

Anti-Corruption/FCPA

Producer, along with all employees and contractors of Producer, must comply with the following global anti-corruption policy. Failure to comply may result in civil and criminal penalties for the companies and individuals involved, and such failure is grounds for termination of any agreement with YouTube/Google.

- **The anti-bribery policy is simple - DON'T BRIBE**

Regardless of local custom, business culture, or requests for bribes, you must never offer or give bribes in connection with your program to anyone at any time for any reason. You must not do anything that even looks like a bribe, and you must never ask anyone else to bribe on your behalf.

- **General Prohibition**

YouTube, its officers, employees, and third parties who act on YouTube's behalf cannot directly or indirectly give, offer, or promise anything of value to anyone with the corrupt intent to obtain or retain any improper advantage.

- **What is "Something of Value"? Examples Include:**

- Cash or cash equivalents (e.g., gift cards/certificates or virtual money);
 - Gifts and entertainment;
 - Meals, travel, and hotel;
 - Offers of employment, including internships;
 - Charitable and political contributions; and
 - Anything else of tangible value.

- **What is Prohibited? Business courtesies/gifts cannot:**

- Violate any laws or regulations;
 - Be intended to be or reasonably perceived to be an attempt to improperly influence official action to gain an unfair advantage for YouTube;
 - Be cash or a cash equivalent (e.g., gift cards/certificates).

- **No Facilitation Payments**

This policy also prohibits any "facilitation" or "grease" payments made to expedite routine, non-discretionary governmental actions, such as the issuance of permits, visas, or licenses, regardless of their amount. Many countries consider facilitation payments to be illegal bribes. Accordingly, employees and third parties acting on your behalf must not make any facilitation payment to any government employee in any country.

- **Gifts, Entertainment, and Travel**

Gifts, entertainment, and travel must not violate local laws or regulations, and must be reasonable and appropriate to the recipient's position, location, and circumstances so that an appearance of impropriety is not created or perceived by the recipient or others. Before offering gifts, entertainment or travel to anybody, especially government officials,

political party officials or political candidates, you should consult your independent legal counsel to obtain further guidance.

- **Hiring Third Parties**

Your company and its employees can be liable for corrupt payments made by third parties who perform services on your behalf, including contractors, brokers, consultants, suppliers, vendors, or agents, even if your company or the employee did not direct or have knowledge of the corrupt payment. As such, when engaging third parties, especially those that may be dealing with governmental authorities, you must exercise due care in assessing the experience, competence, and integrity of such parties prior to engagement and should consider including anti-corruption provisions within formal engagement contracts as well as sharing this anti-corruption/FCPA policy with such parties (subject to confidentiality agreement).

- **Accurate Books and Records**

All transactions must be fairly and accurately recorded. This requirement applies not only to your company's reported financial statements and general ledger, but also to other records kept in the ordinary course of business, such as purchase orders, invoices, expense reports, and receipts used to support requests for reimbursements. Errors or omissions in Producer's records, regardless of their relationship to a claim of bribery, can violate the books and records provisions of the U.S. Foreign Corrupt Practices Act and lead to civil and criminal liability.

- For any Producers that are **filming outside of the U.S.** and that will be interacting directly or indirectly with any foreign government (including obtaining film permits), YouTube Production must be informed and anti-bribery due diligence must be completed. Producer agrees to cooperate and comply with all actions required by YouTube Production throughout the due diligence process.