Code of Conduct
Confluent’s Code of Conduct (the Code of Conduct) describes our core values and establishes global standards for how we work with each other, our customers, and our partners. The Code of Conduct defines our purpose, values, and principles, and sets a standard that all Confluent team members act respectfully, ethically, legally, and with integrity—both in words and in behavior. By adhering to the Code of Conduct, we make Confluent a stronger company, and protect our customers, our co-workers, and our reputation.

Everyone who works at Confluent is expected to be familiar with, and adhere to, the Code of Conduct. Please read it, internalize it, and uphold it. Any references to “employees” in the Code of Conduct also includes Confluent’s directors and contractors. Managers are expected to ensure that contractors, agents, and partners conform to the Code of Conduct’s standards when working for or on our behalf. In complying with the Code of Conduct, you should consider not only your own conduct, but also that of your family members, significant others, or other persons who live in your household.

The Code of Conduct contains the guidelines, rules, and principles that must be followed when you are at work, or acting on Confluent’s behalf. The Code of Conduct covers each of the following key areas:

- Our core values
- Fostering a culture of ethics and trust
- Providing a safe and inclusive workplace
- Playing by the rules
- Avoiding conflicts of interest
- Being honest and accountable
- Being loyal, and
- Speaking up
Our Code is meant to guide us in our daily decisions. Often, the right thing to do is obvious. But the Code of Conduct is a resource for you when the issue is more ambiguous. If there is doubt or confusion as to whether a situation might be unethical, inappropriate, or illegal, ask:

• Is what I am doing consistent with Confluent’s values?
• Does what I am doing comply with the Code of Conduct and other company policies?
• Would I feel comfortable describing my actions at an all-hands meeting?
• How would I or Confluent look if this made headlines?
• Am I being loyal to Confluent and acting in Confluent’s best interests?
• Will this build trust and credibility for Confluent?
• Will this help create a working environment in which Confluent can succeed over the long term?

Asking yourself these questions and understanding the requirements of the Code of Conduct will help keep Confluent, your colleagues, and yourself out of trouble.

The Code of Conduct does not replace Confluent’s other policies and procedures and cannot cover every possible law or scenario. If there is a conflict with any of our other policies and procedures, the Code of Conduct will take precedence. If you have any questions or concerns, please reach out to your People Business Partner, your manager, or Legal.
Our Code of Conduct complements and supports our six core values, which form the foundation of our company culture that we use to guide our actions. If you ever feel we are not living up to our values, speak up and share your ideas to improve!

1. Earn Our Customers’ Love
Our customers are the lifeblood of our business and our most important stakeholders. We strive to earn their love with everything we do. Whether we are thinking through how to evolve our products, figuring out how we interact with prospects, or even designing aspects of our internal operations, we want to start by solving backwards from a fantastic customer experience to arrive at the right solution. We believe that our customers’ love is something we have to earn on an ongoing basis.

2. To Build a Great Company, Build a Great Team
We believe that an important part of building a great company is making sure that our employees are the best they can be. There are three cornerstones to this: hiring, relationships, and growth and development. Each Confluent employee is tasked with helping the company to hire the strongest candidates possible. The relationships we build among teams across the company allow us to effectively solve hard problems. Moreover, our employees learn and grow from working through exceedingly difficult challenges. We are proud that Confluent employees have the opportunity to work with a diverse group of amazing colleagues and can learn from as well as help one another.

3. Smart, Humble, and Empathetic
These three attributes are essential to building a strong team. Our employees appreciate, benefit, and learn from working with other smart, humble, and empathetic people. We strive to hire those who care deeply about others and interact with empathy toward our customers, partners, and employees.
4. Be Fired Up and Get It Done
As much as we benefit from working with smart, humble, and empathetic employees, we also need to “get it done” to pursue our enormous market opportunity. We are in hyper-growth mode and are scaling to fill the demands of the market and our current and future customers. We are building the team, products, and customer journeys to be number one in our market, which of course is difficult work. We hire people who want to be part of this intense experience, know that they are signing up to execute on our mission, and are fired up to go after this market opportunity in a meaningful and passionate way. This passion is a huge source of energy both individually and collectively. As a company we treasure this passion and help to fuel it throughout our employees’ journey at Confluent.

