

# CISION<sup>®</sup> Anti-corruption Policy

(Adopted on 1 June 2021)

## Corruption and bribes in all forms are strictly prohibited

Cision is committed to complying with anti-corruption laws and following the highest ethical standards. We won't tolerate any form of corruption. Corruption puts our integrity, reputation, and business at risk.

**If you work with Cision as a director, employee, representative, supplier, or other third-party, you must read and comply with this Policy.**



### Speak up!

- You must immediately report any suspected violations of this Policy and any request for or offer of a bribe to the Legal Department at [Legaldept@cision.com](mailto:Legaldept@cision.com).
- When your report is in good faith, you will not suffer any adverse consequence for speaking up.



### In doubt, ask

Always ask our Legal Department ([Legaldept@cision.com](mailto:Legaldept@cision.com)) first if you:

- are not sure whether a certain conduct is appropriate
- need further guidance or have questions on the law or Cision's expectations.

**Let's get started! →**

## Never give or accept bribes of any kind

Cision **strictly prohibits** you from offering, gifting, or authorizing the giving of a **payment or anything else of value**, directly or indirectly to anyone in order to obtain something in return, such as:

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- Obtaining an undeserved advantage for yourself or Cision
- Inducing or rewarding someone to act improperly (e.g. doing their job in breach of good faith, impartiality, or a duty of trust)
- Using a government official's position to influence any act or decision of the government for which they work

**It also goes the other way around:** you must never request, agree to receive, or accept **anything of value** for the purposes set out above.



### **“Anything of value”**

Includes money, gifts, favors, hospitality, business opportunities, entertainment, meals, and rewards and benefits of any kind.



### **Beware!**

**Appearances matter** – you must never engage in behavior which may be even *construed* as direct or indirect bribing, even if your intentions are honest.

**Bribes are an offence no matter who offers or receives them:** individuals, private companies, other commercial parties, domestic or foreign government officials, etc.

**Failure to prevent bribery is also an offense.**

**We also prohibit payments** to third-parties where you have **any concern** that the third-party will use any part of the payment for bribes.

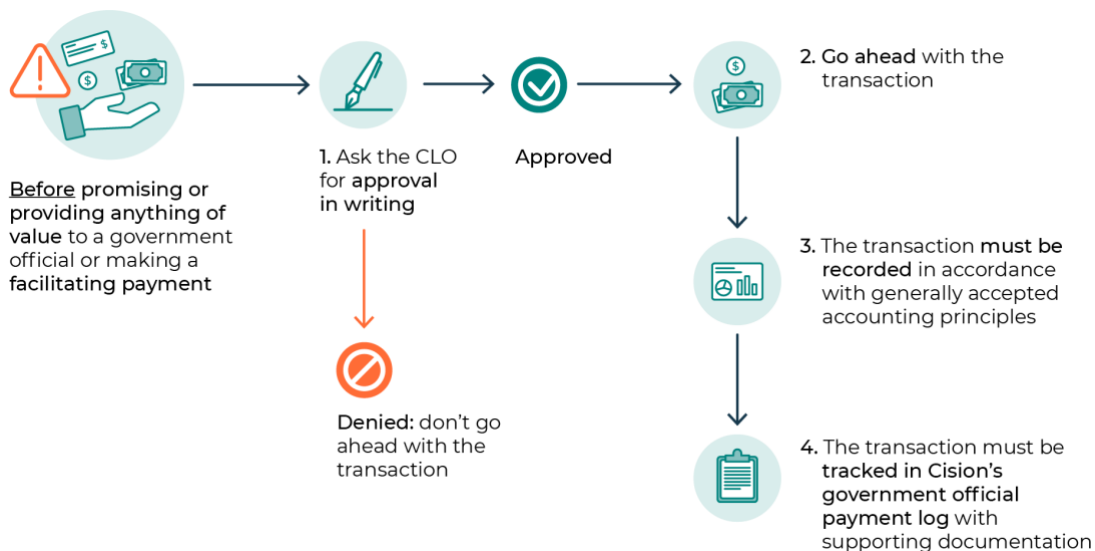
## Be cautious in your interactions with government officials

Dealing with government officials presents a **high-risk in terms of corruption**.

We therefore take a strictly conservative policy – unless you have the prior written approval of Cision's Chief Legal Officer:

- **Do not** provide **anything of value** to any government official
- **Do not** make **facilitating payments**

### What to do:



#### Note!

If there is an **imminent threat to an individual's health, safety, and welfare**, you may make a facilitating payment, provided you either

- obtain **pre-approval**, or
- report the payment **as soon as possible** after it has happened.



### "Facilitating payments"

Nominal payments made to a low-level government official to ensure or speed up the proper performance of a bureaucratic process. **For example:**

- Clearing customs
- Processing visas, permits, or licenses
- Providing police protection
- Providing mail, telephone, or utility services

### "Government officials"

We use a very broad definition. **For example:**

- Officers or employees of a government or a government-owned business
- Officers of public international organizations (such as the United Nations)
- Candidates for public office
- Individuals who perform government functions irrespective of their title
- Any person acting on behalf of any government official.

## Integrity starts from good business practices



### No cash payments

Never pay cash to third parties, unless they are:

- documented petty cash disbursements
- other valid and approved payments

Don't write company checks to "cash", "bearer", or anyone other than the party entitled to payment.



### Good record keeping

All accounting entries in Cision's books and records must be timely, accurate, reasonably detailed, and periodically reviewed to correct errors. These provisions are particularly important to employees who work in Cision's finance team.



### Complying with laws

You must comply with all anti-corruption laws that apply to you and Cision, such as:

- US Foreign Corrupt Practices Act of 1977
- UK Bribery Act
- Canada's Corruption of Foreign Public Officials Act
- The anti-corruption laws of the country where you operate

## If we suspect foul play

- **We may at times undertake a more detailed review of certain transactions** or investigate any circumstance indicating that somebody to whom this Policy applies may have acted or will likely act unlawfully.
- As part of these reviews, **you must cooperate with us** and any third parties (such as auditors). If you fail to cooperate with any review or investigation related to this policy we will consider this a breach of the employment relationship or vendor relationship and deal with that breach severely.
- We'll consider any failure to cooperate as a **violation** of this Policy.

## If you violate this Policy

- If you are an **employee**, we will take disciplinary action and we may suspend or terminate you; if you are a **representative**, we will terminate all commercial relationships with you.
- In addition to any punishment that we may make, you may also be subject to **severe criminal and civil penalties**, including fines and imprisonment.
- Cision itself may be subject to civil or criminal sanction as a result of your actions.