



## Global Business Courtesies Policy

Effective Date: October 15, 2021

### 1. INTRODUCTION – POLICY OVERVIEW

#### 1.1 Purpose

At times, the exchange of **business courtesies** – including but not limited to, gifts, meals, entertainment or other hospitality – is an appropriate way to build goodwill between Ansys and those with whom we do business. However, improper or excessive **business courtesies** can result in **conflicts of interest** or even violations of applicable laws and regulations, which can cause serious harm to Ansys.

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 Business Courtesies Policy* (“Policy”) is intended to promote compliance with applicable laws and help employees identify, avoid and/or mitigate **conflicts of interest** involving **business courtesies**, and it provides more detailed guidelines as well as specific examples of permitted and prohibited conduct.

#### 1.2 Scope

This Policy applies to every employee of ANSYS, Inc., its subsidiaries, and controlled affiliates (collectively, “Ansys” or the “Company”), subject to local laws and works council consultation where applicable.

### 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.

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. The recipient may be an individual or an entity.

A “**conflict of interest**” or “**conflict**” means a personal interest, such as an activity, investment, professional association, or outside employment, that competes with Ansys’ interests or interferes with your ability to make sound, objective business decisions on behalf of the Company.

“**Entertainment**” is a business courtesy in the form of attendance at an event or performance of an activity in which a representative of the giving organization accompanies the recipient or participates. The courtesy itself has little to no bona fide business purpose other than networking or relationship building. Examples include, but are not limited to, attendance at a sporting event, participation in a golf tournament, and attendance at a supplier party. If a representative of the giving organization does not accompany the recipient or participate in the event, then the business courtesy is not entertainment, but is simply a gift subject to the limits of this Policy.



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

A “**gift**” is a business courtesy in the form of anything of value given from one party to another without compensation or at a discount and includes, but is not limited to, cash and cash equivalents (such as gift cards or gift certificates), discounts, door prizes and raffles, free or reduced cost admittance to a business-related event (conference, briefing, seminar, training, etc.), honoraria, promotional items, services, tickets to events (such as sports games, concerts, or cultural events) where the giving party does not attend, training, transportation, or use of a donor’s time, materials, equipment, or facilities.

“**Gifts and Entertainment Disclosure Form**” or “**G&E Disclosure Form**” means the disclosure form described in Section 4.2. If you have received or plan to offer a business courtesy that does not comply with this Policy or that requires pre-approval under this Policy, you are required to complete a *G&E Disclosure Form* and submit it to Ethics & Compliance for review and approval. See Section 4.2 for additional information.

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.

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 General guidelines**

It is important to understand the applicable laws, regulations and rules regarding **business courtesies** and to avoid even the appearance of improper conduct between Ansys and **third parties**. **Business courtesies**



must be reasonable in value, infrequent, provided openly and transparently, given without expecting any return favor or improper benefit or business advantage, and not otherwise create the appearance of impropriety. When deciding on the appropriateness of giving or receiving a **business courtesy**, you should consider:

- whether any applicable legal or regulatory restrictions exist,
- how the **business courtesy** compares in value to the usual gift-giving practices in the applicable industry and country and whether an objective party would consider it to be reasonable or to be lavish or extravagant,
- the total value of **business courtesies** to or from that person or entity in a 12-month period,
- the appropriateness of the **business courtesy** given the Ansys employee’s position or functional responsibility at Ansys, and
- whether an objective party would consider the **business courtesy** to be an improper payment to win business or influence decision-making (such as a bribe or kickback).

Also, please note the following general guidelines:

DO	DO NOT
<ul style="list-style-type: none"> <li>• Accept or give business courtesies only if they comply with the law, the <i>Code of Business Conduct and Ethics</i>, this <i>Global Business Courtesies Policy</i>, and other Ansys policies.</li> </ul>	<ul style="list-style-type: none"> <li>• Never give or accept cash, cash equivalents (such as gift cards, gift certificates or shopping cards) or any other item that can be easily converted to cash.</li> </ul>
<ul style="list-style-type: none"> <li>• Business courtesies must be reasonable and appropriate under the circumstances.</li> </ul>	<ul style="list-style-type: none"> <li>• Never give or accept lavish or extravagant business courtesies.</li> </ul>
<ul style="list-style-type: none"> <li>• Always use good judgement with business courtesies that involve entertainment.</li> </ul>	<ul style="list-style-type: none"> <li>• Never provide, accept or participate in entertainment that is indecent, sexually explicit or that may otherwise harm the reputation of Ansys.</li> </ul>
<ul style="list-style-type: none"> <li>• Ask if a government official is involved before exchanging business courtesies.</li> </ul>	<ul style="list-style-type: none"> <li>• Never solicit business courtesies from third parties.</li> </ul>
<ul style="list-style-type: none"> <li>• Ansys employees who are in a position of procuring goods or services should be particularly mindful of accepting business courtesies in order to avoid the appearance of impropriety.</li> </ul>	<ul style="list-style-type: none"> <li>• Never accept a business courtesy that would influence – or create an appearance that it would influence – your business decision or judgement.</li> </ul>

