



# Anti-Corruption Policy

---

February 2024

---

This document was approved by Radware’s Board of Directors and executive management and is publicly available on our website. All employees are informed about the contents of this document through our website.

# Anti-Corruption Policy

---

## 1. Introduction

Radware Ltd. (the “Parent”), its branches, and its subsidiaries (collectively, “Radware” or the “Company”) conducts business that may, from time to time, relate to activities that involve entities or individuals in foreign countries. Radware adopted this Anti-Corruption Policy (this “Policy”) in order to ensure compliance with the requirements and restrictions of the U.S. Foreign Corrupt Practices Act of 1977, as amended (the “FCPA”), Section 291A of the Israeli Penal Law, 1977, as amended (the “IPL”), the United Kingdom Bribery Act 2010, as amended (the “UK Bribery Act”), and other applicable anti-bribery laws worldwide (collectively, together with the regulations promulgated thereunder, the “Anti-Bribery Laws”).

This Policy provides guidelines and procedures for compliance with the Anti-Bribery Laws and is applicable to Radware, its officers, directors, employees, partners and agents of Radware acting on behalf of Radware.

As detailed in this Policy, the use of Radware funds or assets for any illegal, improper, or unethical purpose is prohibited. Improper gift-giving or offering anything of value to any individual to wrongfully influence an act or decision could jeopardize Radware’s operations and reputation and will not be tolerated by Radware.

The Company requires all Employees (i.e., directors and officers, full time, part-time and temporary employees) and the vast majority of Consultants (i.e., agents, representatives, consultants, advisors, and other similarly titled independent contractors) to sign and acknowledge this Policy as part of their employment and/or consulting agreements. This Policy can be found at the Company’s web-site at the following link: <https://www.radware.com/corporategovernance/governance>

This Policy must be read in conjunction with other Company policies, procedures and guidelines, including the Code of Conduct and Ethics . However, to the extent that this Policy is more restrictive, it supersedes the Company’s other applicable policies and procedures.

Radware’s Legal Department may develop geographic-specific or country-specific expenditure thresholds over which pre-approval procedures are required.

**Should you have any questions about whether a gift, payment, or other benefit is legally permissible, you must seek guidance from the Radware’s Legal Department before providing any such gift, payment, or other benefit. Simply put, when in doubt, ask before acting.** You may also address any questions about this Policy or the relevant Anti-Bribery Laws to the Chairperson of the Company’s Audit Committee of the Board of Directors, anonymously or voluntarily by sending a letter or by mail or email to:

Audit Committee - Chairperson  
Email: [Ethics\\_Committee@radware.com](mailto:Ethics_Committee@radware.com)  
Address: 22 Raoul Wallenberg Street, Tel Aviv 6971917 Israel

## 2. Guidelines and Procedures

### A. The Anti-Bribery Laws' Prohibitions and Requirements

#### *FCPA - Overview*

The FCPA makes it a criminal offense to pay, offer, or give anything of value to a "Foreign Official" (see below) for the purpose of corruptly obtaining or retaining business or directing business to another person. Specifically, the FCPA prohibits corrupt payments that are made or offered for the purpose of: (1) influencing any act or decision of the Foreign Official in his official capacity, (2) inducing the Foreign Official to do or omit any act in violation of his lawful duties, and (3) securing any improper advantage or inducing the Foreign Official to use his influence with a foreign government or instrumentality to affect or influence any of its acts or decisions (collectively, "Bribery" or "Corrupt Payments").

The term "Foreign Official" is defined in the FCPA and generally means any officer or employee of a foreign government, or any department, agency or instrumentality thereof, or of a public international organization or any person acting in an official capacity for or on behalf of any such entity or person. The term also includes officials of foreign government owned or controlled commercial enterprises, organizations, or entities. The definition of a "Foreign Official" in the FCPA is construed broadly and has been interpreted, for example, to include employees at foreign government controlled power companies, utilities, universities, and hospitals.

The FCPA applies to improper payments made directly by U.S. companies or companies traded in the US (such as Radware Ltd.) and their officials, directors, and employees. The FCPA also applies to foreign persons if they commit an act in furtherance of a bribe while in the United States, as well as to U.S. businesses and U.S. nationals making payments wholly outside the United States.

