



POLICY ON COMPLIANCE WITH THE FOREIGN CORUPT PRACTICES ACT (FCPA)

Policy Summary

Maintaining ethical standards is the responsibility of every member of the Pace community. Those ethical standards are embodied in the University's [Guiding Principles of Conduct](#) and other policies as well as federal, state and local laws. Pace University employees and representatives are expected to adhere to high standards of professional and ethical conduct in carrying out their duties. It is the policy of the University to comply with U.S. laws and regulations applicable to the University's overseas activities, including but not limited to negotiating and entering into contracts with foreign entities or individuals for activities in the U.S. or overseas. This Policy addresses laws related to Anti-Bribery.

The U.S. Foreign Corrupt Practices Act (FCPA) contains anti-



Policy on Compliance with the Foreign Corrupt Practices Act (FCPA)

Consequences of Violations- Violations of this policy may result in appropriate disciplinary action up to and including termination of employment or other relationships with the University. Conduct constituting a violation may also expose the University and University Community Members to criminal or civil penalties in the United States and abroad.

Non-Retaliation- The University prohibits retaliation against any person for making a good faith report or cooperating in an investigation in connection