5. Tasteful Not Wasteful
We want to invest in areas that matter the most—in other words, spend “tastefully,” not wastefully. We believe that thoughtful spending is essential to building a high-quality business. Building a strong business enables us to attract the best employees, invest in innovation, and ultimately create a company that endures. The largest cost that we incur is in our people. As equity holders, we expect our employees to take to heart the concept of tasteful spending and to think and act as owners.

6. One Team
It is critical that we act as and make decisions as a unified company, doing our best to optimize globally rather than locally. This means doing our best to avoid the politics, misalignment, and tribalism companies can be prone to. It means recognizing that we succeed individually and as teams, only if Confluent succeeds as a whole.
1. Open and Honest Communication
At Confluent, everyone should feel comfortable to speak their mind with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where this is possible. We all benefit when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times. At Confluent, we want the ethics dialogue to become a natural part of daily work.

2. A Tone Set at the Top
If you supervise others, it is especially important to lead by example and always demonstrate the highest ethics and integrity. Create an environment where members of your team understand their responsibilities and know they can talk with you about their concerns and questions without fear of retaliation. If an issue is raised and you feel comfortable, please reach out to your manager, otherwise please reach out to Employee Relations or Legal, as appropriate, and ensure that problems are promptly and appropriately addressed.

3. Build Trust and Credibility
The success of our business is dependent on the trust and confidence we earn from you, and our customers, vendors, and stockholders. We gain credibility by demonstrating excellence, adhering to our commitments, displaying honesty and integrity, and reaching company goals through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we actually do.
1. Respect the Individual and Celebrate Diversity
We all deserve to work in an environment where we are treated with dignity and respect. Confluent is committed to creating such an environment because it is consistent with who we are as a company and brings out the full potential in each of us. This, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

2. Equal Opportunity Employment
We are an equal opportunity employer, which means employees and applicants have equal employment rights and opportunities, regardless of race, color, religion, creed, sex, gender identity, national origin, age, disability, marital status, veteran status, or any other status protected by applicable law. We take great care to source, interview, and welcome team members of all backgrounds and we are proud of our diverse teams.

Diversity, Equity, and Inclusion Policy
3. Preventing Harassment and Discrimination

We are committed to providing a work environment free of discrimination of all types, and from abusive, offensive, or harassing behavior, including victimization and bullying. We do not tolerate discrimination on the basis of race or ethnicity, color, national origin, ancestry, sex, gender identity or expression, sexual orientation, marital or parental status, pregnancy or childbirth or related conditions, religion, creed, age, disability, genetic information, veteran status, or any other protected status. Our Global Harassment and Discrimination Policy applies to all employees and contractors, and we also will not tolerate harassment of or discrimination against our employees by others who work with us, such as customers and suppliers.

If you feel that you have been bullied, harassed, or suffered discrimination, or have witnessed these acts involving others, report it immediately to Employee Relations or Legal.

Reported acts of discrimination or harassment are taken seriously and will be investigated. Serious breaches of our policies may result in termination of employment or, for non-employees, termination of contract. You should always feel safe to report issues, as we do not condone and will not tolerate retaliation against anyone who reports an incident or participates in an investigation related to an incident.

Global Harassment and Discrimination Policy

4. Hazardous Conditions and Injuries

Confluent is committed to providing a healthy and safe work environment. Safety measures and rules are in place for the protection of employees and anyone who visits our workplace. It is the responsibility of each individual to help prevent accidents. To that end, you should maintain all work areas, including those outside of the office when working remotely, in a safe and orderly manner, free from hazardous conditions. Employees should recognize any potential fire hazards and be aware of fire escape routes and fire drills. Do not block fire exits, tamper with fire extinguishers, or otherwise create fire hazards.

