

## Anti-Corruption & Bribery Policy

### Policy Statement

The Fedcap Group is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA) and similar laws in other countries that prohibit improper payments to obtain a business advantage. This document describes The Fedcap Group's Policy prohibiting bribery and other improper payments in the conduct of The Fedcap Group's business operations.

Any inquiries about the Policy or its applicability to circumstances should be directed to the Corporate Compliance Officer at [corporatecompliance@fedcap.org](mailto:corporatecompliance@fedcap.org) and concerns may be raised via the Compliance Hotline: 1-866-384-4277; TTY: 1-866-294-9572.

### Purpose & Scope

The Fedcap Group strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and The Fedcap Group to possible criminal prosecution, reputational harm, or other serious consequences.

Each officer and employee of The Fedcap Group has a personal responsibility and obligation to conduct The Fedcap Group's business activities ethically and in compliance with all applicable laws based on the countries wherein The Fedcap Group does business. The Anti-Bribery Policy is applicable to The Fedcap Group and all individuals performing The Fedcap Group's business, as well as in connection with any corporate and business unit program, events, campaigns and other initiatives. No associate or agent, consultant, representative, contractor, or anyone acting on behalf of The Fedcap Group has the authority to offer, promise, give, or authorize payments of money or anything else of value, whether directly or indirectly, to a government official or a participant in a private commercial transaction to improperly induce that person to affect any act or decision, to do or omit to do any act in violation of their duty, or to secure an improper advantage in a manner that will assist The Fedcap Group or any of its subsidiaries or divisions, or any of its associates, agents, or anyone else to obtain or retain business. Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of The Fedcap Group's business.

In addition to direct payments of money, other prohibited payments include the following made at the direction, or for the benefit, of a government official:

- Gifts, entertainment or other business promotional activities
- Covering or reimbursing an official's expenses
- Offers of employment or other benefits to a family member or friend of a foreign official
- Political party and candidate contributions
- Charitable contributions and sponsorships

Facilitating payments are not authorized by this Policy. These are payments of small amounts to a government employee to expedite or secure performance of a routine, non-discretionary governmental action, such as obtaining visas, permits and licenses, police protection or utility services in a foreign country. This Policy does not prohibit payments of official fees, which are standard, published fees available to parties and paid to governmental offices or agencies (rather than directly to government employees) to obtain non-discretionary governmental actions, such as legitimate filing fees.

### **Penalties**

Violations of anti-bribery laws or this Policy by any employee, director, or contracted partner of The Fedcap Group will result in progressive discipline, up to and including possible termination of employment or an agent's contract with The Fedcap Group.

Violations by any employee or associate of The Fedcap Group can also result in severe penalties for both The Fedcap Group and such individuals. The Fedcap Group will cooperate with any lawful investigation related to the anti-bribery provisions of the FCPA, the U.K. Bribery Act, and other regulatory bodies.

### **Guidance and Reporting for Employees**

There are several ways in which employees, Board members and volunteers can speak up and report concerns under this policy. Individuals may speak directly with their supervisor, the next level of supervision, or with members of the Legal Department.

Individuals may also send an email to the Corporate Compliance Officer at [corporatecompliance@fedcap.org](mailto:corporatecompliance@fedcap.org) and concerns may be raised via the Compliance Hotline: 1-866-384-4277; TTY: 1-866-294-9572.

Retaliation in any form against an employee who has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited. Employees who violate this Policy will be subject to disciplinary action, up to and including dismissal. Violations can also result in prosecution by law enforcement authorities and serious criminal and civil penalties.

### **Document Control**

This policy will be reviewed at least annually to respond to any changes. The Fedcap Group reserves the right to amend this policy at any time.