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 of Conduct 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 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. 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 towards our customers, partners, and employees.

3. 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 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.
4. 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.

5. 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; if you are not comfortable discussing the issue with your manager, please reach out to another member of management, your People Business Partner, Employee Relations or a member of the Legal team. Representatives from these groups will ensure that problems are promptly and appropriately addressed. You may also report concerns (including anonymously) through Confluent’s EthicsPoint helpline at www.confluent.ethicspoint.com.

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.
Providing a safe and inclusive workplace

It is important for each of us to foster an environment where we all feel respected and valued, where our contributions are appreciated, and where we are safe.

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 the success of each individual but also to our collective 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, sexual orientation, gender identity/expression, national/ethnic origin, age, disability, genetic information, marital or parental status, pregnancy or childbirth or related conditions, 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, as described in our Diversity 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, color, religion, creed, sex, sexual orientation, gender identity/expression, national/ethnic origin, age, disability, genetic information, marital or parental status, pregnancy or childbirth or related conditions, veteran status or any other status protected by applicable law. 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.

   Confluent does not tolerate acts of retaliation against anyone who makes an honest and sincere report of a possible violation of law or
of Confluent’s Code of Conduct or policies, or who participates in an investigation of possible wrongdoing, regardless of the outcome of any investigation into the report. Many countries have laws that protect those who report misconduct, and Confluent enforces any applicable protections afforded by such laws.

If you feel that you have been bullied, harassed, or suffered discrimination, or have witnessed these acts involving others, report it immediately to a member of management, your People Business Partner, Employee Relations, or a member of the Legal team. 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.

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 or at work-related events can negatively impact our ability to provide a safe workplace and to maintain a respectful and professional environment. Accordingly, we strictly prohibit the use of any recreational drugs and the excessive consumption of alcohol at any Confluent workplace or work-related event, or while driving a vehicle on Confluent business. A work-related event can include dinners, bars, or “after parties” if co-workers, customers or business colleagues are present.

We want to maintain an environment that is safe and professional. To this end we prohibit the use of recreational drugs and excessive consumption of alcohol at work or any work-related activities such as events, dinners, or other activities where coworkers or customers are present.

Alcohol consumption at work events is allowed but individuals need to limit themselves to a reasonable amount. No one should feel pressured to drink. And we ask for your help making sure none of your coworkers endanger their own lives or those of others by driving drunk.

And 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 or our other policies, or excuse any inappropriate or unlawful behavior that occurs while under the influence.

This guidance is important for everyone, but is particularly important for those in a leadership role - managers are expected to lead by example.

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, we should seek advice from Legal. 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 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.
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 and 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.

Everyone at Confluent is responsible for ensuring that corruption and bribery are prevented, detected, and reported. If you have concerns or suspicions about corrupt or conduct 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 at www.confluent.ethicspoint.com.

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. Confidential information about another company should only be circulated internally on a “need to know” basis and for the purposes of our relationship with that company. 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. Any employee receiving any document or other article (including electronic documents or articles) containing a marking stating that it is export controlled or subject to any other legal restriction on disclosure—other than basic “confidentiality” markings—may not forward it to anyone or store it on any Confluent information system without first contacting the Legal team.

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, and should not disclose any such information to any third party, including customers, partners, and suppliers.

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.

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.

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, as described in our Modern Slavery Policy.
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 your personal interest outside of work impacts (or has the potential to impact) the business actions you take on behalf of Confluent. 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 your job. 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 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 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 and 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.

1. Romantic and Familial Relationships
Managers should not engage in romantic relationships with anyone in their reporting line, and any employment of family members or romantic partners is subject to our conflict of interest rules. Although romantic relationships with co-workers not in the same reporting line is not prohibited, they can create issues of actual or apparent favoritism and contribute to a negative work environment, and employees in this situation must exercise good judgment and avoid any actual or apparent conflicts of interest.

In the event an employee approaches a co-worker outside of their reporting line about a date or relationship and is rejected, that employee should not ask about it again, as this could constitute sexual harassment.

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 it to Employee Relations or Legal. This includes any relationship where one individual has influence or control (whether directly or indirectly) over the other’s conditions of employment.

2. Outside Activities
Starting an outside business or acting in an advisory or Board role while working at Confluent is not automatically prohibited, as long as it does not create a conflict of interest or negatively affect your ability to do your job.

If you wish to engage in an outside business activity or engage in an advisory or Board role at another company, you must complete an employee attestation form, and your request will be reviewed by representatives of the People and Legal teams, your manager, and the head of your department. You may not commence work on your outside business activity prior to approval, and if it is approved, you may not utilize Confluent assets, intellectual property, or trade secrets, or solicit help from or employment of your co-workers in your outside business activity.

In addition, employees are not permitted to engage in “research opportunities” or any consulting relationships that involve sharing information about Confluent, our customers, partners or suppliers, whether or not such information is public. If you have questions about whether an opportunity may violate the Code of Conduct, seek advice from Legal.

