

# DASSAULT SYSTEMES ANTI-CORRUPTION POLICY

## Version 2.1

Dassault Systemes' purpose is to:

*“Provide business & people with 3DEXPERIENCE universes to imagine sustainable innovations capable of harmonizing product, nature and life.”*

To achieve this, we rely on our core values:

*“Show the Dream is Possible, Challenge the Status Quo, Have a Passion to Learn and Bring our Community Together”,*

Which can only be achieved ethically with our customers, our ecosystem and among ourselves.

Business ethics has been integral to Dassault Systèmes<sup>1</sup> spirit, culture and conduct since its inception. Dassault Systèmes strongly believes that trust and integrity are core values to grow and succeed together, that trusting, long-term relationships are built through honesty, *fair play*, respect for people and “doing the right thing” without compromise, in order to Bring our Community Together.

Protecting and fostering the ongoing reputation of Dassault Systèmes as an ethical company that conducts its business activities with honesty and integrity is the responsibility of each and every one within the Dassault Systèmes community: employees, directors, officers, partners.

Given that Dassault Systèmes operates in a wide range of business environments, situations may arise in certain contexts which could challenge Dassault Systèmes' firm commitment to conduct business with honesty and integrity. The Dassault Systèmes Code of Business Conduct identifies some of those situations and defines the way to act to ensure appropriate professional decisions and interactions.

The purpose of this Anti-Corruption Policy is to complement the provisions of the Dassault Systèmes Code of Business Conduct on anti-corruption (including the peddling of influence), by providing information and guidance as to how to behave in business relationships.

All Dassault Systèmes employees, directors, officers or partners are expected to read, clearly understand and abide by this Policy.

**Should you have any questions or need guidance, please contact Dassault Systèmes Compliance Officer ([people.ethicscommittee@3ds.com](mailto:people.ethicscommittee@3ds.com)), Finance or Legal Departments; they are here to help you.**

---

<sup>1</sup> Dassault Systèmes means Dassault Systèmes S.E. and all persons and entities directly or indirectly controlling, controlled by or under common control with Dassault Systèmes S.E., where control may be by management authority, equity interest or otherwise.

A [Whistleblowing procedure](#) is available to all Dassault Systèmes employees and partners. It allows them to report any breaches of this Anti-Corruption Policy that they may have witnessed, selflessly and in good faith, to the Compliance Officer at the address given above. For more information about this Whistleblowing procedure, which is neither compulsory nor exclusive, you are invited to read its terms that are available on [3DSone/oneConduct](#) or, upon request, from the Legal Department.

## Contents

1. Anti-Corruption Policy Principles & Glossary .....	3
1.1 Anti-Corruption Policy - Principles .....	3
1.2 Anti-Corruption Policy - Glossary .....	4
2. Social Amenities – General conditions.....	7
2.1. No Corrupt Intent.....	7
2.2. Respect for the law and policies .....	7
2.3. Reasonable Value.....	8
2.4. Record Keeping/Accounting Requirements.....	8
3. Social Amenities when dealing directly with commercial businesses .....	9
3.1. Gifts offered to or received from business customers, partners or suppliers.....	9
3.2. Hospitality offered to or received from business customers, partners or suppliers .....	10
4. Social Amenities when dealing directly with Officials .....	10
4.1. Gifts offered to or received from Officials .....	10
4.2. Hospitality provided to or received from Officials.....	11
5. Dealing indirectly .....	12
6. Donations, Charitable Contributions and Corporate Sponsorship.....	14
7. Sanctions .....	14

# 1. Anti-Corruption Policy Principles & Glossary

## 1.1 Anti-Corruption Policy - Principles

**Any form of inducement or payment with the intent to obtain an improper advantage or preferential treatment personally or for Dassault Systèmes is unacceptable under any circumstances.**

This applies to any form of corruption, including the Peddling of Influence<sup>1</sup>.

Such acts are not only violating this Policy but are also illegal in many countries where Dassault Systèmes operates. Any breaking of stringent anti-corruption laws and regulations (e.g. the French Loi Sapin II, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act) can be a serious offence and severe penalties for violation may be imposed on individuals and entities, in particular when Officials<sup>1</sup> are involved.

