



Global Anti-Corruption Policy

Effective Date: October 15, 2021

1. INTRODUCTION – POLICY OVERVIEW

1.1 Purpose

Ansys is committed to doing business ethically and in compliance with the law. An important part of that commitment – and our commitment to integrity – is our strong opposition to **bribery** and **corruption** in any form.

The Ansys [Code of Business Conduct and Ethics](#) sets forth the basic principles we must follow to uphold our Company’s ethical and compliant business culture. This *Global Anti-Corruption Policy* (“Policy”) is intended to promote compliance with **anti-corruption laws** applicable in the countries where we operate, and it provides more detailed guidelines as well as specific examples of permitted and prohibited conduct.

1.2 Scope

This Policy establishes Ansys’ global anti-corruption policy and applies worldwide in all places where Ansys conducts business.

- (A) *Ansys personnel*. This Policy applies to all personnel of ANSYS, Inc., its subsidiaries, and controlled affiliates (collectively, “Ansys” or the “Company”), including any regular full-time or part-time employee, temporary employee, intern, or contingent worker (including agency temporary employees, independent contractors, and vendor employees), subject to local laws and works council consultation where applicable.
- (B) *Third parties*. This Policy also applies to all **third parties** who act on behalf of Ansys, including any distributor, channel partner, reseller, intermediary, consultant, representative, contractor or subcontractor, or any other agent who may act on behalf of Ansys.

2. DEFINITIONS

In addition to the capitalized defined terms in this Policy, the following terms are defined below. References to these terms may appear in **bold** font throughout this Policy, indicating that you should refer to these definitions to ensure that you fully understand the specific provisions to which these terms relate.

“**Anti-corruption laws**” refers to the laws and regulations which prohibit **bribery** and **corruption**. Every country where Ansys operates is subject to one or more of these laws. Examples include, but are not limited to, the United States Foreign Corrupt Practices Act, the U.K. Bribery Act, Sapin II in France, the German Criminal Code, and the China Criminal Code. Although there are some differences between these laws, all were adopted to eliminate corruption and maintain public confidence in the integrity of the global market and to promote a fair and competitive commercial environment within which to conduct business.

The terms “**bribe**” and “**bribery**” refer to anything of value offered, given or received in exchange for a favorable decision or exercise of discretion by a **government official** or private person.

“**Bribery Act**” refers to the Bribery Act 2010, which is the primary anti-corruption law in the United Kingdom. It applies to both public sector and **commercial bribery**. There are four general offenses under the Bribery Act: (1) bribing another person, (2) being bribed, (3) bribing a foreign public official, and (4) a commercial organization failing to prevent bribery by associated persons. Generally speaking, any individual or corporate person with a “close connection” to the UK must comply with the Bribery Act in all their dealings globally. However, if a foreign (i.e., non-UK) company or partnership carries on business, or part of a business, in the UK, then the company or partnership may be subject to prosecution in relation to any bribes offered or paid anywhere in the world.

A “**business courtesy**” means any gift, meal, drink, entertainment (including tickets and passes), recreation (such as golf course fees), lodging, transportation, gratuity, favor, benefit, discount, or other tangible or intangible item having monetary value for which fair market value is not paid by the recipient.

“**Commercial bribery**” refers to bribery involving a private individual or entity, as opposed to a **government official**.

“**Corruption**” refers to dishonest or fraudulent conduct, including the misuse or abuse of power, influence or position. Some common types of corruption include **bribes**, **kickbacks**, influence peddling and **extortion**.

“**Ethics & Compliance**” means the Ethics & Compliance team within the Ansys Legal Department.

“**Extortion**” refers to the practice of obtaining any benefit through coercion. In most jurisdictions, extortion is likely to constitute a criminal offense.

