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# ZAMBELLI

## INTERNATIONAL CONSULTING LLC



### CODE OF ETHICS

**CODE OF ETHICS AND CORPORATE CONDUCT 2026**  
**ZAMBELLI INTERNATIONAL CONSULTING LLC**

**PREAMBLE**

This Code of Ethics and Corporate Conduct (hereinafter, the “Code”) of Zambelli International Consulting LLC constitutes an internal regulatory instrument of a binding nature and mandatory application to all members of the organisation, including directors, employees, consultants, legal representatives, contractors, and associated third parties (hereinafter, the “Obligated Persons”).

This Code has been drafted in accordance with the general principles of corporate law, best practices in corporate governance, and in alignment with international standards relating to regulatory compliance, corporate social responsibility, and corporate due diligence.

Its purpose is to establish an ethical and legal regulatory framework governing institutional conduct, ensuring that all actions of the Company are carried out in accordance with the following principles - Legality -Good faith -Transparency -Corporate loyalty -Due diligence -Professional responsibility

**DECLARATION OF GENERAL PRINCIPLES**

Zambelli International Consulting LLC hereby expressly, irrevocably, and bindingly declares its commitment to:

- Act in strict compliance with the applicable legal framework, including local, national, and international regulations, as well as relevant treaties and conventions.
- Conduct its operations in accordance with the highest ethical standards, avoiding any conduct that may constitute a criminal, administrative, or civil offence.
- Promote an organisational culture based on integrity, legitimate trust, and mutual respect among all stakeholders.
- Prevent, detect, and sanction any act of corruption, fraud, conflict of interest, or improper conduct through internal control and audit mechanisms.
- Ensure transparency in all business operations, contractual relationships, and decision-making processes.

**SCOPE OF APPLICATION**

This Code shall apply to: All business units of the ZAMBELLI INTERNATIONAL CONSULTING LLC and /or WISE UNIVERSAL GROUP HOLDING Company at a global level. Any natural or legal person acting in the name of or on behalf of the Company. All interactions with clients, suppliers, governmental entities, regulatory authorities, and third parties.

Non-compliance with the provisions set forth in this Code may result in: Internal disciplinary liability -Termination of contractual relationships Civil, administrative, or criminal legal action

**INTERPRETATION AND OVERSIGHT**

The authoritative interpretation of this Code shall be vested in The Corporate Legal Department -The Ethics and Compliance Committee

These bodies shall be empowered to Issue binding interpretative guidelines - Resolve ethical conflicts -Monitor regulatory compliance -Propose amendments or updates in accordance with regulatory developments

**INSTITUTIONAL COMMITMENT**

Zambelli International Consulting LLC reaffirms its irrevocable commitment to maintaining a standard of ethical excellence that not only complies with applicable regulatory requirements but exceeds them, thereby consolidating its position as a benchmark entity in corporate integrity at an international level.

The Company acknowledges that ethics is not merely a legal obligation but an essential strategic pillar for business sustainability, institutional reputation, and long-term value creation.

**REGULATORY STRUCTURE OF THE CODE**

This Code is developed through twenty-five (25) articles, which establish in detail: Mandatory rules of conduct Standards of professional behaviour -Ethical decision-making procedures - Mechanisms for the prevention and resolution of conflicts

Each article shall be binding in nature and shall be interpreted in accordance with the general principles of law, applicable regulations, and the corporate values of the organisation.



## **1. Principle of Legality and Regulatory Compliance**

Zambelli International Consulting LLC hereby establishes as a fundamental governing principle the strict adherence to all applicable legal and regulatory frameworks in every jurisdiction in which it operates. Accordingly, all Obligated Persons shall observe and comply with all relevant laws, statutory instruments, regulatory provisions, and international standards, including those relating to the prevention of corporate crime, anti-corruption measures, and international trade compliance. The Company adopts a proactive compliance approach through the implementation of robust compliance programmes designed to identify, assess, and mitigate legal, financial, and reputational risks. Any conduct in contravention of applicable law shall be deemed a serious breach, potentially giving rise to disciplinary action, civil liability, or criminal prosecution. Continuous legal and regulatory training shall be promoted to ensure that all individuals act with full awareness of their legal obligations and professional duties.

## **2. Principle of Integrity, Good Faith and Transparency**

Zambelli International Consulting LLC conducts its operations in accordance with the principles of integrity, good faith, and transparency in all commercial and institutional dealings. All interactions, negotiations, and contractual arrangements must be undertaken honestly, fairly, and without misrepresentation, concealment of material facts, or engagement in deceptive practices. Obligated Persons are required to uphold the legitimate expectations of clients, business partners, and regulatory authorities at all times. The Company fosters a culture of clear, accurate, and timely communication, ensuring that relevant information is disclosed responsibly and in accordance with confidentiality obligations. Furthermore, all financial, accounting, and operational records shall accurately reflect the true state of affairs of the Company, in compliance with applicable accounting standards and international financial reporting requirements, thereby ensuring transparency and accountability in all corporate activities.

## **3. Combating corruption, fraud, and conflicts of interest**

Zambelli International Consulting LLC maintains a strict zero-tolerance policy towards all forms of corruption, bribery, fraud, and unlawful conduct. It is expressly prohibited to offer, promise, authorise, solicit, or accept any undue advantage, whether directly or indirectly, for the purpose of obtaining or retaining business or influencing decision-making processes. Obligated Persons must avoid any situation involving actual, potential, or perceived conflicts of interest and are required to disclose promptly any circumstances that may impair their objectivity or independence. The Company shall implement internal control mechanisms, periodic audits, and due diligence procedures to identify and mitigate associated risks. Any breach of this provision shall result in severe disciplinary measures, including termination of employment or contractual relationships, without prejudice to any legal proceedings that may be initiated before the competent authorities.

## **4. Confidentiality, Data Protection and Information Security**

The protection of information constitutes a fundamental pillar of Zambelli International Consulting LLC's corporate governance framework. All Obligated Persons shall ensure the confidentiality, integrity, and availability of any information accessed in the course of their duties. Unauthorised disclosure, misuse, or access to confidential information, trade secrets, or sensitive client data is strictly prohibited. The Company complies with all applicable data protection laws and regulations, including internationally recognised principles relating to lawfulness, fairness, purpose limitation, proportionality, and data security. Appropriate technical and organisational measures shall be implemented to prevent data breaches, cyber threats, and loss of information. Personal data shall be processed solely for legitimate and authorised purposes, with full respect for the rights of data subjects. Any violation of these obligations shall constitute a serious offence with potential legal consequences.

## **5. Corporate Social Responsibility, Human Rights and Sustainability**

Zambelli International Consulting LLC acknowledges its responsibility to uphold and promote human rights and to conduct its operations in a socially responsible and sustainable manner. The Company is committed to respecting human dignity, ensuring equality of opportunity, and prohibiting discrimination in any form. It further undertakes to provide fair, safe, and healthy working conditions in accordance with internationally recognised labour standards. In environmental matters, the Company promotes policies aimed at minimising environmental impact, optimising resource efficiency, and implementing sustainable business practices. Corporate social responsibility is embedded as a transversal principle in the Company's strategic decision-making processes, contributing to the economic and social development of the communities in which it operates. This commitment reinforces institutional legitimacy and enhances the Company's global corporate reputation.

## **6. Oversight, Compliance and Disciplinary Framework**

Compliance with this Code shall be monitored and enforced by the Ethics and Compliance Committee in conjunction with the Corporate Legal Department, which shall be vested with the authority to investigate, assess, and resolve any alleged breaches. The Company shall establish confidential whistleblowing mechanisms enabling individuals to report misconduct without fear of retaliation, ensuring adequate protection for reporting parties. All investigations shall be conducted in accordance with the principles of objectivity, due process, and confidentiality. Where a breach is substantiated, proportionate disciplinary measures shall be imposed, which may include formal warnings, suspension, termination of employment or contractual engagement, and, where appropriate, referral to competent authorities. The Company is committed to the continuous improvement of its compliance framework through regular assessments and updates. Adherence to this Code constitutes an essential condition for continued association with the organisation.



## **1. COMMITMENT TO INTEGRITY, LEGAL, FINANCIAL AND REGULATORY COMPLIANCE**

Zambelli International Consulting LLC (hereinafter, the “Company”) shall conduct all business activities with the utmost standards of honesty, fairness, transparency, and legal compliance, in accordance with applicable United States federal and state laws, including but not limited to the corporate, civil, commercial, and criminal legal frameworks of the State of Delaware, the State of New York, the State of Florida, and the State of California.

The Company expressly adopts a zero-tolerance policy towards any conduct that may constitute fraud, corruption, financial misconduct, or economic crime, including offences contemplated under, inter alia, the Delaware General Corporation Law, the New York Penal Law, the Florida Statutes, and the California Penal Code, as well as applicable federal statutes such as anti-money laundering (AML) and anti-corruption laws.

All corporate actions shall be undertaken in good faith (bona fide), in the best interests of the Company, and in strict observance of fiduciary duties, corporate governance principles, and financial transparency obligations.

### **1.1 Ethical Decision-Making and Fiduciary Duty**

All directors, officers, employees, consultants, and representatives (the “Obligated Persons”) are required to exercise sound judgement grounded in ethical reasoning, fiduciary responsibility, and legal compliance. Decisions shall be made in accordance with the duty of care, duty of loyalty, and duty of good faith, as recognised under Delaware corporate jurisprudence and applicable state laws.

No individual acting on behalf of the Company shall engage in, authorise, or tolerate any form of bribery, corruption, fraudulent misrepresentation, financial manipulation, embezzlement, or unlawful enrichment. Particular attention shall be given to compliance with criminal provisions under New York and California law relating to fraud, false statements, and corporate misconduct, as well as Florida statutes governing financial crimes and deceptive practices.

All decision-making processes must include a prior risk assessment evaluating legal exposure, financial implications, reputational impact, and stakeholder interests. Any breach of ethical duty shall constitute grounds for disciplinary action and may trigger civil or criminal liability under applicable law.

### **1.2 Legal, Financial and Regulatory Compliance (Civil, Commercial and Criminal Scope)**

The Company shall ensure full compliance with all applicable civil, commercial, financial, and criminal laws and regulations across all jurisdictions in which it operates. This includes, without limitation:

- Corporate governance and fiduciary obligations under Delaware law
- Commercial and financial transaction regulations under New York law
- Consumer protection, financial fraud, and business conduct laws under Florida statutes
- Corporate accountability, securities compliance, and financial disclosure obligations under California law

Zambelli International Consulting LLC shall implement a comprehensive compliance framework, including internal controls, financial audits, risk management systems, and anti-money laundering (AML) procedures in accordance with U.S. federal regulations and international standards.

The Company further undertakes to comply with regulations enforced by authorities such as the U.S. Securities and Exchange Commission and the Financial Crimes Enforcement Network, ensuring transparency in financial reporting, prevention of illicit financial flows, and compliance with economic and financial regulations.

Failure to comply with these obligations may result in severe legal consequences, including civil penalties, regulatory sanctions, and criminal prosecution.

### **1.3 Confidentiality, Privacy and Data Protection Compliance**

Zambelli International Consulting LLC is firmly committed to safeguarding the confidentiality, privacy, and integrity of all sensitive, proprietary, financial, and personal information entrusted to it. This obligation extends to clients, employees, partners, and third parties and shall be enforced in accordance with applicable data protection and privacy laws.

The Company shall comply with international and domestic regulations, including the General Data Protection Regulation and the California Consumer Privacy Act, as well as relevant U.S. federal and state privacy frameworks.

All data processing activities shall be conducted lawfully, fairly, and transparently, and shall be limited to authorised purposes. The Company shall implement appropriate technical and organisational measures, including encryption protocols, secure data storage systems, and cybersecurity safeguards, to prevent unauthorised access, disclosure, alteration, or destruction of data.

Any breach of confidentiality or misuse of information may constitute a violation of civil and criminal law, particularly under California and New York data protection and fraud-related statutes, and shall result in immediate disciplinary and legal action.



