



code of ethics &

business conduct

**August 2020**

# code of ethics



**Dear Colleague,**

**At Amdocs, we pride ourselves on our commitment to uphold the highest professional and ethical standards at all times.**

The trust and confidence of our customers, shareholders, suppliers and employees is one of our greatest assets. Our success depends on maintaining our reputation for integrity in everything we do.

We pledge to maintain the highest ethical standards, not only out of our legal obligation, but because we believe that it is the right thing to do. It is imperative that we all conduct ourselves honestly, fairly and with integrity in our dealings with customers, suppliers and co-workers.

Please take the time to read our Code and use it in guiding your day-to-day behavior on the job. As a valued member of the Amdocs team, you represent the company and are personally responsible for full adherence to these standards.

Sincerely,

**Shuky Sheffer**

President and Chief Executive Officer  
Amdocs Management Limited

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 amdocs

introduction

# introduction



## **Why Amdocs has a Code**

If you think of integrity as a destination, our company's Code of Ethics and Business Conduct is the map we use to get there. It provides information to help us work fairly and honestly wherever we conduct business in the world, and it outlines the steps we need to take for making ethical decisions along the way.

Amdocs' Code helps us to stay on the right track, pointing us in the right direction when we're not sure of what to do. It also represents our shared commitment to the highest standards of integrity. By working for Amdocs, you are agreeing to follow its Code.

## **What's your responsibility?**

As a valued member of the Amdocs team, we rely on you to:

- Read the Code, be familiar with it and make sure you comply with it
- Check the Code when you're not sure of what to do
- Do the right thing and be alert to activities going on around you
- Report any violations – or suspected violations – of the Code

We want you to feel comfortable coming forward, without any apprehension. That's why we strictly prohibit anyone from "getting back at" or retaliating against anyone who speaks up and reports any violation – or suspected violation – of the Code. Amdocs will address and investigate all claims of retaliation.

## **Amdocs' Code applies to:**

- Workforce Personnel, Directors and Officers of Amdocs;
- Amdocs subsidiaries; and
- Other business entities controlled by Amdocs

## **Involved in a situation that just doesn't feel right?**

- Discuss it with your Senior Leader. If you are not sure who your Division Senior Leader is, please contact your HR representative.
- Contact the [Compliance Officer](#)
- Access the [Amdocs Ethics Hotline](#)

## **Amdocs Ethics Hotline**

If you don't feel comfortable approaching your Senior Leader, HR representative, or the Compliance Officer (Amdocs General Counsel), you can contact the Amdocs Ethics Hotline, which offers you a confidential and anonymous way to ask questions or share concerns about possible unethical or illegal behavior either by calling a toll-free number (as specified for each country) or online. The Ethics Hotline is operated by an independent, third-party organization that provides reporting services to companies like Amdocs around the world.



### **If everyone is committed to doing the right thing, why do we need a Code?**

Most people do not knowingly violate a law or policy. Violations usually occur because you're faced with a difficult choice, where the "right thing" is not clear. Our company's Code doesn't address every possible ethical situation you might face on the job, but it's designed to guide you through the grey areas and direct you to people who can help you.

When you access the hotline, you will be able to talk to a specially trained representative who will document your concern in detail and relay the information to Amdocs for action.

Depending on the nature of your concern, the information will be forwarded to either the Amdocs Human Resources or Internal Audit departments for investigation. All Code violations and the results of any investigations are reported to the Audit Committee of the Amdocs Board of Directors on at least a quarterly basis.



If you report a concern, it's a good idea to keep all relevant documents (including computer discs, tapes, hard drive and audio files) in case there is an investigation.

# introduction



## **You are in charge of your decisions and actions**

Always act legally and ethically even if someone tells you to do otherwise. Remember, no one has the authority to violate or instruct you to violate the law or the Amdocs Code of Ethics and Business Conduct.

If you suspect illegal or unethical activities, share your concerns. By speaking up, you are helping us uphold an honest and ethical Amdocs.

Amdocs' Code complements the company's policies, procedures and employment agreements. If you encounter an inconsistency or conflict, discuss it with your Senior Leader, Human Resources representative, or contact the [Compliance Officer](#) to determine the proper course of action.

It's important to know and follow the Code at all times. Anyone who violates the Code may be subject to disciplinary action, which may include termination and in some cases legal action.



## **What if a local law where I work conflicts with the Code?**

As a company operating in a global marketplace, we engage with a wide range of social customs, rules and regulations, cultures and laws. We have an obligation to comply with all applicable laws wherever we operate. If a local law conflicts with the Code, you should follow the law, but please advise the [Compliance Officer](#) of the conflict. If you find, however, that a local business practice conflicts with the Code, you should follow the Code. Not sure? Ask for help.

## **To access the Ethics Hotline:**

[Click here](#) to submit an anonymous and confidential report about any unethical behavior, theft or fraud in the workplace.

## **You can find the Amdocs code of ethics and business conduct on:**

The Amdocs intranet homepage under [Corporate Governance Policies](#); and [amdocs.com](http://amdocs.com).

