



Understanding Anixter's Business Partner Anti-Corruption Policy

- Anixter takes a ZERO tolerance approach to bribery and corruption
- This overview will give you a better understanding of Anixter’s Business Partner Anti-Corruption Policy (“Policy”)
- Anixter expects all of its Business Partners to comply with the principles outlined in the Policy

[Download the Policy here](#)

Please note that Anixter is providing this overview on its Business Partner Anti-Corruption Policy for general informational purposes only and makes no warranties or representations whatsoever as to its accuracy. Anixter strongly encourages that you seek appropriate legal advice regarding anti-bribery and corruption laws, and the compliance with such laws. Anixter expressly disclaims any liability whatsoever, including but not limited to direct, indirect, incidental, special or consequential damages in connection with or arising from the furnishing of the information provided herein.

SEVEN TOPICS COVERED IN THIS COURSE



1. WHY DOES ANIXTER HAVE THIS POLICY?
2. WHO DOES THE POLICY APPLY TO?
3. WHAT DOES THIS POLICY COVER?
4. WHAT IS A BRIBE?
5. DOES THE POLICY ALLOW MEALS, ENTERTAINMENT OR GIFTS TO/FROM PUBLIC OFFICIALS?
6. DOES THE POLICY ALLOW MEALS, ENTERTAINMENT OR GIFTS TO/FROM SOMEONE WHO IS NOT A PUBLIC OFFICIAL?
7. WHAT SHOULD I DO IF I DISCOVER OR SUSPECT BRIBERY?

1. WHY DOES ANIXTER HAVE THIS POLICY?



- To uphold Anixter’s culture of ethics and integrity, and commitment to conduct business in a fair, honest and ethical way
- To protect both You and Anixter from liability and the severe penalties for violating anti-bribery and corruption laws, including substantial fines, imprisonment and inability to conduct business with the government
- To comply with anti-bribery and corruption laws, including but not limited to:
 - The U.S. Foreign Corrupt Practices Act (“FCPA”)
 - The UK Bribery Act
 - The Brazil Clean Company Act
 - All other applicable anti-bribery and corruption laws where Anixter operates

2. WHO DOES THIS POLICY APPLY TO?



- This Policy applies to all Anixter Business Partners globally
- Business Partners are defined as anyone with whom Anixter does business including, but not limited to:

Suppliers	Contractors	Integrators	Distributors and Resellers
Channel partners	Consultants	Professional advisors	Joint venture partners
Custom brokers	Freight forwarders	Sales and Commission agents	Service Providers

3. WHAT DOES THIS POLICY COVER?



- The Policy prohibits doing any of the following on behalf of Anixter:
 - Giving/receiving bribes
 - Giving/receiving anything of value (e.g., meals, hospitality or other gifts) to/from any Public Officials
 - Making political donations
 - Making facilitation payments even if permitted by local law or if considered common practice in certain countries. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official, such as:
 - Getting goods through customs
 - Processing a visa
 - Connecting utilities

4. WHAT IS A BRIBE?



- A bribe is promising, offering, giving, authorizing, requesting, agreeing to receive or receiving anything of value, directly or indirectly, to or from anyone to improperly influence the behavior of such person for the purpose of assisting Anixter to obtain or retain business or secure an improper advantage, such as:

• Obtain a contract	• Reduce taxes
• Change laws	• Clear imports or exports
• Connect electricity/telephone	• Obtain permits to conduct business

- There is **no** minimum monetary amount to be considered a bribe
- A bribe can occur even if anything of value is **not** given.....the offering or promising of it is sufficient. The **intent** to bribe is what matters

4. WHAT IS A BRIBE? (CONTINUED)



- “Anything of value” includes, but is not limited to:

Money or cash equivalents (e.g., gift cards)	Gifts (e.g., birthday, condolence, get well)
Hospitality (e.g., food or beverage offered at a training session)	Meals and entertainment (e.g., golf outing, sporting events, etc.)
Travel expenses (e.g., airfare or lodging)	Training
Promotional items (e.g., calendars)	Business expenses (e.g., utility, lease, etc.)
Personal expenses (e.g., household, country club, etc.)	Services or personal favors
Loans or forgiveness of indebtedness	Stocks, bond, note or other investment interest in a company
Employment offers or promises of future employment	Political or charitable contributions

- As you can see, a bribe does not always involve the payment of money

5. DOES THE POLICY ALLOW MEALS, ENTERTAINMENT OR GIFTS TO/FROM PUBLIC OFFICIALS?

- **NO!** You may **NOT** promise, offer, give, authorize, request, agree to receive or receive anything of value to/from a Public Official on behalf of Anixter. “Public Official” is defined as:
 - Anyone working for the government, public authority or government agency at a national, state, local or any other level
 - Anyone working for a state-owned or state-controlled enterprise (applies to both whole and partial ownership or control)
 - Anyone working for a group with special status (e.g. Native American tribes in US)
 - Anyone working for an international public organization (e.g. UN/ EU)
 - Politicians, political candidates and parties
 - Members of royal or ruling families
- Anything of value given to a third-party (e.g., family member, friend, political party) designated by a Public Official is considered given to the Public Official
- If you are not certain whether a party is a Public Official, please contact your legal department for guidance

6. DOES THE POLICY ALLOW MEALS, ENTERTAINMENT OR GIFTS TO/FROM SOMEONE WHO IS NOT A PUBLIC OFFICIAL?

- You may give or receive anything of value to someone who is **NOT** a Public Official provided it:
 - COMPLIES with applicable local law, and the policies of the giver, receiver and Anixter,
 - Is accurately recorded in Anixter's books and records,
 - Is NOT intended to improperly influence the recipient, and will not create the appearance of impropriety,
 - Is NOT intended to reward the recipient for providing assistance in obtaining or retaining business or a business advantage,
 - Is NOT in the form of cash or cash equivalents,
 - Is NOT requested by the recipient or a third-party on behalf of the recipient

