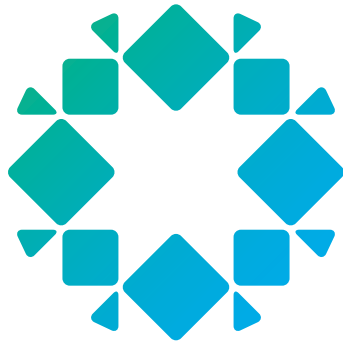


Global Code of Conduct

Working together to bring our core values to life





Rubrik's Mission

To secure
the world's data

Our **RIVET** values are the core of how we show up every day:



Relentlessness

Unyielding will and curiosity to tackle the hardest challenges.



Integrity

Do what you say and do the right thing.



Velocity

Drive clarity, decide quickly, and move fast to delight our customers.



Excellence

Set a high standard and strive for greatness.



Transparency

Build trust and drive smart decisions through transparent communication.

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Introduction

At Rubrik we are on a mission to secure the world's data. Together, we're helping thousands of companies around the world protect their most valuable data assets and keep their businesses running. With our bold mission comes great responsibility. It's up to each of us to maintain the highest standards of business ethics, integrity, and personal accountability that our core values reflect.

Our Rubrik Code of Conduct (the "Code") supplements, supports, and breathes further life into our values. While this Code does not provide a precise checklist for every situation or challenge you may face, it serves as a guide when questions arise or further clarity is needed. It, in turn, is supported by other, more detailed corporate policies and guidelines that our team members can access 24/7 on [The Cube](#) (Rubrik's intranet). If you need additional support or are unsure how to proceed, you should consult your people leader, the Rubrik People Team, or the Rubrik Legal Team. We are here to support you.

If you work at Rubrik or any of Rubrik's subsidiaries or other business entities (collectively "Rubrik" or "we") as an officer, employee, contractor or consultant, or if you serve on Rubrik's Board of Directors (collectively "you" or "Rubrikans"), this Code applies to you and we expect you to understand and follow the standards of business conduct described in our Code.

Rubrik Core Values

We are creating a better, more resilient world through data security. And as we build an iconic and impactful company together, it is up to each of us to behave in a way that upholds our values.



At the core of who we are and how we show up for each other, our customers, and our communities, is a set of collective values that we refer to as RIVET—Relentlessness, Integrity, Velocity, Excellence, and Transparency. Our values guide us as together we build and sustain an inclusive culture where people of all backgrounds are valued, feel they belong, and believe they can succeed at Rubrik. When all Rubrikans feel included and diverse points of view are raised, it fuels our innovation and ability to create new solutions to the world's data security challenges. Every voice and different perspective adds to our strength as a business and moves Rubrik forward.

In line with these core values, we expect all Rubrikans to act with the highest integrity at all times and to comply with all applicable laws, rules, and regulations in addition to this Code. When we work together to live our RIVET values every day, we're successful as a team and able to do the best work of our careers, all in service to our mission. In short, we're unstoppable.

Rubrikan's Responsibilities—Raising Concerns

You are responsible for immediately reporting any conduct that appears to be unethical or illegal or that may be in violation of the Code to our Company's Chief Legal Officer, the Rubrik Legal Team at legal@rubrik.com, or the Rubrik People Team. Concerns may also be reported anonymously through the Integrity Portal, Rubrik's whistleblower hotline, in the following ways:

- By calling 844-611-3941 (toll-free) from the US or 0800-022-4058 (may be toll-free depending on location) from outside of the U.S.
- By submitting an online report at <https://rubrik.ethicspoint.com/>

When a report is received, we will look into the concerns or issues, and will assign internal team members to investigate the matter, potentially with the help of external professionals. It is possible that an individual reporting the suspected misconduct will be asked to provide additional information. We may also ask other individuals involved in or witness to the reported incident for information.

We hope that you feel comfortable voicing concerns openly under this policy, as completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. You can report your concerns anonymously through the above listed resources.