The FCPA also prohibits Corrupt Payments made indirectly through persons or entities (e.g., agents, foreign representatives, consultants, and business partners) who act for or on behalf of Radware where Radware knows, or has reason to know, that such Corrupt Payments will be made. The FCPA defines "knowledge" broadly to include not only actual knowledge that an improper payment was made but also conscious or reckless disregard of facts and circumstances that reasonably raise the likelihood of an FCPA violation. Under the FCPA, an individual is deemed to have knowledge of a particular circumstance if the individual is "aware of a high probability of the existence of such circumstance." To willfully turn a blind eye or to otherwise "bury one's head in the sand" to an FCPA violation is not a defense to potential FCPA liability.

#### *UK Bribery Act - Overview*

The UK Bribery Act also prohibits bribery of, and improper payments to, Foreign Public Officials (as defined therein) but extends these prohibitions by criminalizing commercial bribery, e.g., bribery of private individuals. Under the UK Bribery Act, it is illegal to offer an advantage to any person (including employees of private organizations) for the purpose of persuading or rewarding that person to improperly perform any function or activity related to a business or to that person's employment. Moreover, the UK Bribery Act penalizes recipients and requesters of bribes in addition to those who offer and provide bribes. The UK Bribery Act has an even lower threshold for liability for bribes made to Foreign Public Officials, making it illegal to offer, promise, or give any direct or indirect financial advantage to a Foreign Official intended to influence the Foreign Public Official in his or her official capacity, whether or not it is intended to induce the Foreign Public Official to act "improperly."

### *Other Anti-Bribery Law – Overview*

As an Israeli company, Radware is subject to Section 291A of the IPL, which prohibits bribery of Foreign Public Officials (as defined therein) in order to, among other things, promote a business action or obtain a business advantage and, as a company that conducts operations globally, Radware may be subject to additional Anti-Bribery Laws.

### ***Anti-Bribery Law – Key Principle***

**In light of the foregoing, Radware, its officers, directors, employees, partners and agents of Radware acting on behalf of Radware, shall not offer, pay or give, promise to pay or give, or authorize the payment or giving of any money or anything of value, directly or indirectly:**

- To any person, including “Foreign Officials” (as defined in the FCPA) and Foreign Public Officials (as such terms are defined in the UK Bribery Act and Section 291A of the IPL);
- For the purpose of influencing the recipient to act or refrain from acting; and
- In order to assist Radware in obtaining or retaining business or in directing business to any person or to secure an improper advantage.

In addition, Radware and its officers, directors, employees, partners, third-parties, and agents shall not make any such offering or payment to any person knowing or having reason to believe that all or part of it could be used for a purpose described above.

Radware is also committed to maintaining accurate books and records that, in reasonable detail, accurately and fairly reflect Radware’s business transactions. Consistent with this commitment, Radware, its officers, directors, and employees shall not mischaracterize or otherwise conceal in Radware’s books and records any payments that they know or have reason to know are in violation of the FCPA.

Radware’s Internal Audit function may periodically review Radware’s contracts, transactions, and payments to ensure that all payments to government agencies or to Foreign Officials are accurate and have been properly authorized, reported, and recorded.

### **B. Penalties Under the Anti-Bribery Laws**

The Anti-Bribery Laws are rigorously enforced and the penalties can be severe. Penalties may be applied not only to Radware, but also to its directors, officers, employees, partners, third-parties, and agents in their individual capacities. The corporate criminal penalty for violating the FCPA is \$2,000,000 for each violation of the anti-bribery provision. Individuals may also be fined under the FCPA for up to \$100,000 and imprisoned for up to five years for each violation of the anti-bribery provision. The penalties for committing a crime under the UK Bribery Act include imprisonment for up to ten years and unlimited fines. Individual fines will not be reimbursed by Radware. Other consequences of violating the Anti-Bribery Laws can include severe reputational damage to Radware, imposition of compliance monitors, loss of export privileges, and debarment from government contracting.

### **C. Gifts**

The Anti-Bribery Laws do not prohibit gift-giving; they prohibit the payment of bribes disguised as gifts.