If you observe an unsafe practice or condition, you should report it to a manager or the Workplace Team at workplacehelp@confluent.io immediately. You must also notify Confluent about accidents, no matter how minor, and physical discomfort caused by repetitive tasks. We will never retaliate against any employee for bringing any such incident or condition to our attention.

5. Drugs and Alcohol

We believe that the influence of recreational drugs or excessive consumption of alcohol at work can negatively impact our ability to provide a safe workplace. Accordingly, we strictly prohibit the use of any recreational drugs and the excessive consumption of alcohol at any Confluent workplace or company event, or while driving a vehicle on Confluent business. To be clear, being under the influence of drugs or alcohol does not remove or reduce your obligation to adhere to the Code of Conduct.

6. Workplace Violence

We will not tolerate any violent behavior at the workplace, and we do not allow bringing any kind of weapons to our offices, events, or customer sites.
We must always strive to conduct our business in an honest, fair, and ethical manner, including with respect to our competitors. Therefore, it is essential that every one of us understand the company policies, laws, rules, and regulations that apply to our company and roles.

The Code of Conduct highlights important legal regulations of which you should be aware, and the policies referenced in the Code of Conduct will provide more specifics in key areas. We expect employees to understand the legal and regulatory requirements applicable to their areas of responsibility. If we ever encounter a law that conflicts with the Code of Conduct, the stricter rule should be followed. If we are unsure of which rule is stricter or whether a contemplated action is permitted by law or Confluent policy, we should seek advice from Legal, our manager or Employee Relations. We are all responsible for preventing violations of law and for speaking up if we see possible violations. Failure to respect applicable laws and regulations could result in substantial penalties to Confluent and can also have serious consequences for individual employees.
1. Antitrust Compliance

We are dedicated to ethical, fair, and vigorous competition. We sell our products and services based on their merit, superior quality, functionality, and competitive pricing. We make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors or engage or assist in unlawful boycotts of particular customers.

Most countries have laws that are designed to promote free and fair competition that generally prohibit: (1) arrangements with competitors that restrain trade, (2) abuse of intellectual property rights, and (3) use of market power to unfairly disadvantage competitors. We are committed to complying with antitrust laws in any location where we operate. It is our policy to never:

- Discuss pricing policies, costs, or marketing or strategic plans with any competitor;
- Discuss division of customers, markets, territories, or countries with any competitor;
- Discuss proprietary or confidential information, including technological improvements, with any competitor;
- Discuss sales and marketing strategies with any competitor;
- Engage in joint behaviors against a customer;
- Boycott competitors, customers, or suppliers; or
- Include inappropriate conditions in purchases or sales.

Violating antitrust laws is a serious matter and could place us and the individual engaged in the misconduct at risk for substantial criminal penalties and potential severe fines. Understanding the requirements of antitrust laws in the various jurisdictions where we do business can be difficult. If questions arise, please contact Legal for guidance.
2. Competition Law Compliance

While we compete vigorously in all of our business activities, we are committed to dealing fairly with our customers and competitors, and conducting our global activities in accordance with all applicable laws, including competition laws. When representing our company in the community, you are expected to compete energetically by promoting our company on the merits. Product or service comparisons should be fair and accurate. Competition laws also strictly govern, usually very strictly, relationships between us and our competitors, as discussed above.

Most countries also have laws designed to encourage and protect free and fair competition. These laws are broad and far-reaching and regulate our relationships with actual and prospective customers, partners, vendors, resellers, and distributors. Competition laws generally address the following areas: pricing practices (including predatory pricing, price fixing, and price discrimination), discounting, terms of sale, credit terms, promotional allowances, secret rebates, exclusive relationships, dealerships or distributorships, product bundling, restrictions on carrying competing products, termination, and many other practices.

Acquiring proprietary information from others 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 our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult Employee Relations or Legal.

You are expected to deal fairly with our customers, suppliers, employees, and anyone else with whom you have contact in the course of performing your job. It is a violation of the Federal Trade Commission Act to engage in deceptive, unfair, or unethical practices and to make misrepresentations in connection with sales activities.