**We look to managers to lead with integrity.  
Managers have a special responsibility to:**

**Set a good example**

Serve as a role model for your employees. Model ethical behavior on the job and work according to Amdocs' values, policies and procedures.

**Support the annual signing campaign**

Be sure that every year all members of your team certify that they have received and understand the Code and its importance.

**Be there for your employees**

Help them understand the Code. Encourage them to come to you with any questions or concerns they may have and guide them when they need it.

**Stand by the Code**

In your day-to-day business, make sure policies and procedures you develop are consistent with the framework of the Code. Take action to report any Code violations.

**What you might be concerned about:**

- Retaliation. Everyone can raise concerns about illegal or unethical behavior without fear of retaliation. Amdocs doesn't tolerate retaliation against employees who speak up
- Reporting Concerns about your Manager. Use the [Amdocs Ethics Hotline](#). It's a confidential and anonymous way to share your concerns

**What you need to do:**

- Read, understand and comply with the Code
- Share your concerns if you see or suspect violations of the Code
- Ask for help whenever you have questions



# introduction



## **Make good choices**

Amdocs counts on you to use good judgment in your decision making. But if you are ever faced with a complex ethical situation and the right course of action is unclear, ask yourself the following questions:

- Is it legal?
- Is it in line with Amdocs' Code and other company policies?
- Would you feel comfortable if everyone knew you did it?
- Would it be viewed positively by your co-workers, your company and companies Amdocs does business with?

If you are in doubt as to any of the above or if you feel uncomfortable about a situation, discuss it with your Senior Leader or your Human Resources representative, or contact the [Compliance Officer](#) for guidance.

## Making good choices

Is it legal?

Yes



Is it in line with Amdocs Code and other company policies?

No >

Yes



Would you feel comfortable if everyone knew you did it?

No >

Yes



Would it be viewed positively by your co-workers, your company and companies Amdocs does business with?

No >

Yes



You can go ahead and do it.



Discuss it with your Senior Leader, your HR representative, contact the [Compliance Officer](#) for guidance, or use the [Amdocs Ethics Hotline](#)



If you can't answer yes to these questions...

**Don't do it**



employment

principles

# employment principles



## Respect for Amdocs employees

Amdocs employees are the company's greatest asset. This section of the Code intends to ensure that every employee is treated with dignity and respect.

## Celebrate Amdocs' diversity

Amdocs is committed to providing equal employment opportunities to all qualified candidates and does not discriminate on the basis of race, color, religion, gender, sexual orientation, age, national origin, disability or veteran status or any other status that is protected by law.

With thousands of employees serving customers across six continents, Amdocs is proud of the diversity of cultures, experiences and talents we each represent.

## Speak out again discrimination

Amdocs' commitment to a diverse workforce is reflected in all its employment practices, including decisions about recruiting and hiring, working conditions, appraisals, compensation and benefits, training, promotions and demotions, transfers, layoffs and terminations, and disciplinary actions.

These kinds of decisions are based solely on an individual's performance, experience, training, work history and overall job suitability.



## I think I may have been denied an off-site training opportunity because of my sexual orientation. What should I do?

All employment decisions must be made regardless of sexual orientation or any other status that is protected by law. If you feel you were treated unfairly, contact your Human Resources representative, the [Compliance Officer](#) or the [Amdocs Ethics Hotline](#) for help.

## Modern slavery and human trafficking

Amdocs takes a zero-tolerance approach to any form of modern slavery, human trafficking or child labour practices in our business and supply chains.

We expect our suppliers to comply with all applicable labour and employment laws and regulations wherever they are based in the world. We will not continue to do business with any supplier identified as tolerating any form of modern slavery or human trafficking in their business activities.

# employment principles



## Harassment: recognize it, report it

As employees, we value and respect each other. We do not harass others based on their race, color, religion, gender, sexual orientation, age, national origin, disability or veteran status or other status that is protected by law, or at all.



### What is harassment?

Harassment is when words or actions are used in a way that interferes with someone's work or creates a work environment that is intimidating, hostile or offensive. Harassment can take many forms including words, derogatory statements, signs, offensive jokes, cartoons, pictures, posters, e-mails, pranks, intimidation, physical contact or assault.



### What if the person harassing me is my manager? I'm afraid that if I complain, I'll lose my job.

You are a valued member of Amdocs and you have a right to work without fear of intimidating, hostile or offensive behavior from anyone, including your manager. If you feel you are being harassed, contact your Human Resources representative, the [Compliance Officer](#) or the [Amdocs Ethics Hotline](#).

## Sexual harassment

Any form of sexual harassment, including unwelcome sexual advances of either a physical or verbal nature, is strictly prohibited. Sexual harassment can cross age and gender boundaries and involve people of the opposite sex or the same sex.

To ensure the protection of every employee, Amdocs has prevention of sexual harassment policy that provides details about the kinds of behaviors that are considered to be harassment. The policy also provides information on how to file a sexual harassment complaint.