You may not offer, give, or accept **business courtesies** that do not comply with applicable laws or Ansys’ policies. You also may not offer, give, or accept any **business courtesy** that may reflect negatively on Ansys’ reputation.

You must not use personal funds or assets to circumvent this Policy.

Any **business courtesy** provided to a **third party** must be accurately recorded in Ansys’ books and records, and all business-related expenditures and reimbursements must be accounted for in accordance with Ansys’ policies and procedures.



If you have questions about offering or accepting **business courtesies**, you should consult Ethics & Compliance as directed in the section “Seeking Guidance and Reporting Concerns” below.

**Attention!**

If you offer a **business courtesy** to a **third party** or if you are a manager approving expense reimbursement requests for **business courtesies** given by one of your employees, you must ensure that all expenses and transactions are accurately recorded with reasonable detail, have a legitimate business purpose, and could not reasonably be construed as improper inducements. Payments made on behalf of Ansys must include adequate supporting documentation and must accurately describe the nature and purpose of the payment.

### 3.2 Accepting business courtesies from third parties

#### 3.2.1 *Accepting gifts from third parties*

- In those limited circumstances in which **gifts** are exchanged, employees may accept **gifts** that are reasonable in value (provided such gifts also comply with applicable laws and guidelines set forth in this Policy). To be considered “reasonable in value,” a single **gift** given to an individual recipient must have a value of \$150 USD or less, and multiple **gifts** given to an individual recipient over a 12-month period must have an aggregate value of \$450 USD or less.
- Acceptance of individual **gifts** greater than \$150 USD, or multiple **gifts** in a 12-month period from the same third party totaling greater than \$450 USD, must be approved by Ethics & Compliance before you accept such **gifts**.
- **Gifts** of cash or cash equivalents (such as gift cards, gift certificates, credit cards, checks, vouchers, stocks or virtual currency) are never appropriate and must not be accepted.
- Employees may not solicit **gifts** from third parties.
- If you are involved in a decision-making and/or approval process involving a **third party**, you should not accept a **gift** from that **third party** at that time. Examples of such decision-making and/or approval processes include, but are not limited to, deciding whether to award business, hiring contractors, negotiating pricing or other contract terms, and responding to a request for proposal.
- If you receive a **gift** that does not appear to comply with this Policy and that you did not have the opportunity to decline in advance, you should return it (contact Ethics & Compliance if you are unable to do so).

#### 3.2.2 *Accepting meals and entertainment from third parties*

- Employees may accept meals or **entertainment** provided by **third parties** only if offered for legitimate business purposes and in accordance with the following guidelines:
  - is infrequent,



- is not solicited,
  - is not given as a bribe or other corrupt payment,
  - does not create the appearance (or an implied obligation) that the provider is entitled to preferential treatment,
  - is in good taste and occurs at a business-appropriate venue, and
  - is reasonable and appropriate in the context of the business occasion and your position and functional responsibility at Ansys.
- If you are involved in a decision-making and/or approval process involving a **third party**, you should not accept meals or **entertainment** from that **third party** at that time. Examples of such decision-making and/or approval processes include, but are not limited to, deciding whether to award business, hiring contractors, negotiating pricing or other contract terms, and responding to a request for proposal.
  - If the event is business-related, a spouse or guest may accompany the employee for the purpose of assisting the employee with the business purpose of the event.
  - Lodging and travel for a business conference, meeting or event may not be accepted from a **third party** unless approved in advance by Ethics & Compliance.
  - The guidelines in this section (“Accepting meals and entertainment from third parties”) apply to situations in which a representative of the **third party** providing the event tickets is present. Where a representative of the **third party** providing the event tickets is not present, the tickets are considered **gifts** and must comply with the guidelines set forth above (“Accepting gifts from third parties”).

