

Voya Financial Anti-Corruption and Anti-Bribery Policy

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Information Sheet

ISSUED BY

Voya Financial Compliance

OWNED AND APPROVED BY

Board of Voya Financial

TARGET AUDIENCE

All Voya Financial Directors and Employees

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CONTACT PERSON

John Longwell

Chief Compliance Officer, Enterprise Compliance

John.Longwell@voya.com

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I. Introduction

Voya Financial (“Voya”) aspires to the highest standards of business conduct and integrity. Consistent with these standards, Voya Financial has developed this policy on Anti-Corruption and Anti-Bribery (“Policy”), which is designed to meet applicable legal and regulatory requirements and industry-leading practices as well as protect the reputation of Voya.

Voya maintains a zero-tolerance policy towards bribery and corruption, regardless of the identity or position of the originator or recipient of a corrupt payment. Voya’s Board of Directors and its management fully endorse and support this zero-tolerance policy.

This Policy is designed to achieve compliance with applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and the U.K. Bribery Act 2010 (“Act”). It also provides clear guidance, including restrictions, guidelines and background information on anti-corruption and anti-bribery matters, so that our employees understand how to conduct themselves in a manner consistent with our corporate values. This Policy covers the following:

- Bribes, Kickbacks or Other Corrupt Payments
- Political Contributions
- “Pay-to-Play” rules

II. Definitions and Scope

Corrupt payments come in a variety of forms, but most commonly occur as a bribe, a gratuity, or a kickback. A “bribe” is the offering, giving, receiving, or soliciting of anything of value to influence the actions of an official, or other person, in charge of a public or private legal duty. “Anything of value” has a very broad definition under the law and consists of anything that provides a benefit to the recipient. The benefit does not need to be financial or a direct benefit and can include, for example, employment for another or a charitable contribution to a favored entity. The intent of the parties to the transaction and the surrounding facts and circumstances will determine whether something is an impermissible thing of value.

An illegal “gratuity” is anything of value that a person gives, offers or promises for the purpose of influencing the action of an official in the discharge of his or her public or private legal duties. “Anything of value” has the same broad legal definition as it does for bribery, and like bribery, the intent of the parties to the transaction and the surrounding facts and circumstances will determine whether something is an impermissible thing of value. An illegal “kickback” is an illegal payment or transfer of thing of value in exchange for preferential treatment or improper services. A kickback is typically the same as a bribe or a

gratuity, but the method of payment generally occurs through the misappropriation of funds.

This Policy applies to Voya, includes Voya Financial, Inc., its successors and its direct and indirect subsidiaries. This Policy also extends to all employees, which includes directors, officers, employees, contractors, and agents of Voya as defined immediately above. Employees include managers, who include anyone who manages or supervises people or projects in any line of business or support function.

III. Accountability and Responsibility

A. All Employees

All employees must be familiar with and adhere to this Policy. You should give all words and phrases their common and ordinary meaning. It is your obligation to obtain clarification about the meaning or interpretation of any word, phrase, or section if you have any confusion or uncertainty about its meaning or intent.

If you identify an actual or suspected breach of this Policy, you must promptly report it. Information on all reporting and guidance options can be found in the Ethics Helpline information located on Voya 360°. Questions on anti-corruption and anti-bribery matters may also be directed to the Voya Chief Compliance and Ethics Officer.

Failure to comply with this Policy may subject the Employee to disciplinary action, up to and including termination of employment and reporting of violations to appropriate authorities.

B. Managers

This Policy applies to all managers. Managers have an important and heightened level of responsibility under this Policy. As such, managers must understand and abide by this Policy and should use reasonable efforts to ensure that the employees that he or she manages are familiar with and abide by this Policy.

Managers have the following affirmatives duties:

- Promote and foster a culture of ethical business conduct and a compliance-conscious working environment.
- Establish and adhere to controls and processes designed to prevent and detect compliance risks and potential compliance violations.
- When you suspect misconduct, promptly (i) escalate such issues up the management chain, (ii) report suspected misconduct through the Ethics

Helpline, or (iii) contact the relevant control functions (e.g., Compliance, Law Department, Corporate Special Investigations, Risk) to facilitate an appropriate investigation of the matter.

- When misconduct is established, take appropriate disciplinary action after consultation with the Law Department, Human Resources and relevant control functions (e.g., Compliance, Corporate Special Investigations, Risk), and take steps to understand the root causes and establish measures to prevent a recurrence.
- Encourage employees to report any known or suspected violations and to ask questions or raise concerns, and do not discourage or interfere with an employee's use of reporting channels, including the Ethics Helpline.

