

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

EFFECTIVE DATE

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1. Introduction

Voya Financial (or the “Company”) 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 the Company.

Voya Financial maintains a zero-tolerance policy towards bribery and corruption, regardless of the identity or position of the originator or recipient of a bribe. This zero-tolerance policy is endorsed and supported by the highest levels of the Company including its Board of Directors and its management.

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

1.1 Definitions and Scope

This Policy applies to the following:

1. “Voya Financial” or the “Company” includes Voya Financial, Inc., its successors and its direct and indirect subsidiaries.
2. “Employees” includes directors, officers and employees of Voya Financial and directors, officers and employees of Voya Financial direct and indirect subsidiaries.
3. “Managers” include anyone who manages people or projects in any line of business or support function.

2. Accountability and Responsibility

2.1 All Employees

All Employees must be familiar with and adhere to this Policy. 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 Financial Chief Compliance & 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.

2.2 Managers

Managers are responsible to oversee the implementation and maintenance of processes designed to support this Policy. As such, Managers must understand and abide by this Policy and should use reasonable efforts to ensure that Employees he or she manages are familiar with and abide by this Policy.

2.3 Compliance

The Compliance Department is responsible for advising and supporting the Company in establishing procedures, appropriate training, systems and other processes reasonably designed to achieve compliance with this Policy and regulatory requirements.

On a periodic basis, Compliance at the request of Senior Management will, in cooperation with the Risk Management and Corporate Audit Services (CAS) functions, assess the Company'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.

3. Policy Statement

3.1 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 the Company and to its Employees. Voya Financial 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 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 the Company associated with an FCPA violation could far exceed any monetary penalties.

Accurate Accounting and Record-Keeping

The FCPA also requires companies whose securities are listed in the United States 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 the company and (ii) devise and maintain an adequate system of internal accounting controls.

Compliance with the accounting and internal accounting control procedures of Voya Financial is mandatory. The books and records shall at all times 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.

3.1.1 Anti-Corruption and Anti-Bribery

Voya Financial and each of its Employees is 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 Financial 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 Financial, a request, promise, offer or gift.
- Makes the recipient appear to be under an obligation to Voya Financial or places the Voya Financial Employee under an obligation.

- Is done to secure, maintain, or obtain business, or an advantage in business, by improperly inducing a person to perform a function in the Company's or an Employee's favor.

3.1.2 UK Bribery Act 2010

The Act (Act) prohibits bribery of non-UK public officials as well as private companies or persons, regardless of whether they are UK or non-UK 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-UK) public official
- Failing to prevent bribery at a corporate level by an associated person/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 must also intend to obtain or retain business or an advantage in the conduct of business by doing so. This definition is broader than the FCPA one where the "act in violation of their duty" and "improper advantage" elements are present.

Voya Financial is a U.S. company that maintains offices and does business within the UK. Therefore, Voya Financial 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 (non-governmental official) level.

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

3.1.3 Political Contributions and Activity

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. All political contributions must comply with the FCPA, state and federal pay-to-play laws and rules, the Act, the Voya Financial Code of Business Conduct and Ethics and the Voya Financial Political Activity Policy. While the Company maintains a Political Action Committee (or PAC) to which Employees may voluntarily participate, Employees are prohibited from making political contributions on Voya Financial's behalf. Otherwise, lawful personal political contributions by Employees could bar Voya Financial from doing business with state and local governments, so careful adherence to the Voya Financial Political Activity Policy requirements is critical.

Voya Financial encourages its Employees to support the political process. However, unless you are specifically requested and authorized by the Political Activity Review Committee, any Employee who participates in the governmental process must do so solely as an individual — not as a representative of Voya Financial — and must do so in accordance with all applicable laws.

3.1.4 Charitable Contributions

Employees may make appropriate charitable contributions on behalf of the Company. 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. Therefore, Employees must first obtain written approval from Management and a Compliance Officer before making any charitable contributions on behalf of the Company.