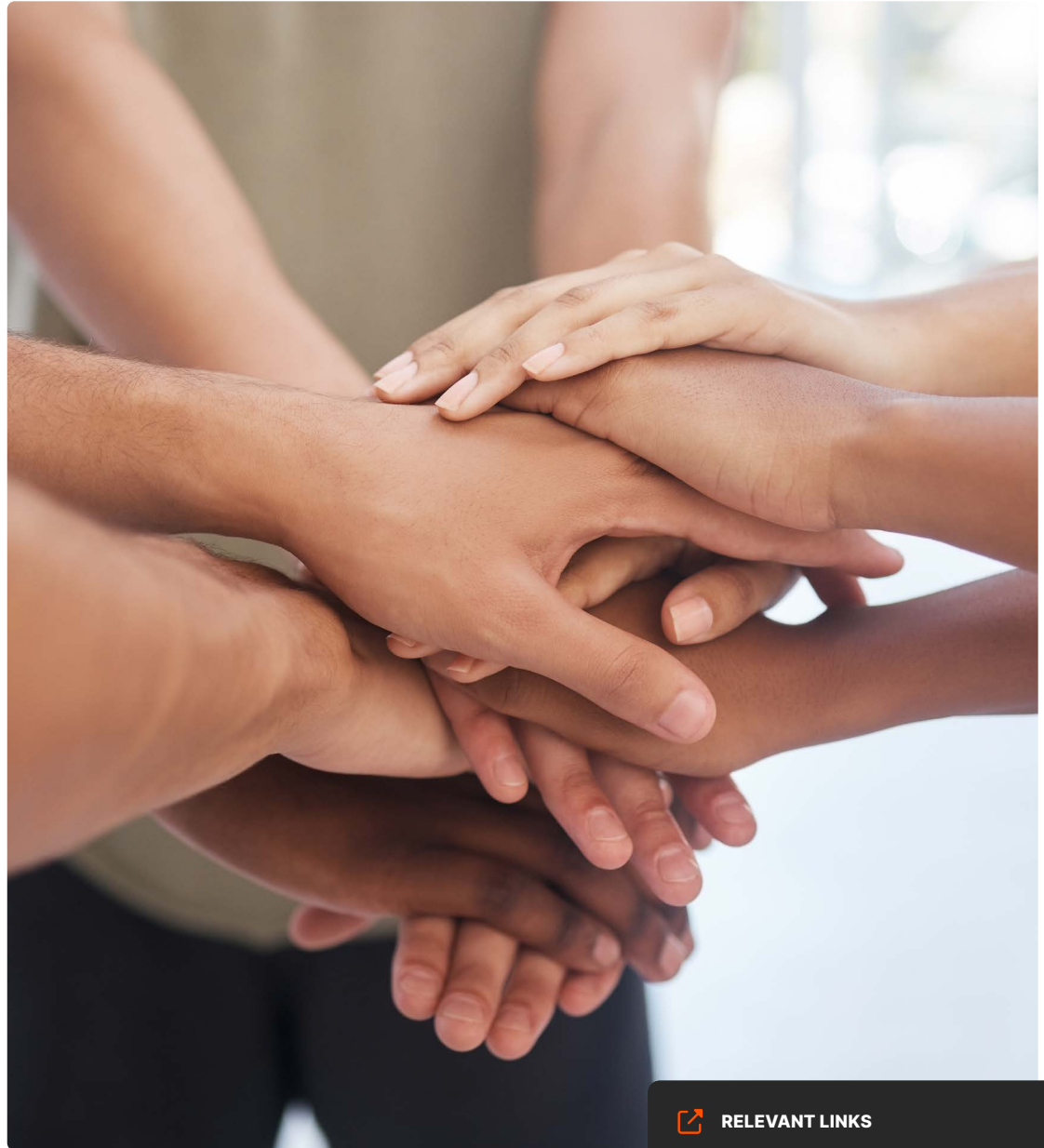
Respecting Human Rights

Pure Storage Is Committed to Respecting Human Rights and Fair Labor Standards in Our Own Business and Throughout Our Global Supply Chain

Pure Storage 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 Pure Storage business in any way. This rule applies to all Pure Storage employees and contractors anywhere in our global workforce and to all Pure Storage Suppliers.

In addition to Pure Storage's own Supplier Code of Conduct, Pure Storage is a member of the Responsible Business Alliances and Pure Storage 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 (worker health and safety, the environment, business ethics).

