

Organizational Narrative

BritePool

January 2020

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Table 1: Control satisfaction

| Standard | Controls Satisfied |
|----------|---|
| TSC | CC1.2, CC1.3, CC1.4, CC1.5, CC3.1, CC3.2, CC3.3 |

Table 2: Document history

| Date | Comment |
|------------|------------------|
| Jan 2 2020 | Initial document |

1 Organizational Narrative

The following provides a description of the corporate a management structure of BritePool.

The intent of this description is to establish both the legal jurisdiction and corporate cultural norms that serve as the foundation for BritePool's compliance program.

2 Entity Type

BritePool is a Delaware C-Corporation headquartered in Winter Park, Florida. BritePool was established in 2019.

3 Integrity and Ethics

The Directors and Executives of BritePool aspire to and demonstrate standards of ethics and integrity consistent with professional norms in American corporate environments.

Chief among these standards is a commitment to honesty in interactions with and among managers, directors, employees, contractors, customers, and other stakeholders.

4 Board Independence

The Board of Directors appoints and oversees the Chief Executive Officer (CEO).

5 Organizational Structure

BritePool is composed of 4 primary divisions:

- Sales & Marketing
- Engineering
- Human Resources
- Finance

Each division is led by a Vice President, who in turn reports to the CEO. A complete Organization Chart is maintained and distributed by Human Resources.

6 Management Objectives

Work is distributed to each division via Objectives set by the respective division Vice President, in collaboration with the Chief Executive Officer.

7 Risk to Objectives

BritePool seeks to manage risk to Objectives through professional management strategies and tactics, including:

- Rigorous hiring practices
- Employee performance reviews
- Aligning compensation with objectives
- Regular communication of objectives by executive management

8 Fraud Risk to Objectives

BritePool acknowledges the possibility that fraud may imperil corporate objectives. BritePool undertakes various activities to manage fraud risk, including:

- Conducting regular financial audits
- Adhering to financial control principles
- Investigating suspicious transactions
- Performing criminal background checks on all employees
- Maximizing the use of information technology in fraud detection