Rubrik does not allow any form of retaliation against anyone, who in good faith, reports or participates in an investigation of a possible violation of laws, regulations, or the Code. Any concerns regarding potential retaliatory conduct should be reported to the Rubrik Legal Team, Rubrik People Team, or through the Integrity Portal.

Leader Responsibilities

If you are a people leader, it is particularly important to lead by example, demonstrate the highest standards of integrity and ethics, and ensure your team members understand the Code, as well as the policies, laws, and regulations that affect their roles. It is important that you help them understand that ethical business conduct and acting with integrity is most important to Rubrik—even if this means sacrificing a desirable business outcome. This also requires our leaders to foster an environment where global team members of all backgrounds believe they belong, have equitable opportunities to grow, and feel comfortable raising issues and concerns without fear of retaliation. If an issue is discussed with you, you must act quickly and decisively to properly address the concerns and correct problems as they arise.

Fostering a Safe and Inclusive Environment



A Diverse and Respectful Workplace

At Rubrik, we believe an inclusive workplace is foundational to building a successful, sustainable company and achieving our mission. Rubrik is committed to creating and sustaining a culture where people of all backgrounds are valued, feel they belong, and believe they can succeed.

Diversity, Equity, and Inclusion (“DEI”) is woven into all facets of our business, and is an integral part of every team member’s job. Rubrikans are expected to behave inclusively, create psychological safety, and respect diverse perspectives.

Our Commitment to DEI

We exhibit our commitment to diversity by seeking out, welcoming, engaging, and developing the most talented people from all dimensions of diversity, including but not limited to: lived experience, ethnic and cultural backgrounds, life stage, sexual orientation and gender identity, caste, ability type, nationality, age, religion, and personality type—to foster more creativity, innovation, and opportunity at Rubrik.

Rubrik promotes equity in the workplace by actively examining business processes and practices, removing barriers, and mitigating bias to create a company where DEI is embedded into the way that we work. This means people are treated fairly, and everyone has equitable opportunities to thrive and succeed.

Rubrik fosters inclusion by valuing and celebrating people for their differences and encourages all team members and customers to show up authentically to do their best work. All Rubrikans contribute to our inclusive environment in a variety of ways including, but not limited to: embracing teamwork and collaboration, remaining open-minded to diverse perspectives, sharing and receiving feedback respectfully, avoiding language that doesn’t resonate with diverse groups of listeners, and operating from a place of respect and understanding for varied lived experiences.

At Rubrik, our commitment to DEI extends beyond our company walls. We strive to invest in future generations of underrepresented and under-resourced businesses through supplier diversity programs and philanthropic efforts. As such, when considering new vendors and suppliers, Rubrik makes a conscious effort to engage diverse suppliers and vendors to bring innovation to our customers and convey our corporate commitment to economic empowerment and access for minority, women, disabled, LGBTQ+, and veteran-owned businesses. Rubrik Beyond Work, our Corporate Social Responsibility program, strategically partners with community-based nonprofits to volunteer time, resources, knowledge, and funding to underrepresented and under-resourced communities around the world.

We seek out and welcome diverse perspectives because they accelerate innovation and creativity to make Rubrik and our products better. As such, Rubrik is an equal opportunity employer, and all policies and practices are administered without regard to race, color, national origin, ancestry, gender, religion, physical or mental disability, age, marital status, sexual orientation, military status or any other basis protected under federal, state, or local law. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

Creating a Safe Work Environment

We strive to create a physically and psychologically safe work environment free from harassment, discrimination, and bullying. All Rubrikans are expected to help foster this environment of respect, free from illegal discrimination or harassment. Rubrik prohibits unlawful harassment in any form—verbal, physical, virtual, visual or otherwise. If you experience or witness any violation of this policy by anyone at Rubrik, a Rubrik partner, customer, or vendor, immediately report the incident to the Rubrik Legal Team or Rubrik People Team; incidents may also be reported to the Integrity Portal. People leaders who learn of any such incident must immediately report it, using the same channels. Rubrik will not tolerate any behavior that creates an intimidating, hostile, or offensive work environment and prohibits retaliation against any Rubrikan who makes a good faith discrimination or harassment complaint or participates in such an investigation.

