

STRATASYS

GLOBAL ANTI-CORRUPTION POLICY

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1. About This Policy

Stratasys Ltd., together with its subsidiaries and affiliates (collectively, "Stratasys"), is a global leader in additive manufacturing and 3D printing solutions, committed to conducting business with the highest ethical standards and complete transparency. As a company serving diverse markets including aerospace, automotive, healthcare, education, and government sectors worldwide, Stratasys adheres strictly to applicable anti-bribery and anti-corruption laws, regulations, and international standards, including, without limitation the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, the Israeli Penal Law, and all applicable local anti-corruption laws and regulations in jurisdictions where we operate.

2. Policy Statement and Scope of Application

Stratasys has a zero-tolerance approach to bribery and corruption. The Company is committed to conducting business ethically, transparently, and in full compliance with all applicable anti-bribery and anti-corruption laws and regulations worldwide.

This Policy applies globally to all **Covered Persons** (as defined in Section 3 below). Covered Persons include employees, directors, officers, contractors, consultants, and third-party intermediaries acting on behalf of the Company, including suppliers, distributors, resellers, and agents. These individuals and entities must not offer, promise, authorize, give, solicit, or accept Anything of Value, directly or indirectly, to improperly influence a business or governmental decision, gain an unfair advantage, or secure business for or from Stratasys. ►

3. Key Definitions

Anything of Value: Includes tangible or intangible items or benefits, such as money, gifts, entertainment, hospitality, travel, services, employment opportunities, loans, charitable contributions, sponsorships, political donations, or other personal or professional advantages.

Compliance Officer: The Chief Legal Officer of Stratasys Ltd.

Covered Person: Means any Stratasys employee, director, officer, contractor, consultant, or third-party intermediary acting for or on behalf of Stratasys, including suppliers, distributors, resellers, and agents, as further described in Section 2 (Scope).

Facilitation Payments: Small, unofficial payments made to government officials to expedite or secure the performance of routine, non-discretionary governmental actions (e.g., issuing permits, processing visas, scheduling inspections). These payments are strictly prohibited under this Policy, regardless of local laws, customs, or expectations.

Government Entity: Any governmental department, agency, instrumentality, or enterprise owned or controlled by a government, including state-owned enterprises, public universities, and government-affiliated organizations.

Public Official: Any government official, employee, or representative, including officials from government-owned entities, political parties, or candidates for political office.

4. Prohibited Activities

Stratasys prohibits bribery. This means we prohibit offering or giving Anything of Value - directly or indirectly - in order to improperly influence a decision, gain an unfair advantage, or secure business.

This prohibition applies universally and includes, but is not limited to, the following:

- **Facilitation payments:** These are strictly prohibited regardless of local custom or practice.
- **Use of intermediaries:** Engaging third parties, such as agents, consultants, or distributors, to carry out actions that would be prohibited under this Policy if done directly by a Stratasys employee.
- **Improper or concealed transactions:** Creating or using "off-the-books" accounts, shell companies, false documentation, or other deceptive methods to conceal the nature or purpose of a payment or benefit.

- **Corrupt practices involving government interaction:** Any offer or provision of value in connection with licenses, permits, procurement, inspections, enforcement actions, or other dealings with a **Public Official** or **Government Entity**, unless explicitly authorized and properly documented. This extends to government procurement or contracting.

Relevant examples are public tenders, government-funded grants, joint development agreements with ministries, engagements with public hospitals or universities, and projects sponsored by military or government agencies - whether conducted directly or via third-party intermediaries.

These prohibitions apply regardless of the value involved, the perceived benefit to Stratasys, or whether the conduct occurs in a country where such practices may be considered customary.

5. Gifts, Entertainment, and Hospitality

Gifts, entertainment, and hospitality must be modest, infrequent, transparent, culturally appropriate, and must never be intended to improperly influence decisions or actions. They are only acceptable when all of the following conditions are met:

- They are transparent and culturally appropriate.
- They are modest, they comply with applicable laws and regulations, and with the internal policies of the recipient.
- They are not intended to improperly influence business decisions or create a sense of obligation.
- They are accurately recorded in the Company's books and records.
- They are pre-approved where required by this Policy.

Specific thresholds and approval requirements must be followed:

- **Gifts under \$100:** No approval required.
- **Gifts between \$100–\$200:** Approval by the relevant Vice President responsible for the activity.
- **Gifts above \$200:** Approval by the Compliance Officer.