Be sure you know, understand and follow Amdocs' prevention of sexual harassment policy. Details of the policy vary according to local laws, but remember, Amdocs will discipline any employee who is found to be guilty of harassment. This may include dismissal.

# employment principles



## Sexual harassment includes...

Requests for sexual favours, graphic verbal comments about a person's body or sexually degrading descriptions of a person. Sexual harassment also includes the display of sexually suggestive objects or pictures at work or anything that creates an uncomfortable environment that prevents someone from focusing on his or her job.

### What you might be concerned about:

Speaking out on behalf of others. You have responsibility to act when you see or suspect a threat or risk to anyone at Amdocs. Notify your Senior Leader, your HR representative or the [Compliance Officer](#) or access the [Amdocs Ethics Hotline](#).

### What you need to do:

- Treat others with dignity and respect
- Support and promote a workplace that values all people, regardless of culture, background and life experience
- If you know or suspect that others are being harassed or discriminated against, report it immediately
- Know Amdocs' Prevention of sexual harassment policy



employee

health & safety

# employee health & safety



## **Health and safety is everyone's responsibility**

Amdocs aims to provide a safe workplace for all employees and visitors. The company counts on you to follow all health and safety rules and notify your Senior Leader immediately of an accident, injury or illness you may experience on the job.

## **Know Amdocs' policy on substance abuse**

You may not use, possess, purchase, manufacture, sell or distribute illegal drugs or controlled substances while on Amdocs property or when working on Amdocs business. Alcohol or other substances that can affect your job performance or good judgment are also prohibited.

## **Keep Amdocs violence-free**

Threats or violence of any kind (including physical violence, intimidation, harassment or coercion) are not tolerated at Amdocs. Weapons are also prohibited while working on Amdocs business, whether you are working on-site, off-site or traveling on behalf of Amdocs.

## **Protect employee privacy**

Our company works to balance its employees' need for privacy with the need to gather essential information.

Personal information about Amdocs employees – gathered for business, legal and contractual reasons, such as your home address and phone number, salary information, benefits information – is kept strictly confidential and shared only with those who have a legal right or a legitimate business need to know.

If you have access to personal information about co-workers you must take every precaution to ensure it is not misused or improperly disclosed.



### **Be aware that...**

You may be required to undergo drug testing as a condition of employment. If you are charged with a drug related crime or, in fact, any crime while on Amdocs business, you must report the incident to your Senior Leader immediately.



# employee health & safety



## **Ensure a safe Amdocs:**

- Comply with all health and safety rules
- Report any unsafe conditions, accidents or injuries
- Do not use or abuse alcohol or drugs on Amdocs' property or when working on Amdocs business
- Report any threatening behavior or weapons in the workplace

## **What you need to do:**

- Know and abide by Amdocs policies regarding drugs and alcohol
- Report any unsafe conditions, violent acts or threats



personal data

protection & privacy

# personal data protection & privacy



Amdocs respects your privacy of your personal data and the workspace you use as an Amdocs employee. Be aware, however, that if the company suspects an employee of illegal behavior, it has the authority to search and monitor company property without notification in advance. Amdocs also reserves the right to search employee property, such as briefcases, bags and private vehicles on Amdocs' premises.



"Company property" includes, for example, desks, cupboards, computers, telephones, mobile phones, mail, voicemail, e-mail and Internet access.

## **What you might be concerned about:**

- Sharing personal data of Employees or other relevant people, such as workforce personnel, customers and customers' customers. If you are ever unsure about what kind of data is considered personal, ask

## **What you need to do:**

- Protect personal data from unauthorized access, misuse or improper disclosure
- Know and abide by Amdocs policies regarding privacy and data protection.



conflicts

of interest

# conflicts of interest



## **Respect for the company**

Each of us has a responsibility to watch over our co-workers, our company and our reputation. This section of the Code will help you understand how to protect Amdocs' interests and use Amdocs' resources wisely.

## **Avoid conflicts of interest**

Amdocs respects your right to conduct activities and pursue interests outside of work. But a "conflict of interest" can occur whenever those activities or interests begin to interfere with your job responsibilities or affect the way you make decisions as an Amdocs Director, Officer or employee.

Amdocs counts on you to make fair, objective decisions based on good business practices and not let personal interests, associations or investments interfere – or appear to interfere – with Amdocs' interest.

What's the best way to avoid a conflict of interest? Be open and honest about your actions on and off the job. Inform your Senior Leader or the Compliance Officer about any outside activities or relationships (with customers, suppliers, competitors, friends or family) that could influence your job responsibilities or the decisions you make at Amdocs.

Together, you and your Senior Leader or the Compliance Officer will document the facts in writing and submit them to the Compliance Officer for review, who will then provide you with advice on how to proceed.