Under current enforcement policy, for example, the giving of nominal items such as cups of coffee, taxi fare, or company promotional items would not be sufficient evidence of the corrupt intent necessary to violate the FCPA or the UK Bribery Act. For example, under the “Resource Guide to the U.S. Foreign Corrupt Practices Act” (the “FCPA Guide”)<sup>1</sup> released jointly by the U.S. department of Justice (DOJ) and the U.S. Securities and Exchange Commission (SEC) in July 2020, such items are cited as being generally permissible under the FCPA. According to the FCPA Guide, other items may also be found to be permissible if: (1) the gift is given openly and transparently, (2) the gift is properly recorded in Radware’s books and records, (3) the gift is permitted under local law, customary where given, and reasonable for the occasion. The UK’s Ministry of Justice has also indicated that it is likely permissible to provide gifts to clients as a reflection of good relations if such gifts are reasonable and proportionate to company business. Before making any gifts of greater than nominal value, however, Radware personnel must consult with Radware’s Legal Department.

## **D. Payments Permitted Under the Anti-Bribery Laws**

### **1. “Reasonable and Bona Fide” Expenditures**

One of the most frequently encountered and complex areas under the Anti-Bribery Laws are payments for travel and entertainment for Foreign Officials. The FCPA permits payments or gifts that are “reasonable and bona fide” expenditures (such as travel and lodging expenses) incurred by or on behalf of a Foreign Official that is directly related to the promotion, demonstration, or explanation of a product or service or for the execution or performance of a contract with the foreign government. Although the UK Bribery Act does not explicitly permit such payments, the UK’s Ministry of Justice issued a Guidance (the “UK Guidance Manual”)<sup>2</sup>, which makes clear that it is not the intention of the UK Bribery Act to criminalize bona fide hospitality and promotion or other business expenditure that seeks to improve the image of a company, to better present products and services, or to establish cordial relations. Thus, under the Anti-Bribery Laws, it is likely permissible to pay for a Foreign Official’s airline ticket and lodging to a demonstration site, but it would likely not be permissible to pay for the official’s spouse or pay to send the official on a ski trip.

The FCPA Guide distinguishes between a legitimate trip to inspect facilities, for which business-class travel and meals are provided, and an improper trip, in which senior officials travel first-class with their spouses on an all-expenses-paid, week-long trip to Atlantic City where Radware has no facilities. While determinations in this area are fact-specific, the FCPA Guide suggests, as guideposts, that:

- Radware should not select the officials who will participate in the proposed trip or program or should select them based on pre-determined, merit-based criteria.
- Radware should pay all costs directly to travel and lodging vendors and/or should pay

---

<sup>1</sup> This Policy provides only a summary of certain provisions of the FCPA Guide and is qualified in its entirety to the full text thereof. You can access a copy of the FCPA Guide here: [www.justice.gov/criminal-fraud/file/1292051/download](http://www.justice.gov/criminal-fraud/file/1292051/download)

<sup>2</sup> This Policy provides only a summary of certain provisions of the UK Guidance Manual and is qualified in its entirety to the full text thereof. You can access a copy of the UK Guidance Manual here: [www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf](http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf)

reimbursements only upon presentation of a receipt.

- Radware should not advance funds or pay for reimbursements in cash.
- Radware should ensure that any stipends are reasonable approximations of costs likely to be incurred and/or that expenses are limited to those that are necessary and reasonable.
- Radware should ensure that the expenditures are transparent, both within Radware and to the foreign government.
- Radware should not condition payment of expenses on any action by the Foreign Official.
- Radware should obtain written confirmation that payment of the expenses is not contrary to local law.
- Radware should not provide additional compensation, stipends, or spending money beyond what is necessary to pay for actual expenses incurred.
- Radware must accurately record the costs and expenses in its books and records.

The UK Guidance Manual also notes that the determination of whether a business expenditure is bona fide will depend on the totality of the circumstances, which will include matters such as the type and level of expenditure, the manner and form in which the expenditure is provided, and the level of influence that the Foreign Official has over awarding business to or for the benefit of Radware.

