



amdocs

# GLOBAL ANTI-BRIBERY AND CORRUPTION POLICY

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**Purpose:** To state Amdocs' commitment to compliance with anti-bribery and corruption law and to provide guidance on how to recognize and address potential bribery and corruption issues.  
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This procedure may change at any time according to the company's discretion. The contents of the procedure are general guidelines and the company reserves its right to deviate from the procedure, as determined necessary. This document contains proprietary or confidential information of the company.

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# 1 ABOUT THIS POLICY

Amdocs strictly prohibits any form of bribery of domestic and foreign government officials as well as private sector (commercial) bribery, and complies with all applicable anti-bribery and corruption laws. This Policy sets forth Amdocs' commitment to compliance with these laws, and provides information and guidance on how to recognize and address potential bribery and corruption issues.

This Policy is reflected in and consistent with our **Code of Ethics and Business Conduct**, which sets out the rules and guidelines by which all Amdocs personnel must abide in order to ensure that Amdocs conducts business according to the highest ethical standards. This Policy also operates in conjunction with our **Third Party Anti-Bribery and Corruption Procedure** and **Gifts & Hospitality Policy**, which describe specific compliance programs and processes designed to implement and uphold this Policy.

This Policy applies across all of Amdocs' operations and entities, including majority-owned or controlled subsidiaries, and in all territories in which Amdocs conducts business. All Amdocs personnel on a worldwide basis, including employees, directors, officers and third parties operating on behalf of Amdocs must comply with and strictly follow this Policy, irrespective of citizenship, domicile or location.

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# 2 OUR POLICY STATEMENT

All Amdocs personnel are expected to conduct Amdocs' business legally and ethically. Amdocs does not tolerate any form of bribery or corruption, either directly or indirectly through third parties. Amdocs conducts every business transaction with integrity, regardless of differing local customs or business practices, and complies with the applicable laws and regulations of each country in which we do business.

Amdocs does not promise, offer, give or authorize the giving of, directly or indirectly, anything of value to anyone, including:

- any government official, employee or representative;
- any stated-owned or controlled organization or entity or representative thereof; or
- any private-sector organization or entity or representative thereof;

in an attempt to improperly influence or reward any act or decision, to obtain or retain business, or to secure any improper advantage for Amdocs.

In addition, Amdocs does not accept any such promises, gifts or inducements, and all Amdocs personnel are strictly prohibited from accepting, requesting, receiving or agreeing to receive, directly or indirectly, anything of value or any kind of advantage intended to influence or reward any act or decision.

Amdocs further maintains internal accounting controls designed to ensure the accuracy of its books and records relating to all transactions, including gifts and other payments of things of value covered by this Policy.

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## 3 WHAT LAWS APPLY TO OUR BUSINESS?

Amdocs is a global enterprise and, as such, is potentially subject to a range of anti-bribery and corruption (“ABAC”) laws around the world. These laws generally prohibit the bribery of government officials, impose books and recordkeeping requirements, and may impose strict liability and/or create criminal and civil penalties for violations. Some laws also prohibit commercial bribery involving private sector – not just governmental – persons and entities.

Amdocs personnel are required to abide by all applicable ABAC laws, including the United States Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act 2010 (“Bribery Act”) and the local laws of every country in which Amdocs does business.

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## 4 WHAT IS BRIBERY?

### 4.1 Offering or Giving Something For an Improper Purpose

Bribery is the promising, offering, giving or authorizing the giving of, directly or indirectly, anything of value to anyone in order to obtain or retain business or to secure some other advantage. This includes anything given with the intention of inducing the recipient or any other person to take action in favor of Amdocs, or to reward them for doing so.

### 4.2 “Anything of Value”

The prohibition on bribery applies to the giving of “anything of value.” This concept is interpreted broadly and is sometimes expressed as a “financial or other advantage.” It may include:

- Money (cash or cash equivalents such as checks or gift cards)
- Services
- Stock options
- Gifts, meals, drinks, entertainment or travel

- Favors, including offers of employment or internships for the recipient's friends or relatives
- Business opportunities
- Favorable contracts or discounts
- Promises to pay/give something
- Sponsorships
- Charitable donations
- Political contributions

This list is not exhaustive, and you should contact Legal Compliance with any questions or concerns regarding the types of activities and business courtesies that may be subject to this Policy as well as any other questions about the scope of this Policy.

