

# Global Anti-Corruption Policy

## PURPOSE

Teradata has zero tolerance for bribery, corruption, and money laundering in all its forms, anywhere in the world. This policy applies to everything Teradata does — every transaction, every relationship, every market.

The bottom line: we do not pay, offer, or accept bribes. We do not make facilitating payments. We do not engage in money laundering. There are no exceptions, regardless of local custom, business pressure, or how small the amount.

This policy exists to protect Teradata, our employees, and our partners from the serious legal, financial, and reputational harm that corruption causes. It also reflects Teradata's commitment to competing fairly and winning business on the merits of our products and services.

This policy should be read alongside the Teradata Code of Conduct, Gifts, Entertainment, and Sponsorships Policy (CMP 912), Conflicts of Interest Policy (CMP 901), and Travel and Expense Policy (CMP 802). For trade compliance intersections — including screening of freight forwarders, customs brokers, and logistics agents — see Restricted Party Screening Policy (CMP 928) and Export Compliance Policy (CMP 919).

## SCOPE

This policy applies globally to all Teradata entities and to every person who acts for or on behalf of Teradata, including:

- All employees, officers, and directors of Teradata and its subsidiaries and affiliates
- Agents, brokers, consultants, and other third-party representatives acting on Teradata's behalf
- Distributors, resellers, suppliers, and contractors to the extent they act for or on behalf of Teradata in connection with Teradata's business

All of these individuals and entities are referred to in this policy as "Teradata Personnel." Third-party agents, distributors, and other business partners must acknowledge and comply with this policy as a condition of their relationship with Teradata. See Section G (Third-Party Due Diligence).

## RESPONSIBILITIES

E&C Office / Law Organization

The E&C Office, under the direction of the Chief Ethics and Compliance Officer (CECO), is responsible for:

- Maintaining and updating this policy and associated guidance

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- Providing advice and guidance on compliance with this policy and applicable anti-corruption laws
- Overseeing the anti-corruption training program
- Managing investigations of suspected violations and coordinating with outside counsel where appropriate
- Evaluating whether voluntary self-disclosure to government authorities is warranted when a potential violation is identified
- Approving any exceptions to this policy and maintaining records of all approvals

### All Teradata Personnel

Every member of Teradata Personnel is responsible for:

- Understanding and complying with this policy
- Completing initial and annual required training as outlined in Code of Conduct Certification (CMP 910)
- Seeking guidance from the E&C Office before taking any action that may raise questions under this policy
- Promptly reporting any known or suspected violation of this policy

### Managers

Managers are responsible for modeling ethical conduct, ensuring employees understand and follow this policy, and creating an environment where employees feel safe raising concerns without fear of retaliation.

## POLICY STATEMENTS

### A. The Core Prohibition — No Bribes, Kickbacks, or Corrupt Payments

Teradata Personnel must never, directly or indirectly, including through a third party, or at the direction of or for the benefit of another:

- Offer, pay, promise to pay, or authorize payment of any bribe, kickback, or other thing of value to any Public Official or Private Official to obtain, retain, or direct business, or to receive any other improper advantage as set out in Gift, Entertainment and Sponsorship Policy (CMP 912).
- Solicit or accept any bribe, kickback, or other improper payment or benefit from any person in connection with Teradata's business.
- Engage or assist in money laundering — that is, concealing, converting, or transferring the proceeds of crime.

A "bribe" is anything of value given with corrupt intent to influence someone in their official or business capacity. It includes cash, gifts, loans, entertainment, job offers, charitable

contributions, travel, and any other benefit. The amount does not matter — even small payments violate this policy if they are made to improperly influence someone.

*Plain language: Someone offers you a shortcut in exchange for a small payment. A customer hints that an expensive gift would help close the deal. A government official suggests a "processing fee." In every case, the answer is the same: decline, do not pay, and report it to the E&C Office.*

### B. Facilitating Payments and 'Grease Payments'

Facilitating payments — sometimes called "grease payments" — are small payments made to low-level government officials to speed up routine government actions such as customs clearances, permit processing, or utility connections. These payments are prohibited at Teradata, even where they may be common practice locally and even where they may not be illegal under local law.

Why? Because the UK Bribery Act and Teradata's policy do not permit facilitating payments, even if the FCPA technically allows a narrow exception. Teradata applies the stricter standard globally.

Legitimate expediting fees charged by a government agency — where the fee is published, paid by check or electronic transfer to the government entity, and properly recorded in Teradata's books — are not facilitating payments. If you are unsure whether a proposed payment falls into this category, contact the E&C Office before paying.

