



ANTI-BRIBERY POLICY

Scope

This policy applies to all of PTC and its subsidiaries worldwide, including employees, temporary workers, contractors, officers and directors, agents, business partners, and all persons who act on PTC's behalf.

Policy Statement

At PTC, we conduct our business with honesty and integrity. We comply with all anti-bribery and anti-corruption laws including United States Foreign Corrupt Practices Act ("FCPA") and UK Bribery Act 2010, everywhere we do business, and we expect the same of the third parties we work with.

PTC has zero tolerance for bribery or corruption, no matter if public or private, whether direct or indirect.

What are Bribery and Corruption?

BRIBERY is offering, giving, promising, soliciting, or accepting **anything of value** in exchange for receiving business, favorable treatment, or personal benefit. Bribery can be active (offering or promising) or passive (receiving). Bribery can happen directly or indirectly through a third party.

CORRUPTION is the abuse of entrusted power for personal gain. Bribery and fraud are considered corrupt practices.

What are Some Examples of Bribery?

- Offering a gift to a customer to obtain a business advantage such as a contract award, confidential information, or preferential treatment (e.g. preferred vendor status)
- Offering incentives to government officials to obtain certain licenses
- Demanding a “kickback” to award a contract (i.e. a portion of the contract fee is being given back to the contract award decision maker)
- Providing luxurious or overly frequent gifts and hospitality in return for competitive information about pending tender
- Promising to pay for personal medical, education, or living expenses
- Making sponsorships or donations to the “pet charity” of a public official
- Extending employment or an unpaid internship to the relative of a key decision-maker

What Types of Gifts or Entertainment are Appropriate?

Gifts given in appreciation of business relationships should always be in good taste and follow customary business standards in the community and should be kept at a reasonable level.

Everyone at PTC must follow our [Regional Gifts and Entertainment Policies](#) which contain price limitations and the special rules involving public officials.

What Can be Considered Anything of Value?

- Cash
- Wire transfer
- Gift cards or certificates
- Travel
- Upgrade to first-class airfare
- Side trips to holiday resorts
- Entertainment
- Charitable contributions
- Political contributions
- Sponsorships
- Employment/internships
- Other gifts of value (including electronic devices such as phones or earbuds)

What are the Rules for Government Officials?

It is illegal to bribe public officials of any country to obtain business or exert influence. This law applies to PTC activities worldwide.

Nothing of value should be provided to these persons unless you receive approval from the Legal Department or Compliance Team. In all cases, business entertainment or gifts should **never** be offered or accepted in exchange for business.



Accurate Books and Records

All transactions must be recorded accurately and completely in detailed manner so the purpose and amount of the transaction is clear. All PTC expenses must be supported by authentic receipts and must be accurately described to ensure that our books and records are correct. No manipulation or falsification of accounting entries concealing any form of bribery or corruption will be tolerated.

Even if a transaction is proper, a violation can occur if the details of that transaction are not properly recorded.



WHO IS A PUBLIC/ GOVERNMENT OFFICIAL?

Anyone who works for, or is an agent of, a government-owned or controlled entity.

They can include:

- Officers and employees of government departments, branches, or agencies (regional, national, or local)
- Employees of commercial businesses that are partially or fully owned by the government or military (e.g. IT Director of state-owned airline, Procurement Lead at a state-owned petroleum company)
- Employees of government-owned or controlled institutions such as schools, hospitals, utilities, or other public service organizations (e.g. police officers, military personnel, tax authorities, customs inspectors)
- Officers and employees of government-owned international agencies, like the United Nations, International Red Cross, World Bank, etc.
- Elected or appointed officials, candidates for political office, or political party officials
- Royal family members
- A close relative (e.g. parent, sibling, spouse, or child) of any of the above



REMEMBER

It is illegal to omit or misrepresent a third-party payment or gratuity in PTC's financial records. This is not just a finance department responsibility—we are all responsible for providing accurate business entries.

Signs of Improper Payments

You must watch for signs that an improper payment has occurred or may occur. Here are a few things to watch out for:

- Known relationships between a PTC representative (such as a reseller or other business partner) and government officials
- An unusual number of third parties involved in a single transaction
- Payments to offshore accounts, or through third parties
- Hiring a representative with no expertise or experience in the area in which it will represent PTC or provide services
- Hiring a relative of a customer or government official as an employee or intern at PTC
- Refusal to provide written assurances against improper payments
- Lack of transparency or undue secrecy
- Being told "not to ask"
- Inflated invoices or unusual rebates
- Unexplained or large bonuses, discounts, commissions, or expense reports
- Reimbursement requests for travel and living expenditures for third parties

- Requests for visa sponsorship for customer employees
- Unusual payment patterns or financial arrangements
- Off-the-books accounts or "slush funds"
- Facts which appear suspicious
- Anything that is "not quite right"

! THIRD PARTIES

Authorizing a third party to do something that you cannot do directly as it relates to offering, giving, promising, or soliciting anything of value is not permitted. PTC can be held responsible for the actions of its partners.

Customer Travel and Visas

Always ensure the customer travel expenses are appropriate, as paid or reimbursed customer travel expenses are often scrutinized as potential bribes.

All customer travel and visa sponsorships must be pre-approved in advance and in accordance with PTC's Policy for [Customer Travel Policy](#).



QUESTIONS OR CONCERNS? SPEAK UP!

We have many resources available to you ask a question, raise a concern, or make a report, including: your manager, **Compliance and Legal**, your **HR Representative**, or the PTC **Open Door Helpline** (you can ask questions and report concerns anonymously).

REMEMBER: PTC does not allow retaliation, which means no one can take a disciplinary or retaliatory action against you for seeking guidance or raising a good faith concern.



RELATED POLICIES & FORMS

- [Code of Business Conduct and Ethics](#)
- [Conflicts of Interest Policy](#)
- [Gifts & Entertainment Policy](#)
- [Open Door Helpline](#)
- [Customer Travel Policy](#)