

## Anti-Bribery and Anti-Corruption Policy

### Purpose

GF is committed to conducting business in accordance with the highest ethical standards and therefore prohibits all forms of bribery and corruption. The purpose of this policy is to outline your responsibilities under both the relevant anti-bribery and anti-corruption laws and GF' policies and to outline the consequences of bribery and corruption. This Anti-Bribery and Anti-Corruption Policy ("ABAC") shall be read together with GF' Worldwide Standards Code of Conduct ("COC"), the GF' Gifts & Entertainment Policy ("G&E Policy"), the Charitable Donations Policy, and the GF' Conflicts of Interest Policy ("COI Policy").

### Scope

This policy applies to all employees, agents and anyone else acting on behalf of GF.

### Policy

#### Definitions

**Bribery:** A bribe is the offering or giving of anything of value to any person for the purpose of obtaining or retaining business. "Anything of Value" includes but is not limited to cash or cash equivalents such as gift cards, stored value cards, gifts, meals, entertainment, and promises or guarantees of something of value or a job opportunity. "Anything of Value" can also include contributions to a charity at the request of a government official if provided to obtain an improper advantage. Reasonable and customary business gifts, meals and hospitality provided for legitimate business purposes may be permissible subject to GF' G&E Policy, COI Policy, the Charitable Donations Policy, and COC.

**Kickbacks:** Kickbacks are a type of bribery and occur when a person is offered or receives money or Anything Of Value in exchange for providing something requested by the other party. Such request or receipt includes but are not limited to, information or a discount to obtain a commercial advantage or a favor.

**Facilitating Payments:** Facilitating payments are payments typically made to Government Officials or employees with the intention of expediting an administrative process. The payment is meant to expedite the process of a service that the payer is legally entitled to. Such payments are typically demanded by low-level Government Officials or employees in



exchange for providing a service that is commonly performed by them (e.g., additional payment directly to a customs officer to expedite cargo clearance). Such facilitating payments are a form of bribery and are strictly prohibited by GF.

A published, well-documented expediting fee payable directly to a Government Entity or state-owned agency is not typically considered a Facilitating Payment prohibited by law and this policy. For example, fees to expedite delivery of a package or to expedite government approvals of licenses, are not considered a facilitating payment for the purpose of anti-bribery and anti-corruption laws and GF policies, provided that such fees are (i) publicized and (ii) payable and paid directly to a Government Entity providing the service and not an individual or group of individuals.

**Government Entities:** Government Entities include but are not limited to:

1. The government of any country or of any political subdivision of any country or collection of countries (e.g., European Union);
2. Any branch, agency, committee, commission, or department of any government;
3. Any person or organization authorized by law to perform any executive, legislative, judicial, regulatory, administrative military, or police function or any government;
4. a Public International Organization;
5. any political party; and
6. any state-owned or state-controlled enterprise (e.g., Mubadala).

**Government Officials:** Government Officials include any:

1. Officer, employee, contractor, consultant or any person acting for or on behalf of any Government Entity;
2. Candidate for political office;
3. Political party or party official;
4. Person who holds legislative, administrative or judicial position of any kind, whether elected or appointed of (or a person who otherwise exercises a public function for or on behalf of) a country, territory, state, municipality, (or subdivision of a country or territory);
5. Official, employee or person acting for or on behalf of a Public International Organization; and
6. Person who performs public duties or functions of any country, territory, state, municipality (or subdivision of any country or territory) or government, including a

person employed by a board, commission, corporation or other body or authority that is established to perform a duty or function on behalf of any state or government.

**Public International Organization:** Public International Organizations are multinational institutions composed principally of countries or a collection of governments or other institutions that carry on government or quasi-government activities or functions. Examples include, but are not limited to, the World Bank, European Union, African Union, United Nations, Organization for Economic Cooperation and Development, and World Trade Organization.

**Sponsorship Promotion (or “Sponsorship”):** A transaction in which a party provides monetary or other tangible support for an event, program or project run by a charity or other service-oriented organization, including but not limited to local governments and educational institutions, in exchange for a legitimate business-related benefit.

## Your Responsibilities

You should never offer or accept an improper payment such as paying Bribes, Kickbacks, Facilitating Payments directly or indirectly through a third party in an attempt to gain business or to influence a business decision or engage in any other activity that could be considered bribery or a corrupt act.

In addition, you are expected to:

- comply with all applicable anti-bribery and anti-corruption laws, including but not limited to, the Foreign Corrupt Practices Act (“FCPA”) and any other anti-bribery and anti-corruption laws;
- comply with GF’ G&E policy, Charitable Donations Policy, and COI Policy;
- comply with GF’ COC;
- reflect all payments and receipts of any value to suppliers, vendors and any other third party accurately in GF’ books;
- carefully select and monitor third parties who act on GF’ behalf to ensure that no improper payments are being offered or received by them; and
- watch out for
  - any offers of extravagant or multiple gifts or entertainment,
  - third parties who do not clearly account for their expenditure or whose

- commissions/fees seem in excess of the services provided,
- customers, suppliers or Government Officials who hint or suggest that certain payments be made to obtain business or information, or to prevent delays or other hard from affecting the current business and
- any questionable or suspicious book or record entry, or any unrecorded expenditure.

### **Charitable Donations & Sponsorship**

It is never permissible to provide a donation or sponsorship to improperly influence a government official or obtain an improper advantage.

If you observe conduct that may be in violation of this policy, the G&E policy, or the COC, contact the Ethics & Compliance Office or the Legal Department.

### **Training & Communications**

GF will provide training to all Employees on a regular basis to assist them in understanding and complying with this Policy and will inform them of substantive changes to this Policy.

### **Consequences Of Bribery and Corruption**

GF has a zero-tolerance policy for all acts of bribery and/or corruption. Employees who violate anti-bribery and/or anti-corruption laws can face severe civil and criminal penalties, including imprisonment. Any violation of this policy, the G&E policy, the COI policy, the Charitable Donations policy, and/or COC could also result in disciplinary action including but not limited to termination of employment.

### **Questions**

If you have any questions regarding this policy please contact the Ethics & Compliance Office or the Legal Department.

### **Policy Effective Date**

This Policy was implemented on April 28, 2021. The Policy will apply for an unlimited period.