Pure Storage 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](#)
- [ESG Report](#)



Compliance with Global Export and Trade Rules

Pure Storage 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 Pure Storage 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 at the resources listed in this Code.



RELEVANT LINKS

- [Pure Storage Export Policy Statement](#)

Environmental Stewardship and Responsibility

Reducing Environmental Impact and Lowering Carbon Emissions Is Part of the Core Innovation of Pure Storage 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 our 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

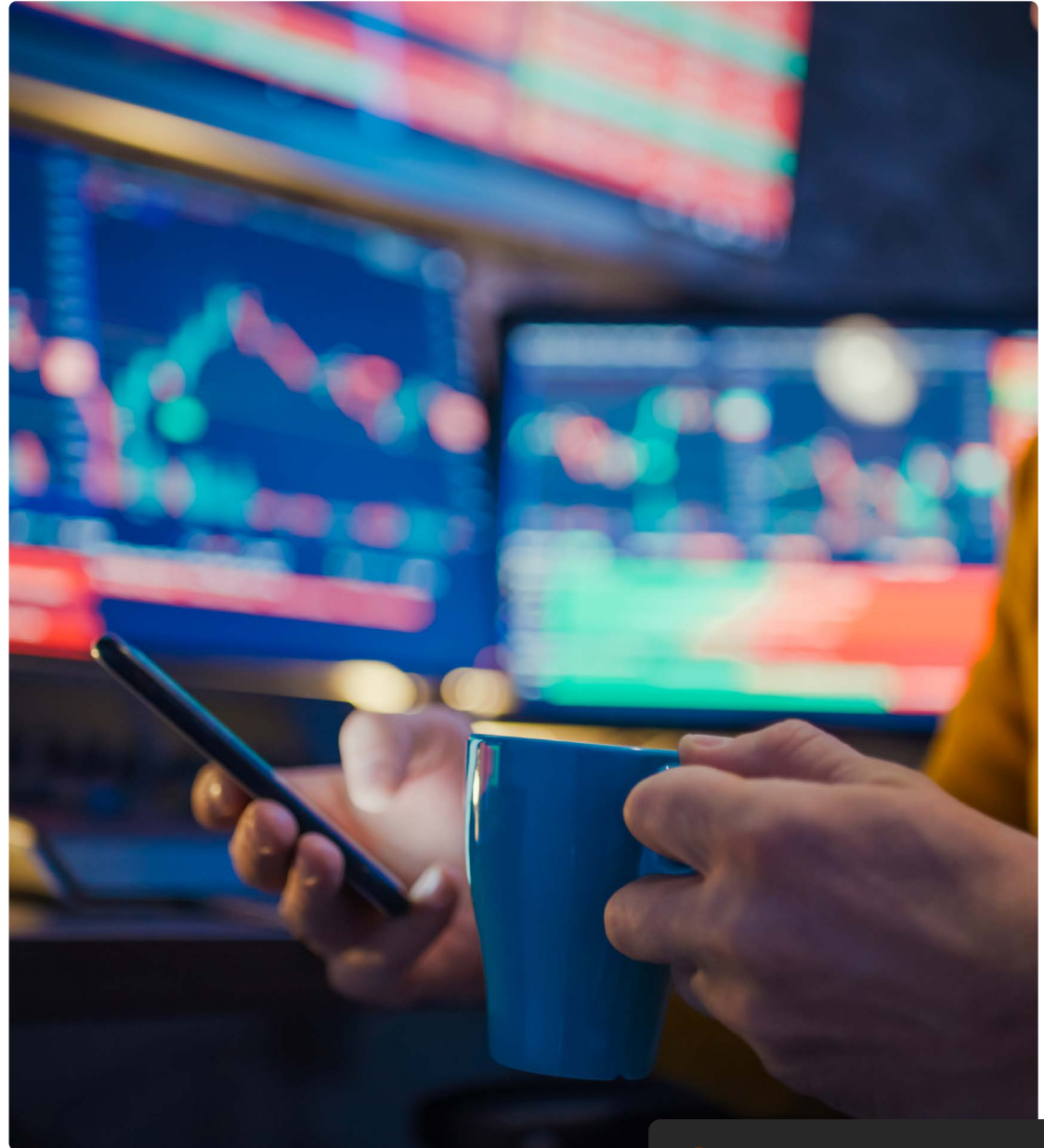
- [Environmental Health and Safety Policy](#)
- [ESG Report](#)
- [Pure Storage Insider Trading Policy](#)

No Insider Trading

As a Pure Storage 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 Pure Storage 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 Pure Storage business.

