

# GENERAL POLICY AGAINST BRIBERY AND CORRUPTION

CSL OWL SRI prohibits bribery and other corrupt conduct in any form. Bribery and kickbacks involving government officials, customers, suppliers, and other counterparties are prohibited by CSL OWL SRI policy.

No CSL OWL SRI officer, director, employee, agent, or other representative worldwide may, directly or indirectly, offer, promise, pay, give, or authorize any financial or other advantage, benefit of any kind, or anything else of value, to any other person or organization, with the intent to exert inappropriate influence over the recipient, induce the recipient to violate his or her official duties, secure an inappropriate advantage for CSL OWL SRI or its members, or inappropriately reward the recipient for past conduct. This prohibition applies with special force to benefits provided to Government Officials, CSL OWL SRI personnel and representatives who deal with Government Officials may not either directly or indirectly convey a benefit to a Government Official for a corrupt or inappropriate purpose.

CSL OWL SRI policy also prohibits its employees from either directly or indirectly requesting, demanding, agreeing to receive, or accepting a bribe, kickback, or any other inappropriate financial or other advantage.

Violation of this policy can lead to discipline and other employment sanctions up to and including termination.

No person subject to this policy will suffer adverse consequences for refusing to offer, promise, pay, give, authorize, or accept any such inappropriate benefit, advantage or reward, even if this results in the loss of opportunities for CSL OWL SRI.

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