#### **1.4 Economic and Financial Integrity Controls**

The Company shall maintain robust financial integrity through the implementation of internal accounting controls, transparent financial reporting systems, and independent auditing mechanisms. All financial transactions must be accurately recorded and supported by verifiable documentation in accordance with generally accepted accounting principles (GAAP) and applicable regulatory standards. Zambelli International Consulting LLC strictly prohibits off-the-books accounts, falsification of financial records, tax evasion, and any form of financial misrepresentation. Compliance with federal and state tax laws, including those applicable in New York, California, Florida, and Delaware, is mandatory.

The Company shall also enforce anti-money laundering (AML) and counter-terrorism financing (CTF) policies, ensuring alignment with FinCEN regulations and international financial compliance standards. Any suspicious financial activity must be reported through internal compliance channels and, where required, to competent authorities.

#### **1.5 Enforcement, Liability and Sanctions**

Any breach of the provisions set forth in this Code shall be subject to strict enforcement measures. Violations may result in internal disciplinary actions, including suspension or termination of employment or contractual relationships.

In addition, the Company reserves the right to initiate civil proceedings for damages and to refer matters to law enforcement authorities where conduct may constitute a criminal offence under applicable laws, including but not limited to fraud, corruption, financial crime, or data misuse.

Obligated Persons may be held personally liable under relevant state and federal laws, including provisions under Delaware corporate law, New York and California penal statutes, and Florida criminal law.

The Company shall cooperate fully with regulatory and judicial authorities in any investigation and shall uphold the principles of due process, legal accountability, and corporate transparency at all times.

### **2. COMPLIANCE WITH LAWS AND REGULATIONS (UNITED STATES, UNITED KINGDOM AND EUROPEAN UNION FRAMEWORK)**

At **Zambelli International Consulting LLC and WISE UNIVERSAL GROUP HOLDING COMPANY** (hereinafter collectively referred to as the “Company”), we are fully committed to strict compliance with all applicable local, national, and supranational laws and regulations across every jurisdiction in which we operate, including, without limitation, the United States, the United Kingdom, and the European Union.

This commitment encompasses adherence to civil, commercial, financial, regulatory, and criminal legal frameworks, including, but not limited to:

- UK Companies Act 2006
- UK Bribery Act 2010
- Proceeds of Crime Act 2002
- Data Protection Act 2018
- General Data Protection Regulation
- Markets in Financial Instruments Directive II
- Delaware General Corporation Law
- California Consumer Privacy Act

The Company recognises that effective compliance requires not only adherence to individual legal systems but also the integration and harmonisation of overlapping regulatory regimes. Accordingly, where multiple jurisdictions apply, the Company shall adopt the highest or most stringent legal standard in order to ensure maximum compliance, risk mitigation, and legal certainty.

#### **2.1 Financial Regulations, Corporate Governance and Market Conduct**

The Company shall comply with all applicable financial regulations governing corporate governance, financial reporting, securities regulation, and market conduct across the United States, the United Kingdom, and the European Union.

This includes regulatory oversight by authorities such as the U.S. Securities and Exchange Commission, the Financial Conduct Authority, and relevant European supervisory authorities.

Compliance obligations include adherence to MiFID II, Basel III, and applicable U.S. securities laws, ensuring transparency, market integrity, and investor protection.

All financial statements shall present a true and fair view of the Company’s financial position in accordance with IFRS and U.S. GAAP standards. Any act of financial misrepresentation, insider dealing, market abuse, or breach of fiduciary duty may give rise to civil liability and criminal sanctions under UK, EU, and U.S. law.



## 2.2 Data Protection, Privacy and Cross-Border Data Governance

The Company shall ensure full compliance with all applicable data protection and privacy laws across jurisdictions, including the General Data Protection Regulation, the UK GDPR under the Data Protection Act 2018, and U.S. privacy laws such as the California Consumer Privacy Act.

All personal data shall be processed lawfully, fairly, and transparently, and solely for specified and legitimate purposes. The Company shall implement robust technical and organisational safeguards, including encryption, access controls, and cybersecurity protocols.

Cross-border data transfers between the United States, United Kingdom, and European Union shall be conducted in compliance with recognised legal mechanisms, including adequacy decisions, standard contractual clauses, and other lawful transfer instruments.

Any breach of data protection obligations may result in significant administrative fines, civil liability, and regulatory enforcement actions across multiple jurisdictions.

## 2.3 Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF) and Financial Crime

The Company shall maintain a comprehensive framework for the prevention, detection, and reporting of money laundering, terrorist financing, and financial crime in accordance with international and domestic laws.

This includes compliance with:

- The Proceeds of Crime Act 2002 - The Money Laundering Regulations 2017 - U.S. legislation such as the Bank Secrecy Act (BSA) - EU AML Directives

The Company shall implement Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), transaction monitoring systems, and suspicious activity reporting procedures to authorities such as FinCEN (U.S.) and the National Crime Agency (UK).

Non-compliance may result in severe criminal penalties, regulatory sanctions, asset forfeiture, and reputational harm.

## 2.4 Tax Compliance, Anti-Evasion and Financial Transparency

The Company shall comply fully with all applicable tax laws and regulations in the United States, the United Kingdom, and the European Union.

This includes compliance with HM Revenue & Customs (HMRC) obligations in the UK, U.S. Internal Revenue Service (IRS) requirements, and EU tax transparency standards, as well as anti-tax evasion provisions under the Criminal Finances Act 2017.

The Company shall maintain accurate records, ensure timely tax filings, and implement internal controls to mitigate tax risks.

Any conduct involving tax evasion, fraudulent reporting, or aggressive tax avoidance schemes is strictly prohibited and may result in civil penalties and criminal prosecution.

## 2.5 Industry-Specific Regulation and Cross-Border Legal Harmonisation

The Company shall comply with all sector-specific regulations applicable to its activities, including financial services, corporate advisory, consulting, and data management regulations across the U.S., UK, and EU.

A continuous regulatory monitoring system shall be maintained to track legislative developments and ensure timely updates to internal compliance frameworks.

Special emphasis shall be placed on cross-border legal harmonisation, ensuring that all international operations comply simultaneously with the legal requirements of originating and receiving jurisdictions.

## 2.6 Enforcement, Liability and Regulatory Cooperation

The Company shall enforce strict adherence to this Code through internal compliance systems, audits, and reporting mechanisms.

Any breach of applicable laws or this Code may result in:

- Internal disciplinary measures -Termination of employment or contractual relationships - Civil litigation - Criminal prosecution under U.S., UK, or EU law

The Company shall cooperate fully with regulatory and enforcement authorities, including:

- The Financial Conduct Authority (FCA) - HM Revenue & Customs (HMRC) -The U.S. Securities and Exchange Commission (SEC) -European supervisory and enforcement bodies

Through rigorous adherence to these integrated legal frameworks, the Company affirms its position as a globally compliant, transparent, and ethically responsible corporate entity.



### **3. CONFIDENTIALITY, PRIVACY AND DATA PROTECTION**

At **Zambelli International Consulting LLC and WISE UNIVERSAL GROUP HOLDING COMPANY (the “Company”)**, we recognise that confidentiality and privacy constitute fundamental pillars of trust, corporate integrity, and legal compliance. The Company is firmly committed to safeguarding all confidential, proprietary, financial, and personal data entrusted to it, ensuring that such information is processed, stored, and transmitted in a secure, lawful, and accountable manner.

This commitment is aligned with applicable legal frameworks across the United States, the United Kingdom, and the European Union, including but not limited to:

- General Data Protection Regulation
- Data Protection Act 2018
- California Consumer Privacy Act

The Company further acknowledges that breaches of confidentiality and misuse of personal data may give rise to civil liability, regulatory enforcement, and criminal sanctions under applicable laws.

#### **3.1 Protection of Confidential and Sensitive Information**

The Company shall implement all necessary legal, technical, and organisational measures to protect confidential and sensitive information against unauthorised access, disclosure, alteration, or destruction.

Confidential information shall include, without limitation:

- Personal data
- Client and employee records
- Financial and transactional data
- Trade secrets and proprietary business information

Access to such information shall be strictly limited to authorised personnel on a “need-to-know” basis and subject to contractual confidentiality obligations. Any unauthorised use or disclosure may constitute a breach of statutory duty and may result in disciplinary, civil, or criminal liability.

#### **3.2 Compliance with Privacy and Data Protection Laws**

The Company shall strictly comply with all applicable data protection and privacy laws in the jurisdictions in which it operates, including the General Data Protection Regulation, the UK GDPR as incorporated under the Data Protection Act 2018, and U.S. legislation such as the California Consumer Privacy Act.

All personal data shall be processed in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, and integrity and confidentiality.

The Company shall maintain records of processing activities and, where required, appoint data protection officers or equivalent compliance roles.

#### **3.3 Transparency, Lawful Basis and Consent**

The Company shall ensure full transparency in all data collection and processing activities. Data subjects shall be informed clearly and comprehensively of:

- The purposes of data processing
- The legal basis for processing
- Their rights under applicable law

Where required, the Company shall obtain explicit, informed, and freely given consent prior to processing personal data.

Such consent shall be documented and may be withdrawn by the data subject at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

#### **3.4 Data Minimisation, Retention and Purpose Limitation**

The Company shall collect and process only such personal data as is strictly necessary for specified, legitimate, and lawful purposes.

Data shall not be retained for longer than necessary and shall be subject to periodic review to ensure its continued relevance, accuracy, and adequacy.

Where data is no longer required, it shall be securely deleted, destroyed, or anonymised in accordance with applicable legal and regulatory requirements.



### **3.5 Secure Data Transmission, Storage and Cybersecurity**

The Company shall implement robust cybersecurity and data protection measures to ensure the secure transmission, storage, and processing of information.

Such measures shall include:

- Encryption technologies
- Secure communication protocols (including SSL/TLS)
- Access controls and authentication systems
- Network and system monitoring

These safeguards are designed to mitigate risks associated with cyber threats, data breaches, and unauthorised access, in compliance with UK, EU, and U.S. cybersecurity and data protection standards.

### **3.6 Third-Party Processing and Data Sharing**

The Company shall not disclose or transfer confidential or personal data to third parties without a lawful basis, including data subject consent where required, or a valid contractual or legal obligation.

Where third-party processing is necessary, the Company shall ensure that such parties are contractually bound by:

- Confidentiality obligations
- Data protection agreements
- Compliance with applicable legal frameworks

Cross-border data transfers shall be conducted in accordance with legally recognised mechanisms, ensuring an adequate level of data protection.

### **3.7 Data Subject Rights and Legal Remedies**

In accordance with applicable data protection laws, including the General Data Protection Regulation and UK data protection legislation, the Company recognises and shall facilitate the exercise of data subject rights, including:

- The right of access
- The right to rectification
- The right to erasure (“right to be forgotten”)
- The right to restriction of processing
- The right to data portability
- The right to object

The Company shall establish clear and accessible procedures to enable individuals to exercise such rights and shall respond within the legally prescribed timeframes.

Failure to comply with these obligations may result in regulatory penalties, civil claims for damages, and enforcement action by supervisory authorities.

### **3.8 Enforcement and Breach Notification**

The Company shall implement procedures for the detection, reporting, and investigation of data breaches.

Where a personal data breach occurs, the Company shall:

- Notify the relevant supervisory authority within the legally required timeframe
- Inform affected data subjects where there is a high risk to their rights and freedoms
- Take immediate remedial action to mitigate the impact of the breach

Any breach of confidentiality or data protection obligations by Obligated Persons shall result in disciplinary measures and may give rise to civil and criminal liability under applicable laws.