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## 5 GOVERNMENT OFFICIALS

The FCPA (and other ABAC laws) prohibits the payment of “anything of value” to any “foreign official” with the intention of obtaining or retaining business or a business advantage. The term “foreign official” refers generally to government officials and other representatives of government, but the term is interpreted very broadly under the FCPA, and for the purposes of this Policy, to include any:

- Employee, official or other representative of any:
  - National, state, or local government body, department, ministry or agency;
  - National, state or local government instrumentality or military organization;
  - Company or other legal entity that is wholly or partly, directly or indirectly, owned or controlled by or acting in an official capacity on behalf of any of the above; or
  - Public international organization;
- Political party or employee, official or other representative thereof; or
- Elected official or candidate for public office.

Please keep in mind that an individual who may not appear to be, or who is not classified under local law as, a government official, may nevertheless constitute a “foreign official” for the purposes of the FCPA, other applicable ABAC laws and this Policy.

Importantly, this term is potentially broad enough to include employees of state-owned or –controlled commercial enterprises, including some companies that may appear to be private sector commercial enterprises, but which are subject to partial and/or indirect governmental ownership or influence. Legal Compliance can provide further guidance regarding the interpretation of the term “foreign official” and its application to a given set of facts.

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## 6 FACILITATION PAYMENTS

Amdocs strictly prohibits the making of facilitation (or expediting) payments, however small. This includes any payment that is made for the purpose of securing or expediting the performance of a routine, non-discretionary, government action or function, e.g., payments to obtain permits, process payments or documents, load or unload cargo, or secure the connection of basic facilities such as water, gas, cable, etc. Such payments are sometimes referred to as “grease payments.”

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## 7 COMMERCIAL BRIBERY

Many ABAC laws, including the Bribery Act, specifically prohibit the offering or acceptance of financial or any other advantages to or by employees and other representatives of private-sector (non-governmental) persons and entities, if the intention is to induce the recipient to act improperly. Such conduct amounts to “commercial bribery.” Amdocs strictly prohibits all commercial bribery, including kickbacks, in all countries in which we do business.

Business courtesies and hospitalities may be provided to potential and existing customers and business partners only where they are appropriate according to the type, value, and purpose of the expense, and only in compliance with this Policy, the **Gifts & Hospitality Policy** (see also section 8, below), and **Amdocs’ Code of Ethics and Business Conduct**.

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## 8 GIFTS AND HOSPITALITY

Amdocs does not seek to gain any advantage through the giving of gifts, entertainment, hospitality, gratuities or other courtesies to anyone. Similarly, the impartial judgment of Amdocs personnel must not be compromised through the receipt of any such courtesies. As part of Amdocs' anti-bribery and corruption compliance program, all giving and receiving of any such courtesies must comply with the principles, procedures and record-keeping requirements set forth in the **Gifts & Hospitality Policy** and the **Gifts & Hospitality Guidelines**.

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## 9 CHARITABLE DONATIONS AND SPONSORSHIPS

All charitable donations and sponsorships must be reviewed and approved in advance according to applicable internal procedures, which may include the performance of due diligence in appropriate cases. Where applicable, charitable donations and sponsorships must also comply with the requirements set forth in the **Gifts & Hospitality Policy** and the **Gifts & Hospitality Guidelines**.

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## 10 POLITICAL CONTRIBUTIONS

Political parties and candidates for public office are considered government officials. Accordingly, Amdocs does not make any political contributions including in the form of money, non-monetary items (e.g., equipment), services, or the use of any corporate resources (e.g., personnel time, facilities).

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## 11 THIRD PARTIES

Amdocs may be liable under applicable ABAC laws for corrupt payments made or received not only by Amdocs personnel, but also indirectly by an agent, distributor, vendor, or any other third party acting for or on behalf of Amdocs (collectively, "Third Parties"). Accordingly, all Third Parties engaged by Amdocs must operate at all times in compliance with applicable ABAC laws and this Policy. In addition, an Amdocs employee's awareness, inducement or facilitation of an act by a Third Party that would violate this Policy is itself a violation of this Policy.

