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Definitions and Key Concepts

To ensure consistent understanding and application of this Anti-Corruption Policy, the following terms are defined:

- **Corruption:** The abuse of entrusted power for private gain. This can include bribery, embezzlement, fraud, and extortion.
- **Bribery:** Offering, promising, giving, accepting, or soliciting something of value to influence a decision. This includes payments, gifts, or other advantages.
- **Conflict of Interest:** A situation where an individual's personal interests could compromise their objectivity or loyalty to DocuPal Demo, LLC.
- **Facilitation Payments:** Small payments made to expedite routine government actions. While often perceived as minor, they are prohibited under this policy.
- **Gifts:** Items or services offered without expectation of return payment. The acceptance of gifts is acceptable only if transparent, documented, reasonable, and compliant with the outlined policy.
- **Hospitality:** Providing meals, accommodation, or entertainment. Similar to gifts, hospitality is acceptable only if transparent, documented, reasonable, and compliant with the outlined policy.

Acceptable vs. Prohibited Practices

Acceptable practices are those that are transparent, fully documented, and legal. Prohibited acts involve secret payments, attempts to exert undue influence, or any violation of applicable laws and regulations. DocuPal Demo, LLC prohibits any activity that could be construed as corruption or bribery, regardless of local custom.



Standards of Conduct and Compliance Obligations

All employees of DocuPal Demo, LLC are expected to uphold the highest ethical standards in all business dealings. This includes acting with integrity, transparency, and accountability. Every employee has a responsibility to avoid situations that create or appear to create conflicts of interest between their personal interests and the interests of DocuPal Demo, LLC.

Employee Obligations

Employees must familiarize themselves with and adhere to this Anti-Corruption Policy. This includes understanding the laws and regulations that govern our operations, such as the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and all applicable local anti-corruption laws. Any suspected violations of this policy or applicable laws must be reported immediately to a manager or the legal department.

Prohibited Conduct

DocuPal Demo, LLC has a zero-tolerance policy toward bribery and corruption in any form. Employees are strictly prohibited from offering, promising, giving, or authorizing the provision of anything of value, directly or indirectly, to any government official or private individual to obtain or retain business or gain an improper advantage. This prohibition applies to all interactions, regardless of location.

Facilitation payments, which are small payments made to expedite routine government actions, are also strictly prohibited. No employee should offer or make such payments.

High-Risk Situations

When faced with a high-risk situation, such as a request for a suspicious payment or an interaction with a government official that feels inappropriate, employees must exercise caution. In such instances, employees should seek immediate guidance from their manager or the legal department. It is crucial to document all



interactions and communications related to the situation. Employees should always refuse to engage in any activity that could be construed as bribery or corruption. If unsure about a situation, err on the side of caution and seek guidance.

Risk Assessment and Internal Controls

DocuPal Demo, LLC recognizes that corruption risks vary across its operations. Risk assessments are conducted considering factors such as geographic location, industry sector, the nature of transactions, and the level of interaction with government officials. These assessments help identify specific vulnerabilities within different departments and business units.

To mitigate identified risks, DocuPal Demo, LLC applies a range of internal controls. These include:

- **Due diligence:** Thorough screening of third parties before engaging in business relationships.
- **Segregation of duties:** Dividing responsibilities to prevent any single individual from controlling critical processes.
- **Transaction monitoring:** Scrutinizing financial transactions for suspicious patterns or red flags.
- **Expenditure approval limits:** Establishing authorization thresholds for expenditures to ensure appropriate oversight.

The effectiveness of these controls is continuously monitored through key metrics. These metrics include:

- **Number of reported incidents:** Tracking the frequency of reported potential violations.
- **Compliance training completion rates:** Monitoring employee participation in anti-corruption training programs.
- **Audit findings:** Reviewing internal and external audit reports for control weaknesses.
- **Third-party risk scores:** Evaluating the ongoing risk associated with third-party relationships.

Reporting Mechanisms and



Whistleblowing

DocuPal Demo, LLC encourages all employees and third parties to report any suspected violations of this Anti-Corruption Policy. We provide several channels for reporting concerns.

Reporting Options

Employees can report concerns to their direct manager or the legal department. We also maintain a confidential hotline for anonymous reporting. Third parties can utilize this same hotline to report any suspected misconduct.

Whistleblower Protection

DocuPal Demo, LLC is committed to protecting whistleblowers. We maintain strict confidentiality protocols to ensure anonymity. The company strictly prohibits any form of retaliation against individuals who report concerns in good faith. Any act of retaliation will be subject to disciplinary action, up to and including termination of employment.

Investigation Procedures

Upon receiving a report, the legal or compliance department will conduct a thorough investigation. The investigation will be conducted discreetly and objectively. If the investigation confirms a violation of this policy, DocuPal Demo, LLC will take appropriate remedial action. This action may include disciplinary measures, improvements to internal controls, or other corrective actions as deemed necessary.

Training and Awareness

DocuPal Demo, LLC provides regular training to ensure all personnel understand and adhere to this Anti-Corruption Policy. All employees are required to complete anti-corruption training on an annual basis. Managers and employees in high-risk roles will receive additional, specialized training.



Training Content and Delivery

Training sessions cover a range of critical topics. These include identifying and avoiding bribery, recognizing and managing conflicts of interest, understanding reporting procedures, and ensuring familiarity with relevant anti-corruption laws and regulations.

Measuring Training Effectiveness

DocuPal Demo, LLC measures the effectiveness of its training programs through several methods. These include post-training quizzes to assess knowledge retention, employee surveys to gather feedback, and continuous monitoring of compliance metrics to track overall policy adherence.

Policy Enforcement and Sanctions

DocuPal Demo, LLC takes violations of this Anti-Corruption Policy seriously. The Chief Compliance Officer and the legal department are responsible for enforcing this policy. We are committed to applying sanctions fairly and consistently.

Disciplinary Actions

Any employee, contractor, or third party acting on behalf of DocuPal Demo, LLC who violates this policy will face appropriate disciplinary action. The severity of the sanction will depend on several factors. These include the nature and seriousness of the violation, the individual's role and responsibilities, and any mitigating or aggravating circumstances.

Consequences of Non-Compliance

Consequences for violating this policy may include, but are not limited to:

- Verbal or written warnings
- Demotion
- Suspension
- Termination of employment or contract
- Legal penalties, including fines and imprisonment

DocuPal Demo, LLC will also cooperate fully with any investigation by regulatory or law enforcement agencies.

Monitoring, Review and Continuous Improvement

DocuPal Demo, LLC is committed to regularly monitoring and improving this Anti-Corruption Policy. This ensures the policy remains effective and relevant.

Ongoing Monitoring

We continuously monitor our operations and internal controls. This helps us identify potential corruption risks. Monitoring activities include:

- Regular audits of financial transactions.
- Review of employee expense reports.
- Analysis of gift and hospitality records.

Periodic Review

We will review this Anti-Corruption Policy annually. This review assesses the policy's effectiveness and relevance. The review considers:

- Changes in anti-corruption laws and regulations.
- Findings from internal and external audits.
- Feedback from employees and stakeholders.
- Industry best practices.

Policy Updates

Updates to this policy will occur when necessary. Triggers for updates include:

- Changes in applicable laws.
- Gaps identified through audits or risk assessments.
- New insights from industry developments.



Feedback from all levels of the organization is crucial. We encourage employees to suggest improvements. We incorporate feedback, audit results, and changes in regulations to enhance the policy.

