

NO IMPROPER PAYMENTS NO IMPROPER ADVANTAGE

No payments of money or anything of value may be offered, promised or paid, directly or indirectly, to anyone, including government officials, to obtain an improper advantage. This includes giving gifts or paying for travel and hospitality for an official without pre-approval from Universal.

For example, we do not make payments:

- To an official to obtain a sale
- To an official to influence legislation
- To an inspector to pass an inspection
- To a Customs official to speed up paperwork
- To an official to schedule pre-shipping product inspections
- To an official to issue a certificate of product delivery
- To a Customs official to process a visa or work permit
- To an official to obtain a phyto sanitary certificate
- To an official to influence a grading inspection
- To any official as a tip or gratuity for doing their job

NO IMPROPER PAYMENTS TO BE MADE ON UNIVERSAL'S BEHALF.  
SHOULD SUCH A PAYMENT BE REQUESTED, LET US KNOW PROMPTLY.

We expect the following from you:

- Take no actions that would violate Universal’s policies, the FCPA or the laws in your country.
- Be aware of and comply with Universal’s Code of Conduct and Anti-Corruption Compliance Manual.
- Tell us if any of your officers, directors or employees are Government officials, relatives of an official or if an official has any substantial financial interest in your organization.
- Do not use sub-contractors, representatives or agents for our account without prior, written Universal approval.
- Advise us promptly of any significant changes in your organization that may have compliance implications such as a change in ownership or management.
- Tell us if a government official ever requests you to make a payment or give them something that violates Universal’s policies.



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**Universal**  
UNIVERSAL CORPORATION

UNIVERSAL PRINCIPLES: LEADING WITH INTEGRITY



**ANTI-CORRUPTION**  
[www.universalcorp.com/compliance](http://www.universalcorp.com/compliance)

# LEADING WITH INTEGRITY



**George Freeman**  
Chairman, President, and Chief Executive Officer

The Universal Corporation family of companies has been conducting business for over 100 years. During that time, our people all over the world have worked hard to create and protect our most important business asset—integrity. Corruption is a threat to our business and employees, and is counter to our culture. We owe it to our customers, our communities, our shareholders, and ourselves to conduct our business pursuant to high ethical standards and to denounce corruption. To state it simply: *We do not pay bribes.*

We hold ourselves to the highest standards and we expect the same of our business partners around the globe. Whether you are a supplier, vendor, agent, freight forwarder, broker, consultant, or other intermediary, we expect you to share our values and commitment to legal compliance.

No matter where in the world you are located or what kind of services you are performing for Universal, it is never acceptable to offer bribes, kickbacks, or improper payments of any kind to anyone.

We need your commitment to follow our policies. Doing the right thing and maintaining an open and honest relationship with us will help build a solid foundation for creating a positive, compliant work environment and an ongoing and mutually successful business relationship.

## THE UNIVERSAL GLOBAL COMPLIANCE PROGRAM



The Universal Global Compliance Program ensures we are conducting ourselves with integrity, in accordance with our compliance policies. Universal has established a Compliance page on its publicly available website, and it maintains the Compliance page in fifteen languages.

Please visit our Compliance page for more information about compliance: [www.universalcorp.com/compliance](http://www.universalcorp.com/compliance)

## CODE OF CONDUCT AND ANTI-CORRUPTION COMPLIANCE MANUAL

Universal values compliance and integrity. An important part of our success is due to our commitment to integrity. Universal’s Code of Conduct (CoC) and Anti-Corruption Compliance Manual (ACM) are our primary compliance and ethics documents, and they state many of our policies on compliance.



## THE U.S. FOREIGN CORRUPT PRACTICES ACT (FCPA)

*“No issuer, domestic concern, person with U.S. nexus may corruptly take any action in furtherance of payment or a promise, offer, or authorization of payment of a bribe or anything of value directly or indirectly (with “knowledge”) to a foreign official to obtain or retain business or improper advantage.”*

Universal complies with the FCPA and we expect our business partners worldwide to comply with it too. The FCPA makes it *illegal to pay or promise to pay money or give anything of value* to a government official to bring in or keep business or to gain any improper advantage. This applies to payments and gifts given by companies and their employees, as well as third parties representing those companies. Universal’s Global Compliance Program and our policies help us comply with the FCPA. That is why we require your commitment to following our policies.

The FCPA defines “official” to include: any officer or employee of a foreign government or any department, agency, or instrumentality thereof, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organization.

Please see page 8 of the ACM for further details.