



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

This anti-bribery and anti-corruption policy is a supplement to our Code of Business Conduct and sets forth the responsibilities of Federal (the "Company"), our employees and trustees with respect to observing and upholding our zero-tolerance position on bribery and corruption. It also serves as a source of information and guidance for those working for the Company to recognize and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy statement

The Company is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. We have zero-tolerance for bribery and corrupt activities and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships wherever we operate. We will uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. Bribery is a crime and if we or anyone we are associated with is found to have taken part in corrupt activities, we may face serious damage to our reputation which is why we are committed to preventing bribery and corruption in our business.

Who is covered by the policy

This anti-bribery and anti-corruption policy applies to all employees and trustees. It also applies to all consultants, contractors and any other person or persons associated with us or any of our subsidiaries or their employees as well as actual and potential tenants, suppliers, business contacts and government and public bodies. All contractual arrangements made by our Company should require those with whom we do business to comply with all applicable laws, including those relating to anti-bribery and anti-corruption.

What constitutes bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. Accepting a bribe also constitutes bribery and is illegal and prohibited by the policy. Employees shall not engage in any form of bribery, whether it be directly, passively, or through a third party. Employees and trustees must not bribe any public officials and shall not accept bribes under any circumstances. If an employee or trustee is uncertain about whether something is a bribe or a gift or act of hospitality, they should must seek further advice from our General Counsel.

Distinguishing bribery from other activities

- A. Gifts and hospitality. The Company and our employees and trustees may give and accept normal and appropriate gifts given as gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:
1. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favors or benefits.
 2. b. It is not made with the suggestion that a return favor is expected.



3. It is in compliance with local law.
4. It is given in the name of the company, not in an individual's name.
5. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
6. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
7. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
8. It is given/received openly, not secretly.
9. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
10. It is not excessive in value.
11. It is not an offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's General Counsel.

We recognize that significant judgment may be required in determining whether a gift is or is not appropriate under the circumstances. Any questions regarding whether a gift is acceptable should be directed to the Company's General Counsel.

- B. **Facilitation Payments and Kickbacks.** The Company will not make any form of facilitation payments or allow kickbacks. A facilitation payment is a form of bribery that is made in order to expedite or facilitate the performance of a public official for a routine governmental action. Facilitation payments do not include any expedited processing or similar fees that may be paid which are recognized as legitimate by the applicable governmental agency and paid directly to the governmental agency, not an individual. A kickback is a payment typically made in exchange for a business favor or advantage.
- C. **Political Contributions.** The Company does not make donations or any kind to support any political parties or candidates; however, individual employees and trustees are permitted to make such contributions so long as they are not being made with the expectation of gaining an improper business advantage. The Company, employees and trustees may make contributions to industry groups who support various political causes for the benefit of the industry as a whole.
- D. **Charitable Contributions.** The Company encourages the act of donating to legitimate charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise). Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. All charitable donations made must be legal and ethical under local laws and practices.

Employee and Trustee Responsibilities

As an employee of the Company, you must ensure that you read, understand, and comply with this policy, and with any training or other anti-bribery and anti-corruption information you are given. All employees and trustees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption and should avoid any activities that could lead to, or imply, a breach of this anti-bribery and anti-corruption policy. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you should notify the General Counsel, or you can report the incident by calling our whistleblower hotline at 833-664-1729. Reports to the whistleblower hotline



can be made anonymously. If any employee breaches this policy, they will face disciplinary action and could face dismissal.

If you are offered a bribe by anyone or asked to make a bribe, or you suspect you will be offered a bribe or asked to make one, you should immediately notify your supervisor and the General Counsel. No employee will suffer dismissal, disciplinary action or any other adverse employment consequences as a result of refusing to accept or offer a bribe or engage in other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption. Any employee who believes he or she has been subjected to any adverse employment action as a result of raising a bribery or anti-corruption concern should report that belief to the Company's General Counsel.

Training and communication

Training on this policy will be provided as part of the on-boarding process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to acknowledge their obligation to comply with this policy. We will also provide relevant anti-bribery and anti-corruption training to employees when we believe there is a potential risk of encountering bribery or corruption during work activities.

Monitoring and reviewing

The Company's General Counsel is responsible for monitoring the effectiveness of this policy and will review the implementation, adequacy and effectiveness of it on a regular basis. The Company has in place internal controls over payments that are designed to prevent, among other things, bribery and corruption, and those internal controls are subject to regular audit to determine effectiveness and compliance. This policy may be amended at any time to improve its effectiveness at combatting bribery and corruption.