



Anti-Corruption

Ethics and Compliance

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Revision: 1

1. Policy

DXC Technology (“DXC”) will compete vigorously and fairly for business solely on the merits of its competitive offerings. DXC shall not offer, promise, give or accept money or anything of value to or from government officials, political parties, or commercial-sector parties to improperly obtain or retain business, secure an improper advantage, or otherwise influence improper action.

- 1.1. Bribery**—It is the policy of DXC that neither of DXC, its employees, or its third-party intermediaries and business partners shall bribe anyone to obtain, retain, or direct business, or to secure any other improper advantage, nor will the company tolerate any other party to do so for its benefit, in any market, whether public or private, anywhere.
- 1.2. Kickbacks**—It is the policy of DXC that the offering or accepting of a kickback by any of its employees is a violation of the DXC Code of Conduct. This Policy is equally applicable to both government and commercial contracts and transactions. In addition to prohibiting the offer or acceptance of a Kickback, DXC requires that all employees avoid actions which might appear to others to constitute the offering or accepting of any kickback.
- 1.3. Internal Control Systems**—DXC and its subsidiaries and affiliates shall operate and maintain internal control systems which are:
 - 1.3.1.** Reasonably sufficient to prevent and detect improper payments that may violate transnational and local anti-corruption laws.
 - 1.3.2.** Intended to ensure our accounting decisions, bookkeeping entries, and financial reporting practices meet the highest standards of professional ethics and comply with applicable laws and regulations.

2. Applicability/Scope

As allowable by law, this policy applies worldwide to all directors, officers, executives, employees, and representatives of DXC, its wholly-owned subsidiaries, and their affiliates.

3. Requirements

- 3.1. Transnational Bribery Laws and Local Anti-Corruption Statutes**
 - 3.1.1.** U.S. Foreign Corrupt Practices Act (“FCPA”)—The FCPA makes it a crime to bribe non-U.S. government officials to improperly influence performance of the officials’ duties. The FCPA also includes the requirement that public companies, such as DXC, have strong internal financial controls and maintain accurate books and records. The FCPA applies to all DXC subsidiaries, affiliates, employees, and agents—no matter where they are located.
 - 3.1.2.** Bribery Provisions—The FCPA’s bribery provisions prohibit DXC employees from giving or offering anything of value, directly or indirectly, to any non-U.S. government official, political party, or party official with the intent to influence that official in his or her official capacity or to secure an improper advantage in order to obtain or retain business.

- 3.1.3. Accounting Provisions**—The FCPA's accounting provisions require DXC to maintain accurate books and records and reasonably effective internal controls.
- 3.1.4. United Kingdom Bribery Act (UKBA)**—Like the FCPA, the UKBA makes it a crime to bribe non-U.K. government officials. However, the UKBA also makes it a crime to take a bribe, to make or take a bribe to individuals in private commercial organizations, and for a commercial enterprise to fail to take steps to prevent bribery. Also like the FCPA, the UKBA applies to all DXC subsidiaries, affiliates, employees, and agents—no matter where they are located.
- 3.1.4.1. Making Bribes**—The UKBA makes it an offense for DXC to give, promise, or offer a bribe.
- 3.1.4.2. Taking Bribes**—The UKBA makes it an offense for DXC to request, agree to receive, or accept a bribe.
- 3.1.4.3. Bribery of a Foreign Official**—The UKBA makes it an offense for DXC to bribe a foreign public official.
- 3.1.4.4. Corporate Failure to Prevent Bribery**—The UKBA makes it an offense for DXC to fail to take steps to prevent bribery.
- 3.1.5. Beyond the transnational reach of the FCPA and UKBA**, DXC must also take care to abide the local anti-corruption statutes of other nations, almost all of which have some form of anti-bribery law to prohibit improper payments to government officials of any payment amount.

3.2. Business Amenities and Contributions

In many countries, business etiquette and custom create gift-giving opportunities and, sometimes, expectations. Similarly, business hospitality may play a customary role in developing business relationships or in the course of ongoing business. However, gifts and hospitality, collectively called “Business Amenities,” may violate the law if offered or provided with corrupt intent or for an improper purpose.