“**FCPA**” refers to the Foreign Corrupt Practices Act of 1977, as amended, which prohibits payments to foreign government officials to assist in obtaining or retaining business. Specifically, the anti-bribery provisions of the FCPA prohibit the offer, payment, promise to pay, or authorization of the payment of money or anything of value to any person, while knowing that all or a portion of such money or thing of value will be offered, given or promised – whether directly or indirectly – to a foreign official to influence the foreign official in the foreign official’s official capacity, induce the foreign official to do or omit to do an act in violation of the foreign official’s lawful duty, or to secure any improper advantage in order to assist in obtaining or retaining business for or with, or directing business to, any person. The FCPA also requires companies whose securities are listed in the United States to (a) make and keep books and records that accurately and fairly reflect the transactions of the corporation and (b) devise and maintain an adequate system of internal accounting controls. Since 1977, the anti-bribery provisions of the FCPA have applied to all U.S. persons and certain foreign issuers of securities. With the enactment of certain amendments in 1998, the anti-bribery provisions of the FCPA now also apply to foreign (i.e., non-U.S.) firms and persons who cause, directly or through agents, an act in furtherance of such a corrupt payment to take place within the territory of the United States.

A “**facilitating payment**” is anything of value, typically a small payment or gift, offered or provided to a **government official** to facilitate or expedite routine clerical or administrative non-discretionary actions such as inspecting goods in transit, issuing permits and/or licenses, processing visas, or providing police protection.



The term “**government official**” is broadly interpreted and refers to any elected or appointed officer, employee or other person performing service on behalf of a government, government agency, state-owned or -controlled entity, military, political party, or public international organization. This definition includes both U.S. and non-U.S. government officials. Examples of government officials include, but are not limited to:

- any employee, director, officer, or person working on behalf of:
 - a government or any department, agency, or instrumentality of a government, at any level (for example, local, regional, or national),
 - a state-owned or -controlled entity, including, in many countries, telecom, healthcare, and educational institutions,
 - a public international organization, such as the Red Cross, United Nations, International Monetary Fund, or World Bank
- political parties (including candidates for political office),
- members of royal families, and
- **immediate family members**, close friends, and close business associates of any of the persons described above.

An “**immediate family member**” includes an individual’s spouse, domestic partner, children (whether natural or adopted), stepchildren, parents, siblings, in-laws (including mothers- and fathers-in-law, sisters- and brothers-in-law, and sons- and daughters-in-law), and any person who lives in the individual’s residence.

An “**improper payment**” is anything of value used to corruptly influence the decision or action of a **government official**, private person or business. Examples of improper payments include, but are not limited to, **bribes**, **facilitating payments**, and **kickbacks**.

A “**kickback**” is a payment made to someone who has facilitated a transaction or appointment, especially illicitly.

“**Legal**” means the Ansys Legal Department.

The term “**red flag**” refers to any sign or indication that alerted an individual, or should have alerted a reasonable person, that another individual or entity has or intends to make an improper payment on their behalf and/or has engaged or intends to engage in some other corrupt conduct.

The terms “**third party**” or “**third parties**” means any prospective or current non-Ansys entity, customer, vendor, supplier, service provider, or any other individual, entity or organization with whom Ansys does or may do business.

3. PRINCIPLES

3.1 Compliance with the law

Ansys is committed to complying with all applicable **anti-corruption laws**, including the **FCPA**, the **Bribery Act**, laws promulgated in accordance with the OECD Anti-Bribery Convention, and any other applicable anti-bribery or anti-corruption laws and regulations. If applicable laws are stricter than this Policy, Ansys will comply with those laws.



3.2 Bribery is prohibited

Ansys prohibits the payment of **bribes** to anyone for any reason. This means that you must not provide anything of value for the purpose of inducing the recipient to misuse their power or position in a way that gives Ansys an unfair advantage. You are also prohibited from offering or promising to pay a **bribe** (even if the bribe is never actually paid), soliciting or accepting a **bribe**, or authorizing or coordinating the exchange of a **bribe** through a **third party**.

