



## **Anti-Bribery and Corruption Compliance Frequently Asked Questions**

Question: What is the FCPA?

Answer: The U.S. Foreign Corrupt Practices Act (FCPA) makes it a crime to pay or offer to pay with corrupt intent anything of value (either directly or indirectly) to any “government official” in order to obtain or retain business, or to secure an improper advantage. It also requires that publicly traded companies, like Huron, maintain a system of internal controls and books and records that accurately reflect every transaction.

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Question: What is anything of value?

Answer: Anything of value may include, but is not limited to, cash, cash equivalents, discounts, donations, travel expenses, entertainment, stock or gifts.

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Question: Can I make a payment to expedite the performance of a routine governmental action such as the obtainment of a required license or visa?

Answer: No, payments to expedite the performance of a routine governmental action, known as facilitating or “grease” payments, are prohibited by Huron.

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Question: Can I pay for a client’s travel expenses that are directly related to the promotion or demonstration of Huron products or services; or the execution or performance of a contract?

Answer: Yes, as long as these expenses are reasonable and pre-approved by your Managing Director and the Anti-Bribery and Corruption Compliance Officer.

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Question: Can Huron or I be prosecuted under the FCPA and other anti-bribery statutes, if a bribe is made by a third-party, such as a business finder or agent?

Answer: Yes, legal liability is not limited to those who actively participate in illegal conduct. A bribe made by a third-party is illegal under anti-bribery laws. The Company and individuals who made the payment to the agent can be prosecuted under the FCPA and other anti-bribery statutes.

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Question: How is the U.K. Bribery Act different from the FCPA?

Answer: The Bribery Act is not limited to government officials. The Act makes any form of bribery illegal, including bribery in private commercial transactions. The Act also creates an offence for failure to prevent bribery. More reasons why Huron must establish adequate procedures to ensure compliance.

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Question: How can I grow my business and still comply with our anti-bribery laws and Huron's Code of Business Conduct and Ethics?

Answer: Communicate Huron's ethical standards with internal and external stakeholders. Prior to engaging business partners, consult with Legal to ensure appropriate due diligence of the supplier has occurred. Incorporate contractual safeguards into agreements and educate your client or supplier on applicable anti-bribery and corruption compliance.

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Question: Who should I contact with questions or concerns regarding anti-bribery and corruption compliance?

Answer: Questions or concerns regarding anti-bribery and corruption compliance should be directed to your Managing Director, Huron's Anti-Bribery and Corruption Compliance Officer, Chief Compliance Officer or General Counsel.

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