3. Anti-Corruption and Anti-Bribery Compliance

The Confluent Global Anti-Bribery and Anti-Corruption Policy establishes worldwide standards for preventing corruption and bribery in our dealings and transactions. All employees are required to strictly comply with such policy and to maintain our commitment to observing ethical business practices and avoiding violations of applicable anti-bribery and anti-corruption laws.

The Foreign Corrupt Practices Act (or FCPA) is a United States federal anti-bribery law that makes it unlawful for any U.S. citizen or any representative of a U.S. corporation to give anything of value to a non-U.S. official in order to obtain or retain business. This includes facilitation or “grease” payments—small, unofficial payments made to a public official to secure a routine administrative action. However, the payment of a published fee to a government agency for expedited service is not considered a facilitation payment.

Some types of gifts, hospitality, and entertainment can run afoul of anti-bribery and anti-corruption laws. Gifts, hospitality, and entertainment remain a legitimate part of conducting business but should be provided only for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services, and always in compliance with the Code of Conduct.

Gifts, hospitality, and entertainment can, when excessive, constitute a bribe and/or a conflict of interest. Under some statutes, such as the FCPA, giving anything of value to a government official to obtain or retain business, obtain favorable treatment, or obtain an improper advantage is a criminal act subject to prosecution and conviction.
Discuss with your manager or Legal any proposed entertainment or gifts, if you are uncertain about their appropriateness or if you are unsure whether a particular act constitutes bribery. You must exercise care and due diligence at all times when giving or receiving any form of gift or hospitality on behalf of Confluent and must comply with the guidelines established in our Global Anti-Bribery and Anti-Corruption Policy.

On rare occasions, you may encounter situations where individuals in positions of authority demand or extort small payments or gifts under the threat of imminent physical harm. In such situations, you are permitted to make the payment or furnish the gift, but only if you believe in good faith that it is necessary to do so in order to avoid the harm. Once it is safe to do so, you should immediately report the situation to the Chief Legal Officer or the Chief People Officer. All such payments and gifts must be accurately recorded in our books and records.

Under the FCPA and many other anti-corruption laws, Confluent can be criminally liable for bribery and corruption undertaken by third parties in connection with our business. These third parties include but are not limited to sales representatives, agents, resellers, consultants, distributors, and persons who make introductions or generate leads. Confluent conducts due diligence on these types of third parties before we agree to work with them. This helps to ensure that we only work with third parties that share our commitment to ethical business conduct, and to mitigate FCPA risks that arise from third-party relationships.

A problem can arise if you:
- receive a gift or entertainment that compromises, or could reasonably be viewed as compromising, your ability to make objective and fair business decisions on behalf of Confluent; or
- offer a gift or entertainment that is, or could reasonably be seen as, an attempt to obtain business through improper means or to gain any special advantage in our business relationships.

Reasonable gifts, hospitality, and entertainment that are provided for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services that do not violate the FCPA or other anti-corruption laws are permissible. However, gifts, hospitality, and entertainment must meet the following criteria:
- Customary and reasonable in value,
- Open and transparent,
- Cannot reasonably be construed as a bribe or payoff,
- Does not violate laws, regulations, or policies of the other party's organization,
- Not be inappropriate or salacious,
- Not be provided with excess frequency to the same recipient, and
- Not in the form of cash.

In addition, you may not receive any income or material gain from a third party in connection with the performance of your job at Confluent.

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Everyone at Confluent is responsible for ensuring that corruption and bribery are prevented, detected, and reported. If you have concerns or suspicions about corruption or potential FCPA or other anti-corruption law violations, you must promptly report this to the Chief Legal Officer or report your concerns through the EthicsPoint helpline.

Global Anti-Bribery and Anti-Corruption Policy

4. Confidential and Proprietary Information

One of our most important assets is our confidential information. You may learn of information about Confluent that is confidential and proprietary. You also may learn of information before that information is released to the general public. Confidential information includes non-public information that might be of interest to investors, of use to competitors, or harmful to Confluent or its customers if disclosed.

In addition, because we interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. 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.