#### **4. PROFESSIONALISM AND COMPETENCE**

Zambelli International Consulting LLC is committed to upholding the highest standards of professionalism, expertise, and competence in all operations. The Company recognises that its reputation, regulatory standing, and long-term success are directly dependent upon the consistent delivery of high-quality services that meet the expectations of clients, employees, partners, and stakeholders. Obligated Persons are required to demonstrate diligence, objectivity, and technical proficiency in their professional undertakings, ensuring that every engagement is executed in accordance with applicable laws, industry best practices, and internal compliance frameworks across the United States, the United Kingdom, and the European Union.

##### **4.1 Continuous Professional Development**

The Company shall ensure that all employees, consultants, and directors have access to ongoing professional development opportunities. This includes participation in relevant training programmes, workshops, seminars, and industry conferences. Continuous learning shall be documented and monitored to ensure that Obligated Persons maintain up-to-date knowledge of legal, regulatory, financial, and technical standards. By fostering a culture of education and skills enhancement, the Company ensures that its personnel are capable of delivering competent, informed, and high-quality services in all jurisdictions, mitigating operational risk, and maintaining compliance with evolving standards in corporate governance, ethics, and industry-specific regulations.

##### **4.2 Adherence to Best Practices**

Zambelli International Consulting LLC shall adopt and implement industry best practices across all operational areas. This includes utilising established methodologies, analytical tools, and compliance frameworks designed to optimise efficiency, reliability, and legal conformity. Internal processes shall be regularly reviewed and updated to ensure alignment with current regulations, international standards, and evolving sector-specific requirements. By adhering to best practices, the Company demonstrates its commitment to professional integrity and regulatory compliance. Obligated Persons are expected to apply these methodologies consistently and document their application, ensuring transparency, traceability, and accountability in all professional engagements undertaken on behalf of the Company.

##### **4.3 Client-Centered Approach**

In all professional dealings, the Company prioritises the legitimate interests of its clients. Obligated Persons shall provide objective, well-reasoned, and tailored advice, reflecting each client's unique circumstances and strategic goals. The Company shall maintain active communication channels, promote transparency, and ensure that clients are fully informed regarding risks, obligations, and alternatives. This client-centred approach shall be conducted in accordance with applicable ethical, civil, and commercial law standards, including fiduciary obligations in the United States, the United Kingdom, and the European Union. The Company recognises that client trust is contingent upon professionalism, competence, and a demonstrable commitment to ethical service delivery.

##### **4.4 Accountability and Responsibility**

All Obligated Persons shall be fully accountable for the quality, accuracy, and timeliness of services rendered. The Company shall maintain procedures for monitoring performance and promptly addressing deficiencies or operational errors. Any challenges, limitations, or incidents must be reported transparently, and immediate corrective action shall be implemented to prevent recurrence. Accountability shall be enforced in accordance with relevant civil, regulatory, and contractual obligations, including potential liability under applicable U.S., UK, and EU law. By demonstrating responsibility, the Company reinforces its professional credibility, regulatory compliance, and commitment to stakeholders, ensuring that all services are delivered in accordance with established ethical and legal standards.

##### **4.5 Ethical Decision-Making**

Zambelli International Consulting LLC requires all personnel to base professional decisions on integrity, fairness, and the highest ethical standards. Obligated Persons shall exercise objective judgment, avoid conflicts of interest, and act in the best interests of clients and stakeholders. Ethical decision-making shall be informed by applicable corporate governance requirements, anti-bribery and anti-corruption legislation, and fiduciary duties under U.S., UK, and EU law. The Company shall provide guidance, training, and oversight to ensure that all decisions are transparent, well-documented, and defensible. Any breach of ethical obligations may result in disciplinary measures, civil liability, or regulatory sanctions, depending on jurisdictional applicability.

##### **4.6 Quality Assurance**

The Company shall implement comprehensive quality assurance protocols to monitor and enhance the delivery of professional services. Internal audits, peer reviews, and periodic performance evaluations shall be conducted to assess compliance with legal, regulatory, and professional standards. Feedback from clients, partners, and other stakeholders shall be actively solicited and used to improve methodologies and outcomes. Obligated Persons shall promptly implement corrective measures when deficiencies are identified. Quality assurance processes shall align with industry best practices and applicable regulatory frameworks in the United States, United Kingdom, and European Union, ensuring that all services maintain the highest standards of accuracy, reliability, and professional integrity.



## **5. CONFLICT OF INTEREST**

Zambelli International Consulting LLC is committed to the highest standards of integrity, objectivity, and transparency in all professional activities. Obligated Persons, including employees, directors, and consultants, must avoid situations in which personal, financial, or other interests could conflict with their duties or the Company's interests. Any actual or potential conflict, whether real, perceived, or apparent, must be promptly disclosed to the Compliance Officer or designated authority. Failure to identify or manage conflicts may constitute a breach of fiduciary duty, civil liability, or criminal offence under applicable U.S., UK, and EU legal frameworks, including anti-bribery and anti-corruption statutes.

### **5.1 Disclosure of Conflicts**

All Obligated Persons must immediately disclose potential or actual conflicts of interest in writing to the Company's Compliance Officer or designated representative. Disclosures include personal, financial, familial, or external business interests that could reasonably influence, or be perceived to influence, professional judgment or decision-making. Timely disclosure ensures compliance with the FCPA, UK Bribery Act 2010, EU AML Directives, and relevant U.S. and UK civil and criminal obligations. The Company shall maintain records of disclosures and review each case to determine whether mitigation, reassignment, or other corrective measures are required to protect the Company's integrity, reputation, and client trust.

### **5.2 Mitigation of Conflicts**

Upon disclosure of a conflict, the Company shall assess and implement appropriate mitigation measures. Remedies may include reallocation of responsibilities, adjustment of decision-making authority, or separation from certain transactions. All mitigation measures shall be documented and regularly reviewed to ensure compliance with legal obligations under the FCPA, UK Bribery Act, EU AML Directives, and applicable civil and criminal statutes. Where mitigation is insufficient, the Company reserves the right to suspend or remove the Obligated Person from the activity or engagement to prevent undue influence, reputational harm, or regulatory non-compliance, thereby safeguarding client interests and corporate integrity.

### **5.3 Avoiding Conflicting Interests**

Obligated Persons must actively avoid circumstances in which external financial, business, or personal relationships could create a conflict with the Company's interests. This includes holding shares or financial stakes in competitors, engaging in contractual relationships that impair objectivity, or participating in external activities that may appear to conflict with professional duties. All such activities must be disclosed and, where necessary, pre-approved by the Compliance Officer. Proactive avoidance ensures compliance with FCPA anti-corruption requirements, the UK Bribery Act, and EU anti-money laundering obligations, and preserves both the Company's integrity and its fiduciary responsibilities to clients and stakeholders.

### **5.4 Prohibition of Undue Influence**

The use of personal, familial, or financial interests to exert undue influence over Company decisions or relationships is strictly prohibited. Obligated Persons must not exploit their position or access to confidential information for personal gain or to benefit others improperly. Manipulation of decision-making processes, distortion of information, or leveraging one's role for personal advantage constitutes a violation of both internal policies and applicable U.S., UK, and EU laws, including civil, commercial, and criminal statutes. Any breach will result in disciplinary action, potential civil liability, and referral to regulatory authorities if warranted, ensuring accountability and ethical compliance.

### **5.5 Continuous Monitoring and Reporting**

The Company shall implement continuous monitoring procedures to identify and manage potential conflicts of interest across all jurisdictions in which it operates. Employees, directors, and consultants are encouraged to report suspected conflicts without fear of retaliation, and the Company shall maintain open and transparent reporting channels. Monitoring shall align with obligations under the FCPA, UK Bribery Act, EU AML Directives, and U.S./UK civil and criminal laws. Regular audits and compliance reviews shall assess adherence to conflict of interest policies, and corrective actions shall be implemented promptly to mitigate reputational, operational, or regulatory risk.

### **5.6 Ethical Decision-Making and Professional Integrity**

Even in the absence of a direct conflict, all Obligated Persons must act with integrity, objectivity, and independence, prioritising the Company's interests, those of clients, and public trust. Professional decisions shall be free from personal gain or undue external influence. Guidance under the FCPA, UK Bribery Act, EU AML Directives, and U.S./UK regulatory frameworks informs the Company's approach to conflict management, ensuring that actions are ethical, legally compliant, and defensible. By adhering to these standards, the Company ensures transparent, reliable, and trustworthy decision-making that protects long-term reputation, regulatory compliance, and stakeholder confidence.



## **6. TRANSPARENCY AND ACCOUNTABILITY**

Zambelli International Consulting LLC recognises transparency and accountability as core values essential to maintaining trust with clients, partners, employees, and stakeholders. The Company is committed to conducting business openly, ensuring that all actions, decisions, and policies are communicated clearly, accurately, and promptly. Obligated Persons shall act in accordance with legal, regulatory, and ethical obligations under the FCPA, UK Bribery Act, EU AML Directives, and applicable U.S./UK civil and criminal frameworks. Transparent operations protect the Company from reputational and legal risks while reinforcing ethical conduct and compliance across all jurisdictions in which it operates.

### **6.1 Transparent Decision-Making**

The Company shall provide clear, documented explanations for all strategic, financial, and operational decisions that affect clients, partners, or stakeholders. Decision-making shall be guided by legal compliance, ethical standards, and the Company's corporate governance frameworks. Significant decisions will be communicated promptly and comprehensively to those impacted, enabling informed evaluation and mitigating potential misunderstandings. Transparency shall include record-keeping sufficient to demonstrate adherence to regulatory obligations, including U.S. SEC requirements, UK Companies Act 2006, and EU directives. By maintaining documented rationale and consistent communication, the Company ensures accountability, supports ethical oversight, and strengthens stakeholder confidence in all decision-making processes.

### **6.2 Accountability for Actions and Results**

Obligated Persons are responsible for the outcomes of their decisions and conduct, including operational successes and any shortcomings. The Company shall implement internal review and audit procedures to verify compliance with legal, regulatory, and ethical standards. Accountability extends to corrective actions when deficiencies are identified, with appropriate reporting to management or compliance authorities. Failure to fulfil these obligations may expose personnel and the Company to civil liability, regulatory enforcement, or criminal prosecution under the FCPA, UK Bribery Act, EU AML Directives, or other applicable law. Accepting responsibility fosters trust, transparency, and organisational integrity.

### **6.3 Open Communication**

The Company promotes open, honest, and constructive dialogue both internally and externally. Employees, directors, and consultants are expected to communicate transparently regarding operational, financial, and compliance matters. Feedback channels are maintained to ensure concerns, questions, and suggestions are addressed promptly without fear of retaliation. Open communication supports early identification of potential compliance breaches, conflicts of interest, or ethical issues. All communications shall adhere to confidentiality requirements and regulatory obligations under applicable U.S., UK, and EU law. Transparent dialogue reinforces ethical culture, enhances stakeholder confidence, and ensures that the Company maintains a compliant and accountable operating environment.

### **6.4 Regular Reporting and Monitoring**

The Company shall establish formal reporting and monitoring systems to track compliance with strategic objectives, regulatory obligations, and internal policies. Regular internal audits, management reviews, and performance reports shall assess adherence to ethical, financial, and operational standards. Reporting shall be documented in a manner sufficient to demonstrate compliance with the FCPA, UK Bribery Act, EU AML Directives, and U.S./UK regulatory frameworks. Stakeholders shall receive timely updates on performance, risks, and corrective actions. Continuous monitoring and transparent reporting reinforce accountability, mitigate potential legal and reputational risk, and ensure that the Company's operations consistently reflect integrity and compliance.

### **6.5 Responsibility to Clients and Stakeholders**

The Company shall act at all times in the best interests of its clients, partners, and stakeholders. Decisions and actions must be both legally compliant and ethically responsible, ensuring that transparency and accountability guide all interactions. Any issues that arise shall be addressed proactively, with remedial measures implemented to mitigate negative impacts. Obligated Persons shall evaluate the consequences of their conduct under the FCPA, UK Bribery Act, EU AML Directives, and applicable civil and criminal frameworks. This ensures that client and stakeholder trust is maintained, and the Company demonstrates consistent commitment to ethical business practices and corporate governance standards.