Given the complexities associated with determining whether a payment for travel and entertainment would fit within the appropriate parameters, Radware personnel must first consult with, and obtain written approval from, the Radware Legal Department prior to making such expenditures for Foreign Officials, as part of the Company's mitigation of potential risks.

## **2. *Lawful Payments Under Written Laws of Foreign Country***

A payment to a Foreign Official that would otherwise be prohibited by the Anti-Bribery Laws may be legal if the payment is lawful under the written laws and regulations of the Foreign Official's country. The written laws of countries, however, rarely, if ever, expressly permit corrupt payments that would be prohibited under the Anti-Bribery Laws. The absence of a law prohibiting such conduct, or evidence that "it is local custom" or that "everyone does it," does not satisfy this defense.

Given the difficulties associated with determining whether a payment would fit within this defense and the often uncertain posture of such payments under local law, Radware personnel must not rely upon this exception without first consulting with, and obtaining written approval from, the Radware Legal Department.

## **3. *Extortion or Duress Defense***

The Anti-Bribery Laws affirm that liability does not arise in cases of true extortionate demands under

imminent threat of physical harm because payments made in these circumstances cannot be said to have been made with corrupt intent or for the purpose of obtaining or retaining business. However, mere economic coercion or threats to a company's business do not qualify for the extortion or duress defense. Radware personnel should report any such economic threats immediately to the Radware Legal Department, at which point the legal department shall refer any relevant threats to the Audit Committee Chairperson, as noted above.

#### **4. Charitable Contributions**

Legitimate charitable giving does not violate the Anti-Bribery Laws. Compliance with these laws, however, requires that charitable contributions not be used as a vehicle to conceal corrupt payments. The FCPA Guide suggests that U.S. authorities expect companies to subject such expenditures to due diligence and controls to determine that they are legitimate and not a ruse for bribery. The FCPA Guide suggests five basic questions to consider when making charitable contributions in a foreign country:

- What is the purpose of the payment?
- Is the payment consistent with Radware's internal guidelines on charitable giving?
- Is the payment at the request of a Foreign Official?
- Is a Foreign Official associated with the charity and, if so, can the Foreign Official make decisions regarding your business in that country?
- Is the payment conditioned upon receiving business or other benefits?

Radware personnel should direct any questions that they have regarding the propriety of charitable contributions to the Radware Legal Department, at this point the Legal Department shall consider any potential red flags or issues.

#### **E. Compliance with Local Laws**

Most countries have laws prohibiting bribery of government officials. Radware personnel may not conduct any activity in violation of the laws or customs of any country in which such personnel operate. Questions regarding the laws of a specific country should be addressed to the Radware Legal Department.

#### **F. Prospective Business Partners and Third-party Relationships**

To ensure compliance with the Anti-Bribery Laws, Radware must exercise caution in dealing with prospective business partners and third-party relationships (including, but not limited to, agents, distributors, contractors, consultants, and joint-venture partners). It is important to remember that Radware may be liable for any Corrupt Payments made, or other illegal or improper acts performed, by third-parties in connection with Radware's business. In addition, a third-party may itself be liable for aiding and abetting or conspiring to violate the Anti-Bribery Laws; in these cases, the U.S. regulators may have jurisdiction over all members of a conspiracy where at least one is a domestic concern or commits an overt act in the United States.

The FCPA Guide articulates three guiding principles for conducting due diligence on third-parties:

- Due diligence should explore the third-party's qualifications and associations.
- Radware must understand the business rationale for engaging the third-party, including a review of the governing contract to ensure that the payment terms are appropriate.
- Radware should continuously monitor the relationship, including updating due diligence, exercising contractual audit rights, conducting periodic training, and requiring annual compliance certifications from the third-party.

The UK Guidance Manual emphasizes similar principles for conducting due diligence and adds that companies engage in a risk-based approach and dedicate more diligence efforts to those third-parties that pose greater bribery risks. In higher risk situations, the UK Guidance Manual suggests that due diligence may include conducting direct interrogative inquiries, indirect investigations, or general research on the proposed third-parties.