Every employee has a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of employment here, until that information is disclosed to the public through approved channels, such as disclosure on Confluent’s website or in a press release.

Unauthorized posting or discussion of any 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 within our offices. All Confluent emails, voicemails, and other internal communications are presumed confidential, and we should not forward Confluent communications outside of Confluent except where
required for legitimate business purposes.

We should strive to ensure that we do not inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, iPads and other tablets, and laptop computers, should be stored securely.

In addition, it is important that we respect the property rights of others. We will not acquire or seek to acquire a competitor’s trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

5. Global Trade Compliance
We must comply with all laws and regulations governing the international trade of our products, including rules administered by the United States Treasury and Commerce Department and the European Union (among others). We take pride in understanding the letter and spirit of the governing export control and economic sanctions laws and regulations.

6. Insider Trading
Confluent shares non-public information with you so that you can successfully perform your jobs. You may also receive non-public information about our customers, partners, or suppliers. Employees may not use confidential, non-public information about Confluent or any other company with which we do business for any other purpose other than to conduct our business. Employees must exercise the utmost care when handling material non-public information.

Employees may not trade, or tip others to trade, in Confluent’s stock or the stock of another company while in possession of material non-public information about that company. “Material” information is information that an average investor would find important in making a decision to buy or sell a company’s shares. Buying or selling shares while in possession of material, non-public information, or tipping others to trade based on this information, is a violation of insider trading laws as well as the Code of Conduct and our Insider Trading Policy.

Insider Trading Policy

7. Selective Disclosure
We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals, or otherwise) any material non-public information with respect to Confluent, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material non-public information.

External Communications Policy

8. Anti-Slavery and Human Trafficking
We are committed to ensuring that our business operates in a socially responsible way that prevents slavery and human trafficking. We are also committed to playing our part in helping the world to improve practices designed to combat slavery and human trafficking.

Modern Slavery Statement

9. Mergers and Acquisitions
From time to time, Confluent may decide that it is beneficial to our business to acquire another company. In such circumstances, we will conduct robust due diligence regarding the other company to ensure that they share our commitment to ethical business conduct. After such a transaction, we will ensure that the acquired company adopts, and that our new colleagues receive training about, the Code of Conduct and our other compliance policies and procedures.
Employees are prohibited from engaging in any behavior or enterprise which conflicts with Confluent’s best interests without our prior written consent. A conflict of interest is a situation where the business actions we take on behalf of Confluent may conflict with our personal interests. You must avoid any relationship or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing our jobs. Even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided. This section provides specific examples of conflicts of interest, as well as other areas that can present potential conflicts of interest if not properly disclosed and addressed.

If you have questions about actual or potential conflicts of interest, seek advice from your manager, Employee Relations, and/or Legal. Before you engage in any activity, transaction, or relationship that might give rise to a conflict of interest, including those described below, you must obtain approval from the Chief Legal Officer, Chief Financial Officer, or Chief People Officer. If you become aware of an actual or potential conflict of interest, you must disclose the information at the earliest opportunity to your manager, Employee Relations, or Legal.
It’s not always easy to determine whether something constitutes a conflict of interest. Here are some examples in which conflicts of interest, or the appearance of a conflict of interest, could arise:

- Being employed by, or acting as a director, consultant, or advisor to, a competitor or potential competitor, customer, reseller, supplier, or contractor, regardless of the nature of the employment, while you are employed by Confluent;
- Hiring or supervising family members or closely related persons;
- Owning—directly or indirectly—or having a financial interest in a competitor, supplier or contractor of Confluent (other than holding a direct interest of less than 1% of the stock of a publicly-traded company);
- Having a personal interest, financial interest, or potential gain in any Confluent transaction not generally applicable to other stockholders or employees;
- Placing company business with an entity owned or controlled by employees or their families;
- Accepting business opportunities discovered in the course of your employment with Confluent;
- Accepting gifts, discounts, favors, or services from a customer, potential customer, competitor, or supplier, unless nominal and reasonable under the circumstances, such as being taken to lunch at a reasonably priced restaurant;
- Soliciting contributions for any political candidate, political organization, or religious organization from any person or entity that does business or seeks to do business with us; or
- Soliciting contributions to a charitable organization or a sponsorship as a quid pro quo for obtaining business from Confluent.

