



Corporate Policy	Public Policy Advocacy
	Effective Date: August 12, 2020

1. SCOPE

This policy on Public Policy Advocacy (the “Policy”) applies to all locations, subsidiaries, officers, directors and employees to the extent allowed by applicable local laws. This policy may be amended by a country-specific or location-specific supplemental policy to allow for deviations (a) required by applicable local laws or competent authorities or (b) resulting from consultations or reviews with local staff representation or unions.

2. STATEMENT OF POLICY

ANSYS, Inc. (the “Company” or “Ansys”) advocates for public policies that promote pervasive simulation, accelerate the digital transformation and other technological advancements, and foster product innovation, the global economy, and other interests of our stakeholders. Ansys is committed to engaging in public policy processes relevant to our shareholders, customers, partners, employees and communities in areas such as innovation and intellectual property, taxation, global trade, and workforce.

3. PRINCIPLES

- 3.1 The Company is committed to compliance with applicable laws, rules, and regulations and our Code of Business Conduct and Ethics. Any Employee who becomes aware of a violation of this policy should report the circumstances of the violation, as outlined by the Company’s Speaking Up Policy.
- 3.2 Ansys may engage in direct advocacy with government officials on public policies, legislation, and regulations relevant to us and our stakeholders. The Company may also engage in indirect advocacy through trade and industry associations, which are selected for their alignment with the policy interests of Ansys and the broader software community. Trade and industry associations represent broad and varying interests, so Ansys’ involvement with a particular association does not mean we agree with or otherwise endorse each of the policy positions of such association.

- 3.3 All direct advocacy as well as trade association memberships must be reviewed and approved in advance by the Chief Financial Officer and the General Counsel, or their delegates.
- 3.4 Ansys does not have a Political Action Committee (PAC) and does not contribute corporate funds to candidates or the political committees they control in Federal, state or local elections, and does not contribute corporate funds to state or local political party committees. Any political contribution on behalf of Ansys, including to ballot measures, 527 groups, 501(c)4s, or independent expenditures, must be pre-approved by the Chief Financial Officer and the General Counsel, or their delegates.
- 3.5 Ansys employees are free to participate in political activities or contribute to political parties and candidates so long as they do so as individuals and in a personal capacity, not on behalf of Ansys or that could be viewed in any way as being on behalf of Ansys.
- 3.6 No employee may engage in grassroots lobbying activities where other employees are encouraged to contact government officials on an issue.
- 3.7 Employees may work in a personal capacity with a particular industry or trade association if pre-approved through Ansys' Conflicts Disclosure Form or Request for Authorization: Outside Employee Form and as long as the employee does not suggest in any way that he/she is representing Ansys.

4. COMPLIANCE AND MONITORING

- 4.1 As required by applicable law, the Company will file periodic disclosure reports with the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives, U.S. state and local jurisdictions, and other governments globally, where required.
- 4.2 Any employee who violates this policy is subject to disciplinary action up to and including termination of employment, in accordance with applicable local laws. In addition, no employee will be retaliated against (i.e., discharged, disciplined, or otherwise disadvantaged in his or her career) as a result of reporting, in good faith, a violation of this policy.

5. POLICY COORDINATION

- 5.1 The Legal Department for Ansys will coordinate the application of this Corporate Policy across Ansys.