Environmental Health and Safety

Rubrik is committed to providing a safe and healthy workplace in compliance with all applicable laws, which requires everyone's support. Laws, such as the U.S. Occupational Safety and Health Act and similar laws of other jurisdictions, regulate the physical safety and exposure to conditions in the workplace that could harm employees. These laws establish specific industrial hygiene and other safety procedures. As such, Rubrikans are expected to follow health and safety guidance, observe all posted warnings and regulations, and immediately report any work-related accident or injury, or any unsafe conditions in the workplace.

Rubrik has a zero tolerance policy for violence and threatening behavior, and prohibits bringing a weapon of any kind into a Rubrik facility, a Rubrik-sponsored event, or a Rubrik customer site.

We foster environmentally sustainable growth in our business strategy and operations by encouraging practices designed to protect the environment through full compliance with all applicable environmental laws and regulations.

Drugs and Alcohol

Rubrik strives to maintain a professional, respectful, and drug-free work environment. While the consumption of alcohol is not banned at our offices, company-sponsored events, or when representing Rubrik, Rubrikans are expected to exercise good judgment and comply with this Code and other company policies. Illegal drugs (and the use of cannabis) at our offices, company-sponsored events, or when representing Rubrik are strictly prohibited.

Acting with Integrity and Transparency

Conflicts of Interest

Rubrikans are expected to use sound judgment to avoid actual or apparent conflicts of interest, and never use or attempt to use their position at Rubrik to obtain improper personal benefits. Team members are prohibited from engaging in any behavior or enterprise that conflicts with Rubrik's best interests without prior written consent.

A conflict of interest occurs when an individual's personal interest in a situation or transaction interferes with Rubrik's best interests. Rubrik expects you to disclose these types of situations. If you become aware of any transaction or relationship that could give rise to a potential conflict of interest, you should disclose the matter to the Rubrik Legal Team.

There are many different ways in which conflicts of interest may arise. Common situations include:

- Having an outside employment relationship or business or financial relationship with potential competitors, customers, or vendors of Rubrik
- Competing with Rubrik for business opportunities
- Using Rubrik's resources to support any political campaign or candidate
- Using Rubrik assets for personal use or benefit
- Hiring or entering into any transaction on behalf of Rubrik with family members or friends
- Using or taking any opportunities discovered using Rubrik property or information, or by virtue of your position with Rubrik, for improper personal gain or benefit

Rubrik does not ban all forms of outside employment, paid consultation, or similar engagements; however, such opportunities must be disclosed to the Rubrik Legal Team for review and clearance.

If you have questions about actual or potential conflicts of interest, seek advice from the Rubrik People Team and/or the Rubrik Legal Team.

Accurate Records and Sales Finance Compliance

Rubrik is required to maintain accurate and reliable business records. This is critical to our decision-making process and to the proper discharge of our financial, legal, and reporting obligations, including the preparation of periodic and current reports required to be filed with the Securities and Exchange Commission ("SEC"). Securities laws require that these reports provide full, fair, accurate, timely, and understandable disclosure and fairly present our financial condition and results of operations. As such, our books, records, accounts, and financial statements must be maintained in appropriate and reasonable detail, appropriately reflect our transactions and arrangements, and conform both to applicable legal and accounting requirements and to our system of internal controls. All Rubrikans must act with honesty and integrity to support these efforts and may not make false or misleading statements or omissions in any of our financial and other disclosures in SEC reports or engage in any practices that would degrade the quality and integrity of our accounting and disclosures. Additionally, all Rubrikans involved in the sales process must comply with Rubrik's sales finance policies which outline the requirements for an eligible booking, set forth approval requirements for certain deal terms, and prohibit any orders from partners that do not have a firm end user purchase order ("Unapproved Orders"). End user letters of intent, memorandums of interest, or other non-binding documents without a firm end user purchase order are still considered Unapproved Orders and not sufficient to book an order. Any violation of these policies will negatively impact Rubrik's revenue recognition and will be considered a serious offense and a violation of Rubrik's Global Code of Conduct.