In order to ensure compliance with this Policy by all Third Parties, Amdocs has implemented a Third Party anti-bribery and corruption risk management process, as described in our **Third Party Anti-Bribery and Corruption Procedure**. That Procedure establishes a process for the risk-based due diligence, approval, and monitoring of all Third Parties that Amdocs engages.

No Amdocs personnel may engage any Third Party other than for a legitimate business need and only when all required processes have been followed and approvals have been obtained pursuant to that Procedure.

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## 12 BOOKS AND RECORDS AND INTERNAL CONTROLS

All Amdocs Group entities shall make and keep books, records and accounts that, in reasonable detail, accurately and fairly reflect all transactions and dispositions of the relevant business entity. In addition, all Amdocs Group entities shall maintain an effective system of internal accounting controls, including periodic audits.

Any expense incurred by Amdocs personnel in connection with Amdocs' business shall not be reimbursable unless the expense is lawful and supported by detailed documentation including valid invoices and/or receipts.

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## 13 IMPLEMENTATION

### 13.1 Executive Commitment

The executive leadership and board of directors of the Amdocs Group are committed to ensuring anti-bribery and corruption compliance and the promotion of an ethical culture within the Amdocs Group and in all of Amdocs' business dealings. Consistent with this commitment, the CEO, together with the General Counsel and CFO, hold ultimate responsibility for the implementation of this Policy. The General Counsel is responsible for periodically reviewing this Policy, as well as the Policies and Procedures through which it is implemented, to ensure their continuing effectiveness.

It is the individual responsibility of business leaders within the Amdocs Group to understand this Policy, to instill the value of ethical business conduct in those they manage, and to monitor all business dealings over which they have responsibility for compliance with this Policy.

## 13.2 Training and Education

All Amdocs personnel receive annual training regarding the **Code of Ethics and Business Conduct**, which sets forth Amdocs' general prohibition of bribery and the basic principles reflected by this Policy.

Relevant Amdocs personnel are also required to receive periodic training regarding this Policy, the legal principles that underlie it, and the policies and procedures through which this Policy is implemented, including the **Third Party Anti-Bribery and Corruption Procedure** and the **Gifts & Hospitality Policy**. Legal Compliance is responsible for identifying and providing such training to relevant personnel.

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# 14 REPORTING AND VIOLATIONS

## 14.1 Reporting Potential Issues

Any person who suspects or becomes aware of any violation of this Policy must either:

- report the relevant conduct to his/her supervisor, who will report the matter to Legal Compliance; or
- report the relevant conduct to the Amdocs Ethics Hotline using one of the methods for making a report specified in the following link:

<https://secure.ethicspoint.com/domain/media/en/gui/20173/index.html>

A link to the Amdocs Ethics Hotline is also available on the Amdocs intranet.

Amdocs personnel should consult with Legal Compliance in the event that they have any questions about this Policy or its potential application to a given set of facts.

Consistent with our commitment to fair and ethical business conduct, no employee will be retaliated against for raising in good faith any concerns or suspicions relating to conduct under this Policy, or refusing to engage in conduct that he or she believes would violate this Policy.

## 14.2 Consequences of Violation

Any violation of applicable ABAC laws can result in severe consequences for Amdocs, its officers, directors, employees and business partners, including criminal consequences (both fines and imprisonment), civil penalties, and damage to Amdocs' reputation and financing arrangements.

Compliance with this Policy will be rigorously enforced, and any violation of this Policy may result in disciplinary and other appropriate actions, up to and including termination of employment.

*For further information regarding this Policy, please contact the Compliance Group in the Legal Department.*

## 15 PROCEDURE INFORMATION

Version No.: 1.0

Last revision: March 2019

Summary of revision: **Description** **Revised Sections**

Changes made throughout the document to align it with the current state and the new format

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The name of the procedure was changed from "Anti-Bribery and Corruption" to Global Anti-Bribery and Corruption Policy"

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Applicability: This procedure applies to all Amdocs Employees, directors, officers, and contractors.

Implementation: Implementation of the procedure is the responsibility of Legal.

Updating: The General Counsel is responsible for updating the procedure.

### Approved by:

Department Head: Michal Topolski, General Counsel

Signature date: 6 March 2019

Signature: Approved by mail

Procedure's Auditor: Nira Erez, General Manager – Global Operations

Signature date: 10 March, 2019

Signature: Original Signed