



## **1.0 PURPOSE**

This document outlines F5's Policy on Gifts, Travel and Entertainment (the 'Policy').

## **2.0 SCOPE**

This Policy applies to all employees, officers and directors of F5, Inc., its subsidiaries and affiliates worldwide ('F5'), as well as third parties acting on behalf of F5 such as agents, resellers, distributors, joint venture partners, suppliers, vendors and other representatives. Within this Policy, these individuals and entities are often referred to collectively as "Third Parties".

## **3.0 POLICY STATEMENT**

The giving and receiving of gifts, travel and entertainment can establish and reinforce goodwill. However, some gifts, travel and entertainment can secure or appear to secure improper influence and might even be seen as bribes attracting criminal liability the implications of which can be very serious for our business.

No gifts, travel or entertainment should be given or received on such a scale that they form an inducement to do business which otherwise may not be undertaken. Examples of inducements include cash payments, valuable gifts, payment of airfares, provision of holidays or any similar benefit which is out of proportion and which would not stand up to independent scrutiny.

The rationale behind the giving and receiving of gifts, travel and entertainment should be the expression of normal business courtesy and should generally be modest in character.

F5 expects the highest standards of integrity in conducting all matters affecting the company. The principles of this Policy should be applied at all times.

### **Government Agencies**

The offering of gifts, entertainment and favors including travel, accommodation or daily expenses (directly or through Third Parties or intermediaries) to government employees and consultants, including the attempt to do so, is a criminal offence in most countries and subject to severe penalties. This Policy prohibits the giving of all kinds of gifts, gratuities, courtesies, entertainment or favors to employees, officials and consultants and their immediate families of any government units (including State companies) world-wide without the prior written approval of the F5 Legal Department or the Office of Business Integrity. Please see the Enterprise Anti-Bribery and Corruption Policy in respect of facilitation or "grease payments".



### **Gifts, Travel and Entertainment – Some Guiding Principles**

F5 employees and its Third Parties must not accept, offer, procure, or encourage the giving or receipt of gifts, travel and entertainment unless it meets the following guidelines:

- it must be reasonable in cost, amount and frequency;
- it must be appropriate to the occasion and circumstance
- it must not be intended or appear to be intended to influence the business judgement of the recipient; and
- it must be capable of withstanding public scrutiny without damaging F5's reputation.

#### **Be mindful of the following:**

- Offering or accepting gifts, travel or entertainment when there is a key business decision pending;
- Extending gifts, travel or entertainment to those you do not have business relations with e.g. spouses, children, family friends of such individuals;
- Where there is a government official;
- When the gift, travel or entertainment is solicited;
- Frequent offers or receipt of gifts, travel and entertainment;
- Confirm that the offer or receipt of the gift, travel or entertainment is in line with the recipients own internal gifts, travel and entertainment policy or procedure.

#### **The following are never permissible:**

- Any gift, travel or entertainment that is in breach of relevant laws, regulations or customs;
- Any gift, travel or entertainment which might be linked (or appear to be linked) to a competitive procurement or bidding process;
- Any entertainment that is indecent, sexually orientated or which might tarnish F5's reputation;
- Any gift of cash or cash equivalent (including but not limited to cheques, traveler's cheques, money vouchers).
- Using your own money or resources for gifts, travel or entertainment for a customer, vendor or supplier

If there is any doubt as to whether any particular gift, travel or entertainment is permissible, please consult with the Business Integrity Office.



**GTE Approval Matrix**

<b>GTE Approval Matrix - Private/Non Government Officials</b>	
<b>Item Value (in \$US) Per Person</b>	<b>Approval Required From</b>
Less than \$50	<i>GTE form not required</i>
\$50-\$149	Manager
\$150 and above	Manager and Finance
Corporate hospitality events in excess of \$500	Manager and Finance
Meals – any value	Follow Enterprise Travel and Expense Procedures (Section 3.6)

<b>GTE Approval Matrix - Government Officials</b>	
<b>Item Value (in \$US) Per Person</b>	<b>Approval Required From</b>
Less than \$149 (this excludes gifts/items of a nominal/small value e.g. a cup of coffee)	Manager and Compliance
\$150 and above	<b>Not permitted</b>
Corporate hospitality events in excess of \$500	<b>Not permitted</b>
Meals – any value	<b>Not permitted</b>



### **Bribes and “Kick-backs”**

Prohibited payments include rebates, commissions and “kick-backs” to third parties or intermediaries where the recipient or payee is not clearly the provider of the service, as well as “consultancy fees” and other such payments where the value to the company making the payment cannot be legitimately demonstrated. Breach of this Policy may result in disciplinary action up to and including dismissal.

### **Site Visits and Hosted Buyer Programs**

While meeting planners are often required to visit sites for meetings such as ISC or Agility or in the case of Hosted Buyer Programs where a potential vendor may offer to cover all your expenses to meet with a group of vendors, the Office of Business Integrity should be notified prior to acceptance. Note that acceptance of any such offer must be limited strictly to the business opportunity e.g. offers to take a tour of the city, golf or other sporting event invitation, spa services, hotel or planner points and similar benefit should be declined. In addition, acceptance of any such opportunity should in no way create an expectation that a promise or an undertaking to influence a business opportunity has or will be made.

### **Raffles and Lucky Dips**

Participation in raffles, lucky dips and giveaways that are fair, indiscriminatory and are conducted in a public forum are typically permitted unless the prize is worth more than \$100 US Dollar equivalent. Prizes worth more than the dollar limit can only be accepted with written approval from Finance and direct line management.

### **Impermissible Gifts**

You must immediately return (and report) any gift of cash or cash equivalent.

Gifts received which are not permitted by this policy may be retained initially if it would be insulting to reject or return the gift, but this must be reported immediately to your line manager who will then decide what action should be taken.

## **4.0 DEFINITIONS**

“Gifts, travel and entertainment” include (but are not limited to) business courtesies, gratuities, discounts, hospitality, entertainment, recreation, tickets, transportation and other “things” of value.

“Corporate hospitality” is typically higher value entertainment provided for the purpose of promoting business especially at major sporting or other public events.

“Manager” is your supervisor or direct line manager.



## **5.0 RESPONSIBILITIES**

If you are aware of any violations of this Policy, it is your duty and responsibility to report that violation to management or through the Business Integrity Hotline, which is available by telephone at 1(855)409-0974 and online at [F5.ethicspoint.com](https://F5.ethicspoint.com). For a list of phone numbers outside the U.S., go to [F5.ethicspoint.com](https://F5.ethicspoint.com). F5's Whistle Blower Policy protects you from retaliation for any good faith report.

## **6.0 ENFORCEMENT**

Failure to follow this policy may result in disciplinary action up to and including separation from F5 or termination of the business relationship with F5.

## **7.0 EXCEPTIONS**

Exceptions to this policy are not permitted.

## **8.0 DOCUMENT MANAGEMENT**

This policy is to be reviewed every 3 years.

## **9.0 RELATED POLICIES & PROCESSES**

Code of Conduct

Enterprise Anti-Bribery and Corruption Policy

Gifts, Travel and Entertainment (GTE) Request Form