



Global Anti-Corruption Policy for all Business Partners of
Cisco Systems, Inc. and its affiliates (Cisco)

Cisco expects and requires that all of its suppliers, subcontractors, resellers or channel partners, consultants, agents and other parties with whom Cisco does business (Business Partners) act at all times in a professional and ethical manner in carrying out their services and contractual obligations with Cisco, or on Cisco's behalf to a Cisco customer or other third party. To that end, as a Business Partner, you shall:

- (a) Comply with all applicable anti-corruption laws, including the US Foreign Corrupt Practices Act, the UK Bribery Act and other similar anti-corruption laws around the world ("Applicable Laws"). These laws generally set prohibitions on giving bribes to government officials, establish books and records requirements, and set criminal and civil penalties for violations; and some laws also apply to receiving bribes, or apply to private sector individuals as a form of commercial bribery. Further information on the FCPA can be found at: <http://www.usdoj.gov/criminal/fraud/fcpa/>, or by contacting publicsectorcompliance@cisco.com.
- (b) Not take any action or permit any action by your own suppliers, subcontractors, agents or other third parties which may cause Cisco to be liable for a violation of any of the Applicable Laws.
- (c) Not use money or other consideration received from Cisco in violation of the Applicable Laws or for other unlawful purposes, such as making any payments or giving anything of value (directly or indirectly) to attempt to improperly influence an act or decision to obtain or retain business or to secure an improper business advantage. The foregoing applies to any offer or promise to make payment or give anything of value to any of the following:
 - a government official or employee (including any person holding an executive, legislative, judicial or administrative office, whether elected or appointed, or of any public international organization, such as the United Nations or World Bank, or any person acting in any official capacity for or on behalf of such government or organization),
 - an employee or officer of a public sector or state-owned enterprise,
 - a political candidate, political party or any officer or employee of a political party,
 - any other person if you know or should know that any portion of the offering will be offered (directly or indirectly) to any of the above-identified persons, or
 - a private sector employee or officer as a form of commercial bribery.

Without limiting the foregoing, prohibited types of offerings include anything of value such as: cash or equivalents (including gift cards), inappropriate gifts, travel and entertainment, charitable or political contributions, no-bid arrangements, in-kind services, hiring relatives, or unauthorized facilitation payments, where given to obtain an improper advantage.

- (d) Upon Cisco request, have your own suppliers, subcontractors, agents or other third parties execute a similar written anti-corruption compliance statement, and to confirm to Cisco that such action has been taken.
- (e) Keep accurate and complete books and records, and all other audit terms and other related obligations set forth in your agreement(s) with Cisco shall apply to compliance with this policy. In addition, you are prohibited from establishing, retaining or using any undisclosed or unrecorded company funds (so-called "off book" funds). Further information on off book funds can be found at: <http://www.cisco.com/go/integritynow>.

In no event shall Cisco be obligated under any supplier or third party agreement to take any action or omit to take any action that Cisco believes, in good faith, could cause it to be in violation of any of the Applicable Laws.

Cisco retains the right to suspend or terminate your agreement(s) with Cisco immediately upon written notice if we believe, in Cisco's sole discretion, that you have breached any elements of this policy, or if you make a false or fraudulent statement, representation or warranty while carrying out your contractual obligations.

You shall immediately report to Cisco any concerns that you have regarding unethical business practices by a Cisco employee or any Cisco business partner by contacting the Cisco Ethics Office at: ethics@cisco.com, or via Cisco's Ethics web form, toll-free hotlines, or anonymous reporting tools available at: <https://www.cisco.com/c/en/us/about/corporate-social-responsibility/ethics-office/ethicsline.html>.