Any manager's failure to comply with this Policy, including his or her duty to report, may subject the manager to disciplinary action, up to and including termination of employment and reporting of violations to appropriate authorities.

C. Compliance

The Compliance Department is responsible for advising and supporting Voya in establishing procedures, appropriate training, systems and other processes reasonably designed to achieve compliance with this Policy and regulatory requirements. It is Compliance's responsibility to conduct the annual mandatory anti-bribery and anti-corruption training that all employees must take, monitor employees' completion of that training, and ensure that employees acknowledge and certify to their understanding and completion of the training.

On a periodic basis, Compliance, at times in cooperation with Risk Management and Internal Audit, will assess Voya's procedures designed to achieve compliance with respect to bribery, corruption and due diligence of associated persons, as well as designing appropriate communications and training.

IV. Policy Statement

A. U.S. Foreign Corrupt Practices Act (FCPA)

The FCPA prohibits U.S. companies and their directors, officers, employees, agents and stockholders acting on their behalf, from offering, promising, paying or authorizing the payment of money or anything of value to a non-U.S. government official to influence the foreign official in his or her official capacity, induce the foreign official to do or omit to do an act in violation of his or her lawful duty, or to secure any improper advantage in order to assist in obtaining or retaining business, for or with, or directing business to, any person. This prohibition applies whether the offer or

payment is made directly or indirectly through a third party.

The penalties for violating the FCPA are potentially severe to both Voya and its Employees. Voya can face fines and become ineligible for U.S. Government contracts, insurance and financing. Individuals can face fines and imprisonment. The U.S. Department of Justice prosecutes criminal violations of the FCPA and has the authority to enforce the FCPA in both criminal and civil proceedings. The U.S. Securities and Exchange Commission may also enforce the FCPA in civil actions and administrative proceedings.

The reputational damage to Voya associated with an FCPA violation could far exceed any monetary penalties.

Accurate Accounting and Record-Keeping

The FCPA also requires companies with securities listed in the United States to satisfy its record-keeping and its accounting provisions. These accounting provisions, which were designed to operate in tandem with the anti-bribery provisions of the FCPA, require companies covered by the provisions to (i) make and keep books and records that accurately and fairly reflect the transactions of Voya and (ii) devise and maintain an adequate system of internal accounting controls.

Employees' compliance with the accounting and internal accounting control procedures of Voya is mandatory. At all time, Voya's books and records shall be maintained and recorded in compliance with applicable laws and applicable accounting principles and regulations. All accounting records, expenditures, expense reports, invoices, vouchers, gifts, business entertainment, and any other business expenses must be accurately and reliably reported and recorded. False or misleading entries or invoices are prohibited.

B. Anti-Corruption and Anti-Bribery

Voya and each of its employees are strictly prohibited from engaging in any activity that involves offering or accepting, or gives the appearance of offering or accepting, a bribe. In doing business anywhere in the world, neither Voya nor any employee shall, directly or indirectly, offer, pay, promise, authorize, solicit or accept any bribe, kickback, or other illicit payment or benefit. A violation can be a serious criminal offense.

Employees are prohibited from taking any action if doing so:

- Could be perceived as a bribe.
- Influences, is intended to influence, or reasonably gives the appearance of influencing any act or decision by anyone, including inducing anyone to do or omit to do something that is dishonest, illegal, misleading or a breach of trust or to improperly perform their function.

- Is done while the recipient conceals, or can be expected to conceal, from Voya, a request, promise, offer or gift.
- Makes the recipient appear to be under an obligation to Voya or places the Voya employee under a similar obligation.
- Is done to secure, maintain, or obtain business, or an advantage in business, by improperly inducing a person to perform a function in Voya's or an employee's favor.

C. U.K. Bribery Act 2010

The U.K. Bribery Act ("the Act") prohibits bribery of non-U.K. public officials as well as private companies or persons, regardless of whether they are U.K. or non-U.K. citizens, residents or companies. There are four categories of offenses that are specifically prohibited by the Act:

- Offering, promising, or giving a bribe to another person.
- Requesting, agreeing to receive, or accepting a bribe from another person.
- Bribing a foreign (non-U.K.) public official.
- Failing to prevent bribery at a corporate level by an associated person or third party.