This includes sharing that information with third-parties (“tipping”) who then engage in stock transactions. Pure Storage employees are also required to abide by periodic “blackout” periods that may impact your ability to sell or buy Pure Storage 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 [Pure Storage Insider Trading Policy](#) for more information.



RELEVANT LINKS

- [Environmental Health and Safety Policy](#)
- [ESG Report](#)
- [Pure Storage Insider Trading Policy](#)

Protecting Sensitive Data and Respecting Privacy Rights

Safeguarding the Personal Data Provided to Us by Pure Storage's Customers, Employees, Partners, and Others Is Critical to Building and Maintaining Trust

Pure Storage 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 Pure Storage employee to take a shared ownership in our commitment to data privacy. All Pure Storage employees are required to regularly complete data privacy training, and Pure Storage 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 a Pure Storage employee, you must not disclose Pure Storage 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 Pure Storage, or on our behalf by a third-party, has been improperly disclosed, breached, stolen, or leaked (even inadvertently), you must contact Pure Storage Legal's 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 Pure Storage does business.



RELEVANT LINKS

- [External Privacy Statement](#)
- [Pure Data Retention and Destruction Standard](#)
- [Document Retention and Destruction Schedule and Guidelines](#)
- [Privacy@Pure Intranet Page](#)



**Protecting
Pure Storage**



Physical Security and Use of Pure Storage Property

As a Pure Storage Employee, You Must Protect Our Assets and Ensure Their Efficient Use

Theft, carelessness, and waste have a direct impact on our profitability. Pure Storage 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 Pure Storage are intended as a benefit during hours of service to Pure Storage.

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

Expense Reporting

Pure Storage 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 Pure Storage's [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

Pure Storage Operates With the Highest Standard of Information Security

Pure Storage employees, contingent workers, and business partners are expected to do their part to prevent unauthorized access to Pure Storage systems and to protect the devices and information entrusted to them. This means that Pure Storage 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 at least annually.



RELEVANT LINKS

- [Information Security Policy](#)
- [Acceptable Use Standard](#)
- [Investigations Safeguards Standard](#)
- [Expanded Security Region \(ESR\) Equipment Standard](#)

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

- Safeguard passwords and any information or hardware that is assigned to them;
- Not use Pure Storage 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 Pure Storage 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 Pure Storage 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 (aka 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 Pure Storage and must be used only in accordance with Pure Storage policies. If you use a personal device, such as a mobile phone, to access Pure Storage systems, the information continues to belong solely to Pure Storage. Pure Storage does not actively monitor its employees' systems use, but we reserve the right to do so in accordance with our [Investigations Safeguards Standard](#).

Concerned About A Security Issue:

If you believe someone may have gained unauthorized access to Pure Storage systems or that Pure Storage confidential information may have been exposed to unauthorized parties, you have an obligation as a Pure Storage employee to speak up immediately, either through our Speak Up hotline or infosec@purestorage.com or report the issue via [PERC](#).



Precautions for Overseas Travel With Pure Storage Devices and Equipment



Pure Storage employees should be aware that when traveling abroad on Pure Storage 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, Pure Storage employees are prohibited from taking their Pure Storage devices or loaners into Extended Security Region countries on personal travel. Exceptions to this rule will require executive approval.