Attempted or requested facilitating payments must be reported to the E&C Office and logged in Teradata's compliance incident register, even if not paid. Only facilitating payments that are actually made are recorded in Teradata's books and records. Note that facilitating payments incurred in connection with international travel are non-reimbursable under Travel and Expense Policy (CMP 802).

### C. Dealing with Government Officials and State-Owned Enterprises

Extra care is required whenever Teradata Personnel interact with a Public Official. A Public Official includes:

- Any employee, officer, elected or appointed official, or candidate of a government, political party, or political entity at any level (national, state, local)
- Any employee, officer, or agent of a state-owned enterprise (SOE) — that is, any company wholly or partially owned by a government, such as state-owned banks, utilities, universities, telecommunications providers, or transportation companies
- Any official or employee of an international public organization, such as the United Nations or the World Bank

Because Teradata sells technology to governments and SOEs around the world, many of Teradata's customers have government connections. This does not mean we cannot do business with them — it means we must be especially careful that our conduct is beyond question. The following rules apply whenever Teradata Personnel interact with Public Officials:

- No gifts, hospitality, or travel for a Public Official without advance written approval from the E&C Office. At a minimum, approval requests must include:
  - the documented business purpose;
  - itemized receipts or cost estimates;
  - an attendee list and agenda (for hospitality or travel);

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- the recipient's name, title, and government or organizational affiliation; and
- designation of the system of record for retention.

More details are set out in Gifts, Entertainment, and Sponsorships Policy (CMP 912).

- No political contributions using Teradata funds, assets, or resources without advance written approval from the E&C Office, and only when permitted under applicable law and Teradata's Political Activity Policy Statement.
- Charitable contributions made at the request of, or for the benefit of, a Public Official must be reviewed and approved in advance by the E&C Office. Such contributions may be characterized as bribes by regulators regardless of the form they take, so extra scrutiny must be taken.
- All expenses for or on behalf of a Public Official must be documented with the name, title, and government affiliation of the official, the business purpose, and the amount, and submitted for E&C Office review.

*Trade compliance note: When a current or potential SOE customer has not been screened in Teradata's Restricted Screening List tool, TradeSphere, screening must be completed before any transaction is entered into, per the Restricted Party Screening Policy (CMP 928). SOE customers on OFAC sanctions lists present both an anti-corruption risk and an export compliance risk.*

### D. Private-Sector Bribery

Bribery in the private sector — between companies and their representatives, without any government involvement — is also prohibited by this policy and by law in many jurisdictions, including the UK Bribery Act.

Teradata Personnel must not offer, pay, or accept anything of value to or from a Private Official (any employee, officer, or agent of a current or potential customer, supplier, or business partner) in order to improperly influence their business decisions or to receive favorable treatment.

The most common forms of private-sector bribery in the technology industry are: excessive gifts or entertainment intended to influence a procurement decision; facilitation of business through a third party who passes value to customer procurement personnel; or offers of employment or consulting work to a customer's decision-makers during a procurement process. All of these are prohibited.

### E. Gifts and Hospitality

Gifts and hospitality are a normal part of business relationships when they are modest, transparent, and not intended to influence anyone. They become bribery when they are excessive, secret, or designed to obtain an improper advantage. The key question is always: could a reasonable, objective observer conclude that this gift or hospitality was intended to influence a decision?

Teradata's specific gift and hospitality limits are set out in Gifts, Entertainment, and Sponsorships Policy (CMP 912). The following rules always apply in addition to the Gifts, Entertainment, and Sponsorship Policy (CMP 912):

- Gifts or hospitality for a Public Official must be approved in advance by the E&C Office, regardless of amount.

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- Cash, cash equivalents (including gift cards), and loans are never acceptable as gifts in any direction.
- No gifts or hospitality may be offered, provided, or authorized around the time of a procurement or contract decision involving the recipient, unless specifically approved by the E&C Office.
- Gifts or hospitality must always be accurately recorded in Teradata's books and records with the recipient's name, business justification, and amount.
- If someone offers you a gift that exceeds Teradata's limits or that makes you uncomfortable, decline it and report it to the E&C Office.

### F. Accurate Books and Records

Accurate recordkeeping is a legal obligation and a fundamental part of Teradata's anti-corruption program. The FCPA's books-and-records provisions require Teradata to maintain books, records, and accounts that accurately and fairly reflect all transactions — including all payments, expenses, assets, and other transfers of value.

Every member of Teradata Personnel must:

- Record all transactions accurately, completely, and in a timely way — including all gifts, entertainment, and travel expenses involving third parties.
- Never make false, misleading, or incomplete entries in Teradata's books or records, regardless of the purpose.
- Never create, use, or authorize undisclosed funds or accounts ("slush funds") for any purpose.
- Never approve or authorize a payment or expense for a purpose other than what is documented.
- Never provide false or misleading information to Teradata's accountants, auditors, or compliance personnel, or omit material facts from financial reports.