Application Guidance: The monetary thresholds outlined above are based on the best risk-sensitive practice. These thresholds are intended to promote consistency and clarity in day-to-day decisions involving gifts and hospitality. ►

Without derogating from the above, it is important to note that the appropriateness of any gift, regardless of monetary value, must always be assessed in light of local customs, laws, and the internal policies of the recipient.

What may be deemed modest in one jurisdiction could be inappropriate in another. Employees must therefore apply sound judgment and consult the Legal Department in cases of uncertainty.

These thresholds will be reviewed periodically, and adjustments (global or regional) may be authorized by the Compliance Officer to reflect evolving cultural, legal, or business needs.

Employees involved in purchasing, sourcing, or supplier selection must refrain from giving or accepting any gifts or entertainment, regardless of value, to avoid any appearance of impropriety or conflict of interest.

Enhanced Restrictions for Government Sector:

Given Stratasys's engagement with Government Entities across multiple jurisdictions, additional restrictions apply:

- All gifts, entertainment, or hospitality involving Government Entities, Public Officials, or their family members require pre-approval from the Compliance Officer (or their designated Legal Department delegate), regardless of value.
- Business meals with government representatives must be modest, infrequent, and directly related to legitimate business discussions. In addition, the appropriateness of such meals must always be assessed in light of applicable local laws and customs, as well as the internal policies of the recipient.
- All government-related expenses must be documented with enhanced detail, including business justification and attendee information.

** This Policy in Clause 5 does not apply to internal gifts or hospitality between Stratasys employees, such as recognition events, team lunches, or employee celebrations.*

6. Facilitation Payments

Facilitation Payments are strictly prohibited under all circumstances regardless of local custom or practice.

If any Stratasys employee or third party is solicited for a Facilitation Payment, they must:

- Immediately decline the request.
- Document the incident, including the identity of the person making the request, the amount requested, and the purported reason for the payment.

- Report the incident immediately to the Compliance Officer.
- Seek alternative legitimate means to accomplish the required government action.

Emergency Situations: In rare circumstances where personal safety is at immediate risk, employees may make payments under duress. Such payments must be reported to the Compliance Officer within 24 hours, along with a full explanation of the circumstances and safety concerns that necessitated the payment. Examples *may include payments demanded under threat of violence or unlawful detention by officials at remote checkpoints, or extorted payments to ensure safe passage during civil unrest or in regions with weak rule of law.*

7. Third-Party Risk Management

Third parties acting for or on behalf of Stratasys - such as sales representatives, distributors, and resellers - present inherent anti-bribery and corruption risks. Stratasys requires all such third parties to comply with this Policy and with all applicable anti-bribery and anti-corruption laws. These obligations must be clearly incorporated into written agreements with all third parties that include, inter alia, strict compliance representations and warranties, audit rights, and termination rights in the event of violation.

Stratasys conducts appropriate risk-based due diligence to evaluate the integrity, ownership structure, and compliance history of any reseller, channel partner, or intermediary. This process is executed with Legal oversight and supported by appropriate screening tools. Stratasys may require periodic certifications of compliance and disclosure of any investigations, sanctions, or enforcement actions as precondition to entering and/or extending a relationship with third parties.

Stratasys maintains ongoing monitoring through automated alerts, periodic reviews, and business-unit oversight to ensure relationships remain appropriate and transparent. The Legal Department may issue internal guidance from time to time to reflect evolving global standards and risk areas.

Reseller and Channel Partner Responsibilities:

Resellers, distributors, and channel partners are responsible for ensuring that their employees, officers, and subcontractors understand and comply with this Policy. They must:

- Maintain accurate and complete records of all transactions related to Stratasys business;
- Promptly disclose any actual or suspected breaches, investigations, or conflicts of interest; ►

- Provide accurate and complete information in their due-diligence submissions;
- Cooperate fully with Stratasys audits or compliance reviews;
- Provide certifications or supporting documentation as requested by Stratasys; and
- Reaffirm their compliance with this Policy annually and acknowledge that any violation may result in immediate termination of engagement and reporting to relevant authorities.

Stratasys may be held legally responsible for actions taken by such intermediaries; therefore, any violation of this Policy by a reseller, distributor, or intermediary may result in immediate termination of engagement and reporting to relevant authorities.

Stratasys will not reimburse intermediaries for any gifts, entertainment, travel, or any other expense involving Public Officials unless expressly pre-approved in writing by the Legal Department. Stratasys will not reimburse intermediaries for any gifts, entertainment, travel, or expenses involving Public Officials unless expressly pre-approved in writing by the Legal Department.

