

## **MadeUpName, LLC**

### **Anti-Bribery & Corruption Policy**

#### **Purpose**

MadeUpName, LLC is committed to conducting business with integrity, fairness, and transparency. This policy ensures compliance with anti-bribery and anti-corruption laws and establishes clear standards for ethical business conduct.

#### **Scope**

This policy applies to all employees, contractors, officers, and third parties acting on behalf of MadeUpName, LLC, regardless of location.

#### **1. Policy Statement**

Bribery and corruption are strictly prohibited. The company does not tolerate any form of offering, giving, soliciting, or receiving bribes or improper advantages to influence business decisions or gain undue benefits.

#### **2. Definitions**

- **Bribe:** Anything of value offered to improperly influence a decision, such as cash, gifts, favors, or entertainment.
- **Corruption:** Abuse of entrusted power for personal or company gain.
- **Facilitation Payment:** Small unofficial payments to expedite routine government actions. These are prohibited.

#### **3. Prohibited Activities**

- Employees and representatives must not:
- Offer or accept bribes or kickbacks from clients, vendors, or partners.
  - Make political or charitable donations intended to influence business outcomes.
  - Use third parties to conceal or carry out improper payments.
  - Provide or accept lavish gifts or hospitality that could be perceived as influencing business decisions.

#### **4. Gifts and Hospitality**

- Modest gifts and hospitality may be acceptable if they are reasonable, infrequent, and intended to build legitimate business relationships.
- All gifts over \$100 must be disclosed to HR or management for approval.
- Cash or cash equivalents are never acceptable gifts.

#### **5. Due Diligence and Third Parties**

Before engaging with new vendors, contractors, or consultants, MadeUpName, LLC will conduct due diligence to ensure compliance with ethical and legal standards.

#### **6. Reporting Violations**

Employees must promptly report any suspected bribery, corruption, or unethical behavior through:

- Their manager or HR.

- The confidential reporting email: **report@madeupname.com**.

Reports will be investigated in accordance with the Whistleblower & Reporting Policy.

**7. Recordkeeping**

All transactions must be accurately recorded and supported by valid documentation. False, misleading, or incomplete records are prohibited.

**8. Training and Awareness**

Employees will receive periodic training on anti-bribery and corruption practices and must acknowledge understanding of this policy.

**9. Disciplinary Action**

Violations of this policy may result in disciplinary action, including termination, and could lead to civil or criminal penalties.

**10. Compliance**

This policy complies with the U.S. Foreign Corrupt Practices Act (FCPA) and New York State laws. Employees working abroad must also comply with local anti-corruption regulations.

**Effective Date:** January 2025

**Next Review Date:** January 2026

**Policy Owner:** Human Resources Department