

Anti-Bribery Policy

Introduction

This Policy applies to you as an employee or member of the Board of Directors of Citrix or one of its subsidiaries, and we expect all third parties (including, but not limited to, consultants, advisors, contractors and business partners) with whom Citrix does business to comply with similar standards.

Integrity is a core value of Citrix, central to our culture and crucial to our long-term success. When conducting Citrix business, you are expected to act ethically and to comply with all anti-bribery laws, which can apply to activities anywhere in the world. If you engage in bribery, you expose Citrix and yourself to serious legal consequences, including imprisonment, heavy fines and damage to our reputation.

This Policy supplements our Code of Business Conduct and is intended to explain in more detail the standard of conduct expected of you under the U.S. Foreign Corrupt Practices Act (the “FCPA”), the UK Bribery Act and other anti-bribery laws. That standard may extend above and beyond what may be customary conduct in some countries.

Citrix, its employees, officers, directors, agents, business partners and other third parties will not engage in bribery, meaning that they will not offer, promise or give anything of value to anyone, directly or indirectly, with the intent to obtain or retain business or otherwise to gain an improper advantage for Citrix. Accurate and complete accounting records, including expense reports, must be kept of all transactions entered into in the course of Citrix’s business dealings.

1. You may not, for the purpose of influencing or promoting Citrix business:

- give, offer to give, promise to give, or authorize to give money or anything of value to any individual in connection with Citrix business (for example, as an inducement for a customer to place an order with Citrix or to obtain a governmental license or permit), or
- receive, or request the receipt of, money or anything of value from anyone, other than Citrix, in connection with Citrix business (for example, as a condition to Citrix placing an order with a vendor).

The prohibitions in this Policy apply even if:

- a third party (for example, a Citrix partner or a spouse) makes or receives the payment or thing of value,
- you have funded it personally and not claimed reimbursement from Citrix,

- the customer, vendor or partner is only a prospect, not a current one, or
- it is a normal or customary practice in your country.

2. Anything of Value

“Anything of value” does not just mean money or tangible goods. Depending on the circumstances, “anything of value” may include, favors, employment or consultancy opportunities, performing services that would otherwise have to be paid for or purchased, charitable donations, political contributions, or material non-public information about Citrix.

3. Gifts, Meals, and Entertainment

If you provide or receive anything of value in connection with Citrix business, you may violate anti-bribery laws, and your actions may be prohibited under this Policy. Under certain circumstances, the provision of modest gifts (such as promotional items), meals and entertainment are permitted. However, you should only provide or receive something of value if:

- there is no intent or expectation that Citrix buy or sell something in return,
- it is not primarily for your, or someone else’s, personal gain,
- it is reasonable, customary and appropriate for the occasion,
- it is provided infrequently,
- it is provided openly and transparently,
- it is given in connection with a legitimate business purpose and complies with Citrix policies and all local laws and regulations.

In addition, it is important to remember that all gifts need to comply with local law and Citrix policy. Citrix employees should also review and comply with the Global Travel and Expense policy.

4. Interactions with Government Officials

Keep in mind that laws and rules governing payments to government officials are complicated and what may be permissible with commercial customers may be illegal with government officials. The definition of Government Officials is expansive and includes officers and employees of local, state, regional, federal governments or any department, agency, ministry or instrumentality of a government, candidates for political office, a political party official or employee, royal family members, and anyone whom you believe may be employed by or acting on behalf of a government entity or state-owned or state-controlled enterprise (for example, a national oil company or a state-owned hospital). If you have any questions about whether someone is a Government Official, talk to your supervisor or the legal department.

5. Facilitation Payments Are Prohibited

Employees working or traveling in certain countries on Citrix business may sometimes be told by Government Officials or other persons that they must pay to speed up or secure certain public privileges, services or actions such as processing products through customs, obtaining licenses or permits, scheduling inspections, etc. These type of payments, often

known as facilitation payments, are not permitted. If you are asked to make a facilitation payment to obtain any routine government service such as these, please contact your supervisor or the legal department for guidance.

The FCPA imposes recordkeeping obligations on Citrix. As such, it is crucial that you report all business transactions and expenses honestly, accurately and in compliance with Citrix policies and procedures. Secret, unrecorded, or unreported transactions are expressly prohibited.