3.2.1 *Understanding bribery*

3.2.1.1 Anything of value. **Bribes** are not limited to cash or traditional forms of payment. A **bribe** can be anything of personal value to the recipient or their friends or family members. Depending on the circumstances, a **bribe** could be any of the following:

- cash or cash equivalents,
- lavish gifts or hospitality,
- travel expenses for leisure and not related to any business matter,
- charitable donations or political contributions to gain the favor of someone who can influence business with Ansys,
- billing schemes, such as excessive discounts or payments of fake or excessive invoices, resulting in money being funneled for **bribes**,
- employment (including for family members and including promises of future employment), or
- any personal favors, such as securing school admission for a family member, paying personal bills, or allowing the use of personal vehicles or vacation homes.

3.2.1.2 Recipient's misuse of power or position. A key characteristic of a **bribe** is that it urges the recipient to misuse their power or position. You must never offer, provide, or accept anything of value if it creates or may create an expectation that the recipient will act improperly in return.

3.2.1.3 Unfair benefit for Ansys. You must never pay or accept a **bribe** to obtain an unfair commercial benefit for Ansys. For example, it is never acceptable to pay a **bribe** to secure or promote the sale of Ansys products or services, or to obtain favorable tax treatment, circumvent a government license or permit requirement, or gain access to non-public information.

3.2.1.4 Guidance. To help you recognize and avoid paying **bribes**, see the guidance in Section 3.3. ("Avoiding common forms of bribery").

3.2.2 *Public sector bribery*

Ansys prohibits offering or providing anything of value to a **government official** in order to secure an improper business advantage for Ansys. Ansys is subject to the **FCPA, Bribery Act**, and other **anti-corruption laws** that strictly regulate our interactions with **government officials**. These laws prohibit Ansys, and any third parties acting on behalf of Ansys, from making corrupt payments that may influence the actions or decisions of any **government official**.

If you wish to give any **business courtesy** to any **government official**, you must obtain pre-approval from Ethics & Compliance before you discuss, make any offer, or provide it to the **government official**. The mere offer of a **business courtesy** to a **government official** could violate the law under certain circumstances.

3.2.3 *Commercial bribery*

Commercial bribery is prohibited under **anti-corruption laws** and under Ansys policies. Ansys prohibits the payment of bribes to anyone – whether a **government official** or a private individual or entity.

3.2.4 *Indirect bribery*

Ansys prohibits the indirect payment of **bribes** through a **third party**. This means that you must never instruct or authorize a **third party** to pay a bribe on Ansys' behalf, regardless of whether Ansys' resources are used to pay the **bribe**.

3.2.5 *Facilitating payments*

Facilitating payments are generally prohibited. The only time you are permitted to make a **facilitating payment** is if one of the following safety exceptions applies:

- There is a medical or safety emergency that requires Ansys to obtain governmental services to protect the safety of Ansys employees (for example, medical evacuation or police or fire protection); or
- You reasonably believe that an Ansys employee is in imminent danger of serious harm and no other reasonable alternatives for aid are available.

If you determine that a safety exception applies and you make a **facilitating payment**, you must document the circumstances in writing and submit your report promptly to Ethics & Compliance or the General Counsel as soon as possible after making the payment.

3.2.6 *Avoiding conflicts of interests*

As an employee or representative of Ansys, you must ensure that your personal interests do not influence, or even appear to influence, your judgment on behalf of Ansys. This means you must never solicit, accept, or agree to accept any **bribes** from any party, and you must avoid participating in any situation where you have a conflict of interest. For more information, see Ansys' *Global Conflicts of Interest Policy* and *Global Business Courtesies Policy*.

3.2.7 *What to do if you suspect bribery*

If you believe that **bribery** or other corrupt activities may be occurring in connection with Ansys business, contact Ethics & Compliance promptly for further guidance. You may also submit a report using the Ansys Ethics Line. Please refer to Section 5 ("Seeking Guidance and Reporting Concerns") for more information.

3.2.8 *Responding to a request for a bribe*

If you are asked for or offered a **bribe** or **improper payment**:

- refuse to make or accept the payment and explain that Ansys does not pay or accept bribes,

- be clear that your refusal is not negotiable, and
- immediately report the request to your manager and to Ethics & Compliance or the Ansys Ethics Line.

All Ansys personnel and every **third party** working on behalf of Ansys has a responsibility to help recognize, detect and avoid potential **corruption**.

