

## **Anti-Corruption Policy for Third Parties**

### **1. Purpose**

This policy explains the anti-corruption obligations that third parties must comply with when doing business with McAfee.

### **2. Scope**

This Policy applies to all third parties who perform services for or on behalf of McAfee.

### **3. Policy Statement**

McAfee can be held liable for the actions of third parties who perform services for or on McAfee's behalf. Such actions may include interactions with government officials, government employees, or employees of state owned enterprises. Third parties are expected to comply with McAfee's Anti-Corruption Policies, and local, regional, or country anti-corruption laws and regulations, regardless of local business practices or social customs.

### **4. Compliance with Anti-Corruption Laws and McAfee Anti-Corruption Policies**

As a third party doing business with McAfee, you are expected to comply with the following policies.

#### **4.1 No Bribery**

McAfee strictly prohibits all forms of bribery. This means never offer, promise, or accept bribes or kickbacks and do not participate in or facilitate corrupt activities of any kind.

#### **4.2 Follow Code of Conduct**

McAfee expects its business to be conducted with uncompromising integrity and professionalism. This expectation applies to all McAfee employees and third parties when conducting business or providing services on McAfee's behalf. Third parties are expected to read and understand [McAfee's Code of Conduct](#).

### **4.3 No Facilitation Payments**

No payments may be made on behalf of McAfee directly to, or for the personal benefit of, any government official, government employee, or anyone acting in an official capacity to influence that person to engage in or refrain from an official act. This prohibition applies to all McAfee employees and third parties when conducting business or providing services on McAfee's behalf, regardless of the amount.

Expediting Fees are published government rates or fees that a government agency or entity charges for the purpose of expediting a service; these are permissible payments. Such payments are made to a government agency and a receipt for the expedited service must be obtained as proof of payment.

### **5.0 How to Raise Questions or Concerns**

If you have questions or concerns, you have numerous avenues to report them to McAfee. Visit [www.mcafee.com/askethics](http://www.mcafee.com/askethics) to find out more information on reporting ethics and legal concerns.