### **6.6 Ethical Leadership**

Leadership at Zambelli International Consulting LLC shall exemplify transparency, accountability, and integrity. Senior management will model compliance with legal obligations, corporate governance standards, and ethical principles in all actions. Leadership shall be responsible for reviewing practices, monitoring adherence to internal policies, and promoting an ethical culture throughout the organisation. Obligated Persons are expected to follow this example, fostering trust, compliance, and professional integrity. Ethical leadership is critical to preventing misconduct, ensuring regulatory compliance under the FCPA, UK Bribery Act, and EU AML Directives, and reinforcing a culture of accountability and transparency across all jurisdictions in which the Company operates.

### **6.7 Collaboration and Stakeholder Engagement**

The Company shall actively engage with clients, partners, employees, regulators, and other stakeholders to encourage collaboration, feedback, and continuous improvement. Stakeholder input shall inform policy updates, operational enhancements, and ethical practices. All engagements shall comply with applicable anti-bribery, anti-corruption, and AML regulations, including the FCPA, UK Bribery Act, and EU AML Directives. Collaboration ensures that the Company remains responsive, transparent, and accountable in its operations. By valuing stakeholder perspectives and maintaining open, regulated channels of communication, Zambelli International Consulting LLC strengthens relationships, reinforces ethical conduct, and upholds a sustainable, compliant, and trustworthy corporate environment.



## **7. ANTI-CORRUPTION AND BRIBERY**

Zambelli International Consulting LLC is unwavering in its commitment to the highest ethical standards and full compliance with all applicable anti-corruption and anti-bribery laws. The Company prohibits corruption, bribery, and unethical business practices in all operations, requiring the same of employees, consultants, partners, and stakeholders. All business dealings must be conducted fairly, transparently, and lawfully, without improper incentives, financial inducements, or other arrangements that could compromise integrity. Compliance obligations extend to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, EU Anti-Money Laundering directives, and other relevant international and domestic criminal, civil, and regulatory frameworks.

### **7.1 Prohibition of Bribery and Kickbacks**

The Company strictly prohibits the offering, promising, giving, receiving, or soliciting of any bribe or kickback, whether in cash, gifts, services, or other inducements. Obligated Persons must not engage in direct or indirect arrangements designed to influence business decisions. This prohibition extends to both domestic and foreign public officials, private parties, and intermediaries acting on behalf of the Company. Non-compliance constitutes a violation of the FCPA, UK Bribery Act, EU directives, and U.S./UK criminal or civil law, and may result in disciplinary action, civil liability, or criminal prosecution. All transactions must be documented and transparent to ensure ethical conduct.

### **7.2 Zero Tolerance for Unethical Transactions**

Zambelli International Consulting LLC maintains a zero-tolerance policy towards money laundering, fraud, or any illegal financial conduct. Internal controls, audits, and transaction monitoring systems are implemented to detect and prevent misconduct. All financial dealings must comply with statutory, regulatory, and ethical standards, including U.S. banking and securities laws, the UK Proceeds of Crime Act, and EU AML frameworks. Any attempt to circumvent lawful processes or conceal illicit activity will be treated as a severe breach of Company policy and may trigger civil or criminal liability for the individual and the organisation.

### **7.3 Compliance with Anti-Corruption Laws**

The Company shall fully comply with national and international anti-corruption laws, including the FCPA, UK Bribery Act, OECD Anti-Bribery Convention, and EU AML Directives. Obligated Persons must ensure that all business practices, including financial transactions, gifts, hospitality, and facilitation payments, adhere to these laws. Non-compliance may expose the Company and individuals to civil fines, regulatory sanctions, and criminal liability. All transactions shall be recorded transparently and accurately to demonstrate compliance. The Company actively promotes fair competition and a culture of integrity, ensuring that legal obligations are embedded in policies, internal controls, and operational procedures.

### **7.4 Training and Awareness**

Zambelli International Consulting LLC provides regular training programs on anti-corruption, anti-bribery, and compliance obligations. These programs educate employees, consultants, and partners on the legal and ethical consequences of misconduct, including civil and criminal penalties under U.S., UK, and EU frameworks. Training covers the identification, prevention, and reporting of bribery, conflicts of interest, and fraudulent transactions. Obligated Persons are expected to complete training periodically, acknowledge understanding of policies, and apply guidance in all professional activities. Continuous awareness ensures the Company maintains a culture of compliance, integrity, and accountability across all jurisdictions in which it operates.

### **7.5 Reporting Mechanism**

The Company provides secure and confidential channels for reporting suspected bribery, corruption, or unethical conduct. Reports may be made anonymously or directly to the Compliance Officer. All allegations are investigated promptly, thoroughly, and in accordance with internal procedures and applicable law, including FCPA and UK Bribery Act requirements. Retaliation against whistleblowers is strictly prohibited. Corrective actions, disciplinary measures, and, where appropriate, referral to enforcement authorities will follow verified violations. The reporting system supports accountability, early detection of misconduct, and compliance with civil and criminal obligations across jurisdictions, reinforcing ethical conduct and corporate governance.

### **7.6 Vendor and Third-Party Relations**

All vendors, partners, and third-party agents must adhere to the same anti-corruption and anti-bribery standards as the Company. Due diligence is conducted prior to engagement to verify compliance with applicable laws and internal policies. Contracts with third parties include representations, warranties, and compliance clauses aligned with FCPA, UK Bribery Act, and EU AML standards. Any violation by a third party may result in termination of the relationship, civil or criminal liability, and reputational consequences. Monitoring and auditing mechanisms ensure third-party adherence, safeguarding the Company against indirect exposure to corruption or bribery risk.

### **7.7 Integrity in Government Relations**

Zambelli International Consulting LLC shall never offer or promise anything of value to government officials, domestic or foreign, to obtain favourable treatment or influence decision-making. All interactions with public authorities shall comply with statutory, regulatory, and ethical standards, including the FCPA, UK Bribery Act, and EU directives. Obligated Persons must document engagements, maintain transparency, and avoid facilitation payments unless explicitly permitted by law. Integrity in government relations protects the Company from criminal prosecution, civil penalties, and reputational harm, ensuring that public trust is upheld and that the Company operates in full compliance with global anti-corruption standards.

### **7.8 Continuous Monitoring and Improvement**

The Company shall implement continuous monitoring of business operations to detect, prevent, and respond to potential bribery or corruption risks. Internal audits, compliance reviews, and risk assessments are conducted regularly. Policies, procedures, and controls are updated to reflect evolving laws, regulations, and industry standards. Any breaches identified shall trigger immediate corrective action, disciplinary measures, and, if necessary, reporting to regulatory authorities. Continuous improvement ensures compliance with FCPA, UK Bribery Act, EU AML Directives, and relevant U.S./UK civil and criminal law, while reinforcing a culture of integrity, accountability, and ethical business conduct throughout the organisation.



## 8. WHISTLEBLOWING, REPORTING, AND ENFORCEMENT

Zambelli International Consulting LLC is committed to fostering a culture of integrity and compliance by providing secure, confidential, and effective mechanisms for reporting potential misconduct. All employees, consultants, directors, and stakeholders are encouraged to report concerns regarding violations of laws, regulations, or internal policies, including but not limited to bribery, corruption, conflicts of interest, fraud, money laundering, and unethical conduct. Reports may be made without fear of retaliation. These mechanisms are designed to comply with whistleblower protections under the FCPA, UK Public Interest Disclosure Act 1998, EU directives, and applicable U.S./UK civil and criminal frameworks.

### 8.1 Reporting Mechanisms and Channels

The Company maintains multiple reporting channels, including confidential hotlines, secure electronic submissions, and direct communication with the Compliance Officer. Reports may be submitted anonymously where permitted by law. All channels are managed to ensure confidentiality, integrity, and timely escalation. The Company guarantees that every report will be recorded, assessed, and investigated in accordance with internal procedures and applicable legal obligations under U.S., UK, and EU law. This approach enables the early detection of misconduct, supports regulatory compliance, and provides assurances to employees and stakeholders that their concerns are taken seriously and addressed in a legally compliant, ethical manner.

### 8.2 Protection Against Retaliation

Zambelli International Consulting LLC strictly prohibits any form of retaliation against individuals who report concerns or cooperate with investigations. Protection applies to all employees, consultants, and third parties who act in good faith, in accordance with the FCPA, UK Public Interest Disclosure Act, EU Whistleblower Directive, and U.S. anti-retaliation statutes. Retaliatory conduct may include dismissal, demotion, harassment, or any adverse employment or contractual action. Any attempt at retaliation will result in disciplinary measures and may give rise to civil or criminal liability. Ensuring protection promotes trust in reporting mechanisms, encourages ethical behaviour, and reinforces compliance with multi-jurisdictional legal frameworks.

### 8.3 Investigation Procedures

All reports of potential misconduct shall be promptly and thoroughly investigated by the Compliance Officer or a designated independent authority. Investigations shall be conducted objectively, confidentially, and in accordance with applicable procedural and evidentiary standards under U.S., UK, and EU law. Documentation of the investigation shall be retained to demonstrate compliance with regulatory requirements, including FCPA, UK Bribery Act, and EU AML obligations. Investigative findings will inform corrective actions, potential disciplinary measures, or referral to enforcement authorities. The process ensures fairness, legal defensibility, and accountability, while maintaining the Company's commitment to ethical governance and regulatory compliance.

### 8.4 Corrective Actions and Enforcement

Where misconduct is confirmed, Zambelli International Consulting LLC will take prompt corrective action proportionate to the severity of the violation. This may include disciplinary measures, termination of employment or contractual relationships, civil claims, or referral to regulatory or law enforcement authorities. Enforcement actions shall comply with applicable civil, criminal, and administrative laws under the FCPA, UK Bribery Act, EU AML Directives, and U.S./UK legal frameworks. Corrective measures aim to remedy harm, mitigate future risk, and reinforce compliance culture. Documentation of enforcement actions shall be retained for audit purposes and to demonstrate adherence to the Company's ethical and legal obligations.

### 8.5 Reporting to Regulators and Authorities

Where required by law, Zambelli International Consulting LLC shall report confirmed violations to the appropriate regulatory or enforcement bodies. This includes U.S. authorities such as the SEC or FinCEN, UK regulators including the FCA or NCA, and EU supervisory authorities. Reporting shall be accurate, timely, and complete, with full cooperation in any subsequent investigations. Transparent communication with regulators ensures compliance with statutory obligations, mitigates legal risk, and enhances the Company's credibility. The Company will provide employees and stakeholders with guidance on when regulatory reporting is necessary, supporting both ethical decision-making and legal conformity across jurisdictions.

### 8.6 Continuous Improvement and Monitoring

The Company shall continuously monitor the effectiveness of whistleblowing, reporting, and enforcement mechanisms. Internal audits, compliance reviews, and stakeholder feedback will be used to refine processes, address emerging risks, and ensure ongoing alignment with FCPA, UK Bribery Act, EU AML, and relevant U.S./UK legal frameworks. Lessons learned from investigations and enforcement actions will inform updates to policies, training, and internal controls. This proactive approach ensures that the Company maintains a robust, transparent, and legally compliant compliance environment, reinforcing stakeholder trust, mitigating legal and reputational risk, and promoting a culture of accountability and ethical conduct throughout the organisation.

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Any unauthorized disclosure, misappropriation, or misuse of the information contained herein may give rise to significant civil liability, regulatory enforcement actions, and criminal prosecution, including the imposition of substantial monetary penalties, injunctive relief, asset forfeiture, and custodial sentences.



## 9. EQUAL OPPORTUNITY AND NON-DISCRIMINATION

Zambelli International Consulting LLC is committed to fostering an inclusive environment where all individuals are valued for their unique perspectives, skills, and experiences. We uphold equal opportunity and non-discrimination principles across recruitment, employment, promotion, training, compensation, and professional development. All business interactions, whether with employees, clients, partners, or stakeholders, shall reflect fairness, respect, and compliance with applicable laws, including the U.S. Civil Rights Act, Equal Pay Act, Americans with Disabilities Act (ADA), the UK Equality Act 2010, and EU employment directives. We actively promote diversity, equity, and inclusion to strengthen organisational performance and societal impact.

