

# UNDERGUIDE

## Anti-Corruption & Anti-Fraud Policy

### 1. Purpose

UNDERGUIDE is committed to conducting business with integrity, transparency, and accountability. We have zero tolerance for any form of corruption, fraud, bribery, or unethical business conduct. This policy outlines our commitment to preventing, detecting, and addressing corruption and fraud in all our operations. It provides a structured framework for maintaining ethical standards and ensuring compliance with all applicable laws and regulations.

### 2. Scope

This policy applies to all employees, contractors, business partners, and third parties acting on behalf of UNDERGUIDE. All individuals covered by this policy are expected to uphold its principles in every aspect of their professional responsibilities.

### 3. Commitments & Principles

#### 3.1 Zero Tolerance

UNDERGUIDE strictly prohibits any form of bribery, fraud, or corruption, whether direct or indirect. Any violations will result in disciplinary action, including potential termination and legal consequences.

#### 3.2 Conflict of Interest

Employees must disclose any personal or financial interests that could improperly influence their decisions. Any conflict of interest should be reported to the management team to ensure transparency and impartial decision-making.

#### 3.3 Gifts & Hospitality

Employees and business partners must not offer or accept gifts, entertainment, or hospitality that could be perceived as influencing business decisions. Clear guidelines will be provided on permissible thresholds.

## **4. Implementation & Training**

### **4.1 Employee Training**

All employees must undergo mandatory training on anti-corruption and ethical business practices. Training will be updated periodically to reflect new risks and regulatory changes.

### **4.2 Reporting Mechanisms**

UNDERGUIDE will maintain multiple channels for reporting concerns confidentially. An independent committee will review and investigate all reports impartially.

### **4.3 Audits & Reviews**

Annual audits and reviews will be conducted to assess compliance with anti-corruption policies. Non-compliance will be addressed with corrective measures.

## **5. Reporting Violations**

Any suspected violation of this policy must be reported immediately. UNDERGUIDE will ensure proper investigation and take necessary actions, including legal proceedings where applicable.

## **6. Integrity Audits**

Conduct annual internal reviews to monitor and strengthen business integrity measures.

By implementing these extensive policies, UNDERGUIDE reinforces its commitment to ethical business practices, anti-corruption efforts. These policies will be reviewed periodically and updated as necessary to align with evolving regulations and industry standards.