### **Conflicts of interest can happen when you...**

- Have a financial interest in an Amdocs competitor, customer, supplier or vendor
- Take on a second job
- Hire (or work with) family or friends at Amdocs
- Take advantage of a business opportunity that rightfully belongs to Amdocs; or serve on the board of another company

# conflicts of interest



**As an Amdocs employee, you and your immediate family are prohibited from owning or having a financial interest in one of our company's competitors, customers or vendors. A "financial interest" is anything other than:**

## **Conflicts of interest can take many forms**

Being aware of possible conflicts of interest can help you avoid them. Make sure you're familiar with the following situations which can present potential conflicts of interest:

### **Improper investments**

Ask yourself: Do I or does any member of my immediate family own or have a "financial interest" in an Amdocs' competitor, customer or vendor?

#### **Think you may have a conflict of interest?**

- Talk to your manager
- Document the facts in writing
- Submit the information to the [Compliance Officer](#)



**As an Amdocs Director, Officer or employee, you and your immediate family are prohibited from owning or having a financial interest in one of our company's competitors, customers or vendors. A "financial interest" is anything other than:**

- Less than 1% ownership of a public company
- Less than 5% ownership of a private company
- Less than 20% of your annual Amdocs base salary (in the case of an Amdocs Officer or employee)



#### **"Immediate family" includes...**

Your spouse or partner and anyone living in your household, parents, brothers, sisters, children and children's spouses as well as your spouse's parents, brothers, sisters, children and children's spouses.

# conflicts of interest



## **My brother-in-law has a financial interest in a company that just recently became an Amdocs vendor. Could this be a conflict of interest?**

It depends. If your brother in law is financially dependent on you, then it may represent a conflict of interest. If your brother in law is not financially dependent on you, this may not represent a conflict of interest. The best approach? Notify your Senior Leader or the Compliance Officer, in writing, to avoid even the appearance of a conflict of interest and determine the best approach.



## **If I invest in a mutual fund – is that considered a “financial interest?”**

No, an investment in a mutual fund is called an indirect investment and not considered a conflict of interest as long as the fund is not managed or controlled by you, a member of your immediate family or a business that one of you owns.

## **A second job**

If you have a job in addition to your employment with Amdocs, you must request approval from your Senior Leader and the Group President of Human Resources. As an Amdocs employee, you may not work for any of our competitors, customers, suppliers, vendors or companies that do (or want to do) business with us.

## **Working with a friend or family member**

Advise your Senior Leader or the Compliance Officer about any personal relationships you share with people at work. Depending on your individual job responsibilities and the areas in which you each work, your Senior Leader and the Compliance Officer can take the proper steps to make sure that there are no conflict of interest situations you two might experience on the job.

# conflicts of interest



## **Is it okay for my neighbor to apply for a job opening in the department I manage?**

There is nothing to stop your neighbour from working for you, but think about it carefully. Even if you try to be objective in your business dealings, the very fact that you share a personal relationship can suggest the appearance of a conflict of interest. Before proceeding, discuss the situation with your Senior Leader.



## **What about family and friends who work for Amdocs' competitors, customers, suppliers, vendors?**

There is nothing to stop your family and friends from working for you, but think about it carefully. Even if you try to be objective in your business dealings, the very fact that you share a personal relationship can suggest the appearance of a conflict of interest. Before proceeding, discuss the situation with your Senior Leader or the [Compliance Officer](#).



## **Before participating in any business venture or investing in any project...**

Get the written approval of the Group President of Human Resources. If you are a Director or an Officer at Amdocs, you must obtain prior written approval from Amdocs' Chief Executive Officer before proceeding.

## **Taking advantage of a potential business opportunity**

You are not permitted to invest in an outside business opportunity in which Amdocs has an interest without the prior written approval of the Group President of Human Resources. As a Director, Officer or employee of Amdocs, you may sit in meetings with customers or suppliers or read Amdocs company documents and learn about opportunities to invest in Amdocs' customers, competitors or suppliers. You may not take advantage of this information for personal gain.



# conflicts of interest



## **Serving on the board of another company**

You may serve on the board of a community or non-profit organization as long as it does not interfere with your work. However, if you wish to serve on the Board of Directors of another company, you must first obtain approval from the [Compliance Officer](#).



### **As an Amdocs Director, Officer or employee, you may not serve on the board of:**

- Amdocs' competitors
- Amdocs' suppliers
- Amdocs' customers, or
- Other business associates

### **What you need to do**

If you think you might have a conflict of interest, act promptly. Notify your Senior Leader, your Human Resources representative or the [Compliance Officer](#).



 amdocs

anti-bribery

& anti-corruption

# anti-bribery & anti-corruption



## **Bribes and kickbacks are illegal**

Never give or accept bribes. As a company that is committed to fair and honest business practices and to the highest standards and promotion of good practices in the prevention of bribery and corruption, we trust you to never offer payment or accept payment from an Amdocs' customer or supplier in exchange for gaining or keeping business. In all transactions involving Amdocs, we must ensure that business is won transparently and strictly on the basis of the products and services we offer. To help you understand the applicable laws and what is expected of you, Amdocs has an Anti-Bribery and Corruption Procedure.

## **What is the FCPA?**

The U.S Foreign Corrupt Practices Act (FCPA) and similar laws and regulations such as the UK Bribery Act make it a crime to offer payment or a promise of payment, or to offer or give anything of value to government officials in exchange for business.



