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Anti-Corruption Policy Statement

A commitment to ethical conduct in all business operations is the heart of PMI's culture. PMI is committed to conducting business ethically and with honesty, integrity and strives to do in compliance with all applicable laws and regulations.

Domestically, employees are required to comply with PMI's policies and all local, state, and federal laws and regulations. When conducting business internationally, employees and others acting for or on behalf of PMI must comply with the U.S. Foreign Corrupt Practices Act (FCPA), and, as applicable, the UK Bribery Act and similar national and local anti-bribery/anti-corruption laws. Specifically, the FCPA makes it a civil and criminal offense to directly or indirectly pay, offer, or give, as well as promise to pay, offer, or give, "anything of value" to a "foreign official" for the purpose of influencing the decisions of the official. Payments or gifts provided indirectly through third parties (such as agents, representatives, brokers, or consultants) to foreign officials are also prohibited. This is true regardless of the fact that giving things of value may be a widely accepted practice in the country in question.

PMI prohibits employee, officers, directors, contractors, and all third parties acting for or on behalf of PMI from offering, paying, promising to make or agreeing to receive an improper payment or anything of value to or from anyone anywhere in the world, or committing an illegal or unethical act, to obtain or retain business or to secure any improper benefit. It is PMI's policy to not be engaged in with business opportunities involving an improper or illegal payment, bribe, gift, rebate, kickback, or similar inducements, and its employees, officers, directors, contractors and third parties acting for or on its behalf must refrain from contracting with any entity or individual that engages in, or is suspected of engaging in, similar improper or unlawful practices. It is also PMI's policy that its employees, officers, directors, contractors and third parties acting for or on its behalf of PMI may not offer, or propose to make facilitation payments for routine government actions in connection with a PMI transaction, even where permitted by the FCPA or local laws.