

# Anti-Corruption Policy

# Purpose

As outlined in our Worldwide Code of Business Conduct (the “Code”), Juniper is committed to conducting business with the highest level of integrity. This Policy sets a global minimum standard for preventing corruption and bribery. Many countries may have more restrictive rules, and in those instances, the local laws or regulations supersede this Policy.

# Scope

This Policy applies to all Juniper directors, employees, and third parties acting on behalf of Juniper. All employees are required to read, understand, and comply with this Policy as a condition of employment.

# Policy Statement

## 1.0 Rules and Requirements

Juniper does not tolerate any form of corruption, including bribes, in connection with our business dealings. Consistent with global anti-corruption laws, we do not promise, offer, give, accept, solicit, or authorize bribes directly or indirectly through third parties (e.g., suppliers, agents, consultants, and business partners).



A bribe is *anything* of value — no matter how small — intended to improperly influence a business decision or gain an unfair business advantage. Bribes may come in many forms, including cash, business courtesies (e.g., gifts, travel, meals, and entertainment), political or charitable donations, or extending favors such as employment, insider information, kickbacks, or loans.

This Policy prohibits bribes to *anyone*, whether the individual is a Public Official or a private party.

### What is a bribe?

## Who is a Public Official?

The definition of a Public Official is broad and covers a wide range of individuals, including:

- Officials and employees at all levels of government
- Military personnel
- Political candidates
- Employees of state-owned or controlled entities (e.g., internet service providers, public schools and universities, hospitals and healthcare organizations, and telephone companies).

Be advised: our interactions with Public Officials receive heightened scrutiny under the law.

**If you are unsure whether an entity or individual is a Public Official, please contact Juniper's Integrity & Compliance Group (ICG) at [integrity@juniper.net](mailto:integrity@juniper.net).**



### **Bribery Risk Posed by Third Parties**

*Juniper can be found responsible for bribes made by third parties in connection with Juniper's business. Third parties (e.g., suppliers, agents, consultants, and business partners) must understand and comply with this Policy and all applicable anti-corruption laws.*

*Juniper employees cannot authorize or condone third parties to commit acts that would circumvent the Code and/or this Policy. Willful blindness is not a defense. Failure by third parties to comply with anti-corruption laws or its contractual obligations with Juniper will result in corrective action, including termination of any business relationship with Juniper.*

# 1.1 Business Courtesies

At Juniper, offering excessive business courtesies (e.g., gifts, meals, travel, entertainment) to third parties and customers is not aligned with the Juniper Way. It may also be considered a bribe by enforcement authorities, especially when it comes to Public Officials. In contrast, business courtesies intended to build goodwill and relationships are generally permissible if they are reasonable, moderate, and not provided regularly.

All business courtesies must be provided in accordance with Juniper policy.

Courtesies must be:

- Permissible under local law & all applicable anti-corruption laws, as well as company policies of the individual or entity receiving the business courtesy
- Reasonable in value given the context and not appear extravagant
- Be offered and accepted in a transparent manner
- Purposeful in facilitating a genuine business meeting or demonstration of Juniper products or services
- Not intended to create any feeling of obligation or otherwise improperly influence the recipient
- Fully documented and accurately recorded in Juniper's books and records



Juniper provides internal guidance to employees regarding acceptable business courtesy amounts that can be given or received. Juniper's ICG must pre-approve any business courtesy that exceeds the internal guidance.

## 1.2 Facilitation Payments

Facilitation payments (or “grease payments”) are a type of bribe generally used to facilitate or expedite the performance of routine, non-discretionary government action. These payments are not permissible and are strictly prohibited by Juniper.

### **Exception – Health and Safety Payments**

Exceptions may be made in situations involving an imminent health or safety threat. All requests must be immediately reported to Juniper’s ICG at [integrity@juniper.net](mailto:integrity@juniper.net).



## 1.3 Charitable and Political Donations

Juniper encourages its employees to support charitable causes, but prohibits making charitable gifts or donations to obtain any business. Juniper also prohibits making charitable gifts or donations given with the intent of improperly receiving favorable treatment from any party. All donations are to be made transparently and never in a situation that gives rise to a feeling of obligation or otherwise improperly influence the recipient.



Generally, Juniper does not permit political contributions directly or indirectly. This includes donations to political candidates, political parties, or party officials. Such donations may be illegal and can result in criminal or civil liability for the person making the donation and Juniper.

## 1.4 Accurate Books and Records

Juniper is legally required to make and keep accurate books and records that truthfully reflect all the company transactions and maintain an adequate system of internal accounting controls, including the preservation of supporting documentation and approvals.

Undisclosed or “off-book funds” are any funds inappropriately established or retained in a non-Juniper account (e.g., with a business partner) where the use of the funds continues to be directed by Juniper employees without proper authorization or documentation. Such funds can be created in many ways, including non-standard discounting and misusing sales/marketing funds.



Without proper financial or accounting oversight, off-book funds create a significant risk to Juniper because the funds can be used for illegitimate purposes (e.g., corruption and bribery).

## 1.5 Juniper Employee Responsibilities

All employees must complete Juniper's annual Code training, which includes anti-corruption-related guidance. In addition, all new employees must read, understand, and attest to the Code as part of their onboarding experience. Just-in-time training is also delivered to specific, high-risk employee segments.

Failure by employees to comply with anti-corruption laws or this Policy may result in criminal or civil penalties (e.g., jail, fines) and/or disciplinary action, including termination of employment.

## 1.6 Retaliation is Not Tolerated

Juniper will not retaliate or tolerate retaliation against any individual for reporting a good-faith concern or participating in any related investigation.

## 2.0 Questions

If you have any questions or are unclear about any part of this Policy, contact Juniper's ICG at [integrity@juniper.net](mailto:integrity@juniper.net).

If you have reason to believe that a policy violation has occurred or will occur, it is your responsibility to report it immediately. You may report violations directly to the ICG or use the [Integrity Helpline](#) for anonymous reporting. Refer to the "Speak Up" section of our [Integrity and Compliance](#) webpage of Juniper's external website for additional contact information.