Therefore, all DXC employees desiring to offer Business Amenities shall do so keeping with our values, and in line with DXC's Gifts and Hospitality Policy, DXC's Government Affairs Policy, and DXC's Charitable Giving Policy.

3.3. Use of Third-Parties

DXC may be held responsible for the acts of third parties that we engage. Therefore, we must take reasonable steps to confirm that a third party is an authentic business entity which conforms to the highest ethical standards and complies with all applicable laws. You must comply with all relevant DXC policies, including the Third Party Risk Management Policy.

3.4. Facilitation Payments

- 3.4.1.** DXC policy prohibits facilitation payments. No DXC employee, intermediary, or business partner shall make any facilitation payment, whether with DXC funds or with personal funds.
- 3.4.2.** DXC employees, intermediaries, and business partners shall timely report any demand for a facilitation payment to Ethics and Compliance. In the event a DXC employee learns of a facilitation demand to or payment by a third party acting on DXC's behalf, that employee shall timely report this demand or payment to Ethics and Compliance.
- 3.4.3.** If, despite this policy's prohibitions, a facilitation payment is made on DXC's behalf by any DXC employee, intermediary, or business partner, that payment shall be recorded in the applicable DXC books and records accurately as a facilitation payment and completely as to the amount, the recipient, and the reason. No such payment shall be reimbursed by DXC.

3.5. Money Laundering and Proceeds of a Crime

- 3.5.1.** DXC must comply with all applicable laws concerning money laundering.

3.5.2. You must not: participate in acquiring, using, converting, concealing or possessing the proceeds of crime; helping another person to do so; or assisting terrorist financing in any way.

4. Key Definitions

- 4.1. **Business Amenities** - amenities can be anything of value. They can be any gift, meal, travel, service, prize, event ticket/pass, promotion, entertainment, reimbursement, loan, favor, or item of value, whether given or received, by a DXC employee, where the recipient is receiving something for free.
- 4.2. **Commercial Sector** - Information is “material” if there is a substantial likelihood that a reasonable shareholder would consider it important in making an investment decision, or there is a substantial likelihood that the information would have been viewed by a reasonable investor as having significantly altered the total mix of information made available.
- 4.3. **Customer** - Information that has not been disseminated in a manner making it generally available to investors and giving them a reasonable time to react to the information.
- 4.4. **Facilitation Payment** - A facilitation or “grease” payment is a payment, generally of low value, made to a government official to facilitate or expedite a routine, non-discretionary government activity that the official is required to perform as a matter of course. Examples of facilitation payments include: permits, licenses, or other documents that allow companies to conduct business in a particular country; processing of visas and work papers; inspections related to transit of goods, for example loading and unloading of cargo; certain one-time fees, such as a government-owned utility company activating a telephone line.
- 4.5. **Kickback** - Any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind which is provided to or received from, directly or indirectly, any person for the purpose of improperly obtaining or rewarding favorable treatment in connection with a contract with a customer, supplier or business associate.
- 4.6. **Money Laundering** - The process of hiding the origin of money obtained through crime (the ‘proceeds of crime’) within lawful business activities. It also describes the use of any money to fund terrorism.
- 4.7. **Public Sector Entity** - Any entity that is owned or controlled by a government. This will include any entity where a government has greater than 50% ownership, or otherwise controls the entity. You should consult your DXC attorney for a determination as to whether an entity is government-owned for purposes of this policy. In countries with government-owned or operated institutions or industries, such as health care, education, energy, telecom, banking or transportation, you should assume these entities are Public Sector.

5. Violations

Any DXC employee who knowingly violates or attempts to violate this Policy shall be subject to disciplinary action, up to and including separation from DXC.

6. Related Documents

- [DXC Code of Conduct](#)
- [DXC Gifts and Hospitality Policy](#)
- [Charitable Giving Policy](#)
- [Government Affairs Policy](#)
- [Third Party Risk Management Policy](#)