This means Rubrikans will:

- Create and keep truthful, clear, and accurate financial records
- Follow Rubrik's expensing, contracting, and purchasing requirements and obtain appropriate authorization
- Never record false sales or record sales early, understate or overstate known liabilities and assets, defer recording items that should be recorded immediately, or otherwise manipulate financial information
- Never submit Unapproved Orders or knowingly allow Unapproved Orders to be booked without notifying the Rubrik Sales Finance Team
- Never pressure a partner to book Unapproved Orders
- Never enter into side letters or make promises to third parties that conflict with or are in addition to the terms of our contracts with them
- Preserve, retain, and dispose of records appropriately, including in compliance with legal or other hold requests
- Never maintain undisclosed or "off the books" funds, accounts, assets, or liabilities
- Cooperate with audits, investigations, and inquiries by the finance and legal teams
- Never hide the true nature of any transaction, misclassify accounts or accounting periods, or make false entries on expense reports or other company records
- Never assist anyone in any prohibited activity and report any activity you believe is questionable

In addition, Rubrikans are required to create, retain, and dispose of our company records, including financial information, in compliance with all of our policies and guidelines, as well as all regulatory and legal requirements. It is a criminal offense to destroy records that are subject to a subpoena or government investigation, and we may also place holds on records in connection with pending or threatened litigation.



Rubrikans should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about Rubrik that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures. In addition:

- No team member may take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules, and regulations
- All Rubrikans must cooperate fully with our finance and accounting team, as well as with our independent public accountants and counsel, 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
- No employee or person acting under their direction may coerce, manipulate, mislead, or fraudulently influence our finance and accounting department, our independent public accountants or counsel, if the employee or other person knows or should know that the action, if successful, could result in rendering Rubrik's financial statements materially misleading
- No team member should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate

Abiding by Laws and Regulations



Securities Laws and Insider Trading

In the course of your day-to-day work, you may have access to information about Rubrik or other companies (such as customers or vendors) that is not available to the general public. Be aware that buying or selling securities while in possession of material, nonpublic information, or tipping others to trade based on this information is a violation of insider trading laws as well as this Code. You are also required to comply with Rubrik's [Insider Trading Policy](#), which contains additional details and requirements.

Antitrust and Competition Laws

When representing Rubrik, you are expected to compete fairly and honestly by promoting our differentiated and industry-leading cybersecurity products and services. Comparisons should be accurate, and never misleading, deceptive, or unfairly exaggerated or disparaging. Never take unfair advantage of anyone on Rubrik's behalf, or misuse proprietary or trade secret information. Rubrik complies with all global antitrust and competition laws that are intended to protect the competitive process. While the laws are complex, they generally prohibit agreements that unreasonably restrain trade or restrict competition. The antitrust laws also prohibit Rubrik from engaging in conduct that is intended to and has the effect of harming competition, even if there is no agreement involved.

The following are examples of conduct that constitutes a violation of this Code:

- Agreements with competitors on price, costs, or terms or conditions of sale
- Agreements with competitors regarding allocating markets or customers, or to influence a bidding process
- Agreements with competitors to boycott a supplier or customer
- Agreements with end users regarding pricing if selling through the channel
- Agreements not to solicit or hire employees of another company that are not reasonably related to a larger legitimate collaboration
- Agreements on the terms of employment to offer certain employees or classes of employees

Other activities can also be illegal or create the appearance of impropriety, including:

- Sharing competitively sensitive information (like prices, customer-specific information, or non-public innovation plans) with competitors
- Using Rubrik's strength in the market to gain an unfair competitive advantage and exclude competitors

Anti-Corruption Compliance

Rubrikans should deal honestly, ethically, and transparently with government officials, political parties, party officials, candidates for political office, and officials of public international organizations around the world. As such, never offer anything of value in an attempt to obtain a particular result for Rubrik or improperly induce an act or decision by such person in their professional capacity. Rubrikans must adhere to all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and similar laws that regulate interactions with government officials. Please see [Rubrik's Anti-Corruption Compliance Policy](#) for additional details and requirements.

