

## CONFLUENT, INC.

### WHISTLEBLOWER POLICY

Confluent, Inc. (“*Confluent*”) is committed to maintaining high standards of financial, regulatory, and cultural integrity, and Confluent takes very seriously all complaints and concerns regarding accounting, internal accounting controls, auditing, and other legal matters. Confluent’s financial information guides the decisions of management and is relied upon by Confluent’s stockholders, employees, and business partners. Confluent’s policies and practices have been developed to maintain the highest business, legal, and ethical standards.

For these reasons, Confluent must maintain a workplace environment where all employees of Confluent and each of its direct and indirect subsidiaries can raise concerns free of any harassment, discrimination, or retaliation if they reasonably believe that they are aware of: (1) questionable accounting, internal accounting controls, or auditing matters, (2) the reporting of fraudulent financial information of or by Confluent, (3) violations of securities laws or other laws, rules, and regulations in the United States, the European Union, the United Kingdom or any other jurisdiction or (4) any activities or transactions that appear to violate Confluent’s Code of Conduct. Employees should report those concerns as soon as possible after discovery. Confluent strives to encourage open communication so that such concerns may be raised without fear of retaliation in any manner.

Accordingly, the Audit Committee (the “*Audit Committee*”) of the Board of Directors (the “*Board*”) and the Board have established the procedures set forth in this policy for:

1. the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters; and
2. the submission by employees (confidentially and anonymously, if they wish, in the United States, the European Union, the United Kingdom and in any other jurisdiction to the fullest extent legally permitted in such other jurisdiction), and the appropriate treatment, of concerns regarding accounting or auditing matters they believe to be questionable or violations of Confluent’s Code of Conduct, the U.S. federal securities laws or other state and federal laws, violations of the laws of the European Union or the United Kingdom or violations of Confluent’s Global Anti-Bribery and Anti-Corruption Policy, including the Foreign Corrupt Practices Act of 1977 (the “*FCPA*”), the UK Bribery Act 2010 (the “*UKBA*”) or similar laws within the European Union or any other jurisdiction.

#### A. **Matters that Must be Reported**

Employees must immediately report and submit complaints of accounting and auditing and other legal matters for which there is actual or suspected:

1. intentional error, fraud, or gross negligence in the preparation, review, or audit of any of the financial statements of Confluent or any of its direct and indirect subsidiaries;

2. intentional error, fraud, or gross negligence in the recording of transactions of Confluent or any of its direct and indirect subsidiaries;
3. intentional noncompliance with the internal and reporting controls of Confluent or any of its direct and indirect subsidiaries;
4. significant deficiencies in the internal and reporting controls of Confluent or any of its direct and indirect subsidiaries;
5. violations of U.S. Securities and Exchange Commission (the “**SEC**”) rules and regulations that are related to accounting, internal accounting controls and auditing matters;
6. fraud against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to management, outside auditors, the SEC, or members of the investing public;
7. violations of the laws of the European Union (including under Directive 2019/1937), the United Kingdom or any other jurisdiction; or
8. violations of Confluent’s Insider Trading Policy, the U.S. federal securities laws, or Confluent’s Global Anti-Bribery and Anti-Corruption Policy, including the FCPA, the UKBA or similar laws within the European Union (including under Directive 2019/1937) or any other jurisdiction.

Employees must also immediately report and submit complaints regarding potential violations of Confluent’s Code of Conduct or applicable laws. Failure to promptly report these matters to Confluent, the appropriate government agency (including the SEC) or any relevant law enforcement agency may result in disciplinary action, up to and including termination.

Timeliness is critical because, as with all investigations, evidential matter may deteriorate, disappear or otherwise become harder to discover or less useful as time passes. Employees should provide as much detail as possible regarding dates, times, places, names of people involved in any way, actions or inactions, statements made or the identity of other evidential matter.

## **B. Receipt of Complaints**

1. Non-employees may submit complaints regarding accounting, internal accounting controls or auditing matters by:
  - a) electronic mail to [legal@confluent.io](mailto:legal@confluent.io); or
  - b) mail to:

Confluent, Inc.  
Attn: Chief Legal Officer  
899 West Evelyn Avenue

Mountain View, CA 94041

With a copy to: legal@confluent.io

2. Employees must submit concerns regarding accounting, internal accounting controls, or auditing matters they believe to be questionable (confidentially and anonymously, if they wish, in the United States, the European Union, the United Kingdom and in any other jurisdiction to the fullest extent legally permitted in such other jurisdiction) in one of the following ways:
  - a) via electronic mail to Confluent's Chief Legal Officer (the "*Chief Legal Officer*");
  - b) via electronic mail to the Audit Committee at compliance-report@confluent.io;
  - c) via a third party hosted telephone and online hotline at www.confluent.ethicspoint.com;
  - d) via regular mail to Confluent as set forth above;
  - e) via a local representative, provided that one has been appointed in accordance with applicable law; or
  - f) if the employee is not willing or able to submit the complaint to Confluent by one of the foregoing methods, the employee may submit concerns directly to the appropriate government agency (e.g., the SEC) including, in the European Union, directly to a Member State authority or, in the United Kingdom, directly to the Financial Conduct Authority. Confluent requests submission to it prior to or in connection with submission of a complaint to any governmental agency, in order that Confluent may properly investigate and remediate the issue.
3. The methods of submitting complaints will be published on Confluent's external and internal websites in such manner as the Chief Legal Officer deems appropriate. It will be emphasized to employees that each of the methods of submitting complaints listed above may be used anonymously and that such complaints will be treated confidentially (to the fullest extent legally permitted in such employee's jurisdiction). Confluent will periodically confirm that the email addresses and third-party hotline number listed in Paragraph 2 above are functioning as intended.
4. Except for complaints sent directly to the Audit Committee, all complaints related to accounting, internal accounting controls, auditing or legal matters or involving executive officers or directors will be forwarded to the Chief Legal Officer for coordination of their treatment as set forth below.