### 9.1 Equal Employment Opportunity

All employment decisions shall be based on merit, qualifications, experience, and performance, without regard to race, colour, national origin, gender, sexual orientation, religion, age, disability, veteran status, or other legally protected characteristics. Recruitment and selection processes are designed to ensure compliance with U.S., UK, and EU equal opportunity laws. Promotions, assignments, and terminations shall follow objective criteria to prevent bias or unlawful discrimination. By ensuring that all personnel decisions are fair and transparent, Zambelli International Consulting LLC fosters an inclusive workforce and demonstrates a commitment to equal access to opportunities in accordance with international labour and employment legal frameworks.

### 9.2 Commitment to Diversity and Inclusion

The Company recognises that diversity enhances innovation, creativity, and decision-making. We are committed to cultivating an inclusive culture that values collaboration, mutual respect, and equitable opportunities for all. Diversity encompasses race, ethnicity, gender, sexual orientation, religion, disability, socio-economic background, and other legally protected characteristics. Policies and initiatives promote participation, career development, and empowerment of underrepresented groups. Training programs raise awareness and encourage inclusive behaviours. Zambelli International Consulting LLC actively measures progress towards diversity goals and ensures that internal practices comply with U.S., UK, and EU legal requirements regarding workplace equality and inclusion.

### 9.3 Non-Discrimination in Business Relationships

Zambelli International Consulting LLC extends its non-discrimination principles to all external relationships, including clients, vendors, partners, and other stakeholders. All parties shall be treated fairly, professionally, and respectfully, irrespective of background, identity, or legally protected status. Engagements or partnerships that perpetuate discrimination or inequality are strictly prohibited. Contracts and procurement processes are structured to comply with U.S., UK, and EU anti-discrimination legislation, ensuring equitable opportunities in commercial dealings. By maintaining consistent ethical standards in both internal and external operations, the Company demonstrates adherence to international labour law, fosters trust among stakeholders, and mitigates reputational and legal risks.

### 9.4 Accessibility and Accommodation

The Company shall ensure reasonable accessibility and accommodations for employees, clients, and partners, including those with disabilities. This includes modifications to workspaces, assistive technologies, flexible work arrangements, and communication methods to enable full participation. All accommodations shall comply with applicable U.S., UK, and EU laws, including the ADA, the UK Equality Act 2010, and EU accessibility directives. Employees and stakeholders are encouraged to request necessary adjustments, which shall be addressed promptly and equitably. These measures reinforce inclusion, facilitate equitable access to professional development and services, and ensure that the workplace and business operations reflect the Company's commitment to diversity and legal compliance.

### 9.5 Harassment-Free Workplace

Zambelli International Consulting LLC maintains a zero-tolerance policy towards harassment, including sexual harassment, bullying, and discriminatory conduct. Any behaviour that infringes upon an individual's dignity or violates protected characteristics is strictly prohibited. Complaints will be investigated promptly and impartially, in accordance with U.S., UK, and EU legal frameworks. Appropriate corrective and disciplinary measures, up to and including termination, will be applied. By maintaining a safe and respectful working environment, the Company safeguards employee wellbeing, reinforces ethical standards, and ensures compliance with civil and criminal anti-harassment provisions. This commitment also applies to interactions with clients, partners, and third parties.

### 9.6 Training, Awareness, and Reporting

The Company provides regular training on diversity, equity, inclusion, and non-discrimination to employees, directors, consultants, and business partners. Training emphasises legal compliance under U.S., UK, and EU frameworks, including workplace equality and anti-discrimination laws. Safe and confidential reporting mechanisms are available for employees or stakeholders to report harassment, discrimination, or unequal treatment. All complaints are thoroughly investigated, and corrective actions implemented as required. The Company ensures protection against retaliation and promotes transparency. Ongoing evaluation of training programs ensures adherence to best practices, regulatory obligations, and continuous **improvement in fostering a fair, inclusive, and legally compliant organisational culture.**

### 9.7 Promoting Gender Equality and Social Responsibility

Zambelli International Consulting LLC actively promotes gender equality, equitable compensation, and access to leadership opportunities. Initiatives to close gender pay gaps and advance careers of underrepresented groups are implemented across operations. The Company extends this commitment to corporate social responsibility by supporting education, empowerment, and employment initiatives in the communities it serves. These actions align with U.S., UK, and EU equal opportunity, anti-discrimination, and social responsibility frameworks. By embedding gender equality and inclusion into corporate strategy, Zambelli International Consulting LLC strengthens ethical governance, enhances workplace diversity, and contributes to equitable and sustainable business practices internationally.



## **10. HEALTH, SAFETY, RESPECT OF HUMAN RIGHTS, AND ENVIRONMENTAL RESPONSIBILITY**

Zambelli International Consulting LLC is committed to maintaining a safe, healthy, and respectful environment for all employees, clients, partners, and stakeholders. The Company adheres to applicable U.S., UK, and EU occupational health and safety regulations, including OSHA standards, the UK Health and Safety at Work Act 1974, and EU directives. Additionally, the Company respects human rights in accordance with the UN Guiding Principles and international labour standards. Environmental responsibility is integral, promoting sustainable operations, minimising environmental impact, and complying with applicable environmental legislation.

### **10.1 Workplace Health and Safety**

The Company prioritises employee and stakeholder safety by implementing robust occupational health and safety measures. Risk assessments, safety protocols, training, and incident reporting systems are maintained in accordance with OSHA, UK HSE guidance, and EU directives. Employees are empowered to raise safety concerns without fear of retaliation. Health and safety policies include ergonomic considerations, emergency preparedness, hazard communication, and preventive measures. Compliance ensures legal obligations are met while fostering a culture of safety and wellbeing. Regular audits and continuous improvement guarantee adherence to international and local standards.

### **10.2 Respect for Human Rights**

Zambelli International Consulting LLC commits to respecting all internationally recognised human rights, including the prohibition of forced labour, child labour, and human trafficking. Operations and business relationships are aligned with the UN Guiding Principles on Business and Human Rights, the UK Modern Slavery Act 2015, and U.S. federal and state labour laws. The Company promotes fair working conditions, non-discrimination, and dignity for all. Supplier and partner engagements are monitored for compliance. Violations are reported, remediated, and addressed through corrective action, ensuring alignment with ethical and legal obligations globally.

### **10.3 Environmental Responsibility**

The Company recognises its responsibility to minimise environmental impact across operations. Policies are designed to comply with U.S. Environmental Protection Agency regulations, the UK Environmental Protection Act 1990, and EU environmental directives. Sustainability initiatives include resource efficiency, waste reduction, responsible energy use, and environmental risk management. Employees and partners are encouraged to adopt environmentally responsible practices. Environmental incidents are reported, investigated, and mitigated promptly. The Company supports innovation and sustainability programmes, demonstrating commitment to corporate social responsibility, regulatory compliance, and long-term environmental stewardship in all jurisdictions where it operates.

### **10.4 Risk Assessment and Compliance**

Regular assessments are conducted to identify and mitigate occupational, environmental, and human rights risks. Compliance checks ensure alignment with U.S., UK, and EU statutory requirements. Policies and procedures are updated in line with legislative changes and best practices. Internal audits, monitoring, and reporting mechanisms provide oversight of adherence to health, safety, human rights, and environmental standards. Corrective actions are implemented when deficiencies are identified. Employees receive training on compliance responsibilities. By integrating risk management, legal adherence, and ethical standards, Zambelli International Consulting LLC maintains a safe, lawful, and socially responsible operational environment.

### **10.5 Stakeholder Engagement and Reporting**

The Company engages stakeholders, including employees, partners, regulators, and communities, on matters of health, safety, human rights, and environmental responsibility. Open communication, transparency, and reporting mechanisms ensure accountability. Feedback is incorporated to enhance safety, respect for human rights, and sustainability practices. Regulatory reporting obligations are met in accordance with U.S., UK, and EU law. Stakeholder engagement reinforces trust, supports continuous improvement, and ensures that the Company's operations align with both ethical principles and legal requirements, contributing to a responsible, safe, and environmentally conscious business culture globally.



## **11. CORPORATE SOCIAL RESPONSIBILITY, REDUCTION OF ENVIRONMENTAL IMPACT, COMMUNITY ENGAGEMENT, AND STAKEHOLDER RELATIONS**

**Zambelli International Consulting LLC** is committed to promoting sustainable and socially responsible business practices. Corporate Social Responsibility (CSR) forms an integral part of our global strategy, aligned with U.S., UK, and EU standards for ethical corporate conduct, environmental stewardship, and community engagement. We aim to reduce our environmental footprint, support local communities, and maintain transparent, accountable relationships with all stakeholders. CSR initiatives are designed to create long-term value, promote ethical business conduct, and reinforce the Company's reputation as a responsible and trustworthy organisation across all jurisdictions.

### **11.1 Environmental Impact Reduction**

The Company actively seeks to minimise environmental impact through sustainable practices across operations. This includes responsible energy usage, reduction of greenhouse gas emissions, resource efficiency, and minimisation of waste and pollution. Compliance with U.S. EPA regulations, UK Environmental Protection Act 1990, and relevant EU directives is mandatory. Employees and partners are educated on environmental best practices and sustainability initiatives. Continuous monitoring, audits, and reporting ensure alignment with legal requirements and corporate sustainability objectives. By reducing environmental impact, Zambelli International Consulting LLC demonstrates global environmental responsibility and commitment to ethical, sustainable business practices.

### **11.2 Community Engagement**

Zambelli International Consulting LLC actively engages with communities where we operate, supporting social, educational, and economic initiatives. This includes partnerships with local organisations, participation in volunteer programmes, and promotion of community development projects. Engagement strategies are designed to respect local customs, laws, and human rights standards under U.S., UK, and EU frameworks. Stakeholder consultation ensures that initiatives are relevant, effective, and culturally sensitive. By investing in communities, the Company fosters social cohesion, contributes to sustainable development, and reinforces its reputation as a responsible global enterprise committed to positive societal impact.

### **11.3 Stakeholder Relations and Transparency**

The Company maintains transparent, ethical, and accountable relationships with all stakeholders, including clients, employees, partners, investors, regulators, and local communities. Open communication, disclosure of policies and performance, and responsiveness to stakeholder concerns are central to engagement. Stakeholder feedback informs business practices, sustainability initiatives, and ethical decision-making. Compliance with U.S., UK, and EU legal and regulatory frameworks is ensured in all communications and disclosures. By cultivating trust, mutual respect, and accountability, Zambelli International Consulting LLC strengthens its global reputation, ensures compliance with legal obligations, and fosters long-term value creation for all stakeholders.

### **11.4 Ethical Supply Chain and Responsible Sourcing**

The Company is committed to ensuring that all suppliers, vendors, and partners adhere to ethical, environmental, and social responsibility standards. Supplier due diligence includes assessment of labour practices, human rights compliance, environmental impact, and anti-corruption adherence. Contracts include obligations aligned with U.S., UK, and EU regulations and international ethical standards. Zambelli International Consulting LLC reserves the right to terminate relationships with non-compliant parties. By promoting a responsible supply chain, the Company mitigates reputational, legal, and operational risks, ensuring alignment with its CSR objectives, ethical commitments, and sustainability goals.

### **11.5 Reporting, Monitoring, and Continuous Improvement**

The Company implements robust monitoring, reporting, and audit mechanisms to evaluate CSR, environmental performance, and stakeholder engagement. Key performance indicators, compliance audits, and feedback systems are used to measure effectiveness and inform continuous improvement. Reports are prepared in alignment with U.S., UK, and EU regulatory requirements and international sustainability reporting standards. Lessons learned from monitoring activities are incorporated into policies, procedures, and initiatives. This ensures that Zambelli International Consulting LLC continuously improves its CSR efforts, minimises environmental impact, strengthens stakeholder trust, and maintains a global standard of responsible, ethical, and sustainable business practice.



