

Anti-Corruption Policy

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Legal

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Objective

The purpose of the Anti-Corruption Policy is to set the expectation for employees that we operate ethically and do not improperly influence business.

Policy Statement

BenefitHub is subject to various anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, the India Prevention of Corruption Act, applicable international anti-corruption laws and agreements and other laws that apply in the various jurisdictions where we do business.

All BenefitHub employees are expected to comply with this Policy and its implementing procedures, which are designed to promote compliance with these laws throughout our operations. This includes all directors, officers, and employees of BenefitHub entities, subsidiaries and joint ventures over which BenefitHub has operational control (collectively “Associates”).

If local law or a business unit imposes stricter requirements than those described in this Policy, team members must comply with those rules.

Process or Procedure

BenefitHub is committed to conducting business ethically. Our rule is simple: we never pay bribes or act corruptly, and we never ask a third party to do so on our behalf. This commitment is a core part of how we do business the right way.

In support of this commitment – and to protect BenefitHub’s reputation and ensure our continued success – every team member must understand and comply with the following guiding principles:

1. **No Bribes.** Do not authorize, offer, promise, or provide anything of value – including a bribe – to get business or secure any advantage in connection with BenefitHub’s business. Do not request or accept any bribes, kickbacks or other improper benefits.
2. **Provide Gifts and Entertainment with Caution.** Be mindful of unique risks and restrictions that apply to giving gifts or entertaining, particularly where a government official is involved. Contact the BenefitHub Legal Department for pre-approval requirements and restrictions when providing anything of value to anyone outside the Company – both recipients at government entities and the private sector.
3. **No Preferential Hiring.** Do not offer or promise employment to, or hire, relatives of a client or government official for the purpose of improperly influencing their decision- making. Follow the processes established by the Human Resources department to ensure only qualified candidates are hired and any conflicts of interest are addressed prior to extending an interview and offer.
4. **Maintain Accurate Books & Records.** Submit accurate and complete timesheets, travel and expense reports, financial statements, customer billing, and other records. The Company’s books and records must correctly reflect the true nature of all business transactions, no matter how small.
5. **No Facilitation Payments.** We prohibit facilitation payments – or small, unofficial cash payments to a low-level government official – to expedite routine administrative actions.
6. **No Improper Conduct by Third Parties.** We cannot allow any third party to act on our behalf in a way that violates applicable laws or our policies. You must contact the Company’s Legal Department for approval before engaging a third party to act on

BenefitHub's behalf in business dealings with government officials; be mindful in managing relationships with third parties – including reviewing and approving invoices – of facts or circumstances that suggest the third party may act improperly.

7. **No Improper Charitable Contributions or Sponsorships.** Charitable contributions and sponsorships can present corruption risks if used to improperly influence a decision-maker in connection with BenefitHub business. Obtain Finance Department and Legal Department pre-approvals in writing before making charitable contributions or sponsorships.
8. **Mitigate Corruption Risks in Merger, Acquisition, and Joint Venture Activity.** Ensure that appropriate anti-corruption due diligence is conducted prior to entering into a joint venture, or entering a new market, and in connection with every merger or acquisition. Contact the Company's Legal Department for assistance.

Reporting

BenefitHub has adopted the Whistleblowing Procedure which, where not specifically forbidden by local laws in certain jurisdictions:

a) encourages and allows employees and Third Parties in general to report on the basis of a reasonable belief (or in any event in good faith) attempted, suspected or actual act of Corruption or violation of the Anti-Corruption Policy and/or of the Code of Ethics and Conduct or, in general, of the internal control system, by contacting BenefitHub's Human Resources Department;

b) requires BenefitHub to keep reports confidential so as to protect the identity of the whistleblower and of others involved or referred to in the report, except to the extent required to carry out investigations by the judicial authorities;

c) permits anonymous reporting;

d) guarantees confidentiality during the entire report handling process, from the receipt of reports through the preliminary investigation to the final stage;

e) prohibits retaliatory or discriminatory acts and/or disciplinary actions against those who make the reports referred to in point (a) above.

BenefitHub ensures that all employees, corporate bodies and Third Parties are aware of the reporting procedures and are able to use reports fully aware of their rights and protections.

Results Measurement

Receipt and acknowledgement of this Policy is tracked for all employees. If questioned, all employees should be able to demonstrate knowledge of anti-corruption practices, policies and responsibility.

Consequences of not Following Policy

Subject to local laws and regulations, a violation of this Policy or applicable anti-corruption laws could result in disciplinary action, up to and including termination.

Speak up! If you become aware of a violation of this Policy, you must report it. BenefitHub does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law or other BenefitHub policies.

To report a possible violation of this Policy, send an e-mail to the Company's Legal Department at legal@benefithub.com. All reports received will be treated confidentially.

Change History

Date	Editor	Change Description
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