Teradata's Corporate Finance and Accounting Policies establish the internal accounting controls required to support this obligation. Violations of books-and-records requirements may themselves be violations of the FCPA and can result in criminal liability even where the underlying conduct does not involve a direct bribe.

### G. Third-Party Due Diligence

Teradata can be held liable for corrupt payments made by third parties acting on its behalf, even if Teradata did not know the specific details of what the third party did. "Turning a blind eye" to red flags is not a defense. This is one of the most common sources of FCPA liability for technology companies.

Before engaging any agent, distributor, reseller, broker, lobbyist, or other third party who will interact with government officials, procure on Teradata's behalf, or represent Teradata in a high-risk market, Teradata Personnel must follow the due diligence processes for that type of party. No third party may be engaged, contracted with, or paid until required due diligence — including

verification of beneficial ownership and government affiliations (risk-based) — is completed and any required E&C Office approval is obtained:

- Conduct risk-based due diligence on the third party, proportionate to the risk the engagement presents. At a minimum this includes: identity verification; restricted party screening via TradeSphere per Denied Party Screening Policy (CMP 928); Anti-bribery/Anti-Corruption background checks; and review of the third party's own code of conduct or anti-corruption policies.
- Obtain E&C Office approval before engaging any third party in a Tier 1 high-risk category: (a) agents or representatives who will interact with Public Officials on Teradata's behalf; (b) third parties in countries ranked as high-risk on Transparency International's Corruption Index; or (c) third parties with any red flags identified in due diligence.
- Include anti-corruption contractual provisions in all agreements with third parties acting on Teradata's behalf, including: a representation that they have not and will not violate anti-corruption laws; an obligation to maintain accurate books and records; audit rights; and a right to terminate if they violate anti-corruption laws.
- Monitor third-party compliance on an ongoing basis — re-screening in TradeSphere when material changes occur, reviewing invoices and expense reports for red flags, and updating due diligence at regular intervals or when red flags emerge.

Third parties in Teradata's international trade supply chain — including freight forwarders, customs brokers, carriers, and logistics agents — are subject to both this policy's ABAC due diligence requirements and TradeSphere restricted party screening per Denied Party Screening Policy (CMP 928). Procurement is responsible for ensuring both are completed before engagement.

### H. Red Flags — When to Stop and Ask

The following situations are warning signs that a proposed transaction or relationship may involve bribery or corruption. They do not automatically mean something illegal is happening, but they do mean you must stop and consult the E&C Office before proceeding:

- A third party requests cash payments, payments to a personal account, or payments to a different entity than the contracting party
- A business partner or customer's representative requests a "commission" or "processing fee" that seems unusually large or lacks a clear business justification
- A request to use an agent or intermediary who insists on anonymity or who has an unexplained connection to a government official
- A customer, agent, or official requests a donation to a specific charity, particularly one connected to a government official or their family
- Someone suggests that a payment is "normal practice" or "the only way to do business" in a particular market
- A deal moves unusually fast or requires bypassing standard contracting or approval processes

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- A third party's proposed compensation is disproportionate to the services they are providing, or their services are vaguely described
- A request to provide a job offer, internship, or consulting arrangement to a family member of a government official or procurement officer
- Instructions to not record a payment, or to record it as something other than what it is

*What to do: Stop. Do not proceed with the transaction or payment. Contact the E&C Office at [E&C@Teradata.com](mailto:E&C@Teradata.com) or [ask.law@teradata.com](mailto:ask.law@teradata.com). Document what you observed. You will not be penalized for raising a concern in good faith.*

### I. AI and Emerging Technology

The use of artificial intelligence and other emerging technologies in Teradata's business creates both compliance opportunities and new risks. Teradata Personnel must not use AI tools to facilitate, conceal, or assist in any conduct that would violate this policy. In particular:

- AI tools must not be used to generate false or misleading documentation, alter business records, or assist in structuring transactions to conceal bribery or corruption.
- AI-generated content used in dealings with government officials — including Request for Proposal (RFP) responses, contract documents, or communications — must be reviewed for accuracy by a human before submission and must accurately represent Teradata's actual products, services, and business practices.
- The E&C Office will use data analytics and available compliance technology to monitor for corruption red flags in transactions, expense reports, and third-party relationships. Compliance personnel have appropriate access to relevant data and systems, consistent with role-based controls, privacy requirements, and applicable law.

