



rh Robert Half® protiviti®

U.S. Foreign Corrupt Practices Act Guidelines and Global Anti-Corruption Policy

Because your office is owned by a U.S. corporation, your activities are subject to the U.S. Foreign Corrupt Practices Act (“FCPA”), local anti-corruption law and possibly other international bribery laws and regulations, including the UK Bribery Act. You are required to comply with all applicable anti-corruption laws in conducting company business.

As a general matter, the FCPA prohibits U.S. companies and their subsidiaries and employees (including non-U.S. subsidiaries and employees) from offering, promising, authorizing or paying money or Anything of Value to any Prohibited Recipient, directly or indirectly through third parties, for the purpose of influencing any act or decision.

The term "Anything of Value" includes money, gifts, travel, entertainment, political, contributions, charitable donations or other favors of more than nominal value.

The term "Prohibited Recipient" includes:

- 1 - any employee or agent of a government or any of its agencies or departments,
- 2 - any employee or agent of a government owned or controlled business or organization,
- 3 - any political party,
- 4 - any employee or agent of a political party,
- 5 - any political candidate, or
- 6 - any employee or agent of a public international organization (such as the World Bank, European Union, International Monetary Fund or the United Nations).

These activities are prohibited whether done directly or indirectly through any persons or organizations. It is also illegal to change any documents in an effort to hide any of these activities.

Any violation may result in civil or criminal penalties against the Company and against you. Violation of the foregoing guidelines would also in most cases be a violation of local laws in your country.

Please note that the FCPA only prohibits "corrupt payments" intended to induce the recipient to misuse his position to direct business wrongfully to us. Accordingly, routine business lunches, literature handouts, gifts of pens with a company logo, and other similar practices where items of nominal value are given to the client that are not designed to induce the recipient to misuse his position are not prohibited and may continue.

If you have any questions regarding the foregoing, please contact the Robert Half Inc. Legal Department in Menlo Park at **650.234.6000**.

In addition, anytime you are requested to, or are involved in a situation that contemplates that you will pay or give money or Anything of Value to any Prohibited Recipient (as defined above), you should contact the Robert Half Ethics and Compliance Online Reporting Tool at roberthalfethicsline.com or from North America, call 1.800.251.4621.

From outside North America, call the toll free number for your country listed in Appendix A in the [Code of Business Conduct and Ethics](#).