As a consequence:

- Dassault Systèmes prohibits Dassault Systèmes employees, directors, officers and partners from, directly or indirectly through third parties:
  - Paying, giving, offering, promising, or providing, with a Corrupt Intent<sup>1</sup>, Anything of Value<sup>1</sup> - or authorizing a third party to pay, give, offer, promise or provide Anything of Value<sup>1</sup> - to a person (individual or entity) with decision making authority or who can influence the decision of such a person (e.g. relative, friend, co-worker); and/or
  - Accepting or soliciting Anything of Value<sup>1</sup> from anyone (or authorizing such acceptance or solicitation) whenever such arrangement could affect the outcome of business transactions (i.e. with a Corrupt Intent<sup>1</sup>).
- Dassault Systèmes prohibits Dassault Systèmes employees, directors, officers and partners, directly or indirectly through a third party, from making any “facilitation or grease payments”, i.e. making any payment to an Official<sup>1</sup>, or to anyone who can influence the decision of an Official<sup>1</sup> (e.g. relative, friend, co-worker), to expedite or secure the performance of a “routine governmental action”, even in countries that legally allow such payments.

Examples of “routine governmental actions” for which Dassault Systèmes prohibits any payment, include (but are not limited to):

- Obtaining permits or licenses or other official document(s),
- Processing governmental papers such as visas and work permits,
- Providing police, mail pick-up and delivery,
- Providing telephone services, power and water supply, loading and unloading cargo or protecting perishable products,

---

<sup>1</sup> See definition in Section 1.2

- Providing inspection services associated with contract performance or transit of goods.
- Specific rules are applicable to Social Amenities<sup>1</sup>:  
The giving and receiving of Social Amenities<sup>1</sup> have a role to play in building cordial business relationships and generating goodwill as long as this may not be considered as business inducement. Dassault Systèmes encourages the use of good judgment and moderation when exchanging Social Amenities<sup>1</sup> in business settings. Any Social Amenity<sup>1</sup> offered or received must be appropriate to the circumstances and comply with the provisions of this Policy (see Sections 2 to 4 below).
- Should your personal health or safety, or the health or safety of your family, be at risk if you refuse to make an improper payment, you should confidentially inform as soon as possible your Geo Managing Director and/or your local HR Director and Legal department, who will take appropriate action.

## 1.2 Anti-Corruption Policy - Glossary

### Anything of Value

The term “Anything of Value” is broadly construed and can include any kind of advantage in any form.

With the “Anything of Value” element, there is generally:

- no associated minimal value: the perception of the recipient and the subjective valuation of the thing conveyed are key factors.
- an associated maximum value, that may be different according to the specific circumstances: for example, the maximum value for Social Amenities<sup>1</sup> provided to Officials<sup>1</sup> (see Section 4 below) is more stringent than for Social Amenities<sup>1</sup> provided to commercial businesses (see Section 3 below).

Thus, this notion encompasses:

- Cash (e.g. checks, money orders, loans, stocks, etc.),
- Cash equivalent (e.g. vouchers, gift certificates, etc.),
- Social Amenities<sup>1</sup>,
- any kind of payment such as (but not limited to):
  - kickbacks (that is, payments or items of value given to individuals in connection with the purchase or sale of products or services, typically for providing a discount in a sales agreement; for example: a Dassault Systèmes customer gets an unusual or unapproved discount, and a Dassault Systèmes sales representative receives a payment in return),
  - seminar speaking fee (if not actually speaking at a seminar), or

---

<sup>1</sup> See definition in Section 1.2

- sponsorship of a seminar that benefits the recipient and is not in the normal course of business for Dassault Systèmes,
- Unusual use of materials, facilities or equipment (outside of the course of normal business),
- Insurance benefits,
- Favorable loan terms,
- Real or personal property,
- Unusual or exceptional, unapproved or undocumented discounts, rebates or commissions,
- Employment offer,
- Scholarships or internships,
- Reciprocal dealing, i.e. an arrangement in which a party agrees to buy a product from a seller if the seller buys something in return (e.g. a member of the Purchasing department states that a decision to buy goods or services is based on a reciprocal agreement for the supplier to purchase Dassault Systèmes products or services),
- settlement of a debt,
- favorable votes in the case of a consultation related to a tender.

### **Corporate Sponsorship**

Corporate sponsorship consists of providing material or financial support to an entity in exchange for a direct benefit.

