



## Clover's Anti-bribery and Anti-corruption Program

Clover maintains a vigorous Anti-bribery and Anti-corruption (AB/AC) Program, and accordingly will not, promise, authorize or make any payment to, or otherwise contribute any item of value to, directly or indirectly, any non-U.S. government official in violation of the U.S. Foreign Corrupt Practices Act of 1977, as amended (FCPA) or any other applicable AB/AC law. Clover takes steps to ensure that its accounting controls and procedures (including, but not limited to, accounting systems, purchasing systems, and billing systems) are sufficient to cause it to comply in all material respects with the FCPA. Clover takes this pledge seriously and expects each of its business partners, agents, and consultants to do the same. In that regard, Clover may require any business partner, agent, or consultant to demonstrate its own compliance with the FCPA and any other applicable AB/AC laws, and to maintain systems of internal controls to ensure such compliance.