Anti-Corruption Policy

We hold ourselves accountable to a high standard and take pride not just in what we build—but how we build it. Throughout the world, we conduct business using ethical business practices only, and we create and maintain accurate business records, always. We do not tolerate any form of corruption, including offering or accepting bribes, kickbacks, and other improper payments, directly, or through third parties acting on our behalf. We are committed to compliance with the letter and the spirit of anti-corruption laws including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act (collectively, “Anti-Corruption Laws”), everywhere we do business.

PURPOSE

To prevent the offering, paying, soliciting, or accepting of bribes or kickbacks worldwide, and to promote Meta’s commitment to compliance with global Anti-Corruption Laws.

DEFINITIONS

Meta Personnel is defined in Meta’s Code of Conduct (“Code”) as members of the Board of Directors, officers, and employees of Meta, as well as contingent workers (including vendor workers, contractors, and consultants).

Government Official is any officer, employee, or person acting for or on behalf of a government or any government department, agency, or state-owned or state-controlled entity, or public international organization (e.g., the United Nations); political parties and officials of political parties; any candidate for political office; or a member of a royal family. For help identifying Government Officials, review our guidance on Who is a “Government Official” and, when in doubt, consult with Compliance.

Anything of Value is broadly construed as anything that a recipient may consider valuable to them. It includes cash and non-cash gifts and benefits, both tangible and intangible. Things like discounts, rebates, gifts, entertainment, meals, travel, conference attendance fees, or Meta ad credits can qualify as “Anything of Value.” For additional examples of Anything of Value, review our guidance on Anything of Value and, when in doubt, consult with Compliance.

Third Party is any person not employed by Meta, or any business or organization not owned or controlled by Meta. For examples of Third Parties, review What’s a Third Party and what’s my role, and, when in doubt, consult with Compliance.

SCOPE AND APPLICABILITY

We expect all Meta Personnel and Third Parties acting on Meta’s behalf to adhere to this Policy and the principles underlying this Policy in any of their activities related to their work with Meta.
REQUIREMENTS

01 No bribes or kickbacks

Bribery is the improper offer, promise, giving, or authorizing the giving of Anything of Value to any person to get or keep business, secure an improper advantage, or influence them to act improperly. At Meta, we do not bribe or condone bribery, period. This prohibition on bribery applies in all situations, including public sector and commercial bribery. We will always choose to lose business rather than secure it through a bribe, kickback, or improper payment. Meta Personnel, whether acting directly or through a Third Party, are prohibited from offering, paying, soliciting, reimbursing, or accepting any bribe, kickback, or improper payment.

02 Engage ethically with government entities and officials

We engage constructively, ethically, and responsibly with governments and political entities to further Meta’s mission. In doing so, unless this Policy expressly allows it, advance approval from Compliance is required before providing Anything of Value to a Government Official. Situations where these issues may arise include:

- **Political contributions**—Contributions by corporations to political parties, political committees, and to candidates for public office are regulated in many countries and can raise corruption concerns or create the appearance of impropriety. For these reasons, advance approval from Compliance is required before making a political or campaign contribution in the name of or on behalf of Meta, or where the contribution will be associated with Meta. Voluntary contributions by eligible Meta employees to Meta’s non-partisan political action committee (MPAC) are permitted pursuant to MPAC’s bylaws. For more information, please see Meta’s Political Activities and Lobbying Policy.

- **Event sponsorships**—While it may be appropriate for Meta to sponsor conferences and similar events, we must take care that our support does not result in improper benefits flowing to any Government Official. Advance approval from Compliance is required for sponsorships at the request of a Government Official, for events closely affiliated with a Government Official, or for sponsorships that would result in a Government Official receiving items of value beyond the limits in Meta’s Gifts and Business Entertainment Policy. Examples of events that are closely affiliated with a Government Official include events that benefit or honor a government entity or a Government Official.

- **Hiring decisions**—Meta hires based on the qualifications, knowledge, skills, and abilities required for a particular position. Always use Meta’s normal hiring process, and never hire any person suggested by or related to a Government Official to obtain or maintain business, to secure any improper advantage, or to influence them to act improperly. For additional information about recruiting and hiring Government Officials, please see Meta’s Political Activities and Lobbying Policy.

- **Facilitating payments**—“Facilitating” or “grease” payments are typically low-value payments made to secure or expedite a routine, non-discretionary action by a Government Official, such as expediting the issuance of an otherwise valid visa. Meta Personnel are prohibited from making or facilitating payments, even if allowed under local law.