3.2.9 *Extortion or duress*

Corrupt individuals may use **extortion**, fear, intimidation or violence to try to force others to pay them money or follow their orders. If someone threatens your health or safety, you should take whatever action you deem appropriate to ensure your safety. If a payment is made under those circumstances, you must notify Ethics & Compliance as soon as possible and document any transactions in accordance with the provisions of this Policy and the Company's policies and procedures.

3.3 **Avoiding common forms of bribery**

This section of the Policy establishes Ansys' requirements to help you identify and avoid common forms of **bribery**. Since it is impossible to describe every scenario where a **bribe** may arise, you must use good judgement at all times and refrain from making or accepting any payment or gesture that may be considered a **bribe**, even if it is not discussed in this Policy. If you have questions about whether something may be considered a **bribe**, promptly contact Ethics & Compliance for guidance.

3.3.1 *Cash or cash equivalents*

You must not give or receive any cash or cash equivalents, such as pre-paid cash cards or re-loadable debit cards, to or from any **third party** unless you are expressly authorized by an Ansys policy or you have been pre-approved by Ethics & Compliance.

Cash contributions are prohibited. In local regions where it may be customary to give cash on certain occasions – such as for condolences, congratulatory events, or holiday occasions – Ansys recommends sending an appropriate gift item (for example, flowers) with a letter of recognition, instead of providing cash, and disclosing the gift to Ethics & Compliance in accordance with Ansys' *Global Business Courtesies Policy*.

3.3.2 *Business courtesies*

You must not give or receive any **business courtesy**, such as gifts, meals, entertainment or other hospitality, if doing so could influence, or appear to influence, your business judgement on behalf of Ansys. Remember:

- Any **business courtesy** must be modest in value, customary to the occasion, and related to a legitimate business purpose such as a meeting to explain or promote Ansys' products or services. Adult entertainment venues, such as strip clubs, are inappropriate sites for Ansys business and are not permitted by Ansys policy.
- Any exchange of **business courtesies** must be conducted in a transparent manner, and you must ensure that any expense is properly documented and does not violate the recipient's policies.

- Ansys personnel must comply with Ansys' *Global Business Courtesies Policy* and the Travel and Expense Policy that applies in your location.

3.3.3 *Travel expenses*

From time to time, Ansys may pay for travel and lodging expenses for **third parties** to attend meetings or events that promote Ansys' products or services. These travel expenses must comply with Ansys' *Global Business Courtesies Policy* (including any pre-approval or disclosure requirements that may apply) and the Travel and Expense Policy that applies in your location.

Subject to certain limited exceptions for Company-sponsored events, Ansys will not pay for or reimburse the following expenses:

- side trips for leisure only,
- expenses for additional family members or personal guests,
- extravagant expenses that are above what Ansys would reimburse its own employees, or
- expenses that otherwise do not comply with Ansys policies.

3.3.4 *Charitable donations and grants*

Ansys prohibits any charitable donation or grant that is intended to influence, or that may in fact influence or appear to influence, the outcome of a pending Ansys business matter. This includes any donation or grant that may confer a personal benefit to anyone who has decision-making authority or influence over a particular purchasing decision or government action that impacts Ansys.

3.3.5 *Political contributions*

Ansys prohibits any political contribution that is intended to influence, or that may in fact influence or appear to influence, the outcome of a pending Ansys business matter. You are not permitted to use any Ansys resources (including any Ansys funds, facilities, services) to support any political candidate, campaign, or issue advocacy, unless you have obtained pre-approval from the General Counsel.

3.3.6 *Billing activities*

You must always ask for clarification and supporting documentation if you detect any unusual billing activities that indicate funds might be used to pay **bribes** or **kickbacks**. If you do not receive a sufficient explanation for the activity, do not authorize any payments and promptly notify your manager or contact Ethics & Compliance for further guidance. Examples of **red flags** to be aware of include:

- Unusually large payments. Any payment from Ansys to a person or entity that appears to be unusually large based on the contemplated transaction, actual services rendered, industry standards, standard of living in the country in which the payment was made, or other relevant facts and circumstances.
- Payments inconsistent with the stated purpose of payment. Any payment that is inconsistent with the services or products to be provided (for example, a government "fine" being paid to a private third party, or a request to make a payment to a third party to which Ansys does not owe money).

