



Anticorruption Policy

January 1, 2023

Who this Policy Applies To

This policy applies to all Edgio officers, directors and employees worldwide, including Edgio subsidiaries and affiliates, and to all individuals and entities who are otherwise acting on our behalf. As a U.S company, Edgio is subject to the U.S. Foreign Corrupt Practices Act ("FCPA").

General

Edgio conducts business honestly and with integrity, and accordingly, it is Edgio's policy to comply with the FCPA, the U.K. Bribery Act of 2010 and all anticorruption laws wherever we operate. The fact that making bribes, kickbacks, gifts or other payments may be an accepted local practice in a country does not relieve Edgio, its officers, directors and employees and those acting on Edgio's behalf of the obligation to comply with the FCPA, the UK Bribery Act or other local laws. To ensure compliance, Edgio maintains accurate books and records and adequate accounting controls. Maintaining accurate books and records is also the responsibility of Edgio's officers, directors and employees, and all managers and supervisory personnel are expected to monitor and enforce continued compliance with these laws to ensure compliance with the highest moral, ethical, and professional standards of the company.

While anticorruption laws throughout the world are commonly invoked when dealing with payments of cash, these laws also strictly limit non-cash gifts, including meals, entertainment, transportation, and lodging. In summary, these laws and this policy prohibit:

Offering or providing anything of value (including, but not limited to, money, stock, services, products, travel expenses and lodging, employment of related persons, and entertainment) directly or indirectly to or for the benefit of a "foreign government official" and his or her family members in order to influence official acts, obtain, direct or retain business, secure any business advantage or favorable decision or treatment, or for any corrupt purpose.

There may be circumstances where it is not clear whether a "foreign government official" is involved. If any uncertainty exists, you should immediately consult with the Edgio Legal Department. Generally speaking a "foreign government official" includes not only officials and employees of a foreign government entity, but also (1) officials and employees of government owned or controlled business enterprises (such as state owned telecommunications providers), (2) officers and employees of public international organizations (such as the United Nations, the World Bank or the IMF), (3) political parties, party officials, candidates for political office, (4) charitable organizations controlled by a foreign government official, and (5) any person acting in an official capacity, or as a private consultant for any of the entities described above

What you must do

Violation of anticorruption laws may result in substantial penalties both for Edgio and individuals who have engaged in prohibited activities -- and individuals, e.g. employees, involved in violations may even be subject to imprisonment. Before offering or providing anything of value to a foreign government official in the course of Edgio business, you must obtain advanced written approval from the Legal Department.

Although this policy does not apply to offers or gifts that are lawful under the written laws and regulations (not just custom or practice) of a foreign country, to facilitations payments made by low level officials for ministerial or clerical duties, or to certain payments, such as legitimate travel and lodging expenses that are directly related to the promotion, demonstration, or explanation of products or services to the official or the performance of a contract with a foreign government, before any expenditure is made or anything of value is offered or made, you must obtain advanced, written approval from the Legal Department. Importantly, there is no “de minimis” exception in the FCPA, so even minor payments can potentially trigger liability.

Guidelines

Below are some common principles to guide Edgio officers, directors and employees in complying with anticorruption laws and this policy:

Do comply with all anticorruption laws where we do business and consult with the Legal Department if you have questions or concerns.

Do exercise due diligence to ensure that Edgio’s partners and other third parties do not have a reputation for engaging in corrupt activities. You should immediately report any concerns to the Legal Department.

Do submit accurate and complete expense and transaction information to ensure Edgio is keeping accurate books and records.

Do maintain adequate supporting documentation for any payments made for Edgio and its subsidiaries.

Do immediately report any suspicious or questionable activity, or if you have been asked to make an improper or questionable payment, to the Legal Department, to Compliance@edg.io, or to the Corporate Governance Hotline. Reports may be made anonymously, and shall be treated as confidential to the extent allowed by law. Edgio policy prohibits retaliation for good faith reports of suspected or actual violations of this Policy.

Don’t provide, directly or indirectly, cash or anything of value to a foreign government official to obtain an unfair business advantage or to obtain, direct or retain business.

Don’t authorize or provide travel benefits, gifts, or entertainment for the benefit of a foreign government official without advance written approval of the Legal Department.

Don’t make expediting or facilitation payments without advance written Legal Department approval.

Don’t use corporate funds for political contributions, regardless of their size, to or on behalf of any political party, candidate or cause. The term “contributions” includes the free use of company facilities, property or personnel, advertisements on behalf of candidates, purchase of tickets to political dinners, etc.

Don’t make any incomplete, false, or inaccurate entries in Edgio’s books and records.

Violations

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Related Policies

Edgio Code of Ethics and Business Conduct

Corporate Governance Hotline 1 (866) 290-5180

Additional Guidance

For additional guidance and questions related to this policy, please contact Edgio's Legal Department.