Further, while generally not a conflict of interest, you must obtain approval from your manager and the Chief Legal Officer (or, in the case of the Chief Legal Officer, the Chief Financial Officer) if you’d like to serve as a board member for an outside commercial company or organization.

1. Romantic and Familial Relationships

We will not take any action against employees simply because they are in a romantic or personal relationship with a colleague. However, managers should not engage in romantic relationships with subordinates, and any employment of family members is subject to our conflict of interest rules.

If you become involved in a relationship that could create an actual or potential conflict of interest or legal risk pertaining to discrimination or sexual harassment, you should disclose the relationship to your People Business Partner.

2. Outside Activities

We know you have a life outside of work, and we are supportive of your outside activities, as long as they do not create a conflict of interest or negatively affect your ability to do your job. In that case, we may take appropriate disciplinary action, up to and including termination of employment.

We will not assume any responsibility for employees’ outside activities. Specifically, we will not provide workers’ compensation coverage or any other benefit for injuries occurring from, or arising out of, such outside activities.

3. Personal Investments

Generally, you may invest in the shares of public companies without creating a conflict of interest, as long as you own, directly or indirectly, less than 1% of such companies’ shares. Investments in private companies are also usually allowed if they meet the other requirements under the Code of Conduct, such as conflicts of interest, outside activities, and confidentiality provisions.
4. Confluent Opportunities

Employees owe a duty to advance our company’s legitimate interests when the opportunity to do so arises. We must never, directly or indirectly, do any of the following:

• Pursue or take personally for ourselves opportunities that are discovered through the use of Confluent’s property, information, or positions. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business;
• Use Confluent property, information, or positions for personal gain; or
• Compete with Confluent for business opportunities.

5. Political Contributions and Activities

Confluent does not make political contributions, and Confluent is not affiliated with any political party, independent candidate, or with any other organization whose activities are primarily political.

Confluent encourages employees to engage in the political process in their communities. However, work is not the place to carry out that engagement. We ask everyone to avoid conducting political activism in the workplace. This includes posting your opinion on elections, candidates, political issues and lobbying your co-workers or the company to share your stance. This behavior is obviously well-intended, but tends to lead to conflict, and makes people who disagree feel excluded. In the end, the discussion is inevitably consumed by the most extreme proponents and opponents of any issue and it creates a lot of acrimony over issues far afield of what we do as a company.

Employees are free to make personal contributions to candidates or participate in the political process, but contributions may not be made on behalf of Confluent and may not be made to obtain any form of advantage in any business transaction. In addition, you may not attribute your personal political activities, beliefs, or contributions to Confluent (e.g., by using your work email address).

6. Charitable Contributions and Activities; Sponsorships

Confluent encourages all employees to be actively involved in their local communities, including by volunteering. You may also make charitable donations using your own assets, but these donations will not be reimbursed by Confluent.
1. Disclosures and Recordkeeping

Our accounting records are relied upon to produce reports for our management, stockholders, and creditors, as well as for governmental agencies. We rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file 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. Employees 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.

Our financial and other disclosures must be full, fair, accurate, timely, and understandable. In addition, all of Confluent’s corporate records must be true, accurate, and complete, and company data must be promptly and accurately entered in our books in accordance with Confluent’s policies and other applicable accounting principles.

Be honest and accountable

Corporate integrity starts with personal accountability.
This means we will:

• Create and keep truthful, clear, and accurate financial records,
• Follow Confluent’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 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, and
• Never assist anyone in any prohibited activity and report any activity you believe is questionable.

In addition, employees 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.

We should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about Confluent 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 employee 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 employees 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 Confluent’s financial statements materially misleading; and
• no employee 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.
Any employee who becomes aware of any departure from these standards or suspects or has reason to believe that financial results are inaccurate or inconsistent with underlying business performance has a responsibility to report their knowledge promptly to a manager, the Chief Legal Officer, our EthicsPoint hotline, or to the Audit Committee of our Board of Directors.