Questions about the use of AI in connection with government dealings or third-party relationships should be directed to the E&C Office.

### J. Reporting Concerns — No Retaliation

All Teradata Personnel have an obligation to report known or suspected violations of this policy promptly. You can report through any of the following channels:

- E&C Office: [E&C@Teradata.com](mailto:E&C@Teradata.com) or [ask.law@teradata.com](mailto:ask.law@teradata.com)
- Your direct manager or a more senior manager
- Any member of the Law Organization
- Teradata Ethics Helpline (confidential, available 24/7, anonymous reporting available where permitted by law): +1-866-455-0993 or [www.integrity-helpline.com/tdhelp.jsp](http://www.integrity-helpline.com/tdhelp.jsp)

Teradata strictly prohibits retaliation against anyone who in good faith reports a concern, raises a question, or cooperates with an investigation under this policy. Retaliation against reporters is itself a serious violation of Teradata policy and may violate applicable law.

Teradata also supports employees who resist paying bribes, even when doing so means losing a contract, a sale, or another business opportunity. The E&C Office will work with you to find alternatives, and Teradata is prepared to forgo business that cannot be won without bribery.

You may also report suspected violations directly to external government agencies, including the U.S. Department of Justice and the Securities and Exchange Commission. Teradata will not retaliate against employees who make good-faith reports to government authorities. See also the DOJ's Corporate Whistleblower Awards Pilot Program, which provides financial awards and legal protections for individuals who report certain corporate criminal conduct to the DOJ.

### K. Investigation and Voluntary Self-Disclosure

When the E&C Office identifies or receives a report of a potential violation of this policy, it will conduct or oversee a prompt investigation. Employees are required to cooperate fully and truthfully with investigations; interference with or obstruction of an investigation is a separate serious violation of Teradata policy and may constitute a crime.

The E&C Office, in consultation with the CECO and outside counsel, will evaluate whether voluntary self-disclosure to the DOJ, SEC, or other relevant authorities is appropriate. Companies that voluntarily disclose potential FCPA violations and cooperate fully have received significant benefits under DOJ's Corporate Enforcement Policy, including declinations and reduced penalties. No self-disclosure determination will be made without the CECO and outside counsel.

### L. Consequences of Violation

Violations of this policy are treated as serious violations of Teradata's Code of Conduct and will result in disciplinary action up to and including termination. Teradata will also report violations to law enforcement where warranted and will cooperate in investigations and prosecutions. Violations by third parties may result in immediate termination of the business relationship, suspension of payments, exercise of contractual audit rights, and pursuit of available contractual remedies including indemnification and clawback provisions.

The legal consequences of bribery and corruption are severe:

- Individuals: criminal fines, imprisonment, civil penalties, and disgorgement of personal gains. Teradata cannot indemnify individuals for criminal fines or penalties.
- Company: multi-million dollar criminal fines and civil penalties, disgorgement of profits, debarment from government contracts, court-appointed compliance monitors, and lasting reputational harm.
- Note: The Foreign Extortion Prevention Act (FEPA), enacted in 2024, now also subjects foreign officials who solicit or accept bribes from U.S. companies to U.S. federal prosecution. Government officials who request bribes may face U.S. criminal liability.

## DEFINITIONS

Anti-Corruption Laws	U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and all other anti-bribery, anti-corruption, and anti-money-laundering laws in every jurisdiction where Teradata does business.
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Bribe / Corrupt Payment	Anything of value — including cash, gifts, loans, entertainment, employment, charitable contributions, or any other benefit — offered, paid, promised, or authorized with corrupt intent to improperly influence someone in their official or business capacity.
Chief Ethics & Compliance Officer	The individual responsible for developing, implementing, and overseeing the organization's ethics and compliance program.
Corruption	Bribery, kickbacks, money laundering, and related conduct as used collectively in this policy.
Facilitating / Grease Payment	A payment to a low-level government official to speed up a routine non-discretionary government action. Prohibited at Teradata regardless of whether permissible under local law.
FEPA	Foreign Extortion Prevention Act (2024) — U.S. federal law criminalizing foreign officials who solicit or accept bribes from U.S. companies or individuals.
FCPA	U.S. Foreign Corrupt Practices Act — prohibits U.S. companies and persons from bribing foreign government officials and requires accurate books-and-records and adequate internal controls.
Money Laundering	Concealing, converting, or transferring proceeds of crime, or assisting others in doing so.
Private Official	Any officer, director, employee, agent, or representative of a current or prospective Teradata customer, supplier, distributor, reseller, contractor, or other private-sector business partner.
Public Official	Any employee, officer, contractor, agent, elected or appointed official, candidate, nominee, or representative of a government, political party, or political entity at any level (national, state, local); any employee, officer, or agent of a state-owned enterprise (SOE); and any official or employee of an international public organization (e.g., the UN, World Bank).
Red Flag	A warning sign that a proposed transaction or relationship may involve bribery or corruption, requiring consultation with the E&C Office before proceeding.
Request for Proposal	A formal solicitation document issued by the organization inviting vendors or service providers to submit competitive bids for specified goods or services.
SOE (State-Owned Enterprise)	A company wholly or partially owned by a government. Employees of SOEs are treated as Public Officials for purposes of this policy.
Teradata Personnel	All employees, officers, and directors of Teradata and its subsidiaries; all agents, brokers, consultants, and third-party representatives acting for or on behalf of Teradata; and distributors, resellers, and contractors to the extent they act for Teradata.