## **12. ANTI-FRAUD, FINANCIAL INTEGRITY, AND INTERNAL CONTROLS**

Zambelli International Consulting LLC is fully committed to maintaining the highest standards of financial integrity and accountability. The Company implements robust internal controls and monitoring systems to prevent, detect, and address fraud, misappropriation, or any financial misconduct. Compliance with U.S., UK, and EU financial and corporate laws, including the U.S. Sarbanes-Oxley Act, the UK Companies Act 2006, and EU Anti-Fraud directives, is mandatory. All employees, directors, consultants, and third parties are expected to uphold ethical financial practices, report suspicious activities, and support the Company in maintaining transparent and lawful operations globally.

### **12.1 Fraud Prevention and Detection**

The Company maintains proactive measures to prevent and detect fraud, including rigorous accounting controls, transaction monitoring, and employee training. Fraud prevention policies are aligned with U.S. FCPA standards, UK Bribery Act obligations, and EU financial regulations. Employees and stakeholders are encouraged to report suspected fraud via secure and confidential channels. Investigations are conducted promptly, impartially, and in compliance with applicable laws. By fostering a culture of vigilance, transparency, and accountability, Zambelli International Consulting LLC mitigates legal, financial, and reputational risks while ensuring compliance with domestic and international anti-fraud obligations.

### **12.2 Financial Integrity and Accurate Reporting**

All financial records, statements, and disclosures must be accurate, complete, and prepared in accordance with applicable accounting standards, including U.S. GAAP, UK Financial Reporting standards, and EU IFRS requirements. Misrepresentation, manipulation, or concealment of financial information is strictly prohibited. Directors, officers, and employees are responsible for ensuring that all reporting accurately reflects the Company's operations and financial position. Robust internal controls, audits, and verification procedures are implemented to ensure compliance with statutory requirements, safeguard stakeholder trust, and uphold Zambelli International Consulting LLC's reputation for integrity and lawful financial practices across jurisdictions.

### **12.3 Internal Controls and Risk Management**

Zambelli International Consulting LLC implements comprehensive internal control systems to identify, assess, and mitigate financial and operational risks. These controls include segregation of duties, approval processes, periodic audits, and risk assessments. Compliance with U.S., UK, and EU regulatory frameworks ensures that internal processes meet legal obligations and best practices. Employees are trained to recognise and report anomalies or potential breaches of financial policies. Regular monitoring and review of internal controls facilitate continuous improvement, prevent fraudulent activity, and ensure that the Company's financial operations are conducted in a transparent, ethical, and legally compliant manner globally.

### **12.4 Whistleblowing and Reporting Mechanisms**

The Company provides secure, confidential, and accessible channels for employees, contractors, and stakeholders to report suspected fraud, financial irregularities, or unethical practices. Reports are investigated promptly and independently, in compliance with U.S. Sarbanes-Oxley Act whistleblower protections, the UK Public Interest Disclosure Act 1998, and applicable EU whistleblowing directives. Retaliation against individuals reporting concerns in good faith is strictly prohibited. By ensuring protection and transparency, Zambelli International Consulting LLC fosters a culture of accountability, strengthens internal controls, and mitigates risk, ensuring that financial integrity and compliance remain central to its global operations.

### **12.5 Continuous Monitoring, Auditing, and Compliance**

Ongoing monitoring, internal audits, and compliance reviews are conducted to ensure the effectiveness of financial controls and adherence to anti-fraud policies. Findings from audits inform corrective actions, updates to policies, and improvements in financial management practices. Reports are prepared for senior management and regulatory bodies as required, in accordance with U.S., UK, and EU legal obligations. Employees, directors, and consultants are trained on risk identification, reporting responsibilities, and compliance requirements. This continuous cycle of monitoring and improvement ensures that Zambelli International Consulting LLC operates with integrity, accountability, and in full compliance with applicable financial, civil, and criminal laws.



## 13. PROTECTION OF INTELLECTUAL PROPERTY

Zambelli International Consulting LLC recognises intellectual property (IP) as a critical asset underpinning innovation, creativity, and commercial success. The Company is committed to safeguarding the proprietary rights of clients, employees, partners, and the organisation itself. All individuals acting on behalf of the Company must ensure that IP is not misused, disclosed, or exploited without authorisation. Compliance with U.S., UK, and EU IP legislation, including copyrights, trademarks, patents, and trade secrets, is mandatory. Policies, contracts, and legal mechanisms are implemented to protect and enforce intellectual property rights in all business activities globally.

### 13.1 Respect for Third-Party Intellectual Property

Employees, directors, and consultants must respect third-party intellectual property rights. Use, reproduction, or disclosure of patents, trademarks, copyrights, trade secrets, or other IP requires proper authorisation or licensing agreements. Unauthorised use is strictly prohibited. Compliance with applicable U.S., UK, and EU IP laws, including the UK Copyright, Designs and Patents Act 1988, U.S. Patent and Copyright statutes, and EU directives, is required. The Company ensures diligence in reviewing third-party materials and technologies before use, thereby safeguarding against infringement claims, maintaining trust with clients and partners, and upholding its reputation for lawful and ethical operations.

### 13.2 Confidentiality of Proprietary Information

Zambelli International Consulting LLC safeguards all proprietary and confidential information entrusted by clients, employees, and partners. Information must be accessed only by authorised personnel and used solely for legitimate business purposes. Disclosure to third parties is prohibited except under explicit consent or legal obligation. Security measures, including encryption, restricted access, and internal audits, are employed to ensure confidentiality. Compliance with U.S., UK, and EU data protection laws, such as GDPR and the UK Data Protection Act 2018, is mandatory. Breach of confidentiality constitutes a serious violation and may trigger disciplinary, civil, or criminal action under applicable law.

### 13.3 Protection of Internal Intellectual Property

The Company actively protects its own IP, including proprietary methodologies, software, trademarks, logos, and business processes. Legal safeguards, such as patents, copyrights, and trademarks, are maintained and monitored for potential infringements. All employees and partners are required to respect these protections and to report suspected misuse. Zambelli International Consulting LLC may pursue enforcement through legal action in U.S., UK, or EU jurisdictions as necessary. These measures ensure the preservation of competitive advantage, the integrity of corporate assets, and compliance with domestic and international intellectual property frameworks.

### 13.4 Legal Compliance and IP Agreements

All intellectual property activities comply with relevant laws, international treaties, and local regulations. The Company implements enforceable agreements, including non-disclosure agreements (NDAs), licensing contracts, and collaboration contracts, to clearly define rights and responsibilities. Employees, contractors, and partners are required to execute and adhere to such agreements. Compliance with U.S., UK, and EU IP legislation is mandatory. Intellectual property agreements are regularly reviewed and updated to align with legal developments. These measures ensure protection of proprietary information, prevent disputes, and safeguard the interests of all parties involved in business collaborations and creative endeavours.

### 13.5 Ethical Use of Technology and Creative Works

All technology, software, and creative works used by the Company must be legally licensed and ethically deployed. Piracy, counterfeiting, unauthorised copying, or distribution of software or intellectual property is strictly prohibited. Employees and partners are trained to understand licensing obligations and to comply with U.S., UK, and EU IP and anti-piracy laws. The Company ensures that proprietary and third-party technology is used lawfully, with respect for contractual obligations and ethical standards. Violations may result in disciplinary action and legal consequences. Upholding ethical use of intellectual property reinforces trust, innovation, and lawful business operations globally.

### 13.6 Enforcement, Monitoring, and Training

Zambelli International Consulting LLC monitors and enforces the protection of intellectual property internally and externally. Suspected infringements are investigated promptly in collaboration with legal counsel and relevant authorities. Employees, consultants, and partners receive regular training on IP protection, ethical usage, and compliance obligations. Awareness programmes cover licensing requirements, confidentiality standards, and consequences of infringement under U.S., UK, and EU law. Continuous monitoring, audits, and proactive enforcement ensure that IP rights are respected and upheld.

These measures foster innovation, protect proprietary assets, and maintain a culture of integrity, accountability, and legal compliance across all business operations.



## 14. FAIR COMPETITION

Zambelli International Consulting LLC is committed to promoting fair, ethical, and transparent competition in all markets in which it operates. The Company recognises that healthy competition fosters innovation, improves service quality, and benefits consumers and stakeholders. All business activities will comply with relevant antitrust, competition, and trade laws in the United States, United Kingdom, and European Union. Employees, directors, and consultants must avoid practices that could distort competition, restrict market access, or harm competitors. The Company will actively uphold these principles to maintain integrity, fairness, and lawful conduct in every commercial engagement.

### 14.1 Compliance with Antitrust and Competition Laws

All employees and representatives of the Company shall strictly adhere to applicable antitrust and competition laws, including the U.S. Sherman Act, Clayton Act, Federal Trade Commission Act, the UK Competition Act 1998, the EU Treaty on the Functioning of the European Union (TFEU) Articles 101–102, and related regulations. Prohibited conduct includes price-fixing, bid-rigging, market allocation, and collusion with competitors. Business practices shall be regularly reviewed to ensure compliance, and the Company will maintain records and internal procedures that demonstrate adherence to fair competition standards, promoting lawful, merit-based market participation.

### 14.2 Prohibition of Price-Fixing and Collusion

Zambelli International Consulting LLC expressly prohibits any agreements, understandings, or coordinated conduct with competitors that could influence pricing, market allocation, customer segmentation, or contract terms. Employees and consultants must not engage in communications or arrangements that could be construed as collusive or anti-competitive under U.S., UK, or EU law. Any suspected violations must be promptly reported to the compliance officer. The Company will take immediate corrective and disciplinary measures to prevent, mitigate, or remediate any conduct that threatens fair competition or risks regulatory enforcement actions.

### 14.3 Promotion of Healthy Competition

The Company fosters a culture of competition based on service quality, innovation, and client value. Business strategies are designed to differentiate Zambelli International Consulting LLC through ethical practices, merit-based performance, and continual enhancement of products and services. Employees and consultants are encouraged to focus on customer-centric solutions, creativity, and operational excellence. Competitive behaviour must never include unfair practices or unlawful advantages. By prioritising transparency, innovation, and ethical conduct, the Company contributes positively to market integrity, strengthens client relationships, and ensures that competition is both robust and lawful across all jurisdictions.

### 14.4 Protection of Competitive Information

Zambelli International Consulting LLC ensures the confidentiality and ethical handling of competitors' proprietary information. Trade secrets, pricing structures, business strategies, and other confidential data must not be misappropriated or exploited. The Company prohibits corporate espionage, unauthorised data acquisition, or use of competitor information in violation of U.S., UK, or EU competition laws. Employees must receive training on proper information management, including the handling of competitor data obtained inadvertently. Violations will trigger disciplinary measures and potential legal action, demonstrating the Company's commitment to fair, transparent, and compliant business practices.

### 14.5 Transparency in Marketing, Advertising, and Contractual Practices

All marketing, advertising, and contractual communications will be truthful, accurate, and non-deceptive. Misrepresentation, exaggeration, or false claims regarding services, capabilities, or competitors are prohibited. Contracts with clients, suppliers, and partners must not include clauses that unduly restrict competition, create unfair market advantages, or violate antitrust regulations. Exclusive arrangements, anti-competitive covenants, or provisions limiting market access require careful review and approval by the compliance team. Employees are trained to ensure transparency and compliance with U.S., UK, and EU laws. Ethical marketing and contractual practices support integrity, client trust, and lawful participation in competitive markets.

