



EMPLOYEE ACKNOWLEDGEMENT OF THE ANTI-CORRUPTION POLICY

To facilitate and promote compliance with the U.S. Foreign Corrupt Practices Act ("FCPA") and other anti-corruption laws, The Company has adopted a global Anti-Corruption Policy (the "Policy"). The Policy applies to the entire company, its international and domestic subsidiaries and affiliates, ALL employees of the Company, and third parties who provide services on behalf of the Company. A high-level overview of the Policy follows:

PROHIBITED ACTIVITY

Anti-Bribery: Employees cannot give or pay, offer to give or pay, or promise to give or pay anything of value to government officials, directly or indirectly (through third-party intermediaries or otherwise), to obtain or retain business or direct business to another person, company or other entity.

Recordkeeping: Employees cannot engage in any transaction involving the Company funds without causing the transaction to be accurately recorded in the Company's accounting records (this includes submitting complete and accurate expense reports and an accurate description of the underlying purpose of the payments).

Third-Party Agency/Business Development Agreements – Employees cannot enter into any third-party agency agreement without first consulting with the Legal Department to ensure that the required due diligence has been completed on the third party. Further, any third-party agency agreement must contain the required anti-corruption warranty and indemnification language provided by the Legal Department.

EXCEPTIONS TO THE ANTI-CORRUPTION POLICY - Please note that the following exceptions may be subject to certain required approvals. Please see the Policy for further details.

Lawful Gifts: a payment or a gift to a government official that is considered lawful under the written laws of the government official's country.

Promotional Expenditures: expenditures (such as travel and lodging expenses) made on behalf of a government official in conjunction with promoting or demonstrating the Company's products or services or performing an existing contract with a government outside of the United States.

Payments Made to Avoid Imminent Threat to Personal Health, Safety, or Freedom: a payment to a government official that is made to avoid an imminent threat to personal health, safety, or freedom (e.g., a person's life is threatened or physical harm is imminent).

EMPLOYEE ACKNOWLEDGMENT

I acknowledge that:

- a. I have read and understand this overview of the Company's Anti-Corruption Policy;
- b. I will comply with the Company's Anti-Corruption Policy; and
- c. I will review the Anti-Corruption Policy available on the Company portal and will consult with the Legal Department if I have any questions.