- Payments inconsistent with the third parties' typical business. Payments to companies or individuals who are in a different line of business than that for which they have been engaged.
- Payments to persons or entities recommended by a government official. Any payment to a person or entity selected or recommended by a **government official** (including employees of government-owned or affiliated entities).
- Contracts requiring travel or overseas training. Any contract which includes a provision requiring travel or overseas training for foreign officials, customers, or third parties.
- Requests for donations. Any contract requirement or request for a charitable or other type of donation.
- Refusal to sign anti-corruption provisions. A customer or vendor who refuses to sign anti-corruption representations or warranties, including an agreement to comply with laws, the right for Ansys to audit its books and records, and termination rights for Ansys if **anti-corruption laws** are violated.
- Commissions above industry standards. Any contract that involves commissions to a representative above typical industry standards or for activities unrelated to the contract.
- Representative is not qualified or permitted to perform service. Payments to representatives who lack qualifications, expertise, manpower, experience, or the necessary legal business scope or permits to perform the relevant service.
- Contract lacks adequate detail. The detail, quality, and sophistication of relevant documents are insufficient, vague, or poorly drafted relative to the size of payment under the contract.
- Payments for ambiguous/unexplained reasons. Payments to companies or individuals whose provision of products or services are unexplained, ambiguous, indeterminable, or seem unnecessary to carry out the purposes of the contract (for example, "training fees" when no training is necessary, vague "consulting fees" for no distinct advice or guidance, or daily allowances or stipends not specifically tied to services).
- Commission payments with unusual timing. Commission payments with unusual timing (for example, commissions paid prior to services being rendered).
- Unusual requests for payments in cash. Any requests for cash payments or other types of unusual payments, such as payments to be made to a bank located in a foreign country unrelated to the contract or made to undisclosed third parties.
- Payments that are unrecorded or poorly documented. Any payments that are not accurately and completely recorded in Ansys's books and records.
- Representative has a reputation for unethical conduct. This includes if the representative has been terminated by other companies for improper or unethical conduct or if the representative has been subject to civil or criminal corruption or fraud-related enforcement actions.

3.3.7 Sales and marketing incentives

Any incentives or prizes awarded as part of a contest, sweepstakes, or other sales or marketing promotion must be permitted by applicable law and properly documented. The rules of the promotion must be objective and fair, and the promotion must not be rigged to favor a particular party or outcome.



3.4 Working with third parties

Ansys engages **third parties** to support a wide range of the Company's business activities. These may include assisting with sales, providing local knowledge, and handling logistics. These business arrangements are usually perfectly legitimate; however, Ansys may be held responsible if a **third party** engages in corrupt conduct while acting on Ansys' behalf.

As part of the selection process and depending on the risk presented, Ansys may conduct anti-corruption due diligence before engaging a **third party**. The scope of due diligence is tailored to the level of risk; however, Ethics & Compliance and other Ansys teams have established pre-screening procedures to evaluate certain criteria, including:

- sales and services capabilities,
- location(s) where the **third party** conducts business,
- financial health,
- ethical behavior and general integrity,
- potential conflicts with Ansys,
- potential interaction with **government officials**,
- compliance with **anti-corruption laws**,
- controls for revenue leakage and fraud risk, and
- other applicable compliance areas (such as anti-money laundering and trade compliance).

Each **third party** is responsible for complying with Ansys' pre-screening procedures and meeting all onboarding requirements. Each **third party** is also responsible for keeping accurate records that demonstrate compliance with these requirements, including any due diligence reports, pre-engagement reviews and approvals, and anti-corruption assurances in agreements and contracts.

3.5 Accurate books and records

Ansys is required by law to maintain books and records that, in reasonable detail, accurately reflect the transactions and disposition of assets of the Company.

