



Global Anti-Corruption Policy

Scope

This document applies to all employees, officers, directors, contractors, agents and partners of Verint Systems Inc. and its subsidiaries in all locations. Verint will undertake in good faith to communicate the Verint Global Anti-Corruption Policy and Procedures to non-wholly owned affiliates. In addition, consultants, representatives, agents and partners of Verint must not act on the Company's behalf in any manner inconsistent with this policy.

Policy

It is Verint's policy that all Verint personnel refrain from any acts which are prohibited by the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act ("UKBA"), Israeli anti-corruption legislation, the Brazilian Anti-Bribery Law and similar laws in all jurisdictions where we do business. All Company personnel must conduct business legally and ethically and comply with the laws of each country in which we do business. The use or offering for use of Verint funds or assets for any unlawful, improper or unethical purpose is prohibited. As a Company, Verint prohibits directly or indirectly offering, paying or accepting bribes of any kind, for any purpose, in any location in the world.

No Verint officer, director, employee, contractor, agent or partner shall authorize, pay, promise or offer to give anything of value to any individual or entity in order to influence that individual or entity improperly to act favorably towards Verint. For purposes of this policy, whether the recipient of any bribe or corrupt payment works in the public or private sector is irrelevant. No Verint officer, director, employee, contractor, agent or partner covered by this policy shall request or authorize any third party sales representatives, agents, consultants, distributors, resellers, integrators or other partners to make any such payment, promise or offer. Such behavior constitutes bribery and is unacceptable business conduct wherever Verint conducts business. Additionally, the individuals subject to this policy may not request or authorize payment for personal (non work-related) travel expenses from a third party with whom Verint conducts business.

This policy extends to all of Verint's financial record-keeping activities and is integrated with the obligations to which Verint is subject by virtue of other applicable laws where Verint does business. Verint's policy prohibits any "off-the books" payments and any knowing falsification of Verint's books and records to cover up any improper payment. This prohibition applies regardless of amount and includes the falsification of books and records to conceal commercial bribery and any other corrupt or improper payments.

Although this policy primarily focuses on compliance with the FCPA, UKBA, Israeli anti-corruption legislation and Brazil's Anti-Bribery Law, it is not intended to exclude compliance with applicable local laws for each of the countries in which Verint operates or seeks to operate. These laws include anti-bribery laws as well as the laws, regulations, and policies that govern the activities of public officials. These include conflict of interest and ethics rules, tax laws, and others.