### **A "government official" includes...**

The employee of any government-owned or controlled entity or any public international organization, political party, party official or candidate for public office.



### **Executives of one of our company's customers expect us to pay special fees to do business in the country where I operate. What should I do?**

Special payments made directly or indirectly to a customer, even if considered acceptable under local custom, could violate the U.S. FCPA or other laws or regulations. Before making any kind of payment to a customer, contact the [Compliance Officer](#) for approval.

The FCPA and similar laws and regulations also extend to the conduct of third-party agents, sub-contractors and other representatives or business partners.

# anti-bribery & anti-corruption



## **Amdocs may be liable for the conduct of third parties**

We must be sensitive to risks inherent in dealing with intermediaries and other third parties and will not tolerate any conduct by third parties that might lead to a violation of the FCPA, the UK Bribery Act and/or any other local law or regulation.

### **What you need to do:**

- Never give or accept bribes
- Know and comply with the Amdocs procedure on 'Appointment and Operating Agents in the Group' prior to engaging any agent, consultant, partner, reseller, subcontractor or any other third party in connection with customer related business

### **What you might be concerned about:**

- Violating the U.S. FCPA. Never pay, promise to pay, give, or promise to give anything of value to any customer in exchange for business, or to any governmental representative or agency in order to advance our business interests or for any other improper purpose.



gifts & hospitality

payments & contributions

# gifts & hospitality payments & contributions



## Is it ok to give or receive gifts and entertainment?

Giving or receiving something of value can be considered bribery, compromise our objectivity, create the appearance of a conflict of interest and harm the reputation of our company. To help you understand the rules, Amdocs has a Gifts and Hospitality Policy. You may only exchange gifts, gratuities and other favors in accordance with this policy. Make sure you know and understand the policy and that you always submit the Gift and Hospitality Online form before giving any Gift or Hospitality.



### A "government official" includes...

The employee of any government-owned or controlled entity or any public international organization, political party, party official or candidate for public office.

### What you need to do:

Know and comply with Amdocs' Gifts and Hospitality Policy. Remember the rules are stricter for interactions with government officials.



**After months of waiting, we finally closed the deal we'd been working on. Is it okay to take the employee of the government owned customer out to lunch to thank him for his help?**

You can't offer lunch – or anything else of value – to a government official, unless you have received prior approval under the Gifts and Hospitality Policy.

### Involving government officials: stricter rules apply

No gifts, gratuities, favors, entertainment or travel expenses may be offered or paid to any government official or to any employee of a government-owned company, unless you have obtained written approval from the Compliance Officer in advance. Conducting business with government officials and employees of government-owned companies is not the same as conducting business with other companies and Amdocs applies stricter rules to any gifts and hospitality extended to such parties.



 amdocs

protecting

amdocs assets

# protecting amdocs assets



Each of us has a responsibility to protect Amdocs' assets from damage, loss, fraud, misuse and theft. Amdocs' assets are the means for us to successfully carry out our company's business every day. Amdocs' assets include:

- Financial Assets: cash assets, bank accounts and credit standing
- Information Assets: confidential information, proprietary information and intellectual property
- Physical Assets: our company's facilities and equipment
- Technology Assets: computer hardware, software and information systems

By safeguarding these assets, we help safeguard our company's competitive advantage in the marketplace.

## **Honesty always**

Fraud and dishonest acts are not tolerated at Amdocs, whether they occur while you're employed at Amdocs or before you accepted a job with us. To preserve an honest and ethical workplace, we promptly investigate all suspected acts of fraud.



## **What are some examples of "fraud and dishonest acts"?**

- Forgery of vendor orders or contractor documentation
- Intentionally failing to accurately represent information, such as your expenses on your expense report or your working hours on your timesheets
- Dishonest accounting practices
- Using company property for personal purposes
- Identity theft
- Embezzlement
- Engaging a supplier, contractor or vendor if you have a conflict of interest or without undergoing the appropriate procurement process
- Receive anything of value from a vendor/partner without obtaining the appropriate approvals

Remember, if you are charged with any crime, you must report the incident to your Senior Leader immediately.



# protecting amdocs assets



## **Financial assets – be accurate in record-keeping**

You are responsible for ensuring the honesty, completeness and accuracy of all company records, books, information and accounts, including expense reports, time sheets, payments and other business transactions. Accurate and complete record-keeping is essential to the successful operation of our company and its ability to meet its legal and regulatory obligations.

### **Make sure Amdocs' books, records and accounts:**

- Are clear, truthful, complete and accurate
- Follow Amdocs policies, procedures and controls
- Comply with all applicable laws, regulations and standards
- Accurately reflect the true nature of the transactions they represent

### **Did you know?**

Financial statements must conform to U.S. generally accepted accounting principles (GAAP). Do your part to ensure that all entries that should be made are made, that they are honest and accurate and that they include the proper supporting documentation.

# protecting amdocs assets



As a public company, Amdocs is required to file periodic reports and issue certain public communications. If your job requires you to prepare or maintain these reports or relay these communications, make sure any company information provided, including financial results and financial condition, is full, fair, accurate, timely and understandable.

