



## **Policy on International Business Relationships**

### **Purpose**

This Policy extends to HJF and its employees worldwide and all its subsidiaries, subrecipients, contractors, consultants, and other representatives regarding business relationships outside the United States (International Business Relationships). This Policy supplements HJF's Code of Ethics provisions on the Conduct of International Business. Compliance with this Policy is mandatory and will help to ensure that all business is conducted in a lawful and ethical manner.

### **Compliance with FCPA and Other Laws Involving International Business Relationships**

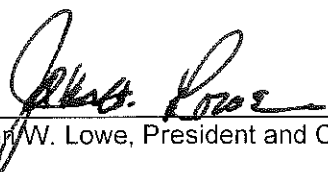
1. International Business Relationships include entering into any agreement (including but not limited to contracts, subcontracts, purchase orders, and consulting agreements) with any third party (including individuals, corporations, government agencies, and unincorporated entities) to assist HJF or its subsidiaries in supporting work or projects, personnel visas, import licenses, facilities or other matters relating to business operations within a foreign country or region.
2. HJF and its employees and subsidiaries will strictly comply with all applicable laws, rules, and regulations in all countries where HJF and its subsidiaries conduct business and will require all contractors, subrecipients, suppliers of services, and other third parties with whom relationships are established to avoid any activities that could potentially violate applicable laws, rules, or regulations or involve HJF or its subsidiaries or employees in any unlawful or unethical practice.
3. HJF and its employees and subsidiaries must comply with all applicable U.S. and international anti-corruption laws. Such laws include the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act, as well as applicable local foreign anti-corruption laws and regulations. In addition, HJF and its employees and subsidiaries must comply with all other applicable laws, treaties, regulations, and policies affecting International Business Relationships, including but not limited to export control laws, trade sanctions, and competition laws.
4. The FCPA prohibits a company from corruptly offering or giving anything of value to a "foreign official", including any officer or employee of a foreign government or any department, agency, instrumentality thereof, or any person acting in such an official capacity; a foreign political party; candidate for political office; or public international organization, for the purpose of influencing any act or decision of these officials or in violation of their duties in order to help a company obtain or retain business. The FCPA also prohibits the corrupt offering or payment of anything of value to any person, including third parties or intermediaries, while knowing that all or a portion of such money or thing of value will be offered, given, or promised, directly or indirectly, to a foreign official. The U.K. Bribery Act broadly prohibits any bribery by a company's employees, agents, subsidiaries and other "associated persons," which may also include the company's contractors and other suppliers of services.


5. In carrying out this Policy, and before entering into any International Business Relationship, HJF and its employees and subsidiaries will give consideration to such matters as:
- the reputation and qualifications of the proposed parties to an International Business Relationship;
  - their connections to the local government;
  - the necessity of the services to be rendered by such persons;
  - the reasonableness of their fees or other compensation in light of the fees paid to other persons in the area for similar services;
  - the location at which, and the currency in which, fees or other compensation is to be paid to such persons;
  - any local legal requirements, including taxes and foreign currency exchange controls regarding the payment of fees or other compensation to such persons;
  - the business and cultural environment in which such persons will render such services; and
  - whether contractual assurances have been received obligating the proposed party to comply with all applicable anti-corruptions laws including the FCPA, the U.K. Bribery Act, and all applicable local laws and requirements.
6. Any questions relating to this Policy, and any questions concerning whether contemplated conduct may violate any law, rule, regulation, or policy, should be directed to the HJF Legal Department, which can be reached at (240) 694-2063, or at [legal@hjf.org](mailto:legal@hjf.org).

## EFFECTIVE DATE

This Policy is effective immediately.

*This Policy does not constitute an express or implied employment contract, and does not create any right, privilege, entitlement, or cause of action in any person or entity (other than the Foundation), where such right, privilege, entitlement, or cause of action would not otherwise exist. All managerial and administrative functions, responsibilities, and prerogatives entrusted to and conferred upon employers inherently and by law are retained and vested exclusively with the Foundation, including but not limited to the right to exercise its judgment to administer policies, practices, and procedures, and to change them. This Policy can be changed at any time by the Foundation in its discretion without notice.*

  
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John W. Lowe, President and CEO

  
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Date