#### **Attention!**

The purpose of this Policy is to prevent **conflicts of interest** involving **business courtesies** and avoid situations that may be perceived by others as a potential **conflict**. Not only does this protect Ansys and our reputation for conducting business with integrity, but it also protects you and your personal integrity. If you are unsure of the reasonableness or appropriateness of a particular meal or entertainment event, consult with your manager or Ethics & Compliance.

### **3.3 Offering business courtesies to third parties**

#### *3.3.1 Offering gifts to third parties*

- In those limited circumstances where **gifts** are exchanged, employees may offer **gifts** to **third parties** that are reasonable in value (provided such **gifts** also comply with applicable laws and the guidelines set forth in this Policy.) To be considered “reasonable in value,” a single **gift** given to an individual recipient must have a value of \$150 USD or less, and multiple **gifts** given to an individual recipient over the course of 12 months must have an aggregate value of \$450 USD or less.

- An offer of individual **gifts** greater than \$150 USD, or multiple **gifts** in a 12-month period to the same third party totaling greater than \$450 USD, must be approved by Ethics & Compliance before you offer such gifts.
- **Gifts** of cash or cash equivalents (such as gift cards, gift certificates, credit cards, checks, vouchers, stocks or virtual currency) are never appropriate and may not be offered.
- Managers are responsible for reviewing the appropriateness of **gifts** and other **business courtesies** offered or provided to **third parties** by Ansys employees. A manager's approval of an expense reimbursement request, expense voucher, or an approval given by other means, indicates that the manager reviewed the request and determined the **business courtesy** provided was appropriate. Managers must ensure they take the needed time to understand the details regarding any **business courtesy** and follow all existing processes for giving their approval.
- Ansys' customers and suppliers may also have policies that restrict the type or amount of **business courtesies** their employees can receive. You must not offer any **business courtesy** to a **third party** if you know that doing so would violate the policies of that **third party**.

### 3.3.2 *Offering meals and entertainment to third parties*

- Employees may offer meals or **entertainment to third parties** only if offered for legitimate business purposes and in accordance with the following guidelines:
  - is infrequent,
  - is not given as a bribe or other corrupt payment,
  - does not create the appearance (or an implied obligation) that the provider is entitled to preferential treatment,
  - is in good taste and occurs at a business-appropriate venue,
  - is reasonable and appropriate in the context of the business occasion and your position and functional responsibility at Ansys, and
  - if the employee is the responsible manager or officer for the contract, Ansys is not and will not soon be in negotiations with the **third party** (for example, responding to a request for proposal or pending contract negotiations).

### 3.4 **Gifts to co-workers**

- Ansys employees may receive **gifts** (including cash or cash equivalents such as gift cards) provided by the Company to mark certain work-related or personal events. Examples of such **gifts** include flowers or illness bereavement, a gift card for a work anniversary, a plaque or other personalized item for a retirement, and the like. Such **gifts** must be in good taste, reasonable and appropriate, and properly expensed to Ansys in accordance with Company policies and procedures, including the Travel and Expense Policy that applies in your location.
- Ansys employees may also exchange personal **gifts** (including cash or cash equivalents such as gift cards) with fellow employees (including from managers to team members) as long as the **gifts** are in good taste, reasonable and appropriate, paid for by the employee and not expensed to Ansys, and do not create an actual or perceived **conflict of interest**. If you collect funds for a group **gift**,

be sure that participation is strictly voluntary. Also, keep in mind that personal **gifts** to and from managers and direct reports may be viewed by others as favoritism if not done carefully.

- Personal **gifts** to employees should not be provided as performance awards. Performance awards should be provided to employees by Ansys under approved Company-sponsored reward and recognition programs.

### 3.5 Sponsorships and charitable contributions

Sponsorships and charitable contributions must be consistent with Ansys values and must not constitute, or create the appearance of, a bribe, kickback or other corrupt practice or be used to circumvent or otherwise violate this Policy or applicable laws and regulations relating to the giving of **business courtesies**. No sponsorship or charitable contribution may be undertaken to directly or indirectly procure future business or otherwise be made with the intent to obtain or retain business, secure an improper advantage, or induce anyone to act improperly.

### 3.6 Offering business courtesies to government officials

This Policy does not address offering **business courtesies** to **government officials**. Please refer to the *Code of Business Conduct and Ethics* and the *Global Anti-Corruption Policy* for more information about offering **business courtesies** to **government officials**. You should be aware that giving or offering even a simple **gift**, meal or other **business courtesy** to a **government official** can be illegal. You must obtain written approval from Ethics & Compliance before giving or offering any **business courtesy** to a **government official**, regardless of the value.