Gifts and Entertainment

While gifts and entertainment can have a legitimate business purpose, they should never be used to create an unfair advantage or improper influence. [Rubrik's Gifts and Entertainment Policy](#) establishes guidelines Rubrikans must follow when giving or accepting any gifts or entertainment.

Government Contracting

Selling Rubrik's products or services to government customers is heavily regulated and follows stricter rules than sales to our commercial customers. The laws applicable to government contracting and to government requests for proposal ("RFPs") are complex. If you contract with government customers, you have a duty to know and abide by all relevant statutory, regulatory, and contractual provisions and to avoid even the appearance of anything improper.

Rubrik strives to promote an atmosphere of openness and transparency in our dealings. Rubrikans should be truthful and accurate in all reports, statements, certifications, bids, proposals, and claims. When bidding on government RFPs, respect the proposal process, honor your obligation to protect confidential information, and comply with all security clearance requirements.

Any types of gifts, entertainment, meals, or other payments made to or on behalf of government agencies must be consistent with Rubrik's policies and completely and accurately recorded in a timely manner. Remember, the rules for giving gifts to employees of the federal government or state-owned entities are strict. Gifts and entertainment offered or provided to government officials raise legal risks and may be prohibited by law. Never offer or provide gifts or entertainment, even of minimal value, to government officials or state-owned entity employees without receiving approval in advance from the Rubrik Legal Team. Gifts must never be given for the purpose of improperly influencing an official decision. Never offer bribes, kickbacks, or preferential treatment to a government official in connection with a government contract.

In line with our values, Rubrikans should always practice transparent and ethical dealings with government officials and representatives. Ask for help if you are unsure what to do.

Government Investigations

To respond properly and promptly to governmental inquiries or investigations, Rubrik must be made aware of any inquiries from any governmental agencies or legal authorities. If a representative of a governmental agency contacts you to seek an interview or facility inspection or makes a request for Rubrik documents or information, you should immediately contact the Rubrik Legal Team. Similarly, if you believe that a governmental investigation or inquiry involving Rubrik has been initiated or is under consideration, appropriate details should be communicated immediately to the Rubrik Legal Team.

Political Contributions

Rubrikans must comply with all applicable laws and regulations regarding political contributions. Rubrik funds or assets cannot be used for political campaigns or practices under any circumstances unless pre-approved by the Rubrik Legal Team and, if necessary, Rubrik's Board of Directors or its designated committee. Lobbying, which covers many kinds of activity including contacts with public officials or their staffs that could influence legislative or administrative action, may require registration and/or reporting and may be subject to other restrictions. Before engaging in lobbying activity you must first consult with the Rubrik Legal Team.

Trade Laws

U.S. and international trade laws control where Rubrik can send or receive its products and services. U.S. regulations are complex and could apply both to deemed exports from the United States and to deemed exports of products from other countries when those products contain U.S.-origin components or technology.

These U.S. laws, rules, and regulations that extend to all Rubrik activities outside the U.S., include:

- U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries, and their employees from doing business with certain countries, as well as specific companies and individuals identified on lists published by the U.S. Treasury Department

- U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software, and technology to many countries, and prohibits transfers of U.S.-origin items to denied persons and entities
- Antiboycott Regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person

Please see [Rubrik's Global Trade Compliance Policy](#), which contains additional details and requirements.

Child Labor, Human Trafficking, and Modern Slavery

Rubrik is committed to upholding all applicable human rights laws, rules, and regulations, including those addressing child labor, modern slavery, and human trafficking. Rubrik expects that its partners, suppliers, vendors, and others who provide services on our behalf to adhere to the same strict standards. As part of our company values prohibiting unlawful discrimination, Rubrik condemns activities involving child or forced labor.

