



amdocs

GLOBAL ANTI-BRIBERY AND CORRUPTION POLICY

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Purpose: To state Amdocs' commitment to compliance with anti-bribery and corruption laws, and to provide guidance on how to identify and address potential bribery and corruption issues.
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This policy reflects internal guidelines intended to ensure compliance with relevant laws and regulations. Amdocs may modify this policy at any time, at its sole discretion.

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1 ABOUT THIS POLICY

This Global Anti-Bribery and Corruption Policy ("Policy") sets forth Amdocs' **commitment to compliance with all applicable anti-bribery and corruption ("ABAC") laws** and provides guidance on how to identify and address potential bribery and corruption issues.

This Policy is consistent with our **Code of Ethics and Business Conduct**, which explains the core ethical principles that guide Amdocs in all aspects of our business. This Policy also operates in conjunction with Amdocs' **Third-Party Anti-Bribery and Corruption Procedure** and **Gifts & Hospitality Policy**, which establish internal compliance processes that implement and operationalize 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 acting on behalf of Amdocs must comply with this Policy, irrespective of citizenship, domicile or location.

2 OUR POLICY STATEMENT

Amdocs has **zero tolerance for any form of bribery or corruption**. We are committed to ensuring that our business operations - at all levels and in all geographies - are carried out ethically and with integrity, and in compliance with applicable ABAC laws, regardless of differing local customs or business practices. This means **we will never, directly or indirectly, offer or accept bribes; participate in or facilitate corrupt activities by others; or engage in conduct** that could otherwise **create the appearance of impropriety**.

Specifically, Amdocs personnel, as well as any third party acting on its behalf, can never **offer, promise, give, or authorize the giving of**, directly or indirectly, **anything of value** to **anyone**, including:

- any **government body**, or representative thereof;
- any **state-owned or controlled** organization or entity, or representative thereof; or
- any **private-sector** organization or entity, or representative thereof;

with the **intent to improperly influence a business decision** or otherwise **secure an improper advantage**.

Amdocs also prohibits its personnel, as well as any third party acting on its behalf, from **requesting, accepting, or agreeing to receive**, directly or indirectly, **anything of value** that is **intended** – or could be perceived as intending - to **improperly influence a business decision** or otherwise **secure an improper advantage**.

3 WHICH ABAC LAWS APPLY TO OUR BUSINESS?

Amdocs is a global enterprise and, as such, our business activities are potentially subject to a range of ABAC laws around the world. Amdocs complies with all applicable ABAC laws, including **the United States Foreign Corrupt Practices Act** ("FCPA") and **the U.K. Bribery Act 2010** ("UK Bribery Act"), as well as **local ABAC laws** that may be in force in certain of the countries in which we conduct business.

The potential consequences for a violation of ABAC laws vary between countries and regulations but may include **administrative fines and penalties** as well as **criminal consequences for both the company and employees**, including, in some cases, **potential imprisonment for the individuals** involved in the underlying conduct. In addition, a violation of ABAC laws could have collateral consequences for Amdocs, such as **civil and shareholder lawsuits, reputational damage, contract termination** by counterparties and **negative impact to share price**.

4 WHAT IS BRIBERY?

4.1 Offering or Giving Something with an Improper Purpose

Bribery involves the offering or giving of anything of value with **the intent to improperly influence** the recipient's **decision, i.e., to obtain or retain business** or to secure some other **improper advantage**).

4.2 Anything of Value

The concept of "anything of value" is **interpreted broadly**, and may include:

- Money (cash or cash equivalents such as checks or gift cards), per diems, stocks or other financial instruments
- Gifts, meals, drinks, entertainment or travel
- Sponsorships, charitable donations or political contributions
- Services
- Business opportunities, favorable contracts or discounts

Favors, e.g., employment or internships for the recipient's friends or relatives

This list is not exhaustive; in fact, under certain circumstances, **anything that has subjective value to the recipient** could potentially be a bribe.

You should always carefully consider whether a gift, courtesy or other activity that you plan to offer someone in the course of business might create a bribery risk under ABAC laws.