3. Personal Investments
Subject to our Insider Trading Policy, 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 percent 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 business 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 understands that employees may 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.

In general, 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 e-mail address). Employees involved in soliciting, seeking, or performing contracts for government customers must contact Legal prior to making such contributions to any non-U.S. federal candidates, campaigns, or committees.


Confluent benefits whenever it draws talented employees from a variety of industries, including the public sector. Important rules apply to discussions regarding employment with current and former government employees, however, and such discussions can create the appearance of a conflict of interest or even corruption. Any discussions with current or former government employees regarding employment should be carefully coordinated in advance by the Recruiting and Legal teams.

7. 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.

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.

The booking of transactions with resellers, distributors and other partners should typically align with the performance period of the end user, and use of license keys should be consistent with the underlying transaction. See our Bookings Policy for further information.

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 Accounting Officer, the Chief Legal Officer, our EthicsPoint hotline, or to the Audit Committee of our Board of Directors.

2. Internal and Outside 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 auditors or any accounting or finance employees has a responsibility to report their knowledge promptly to a manager, the Chief Accounting Officer, 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 Confluent’s Travel and Expense Policy. Among other requirements, work-related expenses must be reasonable and submitted on a timely basis. Certain expenses such as regular commuting expenses are not reimbursable unless otherwise required by local law. Expense reports must not be used for procurement related activity such as paying a vendor; such transactions must be processed by the Procurement organization. Note that submitting expense reports for personal expenses or mischaracterizing items submitted on an expense report is a form of fraud as well as a violation of the Code of Conduct, and can result in termination of employment, actions to recoup any overpaid amounts, and/or referral to criminal authorities.
1. Confidential and Proprietary Information

Integral to Confluent’s business success is our protection of confidential company information, as well as nonpublic 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 nonpublic 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 Software and Services for Business Purposes

Employees may only use Confluent authorized and licensed software and services to perform Confluent business activities. Employees may not enter confidential information, personal information (including customer names or contact information), code, trade secrets or other intellectual property into tools that are not licensed or approved by Confluent’s IT, Business Systems, or Information Security teams.

The restriction includes the use of generative artificial intelligence ("AI") tools in any way that would contradict our security and privacy policies, create risks to our intellectual property rights, promote unethical behavior, or violate the law. Confluent may approve the use of AI tooling for business applications with careful consideration of the security and intellectual property impacts.
3. 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.

4. 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, or relating to dating, drugs, weapons or violence),
- 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),
- Gambling of any kind, and
- Illegally downloading or copying material that is copyrighted or protected by other intellectual property laws.

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.

For more information on the acceptable use of information technology, please review our Acceptable Use Policy.

5. 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.
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 as well as civil litigation to recoup our losses associated with the violations. 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, maintaining Confluent’s reputation and ability to do business with customers, and creating a great workplace for us all. Confluent 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 gaggarwal@confluent.io, or Employee Relations at employeerelations@confluent.io
- Your People Business Partner, or other member of the People team, or
- Confluent’s EthicsPoint helpline at www.confluent.ethicspoint.com, 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.

In all investigations, we will endeavor to keep your identity confidential and only reveal it where necessary in investigating or remediating the issues raised. You can report your concerns anonymously through our EthicsPoint hotline at www.confluent.ethicspoint.com; however, completely anonymous disclosures can be difficult to investigate. If you choose to report anonymously, EthicsPoint enables us to ask follow-up questions while preserving your anonymity, and we encourage you to respond to any inquiries you receive on your anonymous report to enable us to properly investigate the issues raised.

You are not prohibited or limited from filing a charge or complaint with, or otherwise communicating with or participating in any investigation or proceeding conducted by, any federal, state, or local government agency or commission without giving notice to, or getting permission from, Confluent. Further, nothing in this Code is intended to limit your rights under the National Labor Relations Act or local equivalent. In general, you are also not prohibited from disclosing documents or other information pertaining to Confluent to government agencies in the course of a government investigation or communication.

However, you should not disclose any Confluent attorney-client privileged communications or attorney work product (these are generally communications with an attorney or under the direction of an attorney in connection with obtaining legal advice or conducting investigations), unless you are an attorney and disclosure is permitted under applicable state attorney conduct rules or other applicable regulations or laws. You should take all reasonable precautions to prevent any unauthorized use or disclosure of Confluent confidential information to any parties other than the government agencies. If you submit concerns directly to a government agency, we request that you send your report or complaint to our legal team prior to or concurrently with your outside reporting, so that we may properly investigate and remediate any issues.

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 and potential referral to government authorities.

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.
Waivers and amendments

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; provided that waivers to our Insider Trading Policy may be provided by our Chief Legal Officer. 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 Nominating and Governance 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://investors.confluent.io/, 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:

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

**Chief People Officer**
Gunjan Aggarwal  
gaggarwal@confluent.io

**Head of Employee Relations**
Nathan Singer  
employeerelations@confluent.io

**EthicsPoint Helpline**
https://www.confluent.ethicspoint.com