Protecting and Securing Rubrik Assets and Information

Information Security Guidelines

Information security and data protection are core to Rubrik's business and mission. Rubrikans are expected to protect Rubrik's assets, tangible and intangible, and ensure their proper and efficient use. Rubrik assets include items such as facilities, equipment, inventory, funds, computer systems and equipment, computer software and data, business records, intellectual property (such as our patents and trademarks), and proprietary or sensitive information and materials. Each of us has a duty to protect Rubrik's assets from theft, loss, damage, sabotage, and waste, as each has a direct, negative impact on Rubrik's profitability.

Rubrikans are required to follow all Information Security and IT related policies made available on [The Cube](#) (Rubrik's intranet). No matter your team or role, it's crucial that you understand and uphold the data security best practices outlined in this Code, so we can continue to keep our customers' data and therefore their businesses secure.

- If you have any reason to believe that Rubrik network or system security (including lost, stolen, or accidentally distributed passwords, sensitive information, or confidential information) has been compromised, immediately report the incident to Rubrik Security as per the guidance provided in the [Acceptable Use Policy](#).
- Rubrikans are responsible for securing Rubrik Assets, such as laptops or mobile devices, and ensure that they are accounted for at all times, even while on Rubrik premises. You must notify Rubrik Security as per the guidance provided in the [Acceptable Use Policy](#) and your manager immediately in the event of a Rubrik asset being lost or stolen.
- Rubrikans must report any suspected phishing attempts seen on Rubrik Systems or Rubrik Networks to Information Security as per the guidance provided in the [Acceptable Use Policy](#).



- Always wear your Rubrik badge visibly while on Rubrik premises. If you see someone who does not wear a Rubrik or visitor badge and you don't know if they are an employee or otherwise authorized to be there, kindly direct the individual to the front desk for assistance.
- See something, say something. Report any suspicious activity in the office building to the Facilities Team. All Rubrikans are required to use their own badges to enter access controlled areas of the office building. Do not allow 'tailgating' or allow others to follow you with your badge access.
- You must maintain a clear desk, and must not leave sensitive documents on the desk, or other devices such as printers, photocopiers, etc. to prevent unauthorized access.
- Do not use Rubrik provided identifiers (e.g., email addresses) to create accounts on external websites and applications (e.g., social media, retail accounts) for non-business purposes.
- Do not reuse Rubrik authentication secrets and passwords on external websites and applications.
- Rubrik confidential and restricted information should not be shared on social media, social networking sites, and public websites.

Please see the [Acceptable Use Policy](#) for more information.

Secure Use of Assets and Third Party Software

Rubrikans are provided with computers, laptops, and other equipment necessary to perform their jobs and all equipment must be used in accordance with Company policy regarding acceptable use. You may use Rubrik-provided equipment for reasonable personal use so long as such use does not interfere with your performance of your business obligations. Rubrik's Information Security and IT Teams monitor Rubrik-provided equipment, systems, and network to protect against malicious activities, confidential data loss, business disruption, and comply with applicable laws. Investigations into security incidents may require these teams to shut down or control access of Rubrik-provided equipment until it is safe to restore user access.

Unsanctioned software and services present a significant security risk to Rubrik. All third party software and services installed on Rubrik equipment must be pre-approved by Rubrik's Information Security and IT Teams, and be appropriately licensed. Rubrik Assets must not be used for unauthorized activities as described in the [Acceptable Use Policy](#).

Rubrik's Information Security and IT Teams may inspect any equipment used by Rubrikans in the performance of their obligations to Rubrik, and will remove unapproved software and services with or without your notice, consent, or approval. Although Rubrik strives to protect individual privacy, all information sent, received, or stored on Rubrik equipment or systems is not considered private. To the extent permitted by applicable law, Rubrik reserves the right to access any such information at any time, with or without your knowledge, consent, or approval. All Rubrik-provided equipment is owned by Rubrik, and upon termination of the relationship with Rubrik, all Rubrik-provided equipment must be promptly returned to Rubrik.