Remember, feel free to come forward and report any accounting or auditing concerns. Amdocs doesn't tolerate retaliation against anyone who speaks up about unethical or illegal behavior. Discuss your concerns with:

- Your Senior Leader
- Your HR representative
- The [Compliance Officer](#)
- The [Amdocs Ethics Hotline](#)

## Working with independent auditors

We insist on the same standard of honesty and accuracy when working with independent auditors (certified public accountants who are not employees of Amdocs).

Being dishonest, coercing, manipulating, fraudulently influencing or misleading auditors in any way is not only a violation of our company's Code but may also be a violation of the law. If you have any questions about an auditor's request, contact your Senior Leader or the Head of Corporate Finance.



### **My manager asked me to hold an invoice for posting until the next quarter – is that okay?**

No, all expenses should be reported and recorded in the period in which they are spent. If you believe that goods or services are not being accounted for in the proper period, document and report it. Contact your Human Resources representative, the [Compliance Officer](#) or the [Amdocs Ethics Hotline](#).

# protecting amdocs assets



## **Information assets**

Amdocs information assets are among our company's most valuable assets and must be handled with care. Information assets include Amdocs' confidential information, proprietary information and intellectual property (IP).

### **Did you know?**

If you are responsible for controlling funds or records, including cash, checks, money orders, credit cards or electronic media, make sure Amdocs is getting what it is paying for and that amounts are appropriate and valid. If you have any questions on the appropriate use of Amdocs funds, contact your Senior Leader.

# protecting amdocs assets



## **Proprietary and confidential information**

All proprietary information about Amdocs is confidential and should be handled and protected in the same way.

Amdocs proprietary information is any information Amdocs owns. It includes things like the processes our company creates, strategies it develops, specifications it designs, sales list it generates, systems it develops, personnel information, information related to current or future products and services, confidential market search, sales and marketing plans, earnings or financial data, organization information and many other types of information.

Disclosing confidential information of Amdocs can seriously damage our company and put current – and future – business opportunities at risk. It can also expose you and Amdocs to legal penalties. For any questions on confidential information, contact your Senior Leader or the [Compliance Officer](#). Confidential information also includes information you may be exposed to as part of your job, whether about Amdocs or its customers, suppliers or other third parties. It can be verbal, written or electronic information.

Use proprietary and confidential information only as needed to do your job and never share it with people who do not have a need for it, even within Amdocs.

If you leave your job at Amdocs, you must return all proprietary and confidential information.

## **Non-disclosure agreements**

Never share confidential information outside Amdocs without your manager's approval and without a non-disclosure agreement in place. Limit the amount of confidential information shared to the minimum necessary to address the business need. When dealing with suppliers, vendors, or other third parties, use extreme care to avoid improper disclosure. Original copies of non-disclosure agreements should be kept with the Legal Department.

# protecting amdocs assets



## What are some examples of "confidential" information?

Such information includes employment and personnel information (such as health, salary or performance information), product specifications, designs and pricing, business strategies, technical information and data, customer lists, trade secrets, government-classified information, marketing plans and non-public financial information.

## Did you know?

Your responsibility to protect confidential information applies to work you did before coming to Amdocs and to any work you will do after you leave Amdocs. If you have any pre- or post- employment restrictions, such as confidentiality agreements, Amdocs requires you to abide by them.

# protecting amdocs assets



You have an obligation to protect Amdocs' confidential information:

- DO use it only as necessary to do your job and never for your own personal benefit;
  - DO share it only with those Amdocs employees who need access to it in order to do their jobs;
  - DO notify your Senior Leader if you receive confidential information that you should not have received;
  - DO secure information properly, by protecting papers and documents from view, safeguarding your password and blocking electronic access on computers, phones or other mobile devices;
  - DO act according to Amdocs' published information security procedures, relevant to your field of work;
  - DON'T discuss it with anyone outside of Amdocs (including family and friends) or internally, except as required to do your job;
  - DON'T remove it from Amdocs' premises, unless explicit authorization has been given.
- DON'T allow inadvertent disclosure. Never discuss Amdocs' confidential information or non-public information about Amdocs in public places where others can hear, such as in elevators, planes, trains and restaurants, as well as in social networks or blogs.



## **What if an ex-colleague of mine asks me for some documentation on key processes we worked on? Can I forward it to them?**

No, all documentation is Amdocs property and should not be shared with your ex-colleague. If you are in any doubt, contact your Senior Leader.

## **Where can I learn more about Information Security?**

Amdocs has a detailed information security policies.

# protecting amdocs assets



## **Intellectual property**

Amdocs' intellectual property is one of our company's most valuable assets. Intellectual Property includes, but is not limited to, patents, trademarks, trade names, copyrights, proprietary routines, computer programs, documentation, trade secrets, systems, methodology, know-how, marketing and other commercial and business information, techniques, specifications and plans.

