

UPS ANTI-BRIBERY AND CORRUPTION POLICY

For Third-Party Representatives

What is the U.S. Foreign Corrupt Practices Act?

- The U.S. Foreign Corrupt Practices Act of 1977 (referred to as the FCPA going forward) generally prohibits U.S. companies and citizens, foreign companies listed on a U.S. stock exchange, or any person acting while in the United States, from corruptly paying or offering to pay, directly or indirectly, money or anything of value to a foreign official to obtain or retain business.
- FCPA law and UPS policies prohibit UPS, a U.S. company, or any of its global subsidiaries or affiliates, from making payments to a foreign government official (or even offering to make payments) to obtain or retain an improper business benefit.
- Violations of these requirements can result in significant fines and penalties, as well as criminal, civil and administrative sanctions for a company, its officers, directors, employees, agents or representatives.



Invoices and Receipts

- All payments cash or otherwise, must be supported by invoices, receipts or other approved documentation which demonstrates the official nature and legitimacy of the payments.

Definition of Bribery and Corruption

- **Bribery** is offering, giving, receiving or soliciting something of value in order to improperly influence a business action or decision. It can come in many forms: meals, luxury travel, tips, etc. but it's still a bribe if someone gets an undue benefit.
- **Corruption** is a form of dishonesty or a criminal offense that is undertaken by a person or an organization that is entrusted in a position of authority to acquire illicit benefits or abuse power for one's gain. Corruption may involve activities like bribery, influence peddling, and embezzlement.

What are your Responsibilities?

- As a Third-Party Representative of UPS, you or your staff cannot offer, promise, provide or receive any gift, meal or entertainment intended to secure or retain an improper advantage, whether involving a government official or a non-government official.
- In addition, UPS cannot direct or allow our agents or other third-party representatives to make improper payments or engage in prohibited conduct on UPS's behalf.

Activities Requiring Prior Approval

- Under limited circumstances, UPS will permit related expenses for government agencies or employees to ensure sufficient staffing for a project.
 - Gifts, Meals, Entertainment and Sponsorships
 - Overtime & Related Expenses
 - Travel, Meals and Lodging Related to Demonstration and Explanation of Services
- UPS does not expect that its third-party representatives will have to make any of the payments mentioned above on UPS's behalf.
- If the situation does occur, you must contact your UPS Representative immediately to secure express written approval prior to making such payments.



IMPORTANT: As a Third-Party Representative of UPS, you should train your owners, directors and employees who interact with government entities on behalf of UPS on the UPS Anti-Bribery and Corruption policy or equivalent compliance policies every year. All training materials and records relevant to the last training have been kept by our company for at least 15 months.