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Anti-Bribery, Anti-Corruption Declaration by Direct Express, Inc.

Direct Express, Inc, Will Not Tolerate Bribery Corruption. Bribery or attempted bribery is unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against Direct Express, Inc core values of conducting business to the highest legal, moral and ethical standards. Bribery and corruption are covered by various international laws and statutes. These laws often require companies, including FIDI Affiliates to have rigorous, pro-active measures in place to detect and prevent corrupt practices.

What Is Bribery?

<u>Bribery</u> is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action. It is illegal, and it is a breach of trust.

<u>A bribe</u> is an inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

Code of Conduct

Direct Express, Inc here by agrees and committed to:

- 1. Never engage in any form of bribery, either directly or through any third party.
- 2. Never offer or make an improper payment, or authorize an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
- 3. Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
- 4. Never offer, or accept, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
- 5. Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favor.
- 6. Never accept any gift from any business partner if there is any suggestion that a return favor will be expected or implied.
- 7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
- 8. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
- 9. Never induce or assist another individual to break any applicable law or regulation.