To ensure that Ansys maintains accurate financial and administrative information, you are prohibited from authorizing or taking any action that would result in the inaccurate recording of entries in the books and records of Ansys. For example:

- Do not make or participate in making any false or mislabeled entries in the books and records of Ansys.
- Do not intentionally hide or disguise the true nature of any Ansys transaction or liability.
- Do not misclassify the account or accounting period for any Ansys transaction or liability.
- Do not create or maintain any unrecorded or "off-the-books" accounts.
- Do not approve or make any payment on behalf of Ansys if any part of the payment is to be used for an improper purpose or if the purpose is misstated.
- Do not directly or indirectly use any funds or assets of Ansys for any unlawful purpose.

All Ansys transactions must be supported by appropriate documentation. This means that the terms of sales and other commercial transactions must be accurately reflected in the documentation for such

transactions, and that Ansys' books and records must reflect such documentation and be accurate and complete.

Ansys policy requires that all payments and expenses involving **government officials** be appropriately documented. There are no exceptions. Merely failing to document a payment or expense involving a **government official** may subject Ansys to substantial liability.

If you have reason to believe that any entries in Ansys' books and records may be false, misleading, incomplete, inaccurate, or artificial, you must contact Ethics & Compliance or submit a report using the Ansys Ethics Line. Please refer to Section 5 ("Seeking Guidance and Reporting Concerns") for more information.

3.6 Related requirements

To further our commitment to comply with **anti-corruption laws**, Ansys has implemented a compliance program including policies and procedures, training, risk and program assessments, due diligence, monitoring and auditing, reporting, investigations, and other controls.

3.6.1 Training

Anti-corruption training is designed to supplement your understanding of **anti-corruption laws** and the requirements described in this Policy. All Ansys employees receive anti-corruption training on a regular basis. The frequency and type of training depends on several factors, including location, job responsibilities and requirements, and potential exposure to anti-corruption risk. For example, Ansys employees who perform certain business functions (such as senior management, sales, accounting, finance, audit, legal, business development and procurement) may be required to participate in specialized anti-corruption training and/or may be required to participate in training on a more frequent basis than other employees. Ethics & Compliance is responsible for administering the Company's anti-corruption training programs. If you receive a notice to complete anti-corruption training, you must complete it before the due date specified in the notice.

Certain **third parties** may also be required to complete anti-corruption training while providing services to or on behalf of Ansys.

3.6.2 Monitoring and Auditing

The Internal Audit Department, in collaboration with Ethics & Compliance, periodically assesses compliance with this Policy and suggests enhancements as needed. In addition, the Internal Audit Department will consider anti-corruption concerns in connection with its regular risk assessments and audits of Ansys' operations and books and records.

3.6.3 Hiring and Retention of Employees and Others

Care should be exercised in retaining employees, interns, contractors, agents, consultants or suppliers of goods or services who are current or former **government officials**, individuals with familial relationships with a **government official**, and entities in which a **government official** has a significant investment or other financial interest. Hiring of employees, including unpaid interns and other employee-retention decisions, must be made pursuant to standard Human Resources procedures.



4. POLICY COMPLIANCE AND CONSEQUENCES OF NON-COMPLIANCE

Ansys takes its commitment to compliance with all applicable laws and regulations regarding **bribery** and **corruption** very seriously and expects all Ansys personnel and **third parties** acting on Ansys' behalf to share that commitment. Please carefully review this Policy and contact Ethics & Compliance with any questions by using the contact methods described in the "Seeking Guidance and Reporting Concerns" section below.

Strict compliance with this Policy is required. Compliance also includes timely completing any mandatory training and following any procedures that may be issued under this Policy. Any individual subject to this Policy who does not comply with this Policy may be subject to disciplinary action, up to and including termination, to the extent permissible under applicable local laws, regulations, and work rules.

In addition, the civil and/or criminal penalties for violating **anti-corruption laws** are severe. For example, individuals who violate the **anti-corruption laws** of various countries may face imprisonment, as well as substantial fines and penalties. In general, employers may not reimburse fines imposed on individual employees for such violations. Ansys could also be held responsible for violations by its employees and face substantial fines, penalties, and other serious consequences.

