Anti-Bribery and Anti-Corruption Policy

Document Governance

Function Owner	Department	Content Review Cycle	Date Last Revised
General Counsel	Office of the CEO	Annually	May 30, 2023

Copyright © 2023 CRDF Global
The information contained herein is confidential and proprietary, and for internal use by CRDF Global. This document may not be reproduced or distributed in whole or in part without the written permission of CRDF Global.
Hardcopies of this document can be printed for immediate use only and should not be kept or stored for future use.

1. Policy Statement

CRDF Global has zero tolerance for corruption and bribery. Covered Parties must comply with all laws relating to bribery and corruption. CRDF Global will take appropriate action, up to and including termination of any employment or contractual relationship and reporting violations to appropriate enforcement agencies , if any Covered Party is found to have engaged in such behavior in violation of any anti-bribery and anti-corruption laws.

Covered Parties are prohibited from making any direct or indirect offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any foreign official or other party for the purpose of

(a) influencing any act of that party in their official capacity OR
(b) inducing or rewarding that party in their official capacity to exercise influence

in order to obtain, direct, or facilitate business to CRDF Global or any other party or to otherwise obtain improper advantage.

No contract or agreement may be made with any business in which a government official or employee holds a significant interest, without the prior approval of the General Counsel.

Covered Parties must recognize potential risks and seek advice from the General Counsel when they have questions or concerns. Employees that suspect violations of this policy should notify the General Counsel or the Risk Management & Compliance Department. Individuals may also report via the hotline (1-888-475-0450 or http://crdfglobal.alertline.com).

All managers and supervisory personnel are expected to monitor continued compliance to ensure adherence with the highest moral, ethical, and professional standards of CRDF Global.

2. Purpose

CRDF Global requires all Covered Parties to fully comply with the U.S. Foreign Corrupt Practices Act, as amended, 15 U.S.C. §§ 78dd-1, et seq. (FCPA), the United Kingdom (UK) Bribery Act of 2010 and all local anti-bribery laws of other countries in which CRDF Global conducts business. Compliance will limit legal risk and liability to CRDF Global and aligns with CRDF Global's zero-tolerance policy towards corruption and bribery. Violations of laws, regulations, rules, and orders may subject the Covered Party to individual criminal or civil liability, as well as to discipline by CRDF Global. Such individual violations may also subject CRDF Global to civil or criminal liability or loss of business.

3. Definitions

Bribe	Any direct or indirect offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any foreign official or other party for the purpose of influencing any act or failure to act in the official capacity of that party or inducing the party to use influence to affect a decision of a foreign government or agency in order to obtain or direct business to anyone or to obtain any other improper advantage.
Covered Party	Any employee, sub-awardee, consultant, subcontractor, grantee, supplier, distributor, vendor, or other individual or entity that furnishes supplies or services to or receives direct or indirect funding from CRDF Global.

4. Scope

5. Exclusions

None.

6. Additional Content

The FCPA is a United States federal law that contains two main provisions:

- Anti-Bribery: It is illegal to make any direct or indirect offer, payment, promise to pay, or authorization to pay any money, gift, or anything of value to any foreign official for the purpose of influencing any act or failure to act in the official capacity of that foreign official or inducing the foreign official to use influence to affect a decision of a foreign government or agency in order to obtain or direct business to anyone.
- Accounting Requirements: Companies are required to keep accurate books and records, and to maintain adequate internal accounting controls.

The FCPA also applies to individuals and companies outside of the U.S. who participate in furtherance of such a corrupt payment while in the United States.

Similarly, the UK Bribery Act prohibits individuals from offering, promising, or giving a financial advantage to another person, including foreign officials, if the individual intends to induce or reward a person for the improper performance of a function or activity, or if an individual offers, promises, or gives financial advantages or other advantages to another person, and the individual knows or believes the acceptance of the advantage would constitute improper performance of a relevant function or activity.

Local laws of other countries may include similar or more restrictive prohibitions. Laws in most countries prohibit or restrict government officials or employees of government agencies from receiving payments, entertainment, or gifts for the purpose of obtaining or retaining business.

7. Related Documents

CRDF Global Policies, Processes, and Procedures

Related Policies	Related Processes	Related Procedures
Code of Conduct	Anti-Bribery/Anti-Corruption Screening Process (forthcoming)	Anti-Bribery/Anti-Corruption Screening Procedure (forthcoming)
Financial Integrity Policy		
Procurement Policy		Global Supply Chain Procedures
Program Management Policy (forthcoming)		

Business Development Policy		
Whistleblower Policy (forthcoming)		

External References

External Reference	Description
Foreign Corrupt Practices Act	Full text of legislation and related online resources.
UK Bribery Act	Full text of legislation