### **Corrupt Intent**

Corrupt Intent corresponds to:

- encouraging a decision maker to abuse their position in order to:
  - obtain/retain business for or with Dassault Systèmes,
  - secure/retain an improper advantage for oneself (including for Dassault Systèmes) or a government decision or action;
- soliciting any sort of advantage that may influence one's own decision.

In other words, prevention of Corrupt Intent means refraining from encouraging a third party to behave in such a way as to induce conduct that amounts to a breach of an expectation that a person will act in good faith, probity, impartially, or in accordance with a position of trust.

The “obtain/retain business” element has broad application and is intended as any situation where the inducer or the inducer’s employer benefits from an improper advantage, such as but not limited to:

- Securing or renewing a contract,

- Performing on an existing contract,
- Securing special tax or custom treatment,
- Securing a license or a permit needed to do business, etc.

Whether this improper advantage was granted before or after the action was performed is immaterial. Subsequent gratification is therefore sanctioned in the same way as the promise.

It is important to note that a corrupt practice is unacceptable even if it does not succeed in its corrupt purpose.

Sections 2 to 4 below provide guidelines to assess the existence of a Corrupt Intent.

### **Donations and Charitable Contributions**

Donations and charitable contributions may be defined as the fact of providing material, financial or human support for a general interest work or body without seeking a benefit in exchange.

### **Hospitality**

For the purpose of this Policy, Hospitality means travel and lodging, entertainment, drinks and meals (see Social Amenities definition below).

### **Officials**

For the purpose of this Policy, Officials means Government Officials and/or Public Officials, including:

- Any officer or employee of a state or agency or entity controlled by a state or international public organization,
- All civil servants, elected officials or members of the executive, judiciary or parliamentary branches, or ruling families
- Employees of quasi-government entities, regardless of rank or title, such as employees of state-owned or state-controlled enterprises or enterprises in which a state holds an interest
- Members of a political party or candidates for elected office, etc.

### **Peddling of Influence**

The Peddling of Influence involves a situation in which a person abuses their influence (real or supposed) in order to obtain distinctions, jobs, contracts or a favorable decision in exchange for the promise of an advantage. It can take on various forms: active, passive, direct or indirect, national or international.

## **Social Amenities**

For the purpose of this Policy, Social Amenities are deemed to include amongst other:

- Gifts,
- Hospitality, i.e. travel and lodging, entertainment, drinks and meals.

## **2. Social Amenities – General conditions**

Whether dealing with commercial businesses or with Officials, the offering or reception of Social Amenities is allowed subject to the following general conditions (in addition to the specific conditions described in Sections 3 and 4 below):

### **2.1. No Corrupt Intent**

The purpose of the Social Amenity should be to improve the image of a commercial organization, better to present products and services, or establish cordial relations as long as there is no Corrupt Intent; it should be provided as a token of esteem, courtesy or in return for hospitality.

In consequence, the Social Amenities given or received should never create improper influence (or give the impression of doing so) or obligate the recipient. As an example, you should never act in a manner that would place any supplier in a position where he/she may feel obligated to provide a gift or Hospitality<sup>1</sup> in order to do business or continue to do business with Dassault Systèmes.

In order to avoid any risk of Corrupt Intent, you may not offer/accept Social Amenities to/from a customer, partner or supplier during an ongoing commercial negotiation. However, in some countries, providing a modest gift and/or meals and entertainment while business is pending is expected and customary. In such cases, following local customs is permissible subject:

- to the other general conditions stipulated below concerning Social Amenities,
- as well as to the specific conditions described in Sections 3 and 4 below,
- and the prior approval of your local Finance Department.

### **2.2. Respect for the law and policies**

The Social Amenities given or received must:

- Be compatible with local customs and practices,
- Be appropriate, that is, it would not embarrass Dassault Systèmes if publicly disclosed (for example, offering or receiving of entertainment such as gambling or “adult entertainment” is forbidden),

- Not violate applicable laws, which depend on the circumstances of the Social Amenity, and
- Not violate the giver's and recipient's policies on the matter (including this Policy). In particular, many governmental/public entities strictly prohibit the receipt of any gratuities by their employees (the Officials), including meals and entertainment; everyone must be aware of and strictly follow these prohibitions.