Any exception to or waiver of this Policy must be expressly permitted by Ansys policies or pre-approved in writing by Ethics & Compliance or the General Counsel.

5. SEEKING GUIDANCE AND REPORTING CONCERNS

This Policy cannot address every possible situation that you might encounter in your daily work. If you have questions, ask for help. And if you are aware of something that may be a violation of this Policy or the law, you must report it so it can be addressed.

You can also ask questions, raise concerns or make reports of suspected compliance violations by contacting the Ansys Ethics Line:

- by phone using a special toll-free telephone number based on the country from which you are calling. In the United States, call 855-729-0134. For a list of international country phone numbers, see our [Code of Business Conduct and Ethics](#).
- by web at <https://ansys.ethicspoint.com>

The Ansys Ethics Line is managed by an outside company and is available 24 hours a day, seven days a week. Where allowed by local law, you may make an anonymous report to the Ansys Ethics Line.

You may also ask questions and report concerns by contacting Ethics & Compliance at compliance@ansys.com.

NO RETALIATION – *You will not be retaliated against for reporting any concern or a suspected violation of this Policy that you, in good faith, reasonably believe to be true.* Any such attempted retaliation will be subject to disciplinary action, up to and including termination, to the extent permissible under applicable local laws, regulations, and work rules.



6. POLICY ADMINISTRATION

The Ethics & Compliance team within the Ansys Legal Department, under the direction and oversight of the General Counsel, is responsible for the administration of this Policy.

ADDENDUM A

Q&A Examples Global Anti-Corruption Policy

The following Question & Answer (Q&A) examples are intended to (a) help employees better understand how to comply with anti-corruption laws and Ansys' *Global Anti-Corruption Policy*, (b) provide examples of permitted and prohibited conduct, and (c) provide guidance on how to handle specific situations. If you have questions or need guidance on how to handle a situation that is not addressed in this Q&A, contact Ethics & Compliance at compliance@ansys.com.

1. ***How do I know if I am interacting with a government official?*** The term **government official** is broadly interpreted and refers to any elected or appointed officer, employee or other person performing service on behalf of a government, government agency, state-owned or -controlled entity, military, political party, or public international organization. Refer to the definition of **government official** in *Global Anti-Corruption Policy*, and contact Ethics & Compliance if you still have questions.
2. ***A friend of mine works in a government agency and has offered to help me win business for Ansys. Is this allowed?*** If your friend wants something from you in exchange for using her influence to help you win the business, then this may be an example of illegal influence peddling. Report the offer to your manager and to Ethics & Compliance and wait for guidance before proceeding.
3. ***Can I pay a facilitating payment if it's common in my local area?*** No. Facilitating payments are illegal in most countries and are prohibited by Ansys. Report any request for a facilitating payment to Ethics & Compliance.
4. ***Is anti-corruption due diligence required for all third parties?*** No. Anti-corruption due diligence may be required depending on the risk presented. It is typically required for **third parties** that interact with **government officials** on behalf of Ansys or other **third parties** that pose bribery or corruption risk.
5. ***What if I am detained by local law enforcement and they ask for a cash payment to let me go?*** You should refuse to make the payment and tell the local law enforcement officer that it is against company policy and that you could lose your job if you pay. If the local law enforcement officer is threatening your health or safety, take the action needed to protect your health and safety – even if that means making the payment – and report the incident to Ethics & Compliance as soon as possible.
6. ***My manager seems to prefer to do business with certain vendors. I think my manager may be getting favors from these vendors in exchange for giving them Ansys' business. What should I do?*** This may be an example of **commercial bribery** and **kickbacks**. You should report it to Ethics & Compliance or the Ansys Ethics Line.
7. ***I get along very well with an external business contact. Can I take them out for a meal after a meeting?*** You may be able to have the meal if that is appropriate – for example, you are continuing your business discussion. But it is important that it should not be viewed as inappropriately influencing them. The *Global Anti-Corruption Policy* and the *Global Business Courtesies Policy* provide general guidance on when it may not be appropriate to give or receive meals and other business courtesies, as well as information on those situations that require pre-approval.