

Ethics and Compliance

REMINDER: ANTI-CORRUPTION POLICY

Anti-Corruption Policy: Purpose & Definition

- **Purpose:** To establish standards and a framework for prevention and detection of bribery and corruption
- **Definition:**
 - **Corruption:** abuse of entrusted power for personal gain
 - May include bribery, fraud, or unethical practices
 - **Bribery:** giving or taking money (or anything of value) in order to influence the judgment or conduct of a person in a position of trust (especially a government official)

Anti-Corruption Policy: Laureate Employees

- All Laureate employees are required to fully comply with this policy as well as the Foreign Corrupt Practices Act (U.S. Law), and all other applicable anti-corruption laws
 - We shall not be a party to any bribery or kickbacks
 - We must always be truthful and accurate in our records and documents
 - We shall not use 3rd parties as a conduit for prohibited activities

Anti-Corruption Policy: Summary

Laureate maintains a zero-tolerance policy toward bribery and kickbacks, requiring all employees to act with integrity, professionalism, and full compliance with company policies – even if refusing a bribe results in financial loss or project delays. Any solicitation of a bribe must be clearly declined and promptly reported to a Local Compliance Officer or through the [Laureate Ethics Helpline](#).