### 14.6 Reporting, Training, and Enforcement

Zambelli International Consulting LLC provides secure channels for reporting suspected anti-competitive conduct without fear of retaliation. Reports are investigated promptly, and corrective actions, including disciplinary measures, are implemented if required. The Company maintains regular training programmes to educate employees, consultants, and partners on antitrust and competition laws, risks of violations, and the importance of ethical competition. Continuous monitoring ensures adherence to U.S., UK, and EU legal frameworks, fostering a culture of compliance. By embedding transparency, accountability, and legal awareness, the Company safeguards market integrity, protects stakeholder interests, and promotes sustainable, fair, and competitive business practices worldwide.



## 15. RESPONSIBLE MARKETING AND COMMUNICATION

Zambelli International Consulting LLC is committed to ensuring that all marketing, promotional activities, and communications are conducted with honesty, integrity, and transparency. We recognise that our communications directly influence stakeholder trust, reputation, and the perception of our services. Accordingly, all marketing content must accurately reflect the Company's capabilities, commitments, and ethical values. Misrepresentation, exaggeration, or misleading claims are strictly prohibited. The Company will ensure that all marketing and communication activities comply with applicable U.S., UK, and EU laws, including advertising, privacy, and data protection regulations, and promote responsible business conduct.

### 15.1 Truthfulness in Advertising

All advertising and promotional content must accurately represent the Company's services, capabilities, and commitments. Exaggerated claims, unsubstantiated promises, or misleading information are strictly prohibited. Marketing materials, whether print, digital, or broadcast, must be clear, truthful, and readily understandable by the intended audience. Employees and consultants are required to ensure that every statement is verifiable, complies with regulatory requirements such as the UK Advertising Standards Authority (ASA) codes, the U.S. Federal Trade Commission (FTC) rules, and EU directives, and fosters confidence in the Company's integrity and professional competence.

### 15.2 No Misleading or Deceptive Practices

Zambelli International Consulting LLC prohibits any form of deceptive marketing, including "bait-and-switch" tactics, misrepresentation of benefits, or distortion of service quality. Marketing practices must promote transparency, ethical conduct, and stakeholder trust. Employees and consultants are expected to refrain from distributing false, ambiguous, or misleading statements in all promotional or business communications. The Company will monitor marketing campaigns to ensure compliance with the FCPA, UK Bribery Act, GDPR, and EU consumer protection laws. Violations will result in corrective action, including disciplinary measures or legal recourse if required to maintain compliance and uphold corporate integrity.

### 15.3 Accurate and Clear Communication

All communications with clients, partners, regulators, and the public must be clear, accurate, and unambiguous. Marketing, website content, and social media messages shall be presented in language that is understandable and factual. The Company will avoid jargon, technical ambiguity, or statements that could obscure the truth about services. Transparency in communication is essential for informed decision-making and compliance with U.S., UK, and EU advertising and consumer protection standards. Employees must ensure that all messaging accurately reflects business practices, capabilities, and service risks while reinforcing stakeholder trust and ethical responsibility.

### 15.4 Ethical Content Creation

Marketing content must be created ethically, respecting all intellectual property rights, copyrights, trademarks, and patents. The Company will attribute third-party content appropriately and ensure that materials are culturally sensitive and inclusive. Content creation must align with ethical standards, promoting honesty, fairness, and professionalism. Employees and consultants are trained to verify sources, secure licenses where required, and avoid plagiarism or unauthorised use of proprietary information. By maintaining ethical content practices, Zambelli International Consulting LLC safeguards both its own reputation and the rights of third parties, ensuring compliance with applicable intellectual property and advertising laws.

### 15.5 Compliance with Advertising and Privacy Regulations

The Company will comply with all advertising, consumer protection, and data privacy regulations in every jurisdiction in which it operates. This includes GDPR in Europe, CCPA in California, and other relevant U.S., UK, and international regulations. Personal data used in marketing will only be processed lawfully, transparently, and with explicit consent where required. Marketing activities will respect privacy, confidentiality, and ethical standards, while promoting accurate and honest representation of services. Continuous monitoring of regulatory changes ensures ongoing compliance and reflects Zambelli International Consulting LLC's commitment to lawful and responsible marketing practices.

### 15.6 Representation of Risks, Testimonials, and Client Data

Marketing materials will provide clear, balanced, and accurate representations of service-related risks, particularly in financial, advisory, or high-stakes offerings. All testimonials, case studies, or client endorsements must reflect genuine experiences and comply with disclosure requirements. Any compensation related to endorsements must be transparent. Personal client data will never be used for marketing without explicit consent, and confidentiality obligations will be strictly upheld. These practices ensure adherence to U.S., UK, and EU legal standards, safeguard trust, and promote ethical engagement with clients, stakeholders, and the public while maintaining corporate integrity in all communications.



## 16. DUE DILIGENCE AND RISK MANAGEMENT

Zambelli International Consulting LLC is committed to maintaining the highest standards of due diligence and risk management across all business operations. We recognise that informed decision-making is essential to the Company's sustainability, ethical conduct, and long-term success. Every partnership, investment, or business venture is assessed for financial, operational, legal, reputational, and ethical risks. Our approach is proactive, structured, and compliant with applicable U.S., UK, and EU regulations, ensuring that risks are identified, evaluated, and mitigated in a manner that safeguards the Company, its clients, and stakeholders.

### 16.1 Comprehensive Due Diligence

Prior to engaging in any business relationship, partnership, or venture, Zambelli International Consulting LLC will conduct thorough due diligence. This includes verifying financial stability, compliance with applicable laws and regulations, and evaluating the reputation and reliability of prospective partners. All information gathered will be accurate, complete, and up to date, forming the basis of informed decision-making. Due diligence processes will comply with relevant international standards, including U.S. Sarbanes-Oxley obligations, the UK Companies Act, EU regulatory frameworks, and anti-corruption laws such as the FCPA and UK Bribery Act.

### 16.2 Identification of Risks

The Company systematically identifies, assesses, and documents all potential risks, including financial, operational, legal, reputational, and ethical risks. Risk identification considers external factors, such as regulatory changes, economic fluctuations, and market dynamics, as well as internal vulnerabilities, including operational inefficiencies and personnel-related risks. Documented risk registers and assessment tools will be maintained and updated regularly. By systematically identifying risks, Zambelli International Consulting LLC ensures that management and stakeholders are aware of potential threats and can implement strategies to mitigate adverse outcomes, consistent with U.S., UK, and EU legal obligations.

### 16.3 Risk Mitigation and Control Measures

Once identified, risks will be mitigated through appropriate strategies and internal controls. Contingency plans, preventive measures, and monitoring systems will be implemented to reduce the likelihood of adverse events and their potential impact. Responsibilities for risk management are clearly defined, and all mitigation measures are reviewed regularly for effectiveness. Compliance with relevant U.S., UK, and EU legislation is maintained throughout. Risk mitigation practices integrate both operational and ethical considerations to ensure that protective measures do not compromise the Company's integrity or stakeholder trust.

### 16.4 Financial and Legal Risk Assessment

Financial and legal risks are subject to rigorous evaluation before executing any transactions, partnerships, or investments. Financial assessments address credit exposure, liquidity, market volatility, and potential return on investment. Legal risk evaluations ensure compliance with all applicable laws, regulations, and contractual obligations, including anti-money laundering requirements, antitrust laws, and international financial standards. This process safeguards the Company against potential litigation, regulatory penalties, and financial loss. All assessments are documented, periodically reviewed, and aligned with U.S., UK, and EU legal frameworks to guarantee a comprehensive and compliant risk management approach.

### 16.5 Ongoing Monitoring and Review

Risk management is an ongoing process. Zambelli International Consulting LLC will continuously monitor business operations, partnerships, and external conditions to detect emerging risks. Periodic reviews of risk registers, controls, and mitigation strategies ensure that all responses remain effective and compliant with evolving U.S., UK, and EU regulations. Adjustments will be implemented promptly to address new risks or changes in circumstances. This dynamic approach allows the Company to proactively manage threats, protect stakeholder interests, and maintain operational resilience while adhering to the highest ethical, financial, and regulatory standards.

### 16.6 Stakeholder Communication

Transparency in risk management is essential. Zambelli International Consulting LLC will maintain open communication channels with clients, partners, and stakeholders regarding significant risks and mitigation strategies. Risk information will be communicated clearly, accurately, and in a timely manner, allowing stakeholders to make informed decisions when appropriate. Communication practices comply with U.S., UK, and EU regulations, including GDPR and relevant disclosure obligations. By maintaining transparent dialogue, the Company strengthens trust, ensures informed consent in risk-related decisions, and demonstrates accountability in its ethical and legal responsibilities.



## **16.7 Ethical Considerations in Risk Management**

Ethical integrity is central to all risk management activities. Zambelli International Consulting LLC will never pursue opportunities that compromise ethical standards, corporate values, or stakeholder trust. Risk mitigation strategies will align with the Company's ethical principles, avoiding shortcuts or decisions that could damage reputation or compliance. Potential ethical risks—such as conflicts of interest, bribery, or unfair practices—will be proactively identified and addressed. This ensures that risk management decisions support both regulatory compliance and moral accountability, reinforcing the Company's commitment to lawful and ethical operations under U.S., UK, and EU frameworks.

## **16.8 Training and Awareness**

Zambelli International Consulting LLC provides ongoing training to employees, consultants, and partners on risk identification, assessment, and mitigation. Training ensures that all personnel understand risk management policies, compliance requirements, and ethical considerations. Awareness programs are designed to cultivate a proactive risk culture, ensuring that every member of the organization can contribute to maintaining the Company's integrity, operational resilience, and adherence to U.S., UK, and EU laws. Periodic refresher courses and scenario-based exercises are conducted to reinforce knowledge, encourage vigilance, and promote consistent application of risk management principles across the organization.

## **16.9 External Expertise**

When specialized knowledge is required, Zambelli International Consulting LLC will engage external experts, including legal, financial, and industry specialists, to support risk assessment and due diligence processes. This ensures that complex or high-stakes risks are properly identified, evaluated, and mitigated. External advice complements internal expertise, strengthening compliance with U.S., UK, and EU legal standards and providing assurance to stakeholders that risk management is thorough, professional, and informed. The Company will document consultations, apply recommendations appropriately, and integrate external insights into ongoing risk management strategies.

## **16.10 Commitment to Continuous Improvement**

Zambelli International Consulting LLC is dedicated to continuously enhancing its risk management and due diligence frameworks. Policies, procedures, and internal controls are regularly reviewed and updated to reflect changes in laws, regulations, and market conditions. Lessons learned from past risk events, industry best practices, and stakeholder feedback are incorporated to improve operational resilience and compliance. This iterative approach ensures that the Company remains vigilant, proactive, and adaptable, consistently safeguarding the interests of the organization, its clients, partners, and stakeholders while maintaining full adherence to U.S., UK, and EU legal and ethical standards.

## **17. DATA PROTECTION AND CYBERSECURITY**

Zambelli International Consulting LLC recognizes the paramount importance of protecting sensitive and personal data entrusted by clients, employees, and partners. We are committed to maintaining the highest standards of privacy, confidentiality, and cybersecurity. Our approach is proactive and comprehensive, encompassing technical, administrative, and organizational safeguards. All activities are conducted in compliance with relevant U.S., UK, and EU laws, including GDPR, CCPA, and applicable cybersecurity regulations. We aim to prevent unauthorized access, data breaches, or cyber threats, ensuring the integrity, availability, and confidentiality of information across all business operations.

### **17.1 Protection of Sensitive Data**

We implement robust measures to protect sensitive personal and corporate data from unauthorized access, alteration, disclosure, or destruction. Data is classified, stored, and handled securely, whether physical or digital, with access restricted to authorized personnel only. All employees, consultants, and third-party partners are trained to manage sensitive information responsibly, ensuring that confidential client and corporate data is never misused. These practices comply with U.S., UK, and EU privacy frameworks, including GDPR, CCPA, and data protection regulations. The Company continuously monitors and updates these safeguards to maintain the highest levels of information security.

, and resilient information systems for all operations.



