



FCPA and Anti-Bribery Compliance

Commercial bribery is against Company policy, and no Employee may engage in such bribery on behalf of the Company or for his or her own personal benefit. The Foreign Corrupt Practices Act and other U.S. laws regulate, and in many cases, prohibit the payment of any money or anything of value to a foreign official, foreign political party (or official thereof) or any candidate for foreign political office for purposes of obtaining, retaining or directing business. The Company and its Employees must and shall strictly abide by these laws. The Company provides training for employees at all levels on compliance with the FCPA and other laws relating to commercial bribery.