

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

ALL FORMS OF BRIBERY ARE PROHIBITED

Network Solutions is committed to conducting business with integrity, following ethical business practices and adhering to applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA) and local anti-corruption laws in the locations where we do business.

Network Solutions strictly prohibits all forms of bribery. This means we never offer, promise or accept bribes or kickbacks and we do not participate in or facilitate corrupt activities of any kind. This prohibition includes “facilitation or expediting payments” made in furtherance of a non-discretionary routine government action.

WHAT IS A BRIBE?

A bribe is “anything of value” intended to secure an improper advantage or otherwise inappropriately influence the recipient. This means any payment, gift, promise, favor or other benefit valued by the person who someone is attempting to influence – whether or not it has commercial value. It does not matter whether a company is funding the item of value or whether it comes from its third-party business partner or from an employee’s own personal resources. Merely offering the item of value can violate the law, whether or not it is actually accepted, or a benefit is received.

Anti-corruption enforcement actions have involved bribes in many “shapes and forms”, such as:

- Monetary payments
- Lavish or excessive gifts, meals, entertainment or travel
- Charitable donations
- Hiring favors

ENGAGING AND MANAGING THIRD-PARTY BUSINESS PARTNERS

Network Solutions and its employees may be held liable for improper or corrupt payments made by third parties who act on Network Solutions behalf, even if Network Solutions or the employee does not direct or have knowledge of the corrupt payment. Network Solutions, when engaging a third-party business partner, will ensure that:

- The business partner is qualified
- The business partner understands Network Solutions ethics and compliance expectations
- The agreed-upon deliverables are received
- Invoices, proof of performance and other documentation are accurate and sufficiently detailed

Network Solutions conducts risk-based due diligence on business partners. These can be entities or individuals in the supply chain – such as consultants, marketing agencies and construction contractors, or in the distribution channel – such as distributors, system integrators and resellers.

ACCURATE BOOKS & RECORDS

Network Solutions must keep books and records that accurately detail and fairly reflect what is done with Network Solutions resources. This applies not only to Network Solutions reported financial statements and general ledger, but other ordinary business records, such as purchase orders, invoices, expense reports and receipts used to support requests for payment or reimbursements.

VIOLATIONS

Failure to abide by this policy may subject Network Solutions employees to disciplinary action up to and including termination of employment. For third-party business partners, violation may result in termination of the Network Solutions relationship. Violation of anti-corruption laws may also result in corporate or individual prosecution by government authorities.

REPORTING CONCERNS

Network Solutions provides numerous avenues to employees or third-party business partners to report concerns, the Code, including email, telephone, and letter to Network Solutions Legal Department.

Network Solutions does not tolerate retaliation against anyone who in good faith reports possible violations of the law, or other company guidelines, asks questions about ongoing or proposed conduct, or participates in an internal investigation.