Prior to entering into contractual agreements with prospective foreign business partners, foreign third-parties, and other third-parties who conduct business with Foreign Officials, it is the policy of Radware to conduct a due diligence review of such third-parties. Attached as Exhibit A is a sample Compliance Questionnaire and related certification that Radware strives to have completed by relevant third-parties who work or will work for or act on behalf of Radware.

## **G. Anti-Bribery Red Flags**

Radware personnel should be on the lookout for "red flags" that might indicate a potential issue relating to the Anti-Bribery Laws. These "red flags" are critical since the Anti-Corruption Laws impose liability not only on the basis of actual knowledge of a potential bribe, but also on the basis that a representative of a company "should have known" about a potential bribe.

The following is a non-exhaustive list of common "red flags" that should cause Radware personnel to consider whether the Anti-Bribery Laws might be implicated:

- Excessive commissions to third-party agents or consultants;
- Unreasonably large discounts to third-party distributors;
- Third-party consulting agreements that include vaguely described services;
- The third-party consultant is in a different line of business than that for which it has been engaged;
- The transaction or business involves a "high-risk" country or region (Transparency International, a non-profit, non-governmental organization, maintains an annual Corruption Perception Index of countries. This list can be found at [www.transparency.org](http://www.transparency.org));
- A party to the transaction lacks experience with product, field or industry; or lacks qualified staff or adequate facilities;
- A party to the transaction has a reputation for impropriety, unethical, or illegal conduct, or has

been the subject of allegations or investigations related to integrity;

- A party seeks to perform services without a written agreement;
- The transaction involves the use of shell companies or transactions with “secrecy” jurisdictions;
- A party to the transaction has close social or business relationships with government officials, or is a close relative of a government official;
- A government official is a director, officer, senior employee of, or has an ownership interest in, the contracting party;
- A government official or government customer has recommended or insisted that the company use a particular intermediary, agent, representative, or consultant;
- Any part of the arrangement violates local law or policy;
- A party makes misrepresentations or inconsistencies in the application or the due diligence process;
- A party refuses to provide information or make related certifications on compliance with the Anti-Corruption Laws;
- A party refuses to provide information or make related certifications on compliance with the Anti-Corruption Laws;
- A party or agent requests payment up front, before the completion of the project;
- A party to the transaction requests an increase in compensation during the life of the project;
- A party makes requests for payments in third countries or to third-parties;
- A party makes requests for payments in cash or bearer instruments.

As the foregoing examples make clear, intermediaries or consultants present “red flags” by taking certain unreasonable positions. If a potential consultant and/or third party offers any of the following comments, Radware should consider such comments to be a “red flag”:

- “Please pay me in cash.”
- “Pay me through my Swiss [or offshore] bank account.”
- “My close relative is a government official, and you don’t have a chance unless you deal with me.”
- “I have no facilities or staff, but I’ll get the job done.”
- “I have never worked in your industry before, but I know the right people.”
- “While my commission rate is twice the market rate, I’m well worth it.”

The U.S. Department of Justice has issued approximately a dozen opinions that deal directly or indirectly with investments. These opinions provide some guidance to companies about making investments with partners abroad. As more foreign government activities are “privatized” and companies become involved as investors or participants in those privatizations, companies are well-advised to look at potential “red flags” in the investment setting. Potential “red flags” in this context include the following:

- a proposed foreign partner is a company that is owned by a government official or a relative of that official;
- the foreign partner cannot assign many assets to the joint venture or partnership other than their influence with the government;
- the foreign partner refuses to agree to reasonable financial controls;
- the value attributable to the assets being contributed by the foreign partner to the joint venture is excessive; or
- there are rumors that the foreign partner has, in turn, another partner who is a government official.

### 3. Reporting and Commitment to Non-Retaliation

Any suspected violation of the Anti-Bribery Laws should immediately be brought to the attention of the Legal Department. Such reporting may be done without fear of retribution. Radware does not permit retaliation in any form against an individual who, in good faith, reports an actual or potential violation of the Anti-Bribery Laws. This is true even if such report is ultimately determined to be mistaken. Any form of retaliation against a person who makes such a report or who assists in the investigation of a reported violation is itself a serious violation of Radware’s corporate policies, such as the Company’s Code of Conduct and Ethics Acts of retaliation should be reported immediately and may result in disciplinary action up to and including termination of employment with Radware. Similarly, discouraging other employees from making a good faith report is prohibited and could result in disciplinary action.