## 4. POLICY COMPLIANCE AND CONSEQUENCES OF NON-COMPLIANCE

### 4.1 General guidelines

Ansys takes its commitment to compliance with all applicable laws and regulations regarding **business courtesies** very seriously and expects all employees 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 employee 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.

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. If you are in a region with local customs that conflict with the requirements of this Policy (for example, it is a common practice in some regions to give very small, symbolic cash gifts), contact Ethics & Compliance for guidance.

With regard to certain requirements of this Policy, no exceptions can be made. For example, no one may authorize conduct that is illegal or unethical. Other activities are prohibited because they may hurt Ansys’ business interests.



#### 4.2 Disclosure and pre-approval of business courtesies

The key to addressing potential **conflicts of interest** regarding **business courtesies** is prompt and full disclosure. If you have received or plan to offer a **business courtesy** that does not comply with this Policy or that requires pre-approval under this Policy, you are required to complete a *G&E Disclosure Form* and submit it to Ethics & Compliance for review and approval. The *G&E Disclosure Form* can be found on the Ethics & Compliance SharePoint site or by clicking [here](#).

Completion of this disclosure and approval by Ethics & Compliance does not exempt you from the requirements of this Policy. In its discretion, Ethics & Compliance may revoke prior authorizations and you may be required to discontinue previously approved activities.

If you have previously submitted a *G&E Disclosure Form* and the facts and circumstances of that situation have changed since your initial disclosure, you have a continuing obligation to submit an updated *G&E Disclosure Form* or contact [compliance@ansys.com](mailto:compliance@ansys.com) to explain the change in facts and circumstances.

### 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 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 available 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 emailing Ethics & Compliance at [compliance@ansys.com](mailto: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 Business Courtesies Policy

The following Question & Answer (Q&A) examples are intended to (a) help employees better understand how to comply with laws and Ansys' *Global Business Courtesies 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](mailto:compliance@ansys.com).

- 1. How do I seek pre-approval for giving or receiving a business courtesy?** You should complete a *Gifts and Entertainment Disclosure Form* and submit it to Ethics & Compliance for review and approval. The *Gifts and Entertainment Disclosure Form* can be found on the Ethics & Compliance SharePoint site or by clicking [here](#).
- 2. A supplier has sent me a gift basket for the holidays. I have never received a gift from this supplier before. Can I accept it?** You can accept the gift basket if it is valued at \$150 USD or less. You should use your best judgment to estimate the value. If it is valued over \$150 USD, you will need to receive approval from Ethics & Compliance before accepting it.
- 3. A customer was happy with the service I provided. To thank me, she sent me an Amazon gift card for \$50 USD. Can I accept it?** A gift card that allows you to choose from a range of goods or services is considered a cash equivalent. Accepting cash or cash equivalents is strictly prohibited, regardless of the amount involved. You should politely return the gift card to the customer and explain that Ansys' policies do not allow you to accept it.
- 4. I'm traveling on business in a remote location and my taxi failed to arrive. I may now miss my flight. The business partner who is a government official offered to drive me to the airport. What should I do?** Since this is a matter of time and safety, it is reasonable and appropriate in this situation to accept the ride. However, the incident should be reported as soon as possible to Ethics & Compliance.
- 5. The IT manager for one of our large customers is getting married. I think we should send him a wedding gift. Is that ok?** As long as the gift complies with Ansys' *Global Business Courtesies Policy*, it would be acceptable to provide this gift. You should not, however, offer any gift that may influence our customer's business judgement or create the appearance that it can be influenced.
- 6. I was invited to a conference that is sponsored by a supplier. The supplier has offered to pay for all my travel expenses, including airfare, meals and accommodations. Can I accept this offer?** You may not accept the supplier's offer to pay for travel and lodging without prior approval by Ethics & Compliance. You may accept meals from the supplier as long as they comply with Ansys' *Global Business Courtesies Policy*.
- 7. My spouse and I were invited by one of our vendors to the vendor's private box at a professional sporting event. The invitation includes tickets to the game, food and drinks. Several of my co-workers have also been invited. May I accept the invitation?** The value of the entertainment most likely will exceed the gifts and entertainment limits as described in the *Global Business Courtesies Policy*, and therefore will require pre-approval. The fact that other Ansys employees have also been invited does not relieve you from the responsibility of obtaining approval. Pre-approval requests should be submitted to Ethics & Compliance via the *Gifts and Entertainment Disclosure Form*.