Covered Persons must never authorize a third party to make a payment, gift, or offer of Anything of Value on Stratasys' behalf in contradiction to this Policy.

The Legal Department maintains discretion to review and pre-approve engagements with intermediaries or resellers presenting elevated risk.

8. Charitable Contributions and Sponsorships

All charitable contributions and sponsorships must comply fully with the [Stratasys Corporate Contribution Policy](#) (Policy No. GD-000536).

9. Political Contributions

Political contributions - direct or indirect - are prohibited unless they receive prior written approval from both the Compliance Officer and the Audit Committee of the Board of Directors of Stratasys Ltd.

This prohibition covers, without limitation:

- Monetary donations to political parties, candidates, office holders, or campaign committees;
- In-kind support (e.g., volunteer time during working hours, professional services, use of Company facilities or equipment);
- Sponsorship or underwriting of political events, fund-raisers, or partisan publications;

- Any loan, advance, or other provision of Stratasys resources that could reasonably be construed as political support.

All requests for political contributions must be coordinated through the Legal Department and documented in accordance with Section 10 (Books, Records, and Internal Controls) and must:

- Comply with all applicable laws, regulations, and reporting requirements; and
- Avoid conflicts of interest or violations of anti-bribery and anti-corruption laws.

10. Books, Records, and Internal Controls

Stratasys maintains strict accounting practices to ensure transparency:

- All financial transactions must be accurately recorded in reasonable detail.
- No false, misleading, or incomplete entries are permitted.
- Payments must not be made to "cash" or "bearer" accounts.
- Documentation must clearly describe the nature and purpose of expenses.

All Covered Persons must cooperate fully with all audits, investigations, and compliance reviews.

11. Training and Communication

Stratasys will provide periodic and appropriate anti-bribery and anti-corruption guidance and training and will communicate relevant updates as laws and business needs evolve. The Compliance Officer oversees the Company's compliance-training framework and appropriate record keeping.

12. Monitoring and Enforcement

Stratasys uses a risk-based approach to monitor compliance:

- Internal audits and assessments are conducted periodically.
- Red flags (e.g., unusual payments, vague services) are investigated thoroughly.
- The Compliance Officer oversees investigations and recommends remediation or disciplinary action where necessary. ►

13. Reporting Mechanisms

All Covered Persons are required to report any suspected violations of this Policy promptly and in good faith. Stratasys maintains multiple reporting channels to ensure accessibility and confidentiality.

Reports may be made through:

- **Immediate supervisors or management chain.**
- **The Legal Department** - direct contact with legal counsel.
- **Anonymous Ethics Hotline:**
<https://stratasys.gan-compliance.com/report> or 1-833-359-2501.

Confidentiality and Protection: All reports are treated with appropriate confidentiality and investigated thoroughly. Stratasys strictly enforces its [Whistleblower and Non-Retaliation Policy](#) (Policy No. MG-000-027), to protect individuals who report suspected violations in good faith.

Reporting Obligations:

- Reports should be made promptly upon discovery of suspected violations.
- Employees must provide all relevant information available to them.
- Cooperation with investigations is mandatory.
- False or malicious reports are prohibited and may result in disciplinary action up to and including termination of employment.

14. Violations and Disciplinary Actions

Violations of this Policy by any Covered Persons and/or individual or entity to whom it may apply can result in:

- Disciplinary action, up to and including termination of employment (where applicable).
- Contract termination or suspension of engagement for third parties.
- Contract termination or suspension of engagement for third parties.

15. Implementation Responsibilities

- The **Chief Legal Officer** holds overall responsibility for this Policy and may delegate day-to-day compliance tasks to designated members of the Legal Department.
- **Senior executives and managers** are responsible for promoting and enforcing compliance within their teams and for escalating issues to the Compliance Officer as needed.
- **All Covered Persons** must cooperate fully with audits, investigations, and compliance reviews, and demonstrate ongoing commitment to ethical conduct.

16. Policy Review and Updates

This Policy will be reviewed no less than annually and updated as necessary to reflect changes in law, regulations, enforcement priorities, and business practices.

Any amendments must be approved by the Compliance Officer and the Board of Directors of Stratasys Ltd.

17. Country - or Sector-Specific Restrictions

Additional restrictions may apply in specific jurisdictions or industry sectors where Stratasys operates. The Legal Department will provide supplementary guidance as needed to address local regulatory requirements and sector-specific compliance obligations. Nonetheless, all Covered Persons remain responsible for ensuring that their actions comply with applicable laws. Lack of knowledge or understanding does not exempt from responsibility.

Make it with Stratasys