Our intellectual property helps us remain competitive. It is our most confidential asset and should be treated as such. Remember, just as Amdocs expects others to respect the legal rights our company has in its intellectual property, our company has a responsibility to respect the brands, designs, software and legally protected intellectual property of other companies. Never copy, borrow, publish or use other companies' intellectual property without proper authorization.

## **Protect customer, prospective customer and supplier information**

If you work with information belonging to Amdocs' customers, suppliers or other third parties – including written, voice and electronic communications – you have a duty to protect it from others who are not authorized to see it or use it. Business associates trust us to maintain the confidentiality of their information and records and to use them only for legitimate and permitted business purposes. Amdocs employees, including others acting code of ethics on Amdocs' behalf, are responsible for understanding and complying with our customers' applicable procedures, including those which are more restrictive than our own. Failure to do so may result in legal liability and damaged relations with customers suppliers and others.



**Disclosing confidential information about Amdocs' customers, suppliers or other third parties can:**

- Harm our company's business relationships
- Cause current projects to be cancelled
- Put future opportunities at risk
- Endanger the job security of all Amdocs employees and expose you and Amdocs to significant risk with the SEC and other legal bodies
- Don't take chances. Do your part to keep information confidential



**Is it okay to use the office copier to make a few copies of my daughter's school paper?**

Yes, limited personal use such as this is allowed.

**Did you know?**

Security procedures, product development information, locations of physical plant facilities, financial information – this kind of information is highly valued by individuals who wish to harm our company or take unfair advantage of our company's success. If someone requests any sensitive information and they are not authorized to see it, contact your Senior Leader immediately.



# protecting amdocs assets



## **Protecting Amdocs customer's information is critical**

Keep information on Amdocs' customers confidential too. Due to the nature of Amdocs' business, many of us have access to the personal and private information of millions of Amdocs' customers' subscribers. This information is not only considered highly confidential, but is also protected by numerous laws and regulations. Be aware that sharing this data can result in serious consequences both for you and for Amdocs. You must know and abide by Amdocs Policies regarding privacy and data protection.

## **Third party commercial software**

Third party commercial software is a computer software owned by other software developers or publishers who retain the Intellectual Property rights to the software code. A license to use the software is granted to the user under specific legal terms and conditions which must be followed by the user. Before installing or using any third party commercial software (including freeware) – you must follow Amdocs approval process for third party software and obtain a license that matches your usage needs through

Amdocs proper channels. Regularly make sure that your license is up to date and when you cease using the software – remove it from any devices or servers on which it is installed. Failure to comply with the above or the software license terms can result in serious implications for Amdocs such as infringement of third party Intellectual Property rights, reputational risk and financial damages.

## **Open source software**

Open source software is software for which normally the source code is available free of charge under a free software or open source license. Just because open source software is downloadable without charge does not mean we can use it without restrictions. Open source software licenses often impose obligations that could have serious implications if violated. Before downloading, using or modifying any open source software, whether for internal use or for use as part of a product development, you must review Amdocs' approval process for FOSS and follow it.

# protecting amdocs assets



Occasional, personal use of internet and e-mail access and voicemail, is permitted but make sure you do so in moderation. To protect Amdocs' technology assets:

- DO use extreme caution when opening e-mail attachments from unknown or suspicious senders
- DO use only software that is legally licensed to Amdocs
- DO contact the systems administrator before installing data or software not provided by Amdocs
- DO protect and do not share your individually assigned passwords and personal IDs
- DON'T use someone else's password, which you may have learned by chance or while performing your duties
- DON'T download files from unknown or suspicious sources
- DON'T send e-mails that contain offensive, harassing, illegal or otherwise inappropriate content

## **What you might be concerned about**

Not Recognizing Confidential Information.

If you are ever unsure about what information is considered confidential or how it should be handled, contact your Senior Leader.

# protecting amdocs assets



Direct connection (within Amdocs' premises) to the network using a non-Amdocs PC is strictly forbidden. Remote connection to the Amdocs' network, from any location which is not within Amdocs' premises, using a non-Amdocs PC, shall be made through web-based services only. For further details, please refer to Amdocs Remote Connection using non-Amdocs Equipment Procedure.



**Be aware that any information you create, send, receive or download on Amdocs' systems**

**belongs to the company.**

Amdocs reserves the right to review and monitor its use at any time without notifying you and to the extent permitted by law. If you see or suspect any violations of computer security measures, report your concerns to your Senior Leader.



Make sure any portable storage devices, systems, data and magnetic media are used only in compliance with customer contracts and, whether used in the office or at home for the storage of Amdocs data, are physically and logically secured and used for Amdocs business only.