Thing of Value	Any benefit or advantage, monetary or non-monetary, including cash, gifts, entertainment, meals, travel, employment offers, internships, charitable contributions, and loans.
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## ENFORCEMENT

Teradata enforces compliance with this Policy through E&C Office oversight, third-party due diligence review and ongoing monitoring, transaction and expense monitoring, annual certification under Code of Conduct Certification Policy (CMP 910), training completion tracking, gift and hospitality pre-approval workflows, and disciplinary action where warranted.

Enterprise Risk & Assurance Services (ERAS) may provide independent assurance over the design and operating effectiveness of these controls in accordance with its annual audit plan approved by the Audit Committee, with findings reported functionally to the Audit Committee and communicated to the Trade Compliance Council.

Failure to comply with this policy is considered a potentially serious violation. Anyone who violates it may face disciplinary actions and legal sanctions, including but not limited to termination, civil lawsuits, and criminal prosecution.

## EXCEPTIONS

There are no exceptions to the core prohibition on bribery and corrupt payments. Any deviation from other requirements of this policy — such as the standard gift and hospitality limits — must be approved in advance and in writing by the E&C Office. All exceptions are documented and tracked.

The following items are exempt from this policy: None.

## DOCUMENT MANAGEMENT

This policy will be reviewed at least every three years, or sooner when material changes in applicable law, DOJ guidance, or Teradata's risk profile require an update. Next scheduled review: April 2029.

## REFERENCES

- Teradata Code of Conduct
- Ethics & Compliance Process / E&C Program Charter (CMP 900)
- Conflicts of Interest Policy (CMP 901)
- Travel and Expense Policy (CMP 802)
- Teradata Corporate Finance and Accounting Policies
- Gifts, Entertainment, and Sponsorships Policy (CMP 912)
- Export Compliance Policy (CMP 919)

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- Restricted Party Screening Policy (CMP 928)
- Code of Conduct Certification Policy (CMP 910)
- Teradata Ethics & Compliance Program Charter (September 2025)
- Trade Compliance Council Program Charter (April 2026)
- Political Activity Policy Statement ([www.teradata.com/Political-Activity-Policy-Statement](http://www.teradata.com/Political-Activity-Policy-Statement))
- U.S. Foreign Corrupt Practices Act (FCPA): [www.justice.gov/criminal/fraud/fcpa](http://www.justice.gov/criminal/fraud/fcpa)
- UK Bribery Act 2010: [www.legislation.gov.uk/ukpga/2010/23/contents](http://www.legislation.gov.uk/ukpga/2010/23/contents)
- DOJ Evaluation of Corporate Compliance Programs (September 2024)
- DOJ FCPA Guidelines for Investigations and Enforcement (June 9, 2025)
- Foreign Extortion Prevention Act (FEPA), enacted December 2024

## REVISION HISTORY

Issue No.	Version Date	Initiated By	A/M/D	Summary of Changes	Subst. [Y/N]	Approved By
Prior	10/01/2024	Law / E&C	M	Prior version. Approved by Molly Treese, CLO. Covered FCPA/UK Bribery Act, policy statements, and detailed legal Supplement.	N	Molly Treese, CLO
Current	April 2026	Law / E&C	M	Full redraft to CMP 101 TD Style template. Simplified language for employee readability. Added: trade compliance cross-references (CMP 919/928); AI/emerging technology section; anti-retaliation/whistleblower section with VSD guidance; FEPA reference; DOJ June 2025 FCPA Guidelines; third-party ongoing monitoring; Red Flags section; Definitions table; ENFORCEMENT; EXCEPTIONS; DOCUMENT MANAGEMENT. Removed: Supplement (substantive content integrated into policy body). Approver updated.	Y	Jessica Roberts, Chief Ethics, Compliance and Privacy Officer