7. WHAT SHOULD YOU DO IF YOU DISCOVER OR SUSPECT BRIBERY?



- Do NOT ignore corrupt, unethical or questionable behavior, directly or indirectly, in the course of doing business for Anixter or in Anixter's behalf
- Immediately contact the Anixter Business Integrity Line (anixter.ethicspoint.com) report the behavior

SUMMARY



- Anixter takes a **ZERO** tolerance approach to bribery and corruption
- It is **NEVER** acceptable to pay or receive a bribe, directly or indirectly, in the course of doing business for Anixter or on Anixter's behalf
- Facilitation payments are strictly prohibited
- The giving/receiving of anything of value to/from Public Officials is strictly prohibited
- Anixter requires strict compliance with all applicable anti-bribery and corruption laws
- Contact the Anixter Business Integrity Line (anixter.ethicspoint.com) if you become aware of corrupt, unethical or questionable behavior
- Anixter expects all of its Business Partners to comply with the Policy, which can be downloaded at anixter.com/bppolicy

**ARE YOU READY TO TEST
YOUR UNDERSTANDING OF
THE POLICY?**

SCENARIO 1



- One of Anixter's shipments is being held by customs for improper paperwork. You are Anixter's customs broker and have been asked by the customs official to pay a very small fee to release the products. It is your understanding that this type of payment is allowed under local law and you know that these types of small payments to customs officials are very common.

QUESTION:

CAN YOU MAKE THE SMALL PAYMENT TO THE CUSTOMS OFFICIAL?

SCENARIO 1



ANSWER: NO

- This is a facilitation payment and is prohibited by Anixter's policy.
- Monetary value does not matter – there is no minimum!

SCENARIO 2



- You have been trying for months to help Anixter sign up a prospective new customer. During the course of your conversations with your contact at this customer, you learn that her daughter is applying to your university. As a distinguished alumnus of the school, you offer to write a letter of recommendation on behalf of her daughter, but the customer contact politely declines your offer.

QUESTION:

IS YOUR OFFER TO WRITE A LETTER OF RECOMMENDATION ALLOWED UNDER OUR POLICY?

SCENARIO 2



ANSWER: NO

- A bribe can take the form of a personal favor.
- In this scenario, writing the letter of recommendation could be viewed as an attempt to improperly influence Anixter's customer.
- The fact that your offer to provide a letter of recommendation was declined does not matter. A bribe can occur even if the personal favor is never provided or the payment is never made – just offering or promising it is sufficient to violate the anti-bribery laws and Anixter's policy.

SCENARIO 3



- You helped Anixter win a project in Latin America with a particular contractor. You are excited about the win and want to send a gift to the contractor today to celebrate. You decide to send a mini iPad to the contractor with a note that promises more “relationship perks” in the future. The contractor is not a Public Official under Anixter’s Policy.

QUESTION:

SHOULD YOU BE CONCERNED ABOUT GIVING THE IPAD?

SCENARIO 3



ANSWER: YES

- The timing and size of the gift, coupled with your comments, could be considered a bribe offered to reward the contractor for giving Anixter the project.

Remember, during the course of doing business for Anixter you need Anixter's approval prior to providing entertainment or gifts to someone who is a not a Public Official.

SCENARIO 4



- You are a consultant helping Anixter on a particular project involving a state-owned company in China. Anixter has already won the contract. You want to take a Vice President from the state-owned entity to dinner tomorrow night at a reasonably priced restaurant to discuss the project.

QUESTION:

WOULD THE DINNER VIOLATE ANIXTER'S POLICY?

ANSWER: YES

- The recipient is a Public Official.
- Anixter's Policy prohibits Business Partners from promising, offering, giving, authorizing, requesting, agreeing to receive or receiving any meals, gifts or other things of value to or from Public Officials.
- "Public Officials" includes anyone working for a state-owned entity.
- Anixter's Policy applies regardless of monetary value (i.e., it does not matter that the restaurant was reasonably priced).

SCENARIO 5



- You are a consultant hired by Anixter. You have been asked to recommend a technology vendor for a particular solution Anixter is seeking to implement internally. You have selected three possible vendors. During the selection process, you take each vendor to lunch to a reasonably priced restaurant to discuss their capabilities, proposed solution and prices. You only charge Anixter for one of the lunches because two of the vendors are state-owned entities so you decide not to charge Anixter for those lunches.

QUESTION:

WOULD THE DINNER VIOLATE ANIXTER'S POLICY?

SCENARIO 5



ANSWER: YES

- Whether you charge Anixter for the meal is immaterial. You are acting on Anixter's behalf. Anixter's Policy prohibits its Business Partners from engaging in meals or gift-giving with Public Officials on Anixter's behalf.



Concluding thoughts from
Bob Eck, President & CEO - Anixter

“I would rather lose money, a customer, a supplier, or an order than violate our ethics policy, our integrity, or the law.”

Please note that Anixter is providing this overview on its Business Partner Anti-Corruption Policy for general informational purposes only and makes no warranties or representations whatsoever as to its accuracy. Anixter strongly encourages that you seek appropriate legal advice regarding anti-bribery and corruption laws, and the compliance with such laws. Anixter expressly disclaims any liability whatsoever, including but not limited to direct, indirect, incidental, special or consequential damages in connection with or arising from the furnishing of the information provided herein.