Reports can be made by any means, including orally or in writing, directly to the Chairperson of the Company’s Audit Committee of the Board of Directors, on either an anonymous or non-anonymous basis by sending a letter by mail or email to:

Audit Committee Chairperson  
Email: [Ethics\\_Committee@radware.com](mailto:Ethics_Committee@radware.com)  
Address: 22 Raoul Wallenberg Street, Tel Aviv 6971917 Israel

Investigations of any reported violations will be conducted consistent with the terms of Radware’s Code of Conduct and Ethics.

### 4. Discipline

Any violation of this Policy may result in disciplinary action. While the appropriate disciplinary action is dependent upon the facts and circumstances of each case, and subject to any limitations under applicable employment laws, possible disciplinary actions may include:

- Verbal warning;
- Written warning;
- Restriction of employee activities or access to company resources;
- Suspension with pay;
- Suspension without pay; and
- Termination of employment.

With the exception of verbal warnings, all other disciplinary actions will be confirmed in writing and retained in the employee's personnel file. Employees will be given the opportunity to provide written comments in response to any disciplinary actions, and these comments will likewise be retained in the employee's personnel file.

## 5. Training and Audits

It is the policy of Radware to conduct periodic training for all of its employees in the area of Ethics, Anti-Bribery and Anti-Corruption compliance. Likewise, audits for such compliance matters will be conducted from time to time by Radware's internal audit function.

## 6. Completion of Compliance Questionnaire

All employees of Radware must fill out, sign and return the Anti-Corruption Policy Compliance Questionnaire attached hereto as Exhibit B. The Anti-Corruption Policy Compliance Questionnaire should be completed by the above corporate officers and delivered to the Radware Legal Department by the end of each fiscal year.

**This Policy may be amended from time to time with or without notice by the Company.**

# EXHIBIT A

This certification must be included in any agreements Radware makes with business partners (such as joint venture partners), as well as with companies or other third parties who act on behalf of Radware, or who conduct business with a foreign official. This certification must be signed by an authorized representative of the third party:

## Certification

This Agreement is contingent upon compliance with any applicable U.S. laws, particularly the Foreign Corrupt Practices Act ("FCPA"), as well as the laws of [Insert country(ies) in which services are to be performed by foreign business partner/third party on behalf of Radware]. On behalf of [Insert name of foreign business partner/third party], the undersigned hereby represents and warrants that [Insert name of foreign business partner/third party] is familiar with the requirements of the FCPA and will conduct all actions on behalf of Radware in accordance with the FCPA and applicable foreign law. The undersigned further represents and warrants that no money paid to [Insert name of foreign business partner/third party] as compensation or otherwise has been or will be used to pay any bribe or kickback in violation of U.S. or foreign law. In no event shall any payment be made by [Insert name of foreign business partner/third party] or its agents or employees to any undisclosed third party. [Insert name of foreign business partner/third party] agrees to provide prompt certification of its continuing compliance with applicable laws whenever requested by Radware.

[Insert name of foreign business partner/third party] will maintain books and records in accordance with Generally Accepted Accounting Principles ("GAAP") and will maintain written records of all expenditures made by it or on its behalf that clearly and accurately identify the persons or entities that receive payments. A copy of this accounting must be provided to Radware upon request. [Insert name of foreign business partner/third party] expressly agrees that Radware may upon reasonable notice inspect, copy and audit any accounts, books or records maintained by it in connection with its business with Radware or any aspect thereof.

All agents or employees of [Insert name of foreign business partner/third party] who will be involved in representing Radware must be identified in writing to Radware and approved before they perform any actions on behalf of Radware. [Insert name of foreign business partner/third party] shall employ no marketing representative or consultant without the written, advance approval of Radware.

It is understood and agreed that [Insert name of foreign business partner/third party] is an independent contractor without authority to bind Radware in any way. This Agreement can be terminated immediately either upon violation of its terms or in the event that the Agreement is found to be impermissible under U.S. or foreign law.

