

Euphonic AI Anti-Corruption and Compliance Policy

1. Introduction

Euphonic AI is committed to conducting business ethically and in full compliance with all applicable laws and regulations. We uphold the highest standards of integrity and transparency in all our operations.

2. Policy Statement

Euphonic AI strictly prohibits any form of corruption, bribery, or unethical practices. Our commitment to anti-corruption and compliance is fundamental to maintaining our reputation, building trust with our clients and partners, and ensuring a fair, competitive business environment.

3. Scope

This policy applies to all employees, officers, directors, contractors, and any third parties acting on behalf of Euphonic AI, regardless of their location or employment status.

4. Definitions

- **Bribery:** Offering, promising, giving, or receiving any undue financial or other advantage to influence a business decision.
- **Corruption:** Abuse of entrusted power for private gain, including bribery, extortion, or other forms of illicit conduct.
- **Facilitation Payments:** Small payments made to expedite routine government actions are prohibited.

5. Anti-Corruption Principles

- **Zero Tolerance:** Euphonic AI enforces a zero-tolerance approach to bribery and corruption. No employee or third party may engage in, or tolerate, corrupt practices.
- **Gifts and Hospitality:** All offers of gifts, hospitality, or other benefits must be reasonable, properly documented, and approved in line with our internal guidelines.
- **Third-Party Relationships:** Any agents, consultants, or other third parties must adhere to anti-corruption standards and must be subject to due diligence and contractual compliance requirements.

6. Compliance with Laws and Regulations

Euphonic AI complies with all applicable local, national, and international anti-corruption laws. Employees and associates are expected to familiarize themselves with these laws and integrate compliance into daily business activities.

7. Responsibilities

- **Management:** Must lead by example, ensuring that ethical behavior is promoted and that any potential risks of corruption are proactively identified and mitigated.
- **Employees and Contractors:** Are responsible for understanding and complying with this policy, reporting any concerns, and participating in ongoing training.
- **Compliance Officer:** (or designated role) Will oversee the implementation, monitoring, and enforcement of this policy, ensuring that any breaches are promptly investigated and addressed.

8. Training and Awareness

Euphonic AI will provide regular training and communication on anti-corruption and compliance to ensure that all stakeholders are aware of their responsibilities and the procedures for raising concerns.

9. Reporting and Monitoring

- **Reporting:** Employees and third parties are encouraged to report any suspected breaches of this policy through our confidential reporting channels.
- **Monitoring:** Regular audits and assessments will be conducted to ensure compliance and to identify and rectify any gaps in our practices.

10. Enforcement and Disciplinary Action

Any employee or third party found to be in violation of this policy may face disciplinary action, up to and including termination of employment or contract, and may be subject to legal proceedings. Euphonic AI will not tolerate any action that undermines its ethical standards.

11. Review and Continuous Improvement

This policy is reviewed periodically to ensure it remains relevant and effective. Feedback from employees and stakeholders is encouraged to help us maintain best practices and address new challenges as they arise.