## **17.2 Cybersecurity Framework**

Zambelli International Consulting LLC maintains a multi-layered cybersecurity framework aligned with ISO/IEC 27001, NIST Cybersecurity Framework, and other international standards. Our framework includes firewalls, intrusion detection systems, antivirus solutions, secure networks, and role-based access controls to prevent unauthorized access and detect threats promptly. Cybersecurity protocols are regularly reviewed, tested, and updated to respond to emerging threats. Internal policies define responsibilities and procedures for incident management, data protection, and system integrity. Compliance with U.S., UK, and EU regulations ensures that the Company maintains lawful, secure, and resilient information systems for all operations.

## **17.3 Data Encryption**

All sensitive data at rest or in transit is encrypted using industry-standard cryptographic techniques. Encryption ensures that information remains unreadable to unauthorized parties in the event of a breach. Data in transit over public networks and stored on servers, databases, or backup systems is secured through strong encryption protocols. This applies to both personal and corporate data, including client information, employee records, and proprietary business data. Encryption practices comply with international standards and legal requirements under U.S., UK, and EU laws, safeguarding confidentiality, maintaining integrity, and reducing the risk of unauthorized disclosure.

## **17.4 Access Control and Authentication**

Access to sensitive information is strictly controlled. Role-based permissions ensure that employees, contractors, and third-party partners can only access data necessary for their duties. Multi-factor authentication (MFA) and other secure login mechanisms are enforced to verify user identity and prevent unauthorized access. Regular access reviews and audits are conducted to ensure compliance with company policies and legal obligations. This approach aligns with GDPR, CCPA, and other U.S., UK, and EU data protection regulations, ensuring that all information remains secure, confidential, and accessible only to those with legitimate business need.

## **17.5 Regular Security Audits and Assessments**

We conduct periodic security audits, penetration testing, and vulnerability assessments to identify and mitigate risks within our systems. Security assessments are performed both internally and, where necessary, by external cybersecurity experts. Findings are addressed promptly through corrective measures, software updates, and policy enhancements. These proactive measures comply with U.S., UK, and EU regulatory requirements and industry best practices. By continuously evaluating our systems and controls, Zambelli International Consulting LLC ensures that cybersecurity defenses remain effective against evolving threats, protecting the integrity, availability, and confidentiality of data entrusted to us.

## **17.6 Data Backup and Disaster Recovery**

Comprehensive data backup and disaster recovery plans are in place to ensure continuity of operations in the event of cyber incidents, technical failures, or natural disasters. Backup systems are regularly tested, updated, and stored securely, and disaster recovery procedures are defined to restore critical systems efficiently. These plans align with U.S., UK, and EU requirements for business continuity, data integrity, and operational resilience. Regular drills and updates ensure readiness to respond promptly, minimizing disruptions to business operations and safeguarding client, employee, and corporate data against loss, corruption, or unauthorized access.

## **17.7 Compliance with Privacy Laws and Regulations**

Zambelli International Consulting LLC strictly adheres to all applicable privacy and data protection regulations, including GDPR, CCPA, and national laws in jurisdictions of operation. Policies and procedures are continuously reviewed to ensure alignment with regulatory changes. We inform clients, employees, and partners about their rights and how their data is collected, processed, stored, and shared. Privacy impact assessments and compliance monitoring are conducted regularly to mitigate risks. By maintaining strict adherence to legal obligations, the Company ensures transparency, accountability, and protection of individual and corporate data in accordance with international best practices.

## **17.8 Employee Training and Awareness**

All employees, consultants, and relevant stakeholders receive ongoing training on data protection and cybersecurity best practices. Training covers threat recognition, phishing prevention, social engineering, secure data handling, and adherence to Company policies. Staff are educated on their legal obligations under GDPR, CCPA, and other U.S., UK, and EU regulations. Regular refresher courses, assessments, and scenario-based exercises promote a culture of vigilance and responsibility. By ensuring employees are informed and competent, Zambelli International Consulting LLC strengthens its cybersecurity posture, reduces the likelihood of breaches, and maintains the trust of clients, partners, and stakeholders.



### **17.9 Third-Party Vendors and Partners**

Before sharing sensitive or personal data, Zambelli International Consulting LLC conducts thorough due diligence on third-party vendors and partners. Contracts include clear obligations for data protection, security measures, and breach notification procedures. Vendors are required to comply with GDPR, CCPA, and other applicable laws, ensuring consistency with the Company's cybersecurity and privacy standards. Ongoing monitoring and audits verify compliance and performance. By managing third-party risks, the Company safeguards client and corporate information, prevents unauthorized access or misuse, and maintains accountability and trust in all external business relationships.

### **17.10 Incident Response and Notification**

In the event of a cybersecurity incident or data breach, Zambelli International Consulting LLC will act promptly to contain, investigate, and remediate the issue. Impact assessments are conducted, affected parties are notified in compliance with U.S., UK, and EU regulations, and corrective measures are implemented to prevent recurrence. Incident response teams follow structured protocols, including root cause analysis and reporting to regulatory authorities where required. By maintaining a proactive, transparent, and legally compliant response process, the Company ensures resilience, minimizes harm, and maintains trust with clients, employees, and stakeholders.

### **17.11 Continuous Improvement**

Zambelli International Consulting LLC continually evaluates and enhances its data protection and cybersecurity policies to adapt to emerging threats and technological advancements. Threat monitoring, policy updates, and system upgrades are regularly implemented. Lessons learned from incidents, audits, and industry best practices inform ongoing improvements. This commitment ensures that the Company remains resilient, compliant with U.S., UK, and EU laws, and capable of protecting sensitive data effectively. By fostering a culture of vigilance, accountability, and innovation, the Company maintains stakeholder confidence, supports operational integrity, and mitigates risks associated with cyber threats.

## **18. CLIENT-CENTERED APPROACH**

At Zambelli International Consulting LLC, our clients are the focus of every decision and action. We recognize that our success is intrinsically linked to theirs, and we are committed to delivering professional, unbiased, and value-driven solutions. Our approach ensures that every client engagement is tailored to their specific goals, challenges, and operational context. We prioritize understanding client objectives, maintaining transparent communication, and delivering measurable outcomes. By centering our services around client needs, we foster trust, loyalty, and long-term partnerships that contribute to sustainable business growth and mutual success.

### **18.1 Understanding Client Needs**

We actively listen to our clients to understand their objectives, challenges, and expectations fully. Open and consistent communication allows us to grasp their strategic goals and operational requirements, ensuring proposed solutions align with their vision. By cultivating these strong relationships, we enable collaborative problem-solving and informed decision-making. Each client engagement is approached individually, with solutions designed to address specific needs. Through this attentive, client-focused methodology, Zambelli International Consulting LLC builds trust, demonstrates respect for client perspectives, and ensures that all recommendations and strategies are relevant, actionable, and tailored to support the client's long-term success.

### **18.2 Delivering Value-Driven Solutions**

Our solutions are designed to deliver tangible value to clients, enhancing operational efficiency, strategic performance, and overall business outcomes. We leverage evidence-based methodologies, data analytics, and industry best practices to craft solutions that are measurable, actionable, and aligned with client objectives. Each project is evaluated to ensure maximum impact, scalability, and sustainability. By focusing on value creation, Zambelli International Consulting LLC ensures that our services contribute meaningfully to client growth. We prioritize strategies that provide both immediate and long-term benefits, fostering client satisfaction and reinforcing our commitment to excellence and client success.

### **18.3 Transparency in Communication**

We maintain transparent and timely communication at all stages of client engagements. Clients are informed of progress, timelines, potential risks, and any operational challenges, enabling them to make informed decisions. Pricing, deliverables, and contractual obligations are communicated clearly to prevent misunderstandings. By providing clarity in all interactions, we establish accountability and reinforce client trust. Open communication extends to feedback mechanisms, status updates, and consultations, ensuring clients are fully aware of project developments. Transparency is integral to our client-centered approach, supporting collaborative relationships and fostering confidence in Zambelli International Consulting LLC's professional judgment and service quality.



#### **18.4 Professionalism and Unbiased Advice**

Our consultants provide advice that is professional, objective, and aligned with the best interests of our clients. Recommendations are based on thorough analysis, factual data, and sound judgment, free from conflicts of interest or external pressures. Zambelli International Consulting LLC ensures that guidance is ethically grounded and strategically appropriate for each client's unique circumstances. Employees and consultants are trained to maintain integrity, demonstrate impartiality, and prioritize client outcomes over personal or organizational gain. By delivering unbiased advice, we uphold professional ethics, build trust, and enhance the credibility and value of our consulting services.

#### **18.5 Timeliness and Efficiency**

Zambelli International Consulting LLC recognizes that time is a critical resource for our clients. We commit to delivering services promptly, meeting deadlines, and ensuring efficient project execution. Processes are managed to reduce delays, optimize workflow, and provide timely solutions without compromising quality. By balancing speed and accuracy, we ensure that client objectives are achieved efficiently, enhancing operational impact. This commitment demonstrates respect for clients' schedules and resources, fostering reliability and confidence in our services. Timely and effective delivery reinforces the value of our partnership and strengthens long-term client relationships.

#### **18.6 Confidentiality and Privacy**

All sensitive client information is handled with the utmost confidentiality and in compliance with relevant data protection and cybersecurity laws, including GDPR, CCPA, and other applicable regulations. Proprietary data, strategic plans, and operational insights are safeguarded through secure systems, access controls, and strict internal policies. Disclosure of client information is only permitted with explicit consent or when legally required. Zambelli International Consulting LLC ensures that client privacy is respected at all times, reinforcing trust, protecting competitive advantage, and demonstrating our commitment to ethical, responsible consulting practices.

#### **18.7 Client Feedback and Continuous Improvement**

We actively seek client feedback to improve service quality, processes, and outcomes. Regular engagement allows us to measure satisfaction, identify areas for enhancement, and adapt our strategies to meet evolving needs. Feedback informs professional development, operational adjustments, and the refinement of our methodologies. By valuing client perspectives, Zambelli International Consulting LLC promotes continuous improvement and ensures that our services remain aligned with client expectations. Constructive feedback loops strengthen relationships, drive excellence, and demonstrate our commitment to responsive, client-focused service delivery.

#### **18.8 Long-Term Partnerships**

Zambelli International Consulting LLC prioritizes the development of enduring relationships with clients, grounded in trust, mutual respect, and shared goals. Beyond individual projects, we provide ongoing support, strategic guidance, and proactive solutions to help clients grow sustainably. Long-term partnerships enable deeper understanding of client objectives, fostering collaboration and alignment with evolving business priorities. Our commitment to sustained engagement ensures continuity of value, strengthens mutual confidence, and reinforces our reputation as a trusted advisor. By cultivating long-term client relationships, we contribute to the success and resilience of both our clients and our organization.

### **19. COMMITMENT TO QUALITY**

At Zambelli International Consulting LLC, quality is the foundation of our operations. We are dedicated to delivering services that consistently meet the highest professional, regulatory, and industry standards. From client engagement to solution delivery, we ensure every interaction reflects our commitment to excellence. By embedding quality into our processes, methodologies, and organizational culture, we foster trust, reliability, and client satisfaction. We recognize that delivering exceptional, value-driven outcomes is essential for long-term client success, organizational growth, and the continued reputation of Zambelli International Consulting LLC as a leader in ethical, high-quality consulting.

#### **19.1 Consistent Quality Standards**

Zambelli International Consulting LLC maintains rigorous quality standards across all services and engagements. We adhere to industry best practices, regulatory requirements, and internal benchmarks to ensure accuracy, reliability, and comprehensiveness in every deliverable. Each project is assessed against defined criteria, regardless of size or complexity, to guarantee alignment with client expectations and professional norms. Our clients can expect consistent, high-quality results that meet or exceed industry standards. By implementing structured processes and controls, we ensure that our services deliver measurable value and reinforce the company's reputation for excellence, trustworthiness, and ethical business practices.



## **19.2 Continuous Improvement**

We view quality as an ongoing process rather