5 GOVERNMENT OFFICIALS

The **focus of the FCPA and various other ABAC laws is the bribery of government employees and representatives**, which are referred to in the FCPA as "foreign officials" (and referred to throughout this Policy as "**government officials**"). This concept is **interpreted broadly**, and may include any of the following:

- An employee, official or other representative of any:
 - **government body**, i.e., government department, ministry, agency, instrumentality, or military function;
 - **company or other legal entity**, including those operating in the private sector, which is wholly or partly, directly or indirectly, **owned or controlled by**, or acting in an official capacity on behalf of, any **government body**; or
 - public international organization;
- a political party or an employee, official or other representative thereof; or
- an elected official or candidate for public office.

Importantly, the concept of "government official" is **potentially broad enough to include employees of a company that may otherwise appear to be, and which may generally operate in all respects as, a private sector enterprise**; the company might even be publicly traded on a stock exchange. However, **if a government body** holds a **sufficient ownership interest** in, or has a **sufficient measure of control** over, the company, its employees may nevertheless be considered "government officials" for the purposes of the FCPA and other ABAC laws.

Amdocs' dealings with potential government officials require **the exercise of special diligence** and **an enhanced level of scrutiny** due to the severity of potential consequences under the FCPA and its broad extra-territorial applicability. To address these enhanced risks, both Amdocs' **Third-Party Anti-Bribery and Corruption Procedure** and **Gifts & Hospitality Policy**, among other internal processes, reflect **special rules and limitations** that must guide our business dealings with potential governmental officials.

6 FACILITATION PAYMENTS

Amdocs **strictly prohibits** the offering or giving of **facilitation or expediting payments (often referred to as “grease payments”)**, however small the amount, and regardless of the circumstances surrounding the request for the payment. Prohibited facilitation payments include any payment that might need to be made, directly or indirectly, for the purpose of securing or expediting the performance of a routine, non-discretionary, government action or function. Examples include payments made to: obtain permits; process documents; satisfy fees or fines; load or unload cargo; or secure basic facilities such as water, gas, cable, etc.

7 COMMERCIAL BRIBERY

Many ABAC laws, including the **UK Bribery Act**, are not limited in scope to the bribery of “government officials,” but **also prohibit bribery within the private sector** (*i.e.*, involving non-government persons and entities). This is often referred to as **“commercial bribery.”**

Amdocs strictly prohibits all forms of commercial bribery, including kickbacks, in all countries where we do business, regardless of whether the relevant local law prohibits commercial bribery. Indeed, the processes described in both our ***Third-Party Anti-Bribery and Corruption Procedure*** and our ***Gifts & Hospitality Policy*** apply to all our business activities with all customers and third parties, both government and non-government owned.

8 GIFTS & HOSPITALITY

Bribery often takes the form of **gifts, entertainment, meals, travel, or other courtesies (“G&H”)** that may be **provided in the course of a business relationship** with the **intent to improperly gain a business advantage.**

Amdocs **only permits the offering or giving of G&H** when it is **appropriate** in the context of the business relationship in question; has a **clear business purpose**; is **consistent with local business norms**; is **modest** in value; and **could not reasonably be perceived as an inappropriate attempt to influence** the recipient's business decisions.

All G&H activities must comply with this Policy as well as the procedures described in Amdocs' ***Gifts & Hospitality Policy***, including all requirements relating to **pre-approval, spending limits** and **accurate record-keeping.**

Amdocs also **prohibits the acceptance of any G&H** from our vendors or partners where that acceptance **could compromise**, or be perceived as compromising, Amdocs' **business integrity** and **impartiality**.

9 CHARITABLE DONATIONS & SPONSORSHIPS

Where Amdocs makes charitable donations or sponsorships at the request of a customer or partner, or to a charity with which a customer or partner is affiliated, that contribution is considered a G&H activity. Such donations and sponsorships must be **reviewed and approved in advance** and must fully comply with all the requirements set forth in our ***Gifts & Hospitality Policy***.

10 POLITICAL CONTRIBUTIONS

As noted above, political parties and candidates for public office may be considered government officials for the purposes of the FCPA and other ABAC laws. Accordingly, Amdocs **prohibits the making of any political contributions on its behalf**, directly or indirectly. Prohibited contributions include not only commitments of money, but also the provision of non-monetary items such as equipment, services, or the use of any corporate resources (e.g., personnel time, facilities).