All use of personal computing devices requires an explicit exception from the Rubrik Information Security and IT Teams, and the approval will be strictly based on the outcome of the risk review, and business requirements. All access to Rubrik systems will be managed through Rubrik's identity management software. If circumstances require you to use personal computing devices to access Rubrik assets, Rubrik reserves the right to view, edit, control, access, delete, transfer, and process such information at all times. This may include requiring personal devices to be enrolled into mobile device management software to secure Rubrik assets. Rubrik has the right to access and delete all Rubrik Information stored on any personal device upon termination of employment, or contract, or if Rubrik considers such deletion necessary for the protection of Rubrik Information.

Any loss or potential loss of Rubrik Information and Data assets from the personal device must be reported to the Information Security Team as per the guidance provided in the [Acceptable Use Policy](#) and the IT Helpdesk at help@rubrik.com. More information about use of personal computing devices can be found in the [Information Security Policy](#).

Intellectual Property and Confidentiality

Each of us is responsible for safeguarding Rubrik's intellectual property and confidential information. Examples include: non-public financial, business and operating information, budgets, sales or earnings forecasts, business and strategic plans, pricing information and contract terms, information about customers, prospects, vendors, business partners or employees, marketing plans, new product or service information, and other proprietary business information and methods. Confidential information should not be disclosed to any third parties unless legally required or authorized by an appropriate officer of Rubrik. Confidential information also should not be disclosed to other Rubrikans unless they need the information to do their job. Your confidentiality obligations continue even after the end of your employment or other relationship with Rubrik. Rubrik also respects the intellectual property and confidential information of others. We respect the obligations our Rubrik team members may have to protect the confidential information of their former employers, and you are prohibited from bringing or using such information in your role at Rubrik.

Privacy

Many countries have privacy laws that govern the collection and use of personal data or personally identifiable information. This includes any information about an individual who is or can be identified, and may include a person's name, contact details, identification numbers, payment information, and information about their online activity and purchase history. We are committed to complying with data protection laws applicable to where we collect and process personal data and will use all reasonable efforts to safeguard the privacy expectations of Rubrikans, our customers, and vendors. We are transparent about how we collect and use personal information in our [Worker Privacy Notice](#), which includes details about how individuals may exercise their rights. To obtain more information about Rubrik's privacy practices, please contact Privacy@Rubrik.com.

Outside Communications

Rubrikans may from time-to-time receive inquiries from various third parties, such as business analysts and the media, including requests for information about our customers, partners, internal corporate numbers, and other business relations. It is important that Rubrik knows about all such inquiries, so that we can respond properly and in compliance with applicable laws. Even if you believe that you can respond to the questions, all such inquiries should be referred to

the Rubrik Public Relations or Analyst Relations Teams, in accordance with our corporate policies. You should never speak to the media or analysts on behalf of Rubrik without previous express authorization by the Rubrik Public Relations and Analyst Relations Teams, even if Rubrik is not the main topic of conversation. Be very cautious with what may feel like casual conversations at events and trade shows, as well as posting opinions or information about Rubrik on the internet and social media—even if it is not confidential information—as the statements you make may be unintentionally attributed to Rubrik. Before accepting any public speaking engagement where you will be discussing Rubrik or its products or services, please review our internal policies and get advanced expressed approval from the Rubrik Public Relations Team and the Rubrik Legal Team. Please refer to our [External Communications Policy](#) for further details.



Administration, Review, and Waivers

Rubrik's Board of Directors has adopted this Code and is responsible for compliance. The Audit Committee of the Board of Directors will review this Code periodically to ensure that it continues to promote the legal and ethical conduct of Rubrikans and recommend any amendments as necessary; however, non-material amendments (for example, updates to the whistleblower hotline provider, references to new or amended policies, or policy locations) may be approved by our Chief Legal Officer. Any amendment (other than non-material amendments) or waiver must be approved by Rubrik's Board of Directors or Audit Committee of the Board of Directors. Any waiver of the Code for our executive officers or directors will be reported as required by federal securities laws and applicable stock exchange rules.