The undersigned hereby certifies that he/she has authority to enter into and bind [Insert name of foreign business partner/third party] to all the terms and condition of this Agreement, including the foregoing certification.

---

[Insert name of foreign business partner/third party]

By: \_\_\_\_\_

(Signature of foreign business partner/third party representative)

Printed name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

# Exhibit B

## ANTI-CORRUPTION POLICY COMPLIANCE QUESTIONNAIRE

**For Compliance period [DATE] through [DATE]**

The Anti-Corruption Policy (“Policy”), a copy of which is attached, covers several important areas of business conduct, including compliance with the U.S. Foreign Corrupt Practices Act (“FCPA”). For the purpose of obtaining legal advice and to ensure that Radware and its subsidiaries (“Radware”) comply with this Policy, you are requested to answer the following questions relating to the activities of your Business Unit, Group Function or subsidiary during the past calendar year. For the purposes of this questionnaire, Business Unit, Group Function or subsidiary includes the respective employees, representatives, distributors, and agents of each. Please answer questions 1 to 12 by placing an ‘X’ in the space adjacent to the correct answer. Please answer to the best of your knowledge,<sup>1</sup> information and belief.

QUESTIONS	YES	NO
1. Have you read and do you understand the Anti-Corruption Policy?		
2. Are you aware of ways to report potential violations of the Anti-Corruption Policy or the Company’s Code of Conduct and Ethics Conduct (“Code”)?		
3. Are you aware that it is illegal to give gifts, payments, or entertainment at Radware’s expense to foreign government officials or entities (e.g., public servants, public bank employees, political parties, party officials, political candidates and international organization officials) to influence an official act or decision by these officials or entities?		
4. Are you aware that a “foreign official” can include an official of a foreign government-owned commercial enterprise?		
<b>If you answer “YES” to any of the following questions 5-12, please provide further detail at the end of the questionnaire.</b>		
5. Are you aware of any such illegal exchanges as described in Question 3 being made by Radware?		
6. Are you aware of any payments being made directly or indirectly to or for the benefit of any foreign government official, foreign candidate for political office, foreign political party or international organization for the purpose of obtaining or retaining business?		
7. Are you aware of any payments being made directly or indirectly to a third-party with knowledge that it would be offered to a foreign official or employee for the purpose of obtaining or retaining business?		
8. Are you aware of any payments being made directly or indirectly to or for the benefit of any foreign employees of government-controlled businesses, corporations, companies or societies, including hospitals or health facilities, for the purpose of obtaining or retaining business?		

<sup>1</sup> “Knowledge” for purposes of this questionnaire and under the FCPA means not only actual knowledge, but also a conscious disregard of facts and circumstances that reasonably raise a question of an FCPA violation. Under the FCPA, an individual is deemed to have knowledge of a particular circumstance if the individual is “aware of a high probability of the existence of such circumstance.”

9. Has your Business Unit, Group Function or subsidiary recorded any entries in its books, records or accounts that might be interpreted as misstating or concealing the nature or purpose of any payment or expenditure?		
10. Has your Business Unit, Group Function or subsidiary maintained any cash funds, bank deposits or other assets without recording them on financial and accounting books and records?		
11. While employed at Radware, have you ever participated in, assisted others in, or had knowledge of any conduct by Radware that, in your judgment, either does not comply with the Policy or Code or has the appearance of not complying with the Policy or Code?		
12. Are you aware of any joint ventures that Radware is a part of in which business partners may have personal or professional ties to a foreign government?		
<b>Complete Attachment A if you have answered "YES" to questions 5-12.</b>		

**Completion and Delivery Instructions**

Please sign and date as instructed below. Once completed, deliver this questionnaire to Radware [INSERT APPROPRIATE RECIPIENT by [DATE].

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name (please print)

\_\_\_\_\_  
Location

\_\_\_\_\_  
Business Unit/Group Function

\_\_\_\_\_  
Position

## Attachment A

If you have answered “YES” to any of the questions numbered 5 through 12 above, please provide the details in the space provided below. Remember to include the question number to which you are providing the further detail.