

Effective: 11 March 2025, last updated 11 March 2025

#### **KEYSIGHT GLOBAL ANTI-CORRUPTION POLICY – SUMMARY**

## **Our Commitment to Integrity**

Keysight Technologies, Inc. is committed to conducting business with uncompromising integrity, and we require all employees, business partners, and third parties acting on our behalf to honor this same commitment. Keysight's Standards of Business Conduct (SBC) strictly prohibit bribery and corruption in any form. The company also maintains a written Global Anti-Corruption Policy and supporting procedures to ensure compliance with applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and the OECD Anti-Bribery Convention. This document provides a high-level summary of those requirements.

#### What is Prohibited?

- Bribery: Offering, giving, soliciting, or receiving anything of value to improperly influence a business decision.
- Kickbacks & Quid Pro Quos: Any exchange of favors or benefits in return for business advantages.
- **Improper Payments:** Facilitation payments and any other payments intended to improperly influence an official's actions.
- Improper Influence through Donations or Contributions: Charitable or political contributions intended to gain business advantage.

## What is "Anything of Value"?

- Cash or cash equivalents (e.g., gift cards)
- Gifts, meals, entertainment, or travel expenses
- Stock, employment offers, or other personal benefits
- Charitable or political donations made at the request of a business partner or government official

# Who is Responsible?

Ensuring compliance with this policy is the responsibility of all Keysight employees, business partners, and third parties acting on behalf of the company. Keysight managers have an additional duty to promote awareness, monitor compliance, and take action if violations occur.

### Other Information

- **Third-Party Due Diligence**: Keysight conducts due diligence on third party business partners to ensure compliance with anti-corruption laws. Contracts with third parties also include appropriate anti-corruption provisions.
- Record-Keeping & Transparency: Keysight requires accurate books and records that properly
  reflect transactions. Mischaracterizing expenses, maintaining "off-the-books" accounts, or
  circumventing financial controls is strictly prohibited.
- Duty to Report & Non-Retaliation: Reports of any known or suspected violations should made confidentially and anonymously to the Keysight Compliance Hotline (<a href="https://keysight.ethicspoint.com">https://keysight.ethicspoint.com</a>). Keysight prohibits retaliation against anyone who makes a good faith report about a known or suspected violation.
- **Consequences of Non-Compliance:** Violations of laws or Keysight's policies prohibiting bribery or corruption may result in disciplinary action, including termination of employment.