As a consequence:

- Before offering/accepting a Social Amenity, all those concerned are required to read, understand and follow not only the provisions of this Social Amenity Policy, but also those established by the customer, partner, supplier or governmental/public body in question (these policies are generally to be found on the corporate websites of these entities ; you can also request a copy from your customer, partner, supplier or Official).
- **Furthermore, before accepting or offering a Social Amenity, you must ask for and obtain the prior written approval from the Finance Department, using the [template available on 3DSone/oneConduct](#) or, upon request from the following address: [3ds.compliance-anticorruption@3ds.com](mailto:3ds.compliance-anticorruption@3ds.com)**

### 2.3. Reasonable Value

The Social Amenities given or received must be of reasonable value. It means that any Social Amenity offered or received must be of a value which is:

- customary for the recipient's country in the case of gifts, or for the country where Hospitality is provided,
- appropriate for the occasion,
- be commensurate with the reasonable and proportionate norms applicable to activities similar to those of Dassault Systèmes, and
- conform to local norms and more stringent local Dassault Systèmes policy.

For further details on acceptable amounts, see below in Section 3 for commercial businesses and Section 4 for Officials.

### 2.4. Record Keeping/Accounting Requirements

As a company listed on Euronext Paris, Dassault Systèmes is required to comply with strict accounting principles and regulations and to apply standards of full, fair, accurate, timely, and understandable disclosure in its records and financial reporting. As a consequence, all expenses for Social Amenities must be supported by appropriate documentation and properly recorded on Dassault Systèmes' books and records (example: entertainment expenses should not be categorized as "training expenses" but as "Hospitality expenses").



Please note that in order to avoid any situation of conflict of interest, expenses for meals or entertainment offered to customers or prospects must be paid by the representative of Dassault Systèmes taking part in the meal or entertainment, and whose expense reports are approved by someone else than another participant to the meal or entertainment (example: a VP BT in a Geo may pay even if the Geo Managing Director is attending the dinner since VP BT's expense reports are approved by the EVP, BT).

### **3. Social Amenities when dealing directly with commercial businesses**

In addition to the general conditions set forth in Section 2 above, any business-related Social Amenity that is conducted in the interests of Dassault Systèmes can be provided to a commercial customer, partner or supplier only if it is occasional.

Social Amenities received from a commercial customer, partner or supplier should be judged on a like-for-like basis. In other words, the type of gifts or Hospitality received should be similar to what would be offered as a supplier or a host.

In consequence, the conditions below are applicable whether you offer or receive a gift or Hospitality.

#### **3.1. Gifts offered to or received from business customers, partners or suppliers**

To appraise the “reasonable value” of a gift offered or received, the position of the recipient in his/her organization and the general prevailing living standards must be considered. In general, subject to more stringent local policy (to be checked with your local Finance or Legal Departments):

- Gifts of cash (e.g. checks, money orders, loans, stocks, etc.) are NEVER allowed.
- Off-the-shelf, token items – e.g., pens, coffee mugs, shirts, tote bags, etc. – with the Dassault Systèmes’ or Dassault Systèmes Brands’ logos are allowed.
- A nominal, impersonal gift is allowed on local holidays (e.g. Christmas or New Year) as long as compliant with the General Conditions set forth in Section 2 above and with the 3 conditions just below:
  - The offer or acceptance of a gift valued at more than US\$100 is subject to prior written approval from your manager and your local Finance Department.
  - The total value of the gifts offered to or received from an individual in any 12-month period is considered « reasonable » as long as it does not exceed US\$250.
  - Gifts to/from an individual (excluding Officials<sup>1</sup> – see Section 4 below) valued at more than US\$250 in any 12-month period may be offered or accepted subject to prior written approval from your manager and your local Finance Department. They will together appreciate whether such gift could be offered or kept by you or by Dassault Systèmes (for instance, in some rare cases where it would be insulting to refuse it).