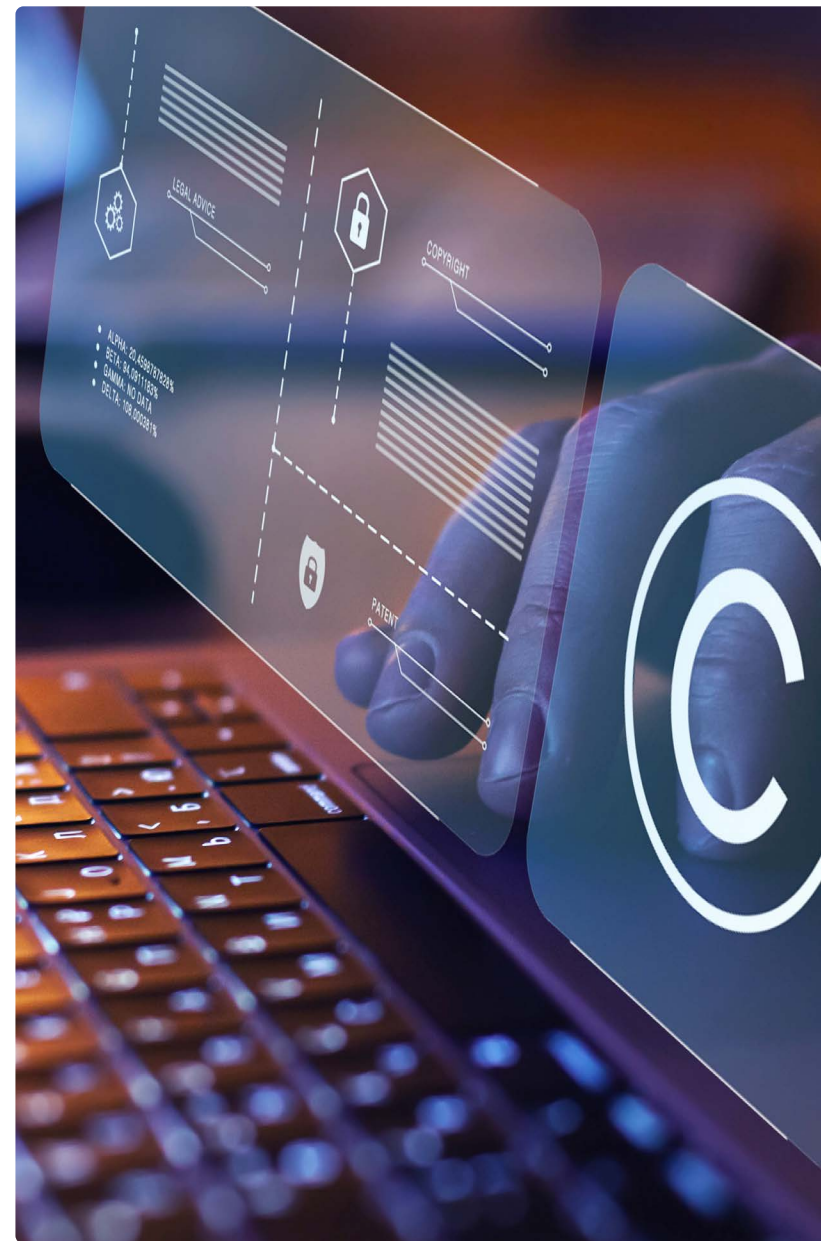
Protecting Pure Storage Intellectual Property and Confidential Information

Pure Storage 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 secret) is one of our greatest assets, and it is up to every employee to help protect it. If you're developing a product or services or collateral that uses content, like third-party media, that does not belong to Pure Storage, you must check with Pure Storage Legal first.

Respecting Intellectual Property Rights

We expect employees to respect all laws related to patents, trademarks, trade secrets, copyrights, 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 Pure Storage as a new employee, you must not bring any property or proprietary or confidential information of your prior employer, including documents like emails, slide decks, and spreadsheets with you or install them on Pure Storage systems, including your assigned laptop or mobile device. Likewise, when you leave Pure Storage, you are forbidden from taking any information with you or from providing Pure Storage 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 Pure Storage 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 Pure Storage Legal.

Pure Storage Confidential Information

As an employee of Pure Storage, you may learn of information about Pure Storage 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 Pure Storage's 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 Pure Storage 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 Pure Storage, 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 Pure Storage emails, voicemails, and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of Pure Storage 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 Pure Storage or its customers if disclosed, such as business plans, technical strategies, financial information, information related to Pure Storage 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

Pure Storage 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 Pure Storage, you must seek approval from our Chief Legal Officer and/or VP of Global Communications.

If part of your role at Pure Storage 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 Pure Storage 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 a Pure Storage employee, you should clearly state that you are expressing your own personal opinion and not the opinions of Pure Storage.

You should also be aware that there are special rules for disclosure of Company financial information. Pure Storage 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 Pure Storage 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 Pure Storage’s Chief Legal Officer.

Our Guidelines require, among other things:



- Identify yourself honestly and clearly and state your affiliation to Pure Storage;
- 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 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 others’ ideas;
- 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 Pure Storage 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

- [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](#)
- [ESG 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@Pure Intranet Page](#)
- [Pure Data Retention and Destruction Standard](#)
- [Pure Finance Intranet Page](#)
- [Pure Storage Export Policy Statement](#)
- [Pure Storage Insider Trading Policy](#)
- [Social Media Guidelines](#)
- [Speak Up Policy](#)
- [Statement Against Human Trafficking](#)
- [Supplier Code of Conduct](#)
- [Trademark Usage Guidelines](#)
- [Travel & Expense Guidelines](#)
- [Zero Tolerance for Workplace Discrimination or Harassment Policy](#)

purestorage.com[800.379.PURE](tel:800.379.PURE)