Under the Act, the offence of bribing a foreign public official is committed where a person offers, promises or gives a financial or other advantage to a foreign public official with the intention of influencing the official in the performance of his or her official functions. The person offering, promising or giving the advantage also must intend to obtain or retain business or an advantage in the conduct of business by doing so. This definition is broader than the FCPA definition where the "act in violation of their duty" and "improper advantage" elements are present.

Voya is a United States company that maintains offices and does business within the U.K. Therefore, Voya will conduct our business in compliance with the standards and prohibitions of the Act throughout the world.

Different from the FCPA, the Act:

- Prohibits "facilitation payments," which are payments in order to facilitate or expedite performance of a routine government action (e.g., non-discretionary activities such as issuing permits, licenses, or other official documents to which the applicant is legally entitled);
- Has no requirement as to intent on the part of the person or entity in relation to bribery of an official; and

- Covers passive bribery and bribery on a private, or non-governmental, level.

A defense to a charge of failing to prevent bribery is for the subject company to have in place adequate procedures that are reasonably designed to prevent bribery.

D. Political Contributions and Activity

Voya respects and encourages the interests of its employees in supporting the political candidates and issues of their choice. However, it is very important that any employee's participation in the governmental process be undertaken as an individual — not as a representative of Voya. This is because United States federal law and certain state laws prohibit a corporation, such as Voya, from making political contributions in the United States. In addition, there are numerous U.S. laws that regulate company lobbying, political outreach, and the provision of gifts and entertainment to public officials at the local, state and federal levels. These laws are commonly known as “pay-to-play” laws. Finally, political contributions, when combined with a specific intent to exchange the contribution for an official act, can constitute bribery, which, as discussed above, is illegal.

A “political contribution” is a campaign contribution, gift, loan, advance or deposit of money or anything of value, made for the purpose of influencing any U.S. (or non-U.S. equivalent) federal, state or local election for political office, or a ballot initiative or to pay debt incurred in connection with any such election or ballot initiative. This definition includes monetary contributions (e.g., in the form of a corporate check or a purchase of tickets to a political fundraiser) as well as “in-kind” contributions (e.g., the use of corporate personnel or facilities, or payment for services). All political contributions must comply with the FCPA, state and federal “pay-to-play” laws and rules, the U.K. Bribery Act, the Voya Financial Code of Business Conduct and Ethics, and the Voya Financial Political Activity Policy.

To ensure compliance, Voya's Government Affairs Department represents all Voya businesses in governmental processes and serves as the only authorized representative of Voya in the public policy arena. While active and broad participation by Voya's business and functional leaders in the political process is encouraged, it can only be undertaken with guidance and pre-approval from Voya Government Affairs. It is critically important that any political activity engaged in by an employee be consistent with applicable law.

At times, Voya maintains a Political Action Committee (or PAC) to which employees may voluntarily participate, and Voya's Government Affairs as well as other Voya representatives oversee the PAC's functions. Any political contributions made by Voya must occur through the PAC or other authorized means. Employees are prohibited from making political contributions individually on Voya's behalf.

The Voya Financial Political Activity Policy, incorporated by reference

herein, governs political contributions, entertainment, and gifts of any size or type to any public official, as well as to an official's spouse or child, made by any Voya employee. It also covers contributions to a charity or nonprofit made at the request of a public official. Among other things, the Political Activity Policy requires pre-approval by Voya's Political Activity Review Committee ("PARC") or its designees of certain political activities and outlines the procedures for obtaining pre-approval. Therefore, before making a political contribution, you should consult the Political Activity Policy.

Certain business units may have additional, more stringent political activity policies with which employees of those businesses also must comply. In particular, employees of a registered investment adviser, or employees who are registered or otherwise associated with Voya broker-dealers, should consult the policies applicable to their business units concerning any of the activities described in this policy. Therefore, all employees must remain mindful of their own business units' more stringent policies.

E. Charitable Contributions

Employees may make appropriate charitable contributions on behalf of Voya. However, care must be taken to ensure that the recipient is a bona fide charity, and that there is no reason to believe that the charity itself may be operated directly or indirectly for the private benefit of a public official or an immediate family member. In addition, Voya prohibits any charitable contribution made with the specific intent that the contribution is in exchange for an official act or a violation of a public or private legal duty. Therefore, employees must first obtain written approval from Management and a Compliance Officer before making any charitable contributions on behalf of Voya.