## Communicating about Amdocs

Don't speak on behalf of Amdocs unless you're authorized to do so. If you are contacted by a member of the media, financial analysts, stockholders, government entities or law enforcement for information about Amdocs, please refer them to the contacts below:



### Contacted by:

Representative of the media



### Refer them to:

Public Relations Manager

Financial analysts and stockholders



Head of Investor Relations

Government entities and law enforcement



Compliance Officer

# protecting amdocs assets



## **What you need to do:**

- Protect all Amdocs' assets – financial, information, physical and technology
- Keep all confidential information safe and comply with non-disclosure obligations
- Do your part to ensure Amdocs' books, records and accounts are clear, complete, truthful and accurate
- Ensure the privacy of Amdocs' customers' and suppliers' information
- If you see or suspect any violations of computer security measures, report your concerns
- Don't speak on behalf of Amdocs unless you're authorized to do so



respect for

the marketplace

# respect for marketplace



Amdocs is committed to conducting its business fairly, honestly and in accordance with the highest ethical principles. Amdocs provides you with the information you need to do your job with integrity and expects you to observe ethical business practices everywhere Amdocs operates in the world.

## **Good corporate citizens**

Amdocs recognizes that our company has a responsibility to respect individuals, the environment and the global community in developing its corporate strategies. Amdocs' Corporate Responsibility Report describes our company's commitment and the steps it is taking to measure our company's economic, environmental and social performance. Do your part to support these initiatives.

## **Amdocs is a fair and honest competitor**

Our company competes against other companies based only on the merits of our products and services and our ability to support our clients. We depend on you to be truthful in all customer interactions and accurately represent Amdocs' product and service quality, features and availability.

By following good business practices, we maintain the respect of Amdocs customers and Amdocs competitors and ensure future Amdocs business. If you have questions about fair competition practices, contact your Senior Leader.



## **What is "industrial espionage"?**

Someone who is involved in industrial espionage is using illegal means to try to obtain information about a company's plans, products, clients or trade secrets.

## **Fair competition means we...**

- Never interfere in contracts between a prospective customer and an Amdocs competitor
- Don't engage in industrial espionage or offer bribes
- Don't say disrespectful or untruthful things about Amdocs' competitors' products or services
- Never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of facts

## Insider trading

### Never trade on inside information

As an employee of Amdocs, you may not use inside information for personal gain or "tip" others about the information. "Inside Information" – which is also referred to as "material non-public information" is any information about Amdocs, its customers, suppliers or other companies that is not known to the public, but if known, could influence someone to buy, sell or hold stock in a company. No inside information should be considered "public" until a formal external announcement is made either through a press release or through a document filed with the SEC.



### What is the U.S. Securities and Exchange Commission (SEC)?

The SEC is a U.S. government agency that is responsible for enforcing U.S. federal securities laws.



### What kinds of information may be considered Inside Information?

"Inside Information" includes information about new products or services, financial information (such as pricing, budgets and revenues), earnings, proposed mergers or acquisitions, the gain or loss of a major customer or supplier, organizational changes, anticipated layoffs, and any other material non-public information.



### What happens if someone trades on Inside Information?

Think about all of the sensitive information about our company and other companies that you see and work with every day. If someone uses this information or shares it with individuals outside the company to buy or sell stock, it could potentially affect the market value of those stocks.

Amdocs has a detailed [Insider Trading Policy](#) to help you determine what's appropriate and what's not. If you have any questions about Inside Information, talk to your Senior Leader or your Human Resources representative. If you believe someone may have improperly shared Inside Information with others, contact the Chief Financial Officer.

# respect for marketplace



## **Did you know?**

Passing on Inside Information to any other person is illegal.

## **What you might be concerned about:**

Violating Insider Trading Laws. If you are ever unsure about what information is considered "Inside Information" or how it should be handled, contact your Senior Leader.

## **What you need to do:**

- Know Amdocs' Insider Trading Policy
- Be familiar with Amdocs' Corporate Responsibility Report
- Compete fairly and honestly for business – always be truthful and accurate
- Report any suspected acts of fraud or dishonesty
- Never buy or sell stock (or tip off others to do so) based on "Inside Information."





code of ethics &

business conduct

# code of ethics & business conduct



## **Asking questions and voicing concerns**

Questions or concerns about Amdocs' Code of Ethics and Business Conduct may be brought to:

- Your Senior Leader
- Your Human Resources representative
- The [Compliance Officer](#)
- The [Amdocs Ethics Hotline](#)

Remember, you can feel comfortable coming forward. Amdocs strictly prohibits retaliation against anyone who speaks up to protect our company.

## **Waivers of the Amdocs' Code**

Any employee, other than an executive officer, requesting an exception to the Code must first contact his or her Senior Leader. If the Senior Leader agrees that an exception is appropriate, then the approval of the Group President of Human Resources and the [Compliance Officer](#) must be obtained. Group President of Human Resources is responsible for maintaining a complete record of all exception requests and the handling of those requests.

Any executive officer or director who seeks an exception to the Code must first contact the [Compliance Officer](#). Waivers may only be granted by the Board of Directors and must be disclosed as required by law or regulation.

This Code is not an Employment Agreement between Amdocs and any of its employees.

Your rights as an employee and Amdocs rights as an employer are governed by the laws of the country of employment, the work rules at your location and your individual written employment contract, if any. To the extent that the terms of your employment are more specific than those contained in this Code, the more specific terms shall govern. In such case, this code shall not modify the term of employment of any employee of Amdocs, including, but not limited to, any employee employed at-will.