

### ### AdventureWorks Anti-Bribery Policy

#### #### Introduction

AdventureWorks is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. AdventureWorks has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the world we operate.

#### #### Policy Statement

AdventureWorks will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of our country, including the Foreign Corrupt Practices Act (FCPA), in respect to our conduct both at home and abroad.

#### #### Who is Covered?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), consultants, contractors, trainees, seconded staff, homeworkers, volunteers, interns, agents, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

#### #### Definitions

- **\*\*Bribery\*\***: The offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical, or a breach of trust.
- **\*\*Corruption\*\***: The abuse of entrusted power for private gain.

#### #### Bribery Prevention Principles

1. **\*\*Prohibition\*\***: AdventureWorks prohibits any form of bribery, whether directly or through a third party.
2. **\*\*Gifts and Hospitality\*\***: Gifts and hospitality are acceptable under this policy if they are modest, occasional, and do not influence business decisions.
3. **\*\*Donations\*\***: AdventureWorks does not make contributions to political parties. Charitable donations are allowed, provided they are not used as a scheme for bribery.
4. **\*\*Record-Keeping\*\***: AdventureWorks will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
5. **\*\*Due Diligence\*\***: AdventureWorks undertakes due diligence on prospective and existing third parties to mitigate against the risk of bribery.
6. **\*\*Training and Communication\*\***: AdventureWorks will provide training to employees on this policy and communicate this policy to all business partners.

#### #### Responsibilities

Every individual working for or under the control of AdventureWorks has an obligation to prevent, detect, and report bribery. This includes any instances of bribery they know of, or suspect, to occur within the organization or any of its business dealings.

#### #### Reporting Violations

AdventureWorks encourages all employees and business partners to be vigilant and to report any suspicions of bribery, in confidence, and without fear of retaliation.

#### #### Enforcement

Violations of this policy will result in disciplinary action, including termination of employment. Where applicable, AdventureWorks may also terminate its contractual relationship with non-employee workers or agents.

#### #### Review and Monitoring

This policy will be reviewed regularly and may be amended at any time. AdventureWorks is committed to the continual improvement of this policy and its associated procedures to combat bribery.