6. Third Party Activities

Citrix can be liable for prohibited payments or misconduct by third parties (for example, distributors, resellers, agents and contractors) and therefore takes reasonable steps to minimize the likelihood of such bribery in relation to Citrix business. Remember that bribes take many forms and can be “anything of value” not just money.

You should never encourage third parties to give something of value to an individual in connection with Citrix business, and you should be mindful of the conduct of third parties with which you interact on behalf of Citrix (e.g., channel partners or vendors). Should you become aware of the possibility of a third party offering a bribe in connection with Citrix business, you should immediately report the matter to the legal department.

7. Red Flags

From time to time you may encounter “red flags” or circumstances that might cause you concern especially if, for example, Citrix is conducting business in a country known for corruption. If you have a concern, you should promptly inform your manager or the legal department, or report the concern through Citrix reporting methods outlined below. The following is a non-exhaustive list of “red flags” that could suggest non-compliance with this Policy, or represent common areas of corruption-related risk.

- Are there extravagant gifts or hospitalities, especially involving government officials?
- Has a person or business person been involved in fraud or bribery before?
- Does a third party have a personal or business relationship with or was such party recommended by a government official?
- Is it a new company? Does the third party lack relevant qualifications or experience in the field? Is there transparency about ownership?
- Is the third party requesting unusual contract terms or payment arrangements such as payments in cash, non-customary credit terms or larger than customary discounts or margins?
- Are payments being directed through a third party not involved in the transaction?
- Are payments requested in advanced of the agreement being finalized?

It's Your Responsibility, But Please Ask for Help

You are expected to fully comply with this Policy. The company will not tolerate retaliation or retribution against anyone who make a good faith report of a potential violation of this or any other policy, even if it results in a loss of business to Citrix.

Failure to comply with this Policy will subject you to disciplinary action up to, and including, termination of your employment or relationship with Citrix. Exceptions to this Policy that comply with all applicable law and that are documented in writing may be granted by the Chief Compliance Officer or his/her designee. You should always consult with your legal department contact if you are in doubt about the requirements of this Policy or the law.

You are also expected to report any known or suspected violations of this Policy and to ask for help when you are not sure about something. For such purposes, you are encouraged to contact the Citrix Chief Compliance Officer, Angie Au-Yong, at +852- 21005084, or Angie.Au-Yong@citrix.com.

Alternatively, you can always use our confidential Citrix HelpLine by accessing <https://citrix.alertline.com> which allows you to leave a report anonymously where permitted by law.

Dated: June 4, 2021

Frequently Asked Questions

Question: Can I give a gift card to a partner as a token of appreciation for them helping to close a deal?

Answer: No. Gifts of cash or cash equivalents (such as gift cards) are prohibited.

Question: Can I pay for a customer's travel expenses that are directly related to the promotion or demonstration of Citrix products or services; or the execution or performance of a contract?

Answer: Yes, as long as these expenses are reasonable and permitted under the Global Travel and Expense policy.

Question: A customer asks me to obtain four tickets to a large sporting event and hints that this will close the sale more quickly. Can I buy the tickets?

Answer: This potential scenario raises a number of concerns. First, a gift should not be solicited. Second, four tickets to an event is considered lavish. Third, the facts do not suggest that a business conversation or product demonstration would be taking place.

Question: Can Citrix or I be prosecuted under the FCPA and other anti-bribery statutes, if a bribe is made by a third-party, such as a partner or consultant?

Answer: Yes, legal liability is not limited to those who actively participate in illegal conduct. A bribe made by a third-party is illegal under anti-bribery laws and Citrix could be held responsible for the actions of our partners or other third parties.

Question: How do I know if the entity I am interacting with is a government entity?

Answer: You can look that up in Salesforce. If you are uncertain, reach out to your local legal contact.

Question: Can I make a charitable contribution on behalf of Citrix?

Answer: No, all charitable gifts on behalf of Citrix must be made with the approval of the Corporate Citizenship team or as expressly permitted in the Global Travel and Expense policy.

Question: Can I invite any customer to a Citrix event like the Formula 1 racing event?

Answer: No, invitations to lavish events, should not be extended to government customers or to other customers where a deal is currently pending. If a commercial customer does not have a deal that is set to close in the next six months, then it is probably ok to invite them. Please feel free to reach out to the compliance team to discuss.