- **Gifts offered to or received from a customer, partner or supplier must be properly declared including the cost and type of gift, using the [template available on 3DSone/oneConduct](#), or upon request from the following address: [3ds.compliance-anticorruption@3ds.com](mailto:3ds.compliance-anticorruption@3ds.com).**

### **3.2. Hospitality offered to or received from business customers, partners or suppliers**

In general, subject to more stringent local policy (to be checked with your local Finance or Legal Department):

- The offer or acceptance of Hospitality valued at more than US\$250 is subject to prior written approval from your manager and your local Finance or Legal Department.
- The total value of the Hospitality offered to or received from an individual in any 12-month period is considered "reasonable" as long as it does not exceed US\$400.
- Hospitality extended to/received from an individual (excluding Officials – see Section 4 below) valued at more than US\$400 in any 12-month period is subject to prior written approval from your manager and your local Finance Department. They will together appreciate whether such Hospitality could be offered or accepted by you (for instance, in some rare cases where it would be insulting to refuse it).
- **Hospitality extended to or received from a customer, partner or supplier must be properly declared including the cost and type of gift, using the [template available on 3DSone/oneConduct](#), or upon request from the following address: [3ds.compliance-anticorruption@3ds.com](mailto:3ds.compliance-anticorruption@3ds.com).**

## **4. Social Amenities when dealing directly with Officials**

In addition to the general conditions set forth in Section 2 above, and, in particular, to the need to get a prior approval from your local Finance Department before making any gift or providing Hospitality to Officials, the following additional conditions are also applicable, whether you offer or receive a gift or Hospitality<sup>1</sup> to/from an Official.

No Social Amenity may be offered to an Official involved in an ongoing procurement process in which Dassault Systèmes is taking part, even if indirectly.

### **4.1. Gifts offered to or received from Officials**

In some countries, conditions relating to offering and accepting Social Amenities to/from Officials are very stringent and significantly stricter than conditions applicable to commercial businesses.

In general, subject to more stringent local policy:

- Gifts in cash or cash equivalents (e.g. checks, money orders, vouchers, gift certificates, loans, stocks, etc.) ARE NEVER ALLOWED.
- The gift should be for official use rather than personal use, except if it is a mass-produced item (see following section).
- The gift should showcase the Dassault Systèmes' products and solutions or be off-the-shelf, token items – e.g., pens, coffee mugs, shirts, tote bags, etc. – with the Dassault Systèmes' or Dassault Systèmes Brands' logos.
- The offer or acceptance of a gift valued at more than US\$100 is subject to prior written approval from your manager and your local Finance Departments.
- The total value of the gifts offered to or received from an Official should NEVER exceed US\$250 in any 12-month period.
- The gift should be presented openly with complete transparency, rather than secretly or in one-on-one exchanges between the Official and the Dassault Systèmes representative.
- **Gifts offered to or received from an Official must be properly declared including the cost and type of gift, using the [template available on 3DSone/oneConduct](#), or upon request from the following address: [3ds.compliance-anticorruption@3ds.com](mailto:3ds.compliance-anticorruption@3ds.com).**

## 4.2. Hospitality provided to or received from Officials

In general, Hospitality may be extended to Officials subject to more stringent local policy (to be checked with your local Finance or Legal Departments) and the following conditions:

- Selection of the particular Officials who will travel must be made solely by the government/public entity; you should not do it.
- The only individuals who may be hosted are the designated Officials, excluding their spouses, family members or any other party otherwise related such as friends.
- No cash or *per diem* should be provided to any Official. Instead, for permissible expenses, Dassault Systèmes should directly pay the service providers (e.g. hotels, restaurants, taxis, travel agencies). If, exceptionally, an expense requires reimbursement, Dassault Systèmes may do so, up to a modest daily maximum of US\$35 and upon presentation of a written receipt.
- Officials cannot be compensated for their visit.
- No entertainment, side trips, or leisure activities for the Officials, may be funded, organized or hosted.
- The training costs and expenses are only those necessary and reasonable to educate the visiting Officials about the Dassault Systèmes products and solutions.
- Souvenirs provided to the visiting Officials should comply with Section 4.1 above.
- The total value of Hospitality offered to or received from Officials should NEVER exceed US\$250 in any 12-month period. However, travel and lodging (i.e. to the

exclusion of any other generally allowed type of Hospitality – meals or drinks) exceeding US\$250 in any 12-month period may be offered to Officials as long as:

- Such travel or lodging is directly related to the promotion, demonstration, or explanation of the Dassault Systèmes products, solutions or services, or the execution or performance of a contract.
- Prior written approval from your manager and your local Finance Department has been obtained.
- **Hospitality extended to or received from an Official must be properly declared including the cost and type of Hospitality, using the [template available on 3DSone/oneConduct](#), or upon request from the following address: [3ds.compliance-anticorruption@3ds.com](mailto:3ds.compliance-anticorruption@3ds.com).**

## 5. Dealing indirectly

Dassault Systèmes may be liable for misconduct engaged in:

- by its employees, directors or officers on behalf of Dassault Systèmes (direct deals),
- by its business intermediaries (e.g. resellers, agents, consultants, joint venture partners, business partners) and their own intermediaries, if Dassault Systèmes has knowledge that such an intermediary engages in corrupt practices.