2. Dealing with Auditors
Our auditors have a duty to review our records in a fair and accurate manner. You must cooperate with independent and any internal auditors in good faith and in accordance with law. In addition, you must not fraudulently induce or influence, coerce, manipulate, or mislead our auditors about financial records, processes, controls, procedures, or other matters. You must respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records are accurate and complete. You may not engage, directly or indirectly, any outside auditors to perform any audit, audit-related, tax, or other services, including consulting, without prior approval from the Chief Accounting Officer or Chief Financial Officer.

Any employee who is aware that persons within Confluent seek to improperly influence the work of our internal or external financial or accounting employees or auditors has a responsibility to report their knowledge promptly to a manager, the Chief Legal Officer, our EthicsPoint hotline, or to the Audit Committee of our Board of Directors.

3. Business Expenses
From time to time, you may incur expenses on behalf of Confluent. We will reimburse you for the work-related expenses you incur, provided they comply with any travel and expense policy published by Confluent’s HR or Finance teams. Note that you are required to obtain manager approval before incurring business expenses.
1. Confidential and Proprietary Information

Integral to Confluent’s business success is our protection of confidential company information, as well as non-public information entrusted to us by employees, customers, and other business partners. Confidential and proprietary information includes things such as our intellectual property and trade secrets, our marketing and business development plans, pricing and financial data, attorney-client privileged information, customer names/addresses, or non-public information about other companies, including current or potential supplier and vendors. We will not disclose confidential and non-public information without a valid business purpose and proper authorization.

Please refer to the Data Classification and Handling Standard for the expectations and requirements for securely handling company information.
2. Use of Company Resources

Company resources, including time, material, and equipment, are provided for company business use. Employees are expected to protect company resources, ensure their efficient use, and use them only for legitimate business purposes. Nonetheless, occasional incidental personal use, not including use for outside employment, may be permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Confluent are trusted to behave responsibly and use good judgment to conserve company resources. Employees may not use our corporate name or any brand name or trademark owned or associated with Confluent for any personal purpose. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, employees should not use company equipment such as computers, copiers, and systems to conduct outside business or support any other organization, except where such activity is sponsored by Confluent.

3. Acceptable Use of IT

Confluent will not tolerate the use of company resources to create, access, store, print, solicit, or send any materials that are harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate. Examples of prohibited use includes, but is not limited to:

- Transmitting, retrieving, downloading, or storing messages or images that are offensive, derogatory, defamatory, sexual in content, or otherwise inappropriate in a business environment (e.g., off-color jokes or gender- or ethnicity-based derogatory statements),
- Making threatening or harassing statements to other employees,
- Soliciting personal business opportunities or personal advertising (e.g., activities involving a for-profit business other than the company), and
- Gambling of any kind.

Computer viruses pose a significant risk to our company. Employees are therefore not permitted to use unauthorized software on any company computer or device without first obtaining specific authorization from the IT Department. Similarly, information is not to be downloaded directly from the internet onto our computer systems. If you need to download information from the internet, you should contact the IT Department before introducing the data into our system.

Acceptable Use Policy

4. Social Media

We recognize that social media has established itself as an ordinary part of personal and professional life. We use it to share news and to gather information, generate new ideas, and learn. Employees must always consider the public nature of online posts and communications and use their best judgment when communicating online. The Confluent Social Media Policy establishes our standards and expectations for social media use.

Social Media Policy
Each of us is responsible for knowing and adhering to the values and standards set forth in the Code of Conduct, and for raising concerns if there may have been a violation of the Code of Conduct. We take violations of the Code of Conduct seriously, as they may cause significant harm to Confluent, our co-workers, customers, and others. Violations of certain laws and regulations referenced in the Code of Conduct and other Confluent policies could result in costly investigations, material fines, lasting damage to Confluent’s reputation, and even criminal penalties. As a result, violations of the Code of Conduct may be cause for disciplinary action, up to and including termination of employment. In certain cases, violations of the Code of Conduct may be referred to government authorities for potential criminal prosecution.

