



API Conduct Policy

Global Industry Services Division

API Policy on Standards of Conduct

API is committed to maintaining the highest standard of professionalism and integrity among its employees. No employee should, at any time, undertake any action on behalf of API that is known or should be known to violate a law, regulation, or standard of morality. All employees are responsible for carrying out their jobs in a manner reflecting standards of ethics that are consistent with generally accepted criteria for personal integrity. This means individual conduct that is legal, that reflects honesty, and that does not conflict with the best interests of API. Further, employees are responsible for avoiding any act that may result in a conflict of interest.

API Policy on Anti-Corruption and Ethical Conduct

API has a zero-tolerance policy towards bribery and corruption, and is committed to observing the highest possible standards of ethical conduct in its operations in the United States and around the world. This includes complying with laws that prohibit bribery such as the U.S. Foreign Corrupt Practices Act (“FCPA”), state anti-bribery laws, and the anti-bribery and anti-corruption laws of the countries in which we operate, including but not limited to Chinese Criminal Law and the Brazilian Clean Companies Act.

Bribery, kickbacks, and other improper inducements involving public officials, state-owned companies, and others in the commercial marketplace, including customers and members, are all prohibited. No API officer, director, employee, consultant, agent, or other representative may, directly or indirectly:

- Offer, promise, make, give, or authorize any payment, or anything else of value, to any other person or organization, with the intent to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for API or any API member, or improperly reward the recipient for past conduct; or
- Request, solicit, agree to receive, or accept a bribe, kickback, or any other improper financial or other advantage from anyone.