No known law provides for exoneration from liability for voluntary ignorance. Dassault Systèmes is considered as having such knowledge when any Dassault Systèmes employee, director or officer:

- has actual knowledge of behavior that constitutes an act of corruption,
- has good reason to believe that behavior that constitutes an act of corruption has taken place or will take place, or
- holds information that would lead them to suspect that an act of corruption has been committed or is being prepared.

For example, if an employee of Dassault Systèmes knows that all or a portion of a commission Dassault Systèmes paid to the intermediary is used as bribe, Dassault Systèmes - and the employee who knows - may be liable and may be convicted for corruption.

In any case, neither Dassault Systèmes nor Dassault Systèmes employees, directors, officers and partners can avoid liability by deliberately closing their eyes to what they know (or reasonably should know) is occurring.

As a consequence:

- engaging with intermediaries is subject to the execution of a written agreement containing language to ensure compliance with this Policy (and, in particular, to ensure that the commissions or fee arrangements will not be used as bribes).

- the need for Dassault Systèmes to call upon the services of the prospective intermediary has been approved by Dassault Systèmes employees with the power to decide within the framework of the applicable internal procedures.
- the designated intermediary must have been subjected to thorough background checks deemed to be satisfactory by all the relevant departments of Dassault Systèmes.

The following factors will be taken into consideration

In when deciding whether or not to call upon the services of an intermediary to assist Dassault Systèmes as part of a transaction regarding its products, solutions or services or its business in general:

- the legality of the business relationship between Dassault Systèmes and the intermediary under local law,
- the reputation and qualifications of the intermediary,
- The relationship, if any, between the owners and employees of the intermediary and an Official,
- The presence or absence of any secret partners, and
- the willingness of the intermediary to fully disclose its relationship with Dassault Systèmes.

The Dassault Systèmes Compliance Officer or the Legal Department may order the relationship with the intermediary to be terminated depending on the results of the investigation undertaken.

Everyone is expected to be aware of “Red Flags” which might indicate a questionable intermediary. Such “Red Flags” might include one or more of the following:

- The country where the intermediary is going to perform has a low score under the Transparency International Corruption Perceptions index.
- The intermediary refuses to undertake in the agreement that it will ensure compliance with this Policy.
- The intermediary has ties to Officials. If you become aware that an intermediary has such ties, you must contact the Legal Department or the Compliance Officer, and they will advise you on the continuation of the relationship.
- The intermediary is “recommended” by a potential Official customer.
- The intermediary has a questionable reputation.
- The intermediary apparently lacks qualifications or resources to perform the services offered.
- Unusually high commission or discount is required (it may cover bribe).
- Invoices are inflated.
- There are unusual payments or financial arrangements (e.g. cash payment, payment to a numbered bank account or payment to accounts in countries other than where the intermediary is located or where business is to be performed).

- Expenses in accounting records lack of transparency.

For further clarification about the procedure applicable to Dassault Systèmes, please read the [Dassault Systèmes Guidelines for Dealing with Intermediaries](#) available on 3DSone/oneConduct, or upon request from the Legal Department.

## **6. Donations, Charitable Contributions, and Corporate Sponsorship**

Donations, charitable contributions and corporate sponsorship activities must be subjected to special checks and precautions in order to ensure that they are not "disguised" forms of corruption.

The participation of Dassault Systèmes in Donations, charitable contributions, and corporate Sponsorship must follow local legislation and be fully transparent. These activities must also comply with the values and priorities of Dassault Systèmes and its communication strategy, and be subject to a written contract approved by the Legal Department.

Donations (including in the form of in kind contributions) and corporate sponsorship activities must not be given or undertaken in exchange for any benefits whatsoever.

## **7. Sanctions**

In case of a breach of one or more of the provisions of this Anti-Corruption Policy, the employee may be subject to disciplinary action in compliance with the provisions of local HR policy and/or the Employee Handbook regarding disciplinary action.