At Confluent, we view raising an ethical concern as protecting the company and others, not a challenge to authority. Failure to report potential violations and allowing a bad situation to fester erodes confidence in the Code of Conduct, our team, and ultimately the company. It may also increase Confluent’s risk and liability by compromising and delaying Confluent’s ability to address the problem.

Sometimes it takes courage to do the right thing and report a potential violation or concern. However, please know that by bringing potential violations to our attention, you are helping to maintain the integrity of the company, reducing Confluent’s risk and liability, and creating an environment which respects employees and others. Confluent does not tolerate retaliation and will not tolerate retaliation against anyone who reports violations or suspected violations of the Code of Conduct or assists in an investigation of a reported violation.
1. Reporting a Potential Violation or Ethical Concern

If you suspect that any employee or other person at Confluent has violated any laws, rules, regulations, or the Code of Conduct, please report this violation or potential violation immediately to one of the following:

- Your manager, or another person in Confluent management whom you trust,
- The Chief Legal Officer at mvinson@confluent.io or the Legal team at legal@confluent.io,
- Your Chief People Officer at cheryl@confluent.io, Employee Relations at employeerelations@confluent.io, or your People Business Partner, or
- Confluent’s EthicsPoint helpline which also includes a process for making an anonymous report.

In addition, if you have a concern that someone has engaged in unethical conduct, you may turn to any of the above resources.

When a report is received, the company will look into the concerns, and will assign internal employees 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. The company 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 our EthicsPoint hotline.

Whistleblower Policy

2. Investigations

All employees are expected to fully cooperate with internal and external investigations, including, but not limited to:

- Providing truthful and accurate information to investigators, including Confluent employees working on the investigation, third-party investigators, external auditors, and government regulators or authorities,
- Complying with records retention requirements and never altering or destroying correspondence, documents, or evidence relating to an active or possible investigation, and
- Notifying Legal immediately if you are contacted by a government regulator or third party seeking information, requesting an inspection or investigation, threatening legal action, or conducting an audit.

Employees who fail to cooperate as described above may be subject to disciplinary action, up to and including termination of employment.

3. Anti-Retaliation Policy

As a company, we do not tolerate retaliation. No employee may retaliate against any person who reports a known or suspected violation of the Code of Conduct or any of our company policies and procedures, or who participates in an open investigation. Retaliation consists of doing the following (among other things) as punishment for speaking up: demotion, low performance reviews, transfer or reassignment, change of terms of employment and/or compensation, harassment, threats, or termination of employment.

Anyone who retaliates against a person for making a good faith report or for participating in an investigation will be subject to prompt and serious disciplinary action, up to and including termination of employment, and potential referral to government authorities.

Employees who believe they have experienced retaliation should contact their People Business Partner or Legal immediately.
Any waiver of the Code of Conduct for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller) or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of the exchange on which our Class A common stock may be traded, a committee of the Board of Directors. Any waiver will be reported as required by federal securities laws and applicable stock exchange rules. Any matter which has been approved in accordance with the processes set out in or referenced by the Code of Conduct will not be considered a waiver.

We are committed to regularly reviewing and updating our policies and procedures, including the Code of Conduct. The Code of Conduct may be amended by our Board of Directors or the Audit Committee; 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. The most current version of the Code of Conduct is always available on our website at https://confluentinc.atlassian.net/wiki/spaces/PEOPLE/overview, and we encourage you to review it periodically to stay aware of any changes.
If you have a question or concern, suspect a possible violation of the Code of Conduct, or wish to discuss a personal situation, there are several resources you can reach out to for help, in addition to your manager or People Business Partner:

**Chief Legal Officer**
Melanie Vinson  
mvinson@confluent.io

**Chief People Officer**
Cheryl Dalrymple  
cheryl@confluent.io

**EthicsPoint Helpline**
[https://www.confluent.ethicspoint.com](https://www.confluent.ethicspoint.com)