11 THIRD PARTIES

Many ABAC laws impose liability not only for bribes paid or received directly by a company's own personnel, but also bribes that may be **paid or received indirectly** by **a third party acting on the company's behalf**, e.g., an agent, distributor, vendor, sub-contractor, consultant etc. (collectively, "Third Parties").

To address this risk, our ***Third-Party Anti-Bribery and Corruption Procedure*** requires that **all Third Parties** we engage undergo an **ABAC risk assessment**, are subject in some cases to **extended due diligence**, and **agree to comply** with ABAC-related **contractual terms**.

It is prohibited for Amdocs personnel to engage any Third Party unless they have first complied with all the requirements, including obtaining formal approvals, set forth in our ***Third-Party Anti-Bribery and Corruption Procedure***.

12 BOOKS & RECORDS AND INTERNAL CONTROLS

Amdocs maintains books, records and accounts that, in reasonable detail, accurately and fairly reflect the company's transactions and dispositions. In addition, Amdocs has implemented robust internal controls that are designed to promote transparency, ensure the accuracy of our financial records, and prevent and detect potential instances of bribery or corruption.

13 IMPLEMENTATION

13.1 Executive Commitment

Amdocs' executive leadership and board of directors are committed to ensuring ABAC compliance and promoting ethical conduct and integrity across all functions and at all levels of our operations. Consistent with this commitment, **the CEO, together with the General Counsel and the CFO, have ultimate responsibility for the effective implementation of this Policy.** In addition, the General Counsel is responsible for periodically reviewing this Policy and the related procedures through which it is implemented, to ensure their continuing effectiveness.

In addition, Amdocs' business leaders and managers are responsible for understanding this Policy, instilling the value of ethical business conduct and the importance of ABAC compliance in their teams, and monitoring all business dealings within their responsibility to ensure compliance with this Policy.

13.2 Training and Education

All Amdocs personnel receive mandatory annual training regarding the **Code of Ethics and Business Conduct**, which sets forth and explains, among other things, the basic principles of ABAC compliance as reflected by this Policy.

In addition, **specific populations of Amdocs personnel** receive **more in-depth training** regarding ABAC compliance, which is **tailored to specific audiences** and **provided in a range of formats.** Legal Compliance is responsible for identifying relevant populations for this training and determining its content and format in each case.

14 REPORTING AND VIOLATIONS

14.1 Reporting Potential Issues

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

- report the conduct in question to his/her manager, who should report the matter to Legal Compliance; or
- report the conduct in question to the Amdocs Ethics Hotline via the following link:

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

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

Consistent with our commitment to fair and ethical business conduct, **Amdocs prohibits any retaliation** against an employee who (a) in good faith raises any concerns or suspicions relating to conduct that may violate this Policy, or (b) refuses to engage in conduct that he or she believes would violate this Policy.

14.2 Consequences of Violation

As described above, a violation of applicable ABAC laws can result in **severe consequences for Amdocs, its employees, and any business partners or customers who may be involved in the underlying conduct.**

Importantly, the FCPA and certain other ABAC laws provide for **personal liability (including criminal consequences such as imprisonment) for the individuals** involved in the underlying conduct.

Internally, compliance with this Policy will be rigorously enforced, and any violation of this Policy may result in **disciplinary and other appropriate action**, potentially including a **reduction of compensation** and/or **termination of employment.**

If you have any questions or concerns regarding this Policy, please contact Legal Compliance for further guidance.

15 PROCEDURE INFORMATION

Version No.: 3.0

Last revision: March 2025

Summary of revision:	Description	Revised Sections
	Changes made throughout the document to align it with current best practices	---

Applicability:

This procedure applies to all Amdocs employees, directors, officers, contractors and other third parties acting on behalf of Amdocs.

Implementation:

Implementation of the procedure is the responsibility of Legal Compliance.

Updating:

The General Counsel is responsible for updating the procedure.

Approved by:

Department Head: Michal Topolski, General Counsel

Signature date: March 19, 2025

Signature: Approved by email