03 Follow Meta’s rules on gifts and business hospitality

We responsibly invest in our business relationships but never offer or accept Anything of Value to improperly influence people or under circumstances that might give rise to even an appearance of impropriety. Meta’s Gifts and Business Entertainment Policy contains dollar limits and pre-approval requirements for giving and receiving gifts, meals, travel, and entertainment. These rules vary by country, activity, and whether the recipient is a Government Official. Meta Personnel are expected to consult and comply with these requirements before giving or receiving gifts, meals, entertainment, or travel, to or from a Third Party.
In pursuit of Meta’s mission, values, and principles, we may choose to make grants or donations to philanthropic, community, educational, advocacy, industry, or research organizations. All such grants and donations must be based on legitimate business or philanthropic objectives, not be made as part of an exchange of favors with a Government Official, and comply with the pre-approval requirements and restrictions in Meta’s Grants and Donations Policy.

Meta works with Third Parties that are qualified, act with ethics and integrity, and comply with local law. Always follow the steps in Meta’s Third Party Risk Management Policy to ensure that Meta’s third-party risk management procedures, including intake via the Third Party Assessment Tool, risk-based due diligence, and contracting, are conducted on all third party engagements. For higher-risk Third Parties, as determined by Compliance, Meta may require heightened diligence, contractual provisions, training, and oversight. Meta Personnel who interact with higher-risk Third Parties may be required to help spot and mitigate corruption risks, as detailed in Guidelines for Retaining Third Parties. Never ask a Third Party to do something that we cannot do ourselves under this Anti-Corruption Policy.

Ignoring signs of bribery can lead to legal liability for you and Meta. If something about a transaction, business arrangement, or request from a Government Official “looks bad” or “smells funny,” you are expected to refer the matter to Compliance for review and guidance, and follow any guidance provided. For additional guidance, review Examples of “Red Flags”.

Meta’s books and records always reflect the underlying transaction or event. Contracts must accurately reflect the economics of the agreement, for example, by including the amounts to be paid, the work to be performed, and the beneficiary of the payments, and all expenditures and uses of Meta resources must be accurately described in supporting documents and accurately entered in our books and records. Never cause or permit any business expense to be handled “off the books” or mischaracterized. Never make a false, misleading, incomplete, or inaccurate entry in Meta’s books and records. Be sure to follow the Meta Contract Policy for the review, approval, and signing of contracts, and never enter into “side agreements” that change contractual provisions without the required approvals. And remember, everyone is responsible for helping Meta maintain a system of internal controls sufficient to prevent corruption and ensure accurate books and records.

Meta will not participate in joint ventures or similar business arrangements, or invest in or acquire any companies, without having first conducted appropriate due diligence, negotiated appropriate contractual protections, and ensured appropriate oversight. In the case of acquisitions, Meta will conduct post-acquisition integration and risk-based training to ensure that acquired entities and their personnel are familiar with and follow this Policy.
VIOLATIONS

Enforcement—A violation of this Policy or law may result in disciplinary action up to and including termination of employment for Meta employees or removal from Meta’s account for contingent workers, subject to applicable law. Anyone who violates this Policy also can subject themselves and Meta to civil and criminal penalties.

Exceptions for serious and imminent threats to life or safety—Consistent with global Anti-Corruption Laws, this Policy does not prohibit payments to avoid a serious and imminent threat to life or physical safety. If at all possible, you should consult with Compliance in advance of making any such payment. If that is not possible, you must report the incident to Compliance as soon as possible. Meta’s Global Travel Security Policy provides further guidance and reporting mechanisms for emergency exceptions.

REPORTING CONCERNS OR VIOLATIONS

All known or suspected violations of this Policy must be reported without delay, either directly to Compliance, Internal Audit, or through the Meta Whistleblower and Complaint Policy.

Anonymous reporting is available by:
- Visiting SpeakUp
- Calling +1-877-564-9619
- Dialing the direct access code available at https://www.business.att.com/collateral/access.html and then +1-877-564-9619 following the operator’s instructions.

For Meta managers, please be aware of your responsibilities under the Code to report compliance concerns and alleged or known policy or legal violations to your Employee Relations Business Partner, Human Resources Business Partner, or Legal. Please report concerns regarding contingent workers to cwquestions@meta.com.

Questions concerning application of this Policy should be directed to legalapproval@meta.com. You are also encouraged to discuss questions and concerns about our business practices or policies with your management. For additional guidance on how to request approvals required under this Policy, please visit Approvals and Policy Questions.

MODIFICATIONS

The Audit and Risk Oversight Committee will review this Policy on a regular basis, evaluate its effectiveness, and update or amend the Policy as necessary. Administrative changes to the Policy may be approved by Meta’s Chief Legal Officer, or their designee.