



## **AAA's Global Anti-Bribery and Anti-Corruption Business Principles**

AAA is fully committed to performing business legally and with integrity in every country in which we operate. We expect the same commitment from our business partners.

Most countries forbid making, offering or promising any payment or anything of value (directly or indirectly) to a government official when the payment is intended to influence an official act or decision to award or retain business.

Two such laws are the Foreign Corrupt Practices Act (FCPA) in the United States and the UK Bribery Act. Although they are US and UK based laws, they are applicable to AAA as we conduct business in both countries and apply to AAA actions anywhere in the world. Additionally, AAA's international activities may also be subject to other international and local anti-bribery laws. It is important that AAA's business partners respect all international and local anti-bribery and anti-corruption laws, even where the perception is that such standards are only loosely enforced by local authorities. Corruption and bribery are never acceptable business practices.

Violation of the relevant laws can result in civil and criminal penalties, including heavy fines and prison sentences. In addition, corrupt practices committed in one country may result in civil and criminal proceedings not only in that country but also in another country, given the extra-territorial application of some regulations. AAA employees, contractors and third parties that AAA transacts with, are strictly prohibited from offering, paying, promising or authorizing any bribe to any government official, politician, political party or any other person or organization directly or indirectly, or through a third party or family member. AAA employees are requested to seek help and advice in case of doubt about such laws and how they may apply to their actions.

Bribery and corruption can also occur in non-government business relationships. Most countries have laws which prohibit offering, promising, giving, requesting, receiving, accepting, or agreeing to accept money or anything of value in exchange for an improper business advantage. AAA employees are not permitted to offer, give, solicit or accept bribes, and we expect our business partners, and those acting on their behalf in connection with work for AAA, to abide by the same principles.

Business partners, and those acting on their behalf in connection with work for AAA, are expected to raise concerns related to potential violations of these Global Anti-Bribery and Anti-Corruption Principles or the law. Such reports can be made to a business partner's primary point of contact at AAA, by e-mail at [group-legal@adacap.com](mailto:group-legal@adacap.com) or by phone at 1-212-235-2380.