

Gifts, Meals, Entertainment, and Travel for Third Parties

1. Purpose

This Policy explains the gifts, meals, entertainment, and travel ("GMET") provisions that third parties must comply with when doing business with McAfee.

2. Scope

This Policy applies to all third parties who interact with McAfee.

3. Policy Statement

McAfee's Code of Conduct reflects our commitment to conduct business with uncompromising integrity and in compliance with all applicable laws. We expect all companies or persons who provide services or act on behalf of McAfee ("Third Parties") to comply with our Code of Conduct, including our **Anti-Corruption Policy for Third Parties**, regardless of local business practices or social customs.

4. Giving and Receiving Gifts, Meals, Entertainment, and Travel ("GMET")

The exchange or provision of GMET may create a real or perceived conflict of interest or a situation where those types of expenses could be viewed as a bribe under applicable laws and international standards. McAfee expects its Third Parties to comply with the following principles when giving or receiving GMET:

- **Compliance with Applicable Law:** You must comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and applicable local laws, when giving or receiving GMET in connection with McAfee business.
- **Business Purpose:** The GMET must be for a legitimate purpose, such as to promote, demonstrate, or explain a McAfee product, position, or service.
- **No Improper Influence:** The GMET must not place the recipient under any obligation. You must never offer, promise, or give anything of value with the intent to improperly influence any act or decision of the recipient in McAfee's or your company's favor, or with the intent of compromising the recipient's objectivity in making business decisions.

- **Made Openly:** The GMET must be given or received in an open and transparent manner.
- **Reasonable in Value:** The GMET must be reasonable in value and neither lavish nor excessive.
- **Appropriate:** The nature of the GMET must be appropriate to the business relationship and local customs, and not cause embarrassment by its disclosure.
- **Accurately Recorded:** You must accurately record all GMET provided on McAfee's behalf. You must be able to produce receipts or proper documentation for all GMET expenses.
- **Government GMET:** You may not give GMET on McAfee's behalf to a government official (including employees of government agencies, public institutions, and state-owned enterprises) without prior approval from McAfee. Approval will be provided only in limited circumstances and will require the approval of McAfee Legal. All GMET provided on McAfee's behalf to a government official must be properly recorded, with appropriate receipts or proper documentation.

5. GMET Involving McAfee Employees

McAfee employees must comply with [McAfee's Code of Conduct](#) and internal policy requirements and restrictions, including pre-approval requirements, when giving or receiving GMET to or from a Third Party. We discourage McAfee suppliers and vendors from giving any gifts to our employees and appreciate your support on this request.

6. How to Raise Questions or Concerns

If you have questions or concerns, you have numerous avenues to report them to McAfee. Visit www.mcafee.com/askethics to find out more information on reporting ethics and legal concerns.