

## ANTI-CORRUPTION POLICY FOR KLAS REPRESENTATIVES

Klas LTD, and all of its subsidiaries and affiliates worldwide ("Klas"), requires its channel partners (for example, resellers, software advisors, original equipment manufacturers, and distributors), suppliers, vendors, consultants, lobbyists, and any other third-party representative (collectively, "Klas Representatives") to comply with this policy.

### Compliance with Anti-Corruption Laws

Each Klas Representative is expected to conduct itself with high ethical standards and comply with the FCPA and all other applicable anti-corruption laws. No Klas Representative shall, directly or indirectly, promise, authorize, offer, or pay anything of value (including but not limited to gifts, travel, hospitality, charitable donations, or employment) to any Government Official or other party to improperly influence any act or decision of such official for the purpose of promoting the business interests of Klas in any respect, or to otherwise improperly promote the business interests of Klas in any respect. "Government Official" is defined below.

- Providing government travel on Klas's behalf is prohibited
  - Representatives are prohibited from paying expenses for travel, lodging, gifts, hospitality, or charitable contributions for government officials on Klas's behalf. Representative also must acknowledge that it is prohibited from using any funds provided by Klas to pay expenses for travel, lodging, gifts, hospitality, or charitable contributions for government officials.
- Facilitating payments prohibited
  - A facilitating payment is a small payment to secure or expedite a routine, non-discretionary government action by a government official. Klas prohibits bribes of any kind, including facilitating payments.
- No retaliation
  - Klas will not tolerate retaliation against anyone who has, in good faith, reported a possible violation of this Policy or who refused to participate in activities that violate this Policy.
- Enforcement
  - In addition to its rights and remedies under applicable agreements, Klas may refer any Representative who violates this policy to U.S. or foreign authorities for criminal prosecution or other enforcement action or bring suit for damages.
- Representative due diligence
  - Klas conducts appropriate due diligence or "vetting" of Klas Representatives. Representatives must comply with Klas's vetting procedures. Klas appreciates the understanding and cooperation of Representatives in providing accurate and timely information and responses to Klas's vetting processes.
- Money laundering prohibited
  - No Klas Representative shall use its relationship with Klas to disguise or attempt to disguise the sources of illegally obtained funds.
- Accurate books and records
  - Representatives must record information, including payments and other compensation, in their corporate books, records and accounts accurately, in a timely manner, and in reasonable detail. No undisclosed or unrecorded accounts may be established for any purpose. False, misleading, incomplete, inaccurate or artificial

entries in the books and records are prohibited. Personal funds may not be used to accomplish what is otherwise prohibited by this policy or other Klas policies.

### **Reporting**

Representatives are instructed to report any concerns about violation of this policy or applicable laws to their legal department and/or their ethics and compliance officer. Representatives should also report such concerns to Klas.

"Government Official" refers to all of the following: (i) any employee of a government entity or subdivision, including elected officials; (ii) any private person acting on behalf of a government entity, even if just temporarily; (iii) officers and employees of companies that are owned or controlled by the government; (iv) candidates for political office; (v) political party officials; and (vi) officers, employees and representatives of public international organizations, such as the World Bank and United Nations. Representatives are also made aware that in certain countries and in certain industries, an individual who seems to work for a private entity might be considered a Government Official.