### C. **Treatment of Complaints**

1. All complaints received will be processed and recorded, including: (a) the date the complaint was received, (b) a description of the complaint, (c) the submitter (if

- provided), and (d) the status and outcome of an investigation of the complaint. Receipt of the complaint will be acknowledged to the sender, within a reasonable period of time following receipt, if appropriate information for response is supplied. Complaints will be forwarded to the appropriate person or department for investigation, unless the Chief Legal Officer deems other treatment is necessary (e.g., such complaint involves an executive officer).
2. With respect to complaints not initially directed to the Audit Committee, the Chief Legal Officer will report promptly to the Audit Committee, or the Audit Committee Chair, any significant matters related to: (i) violations or potential violations of Confluent's Global Anti-Bribery and Anti-Corruption Policy, including the FCPA, the UKBA or similar laws within the European Union or any other jurisdiction, (ii) Confluent's accounting, internal accounting controls, and auditing matters, and (iii) Confluent's executive officers, and such other matters as the Chief Legal Officer deems significant. The Audit Committee may direct and oversee an investigation of such complaints, as well as any complaints initially directed to the Audit Committee, as it determines to be appropriate. The Audit Committee may also delegate the oversight and investigation of such complaints to the appropriate members of Confluent's management. The Chief Legal Officer will report matters involving significant ethics or Code of Conduct violations not relating to accounting, internal controls or auditing matters to the Nominating and Governance Committee.
  3. All other complaints regarding accounting or auditing matters will be reviewed under the direction and oversight of the Chief Legal Officer or her delegates, who will involve such other parties (e.g., members of Confluent's Finance Department or outside advisors) as deemed appropriate. The Chief Legal Officer will provide the Audit Committee with a quarterly report of all accounting or auditing complaints received and an update of pending investigations relating to accounting or auditing matters. The Audit Committee may request further review of any complaint and may assume the direction and oversight of an investigation of any such complaint.
  4. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an appropriate review. Access to reports and records of complaints may be granted to regulatory agencies and other parties at the discretion of the Audit Committee. Documents that are covered by the attorney-client communication and/or work-product privileges should not be disclosed unless the Chief Legal Officer has consented to a waiver of privilege.
  5. Prompt and appropriate corrective action will be taken by management, as overseen by the Audit Committee. An employee may be subject to disciplinary action, which may include the termination of his or her employment, if the employee fails to cooperate in an investigation or deliberately provides false or misleading information during an investigation. The specific action that will be taken in response to a report will depend on the final outcome of the investigation and the nature and gravity of the conduct or circumstances at issue. Where questionable accounting, internal accounting controls or auditing matters, or the reporting of fraudulent financial

information is verified, corrective action will be taken and, if appropriate, the persons responsible will be disciplined, up to and including termination of employment.

6. Reprisal, threats, retribution, or retaliation in any way against any person who has in good faith made a complaint or reported a concern, or against any person who assists in any investigation or process with respect to such a complaint or concern, is prohibited. Employees who believe that they have been subjected to any discrimination, retaliation, or harassment for having submitted a complaint regarding questionable accounting, internal accounting controls or auditing matters, or the reporting of fraudulent financial information under this policy, or participating in an investigation relating to such a complaint, should immediately report the concern to the Chief Legal Officer or to any of their supervisors or to the Audit Committee Chairperson. Any complaint that discrimination, retaliation or harassment has occurred will be promptly and thoroughly investigated. If such a complaint is substantiated, appropriate disciplinary action will be taken, up to and including termination of employment for those individuals that engaged in the misconduct.
7. The Chief Legal Officer, Chief People Officer or their respective designees will acknowledge the complaint and investigation, as appropriate, to the person making the complaint, if appropriate information for response was supplied, maintaining the anonymity of the person making the complaint to the fullest extent possible.

#### **D. Retention of Complaints**

The Chief Legal Officer will retain written complaints and all related documentation as required under applicable law.

#### **E. Additional Enforcement Information**

Confluent endeavors to operate in a highly transparent manner, and Confluent wants to be made aware of alleged wrongdoings and to address them as soon as possible. We encourage you to first address your concerns by following the procedures outlined in this policy for reporting to or through Confluent, so that Confluent may conduct its own internal investigation and take corrective action as quickly as possible. Among other things, Confluent may choose to self-report certain matters to government or other agencies. However, nothing in this Policy is intended to prevent any employee from directly reporting information to law enforcement or other government agencies when an employee has reasonable cause to believe that the violation of a law or regulation has occurred. A report to law enforcement or other government agencies may be made instead of, or in addition to, a report directly to Confluent through its management or reporting hotline.

#### **F. Modification**

Confluent may modify this policy at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with applicable laws, rules and regulations and to accommodate organizational changes.

**Policy Dates:**

Adoption: March 19, 2021

Amended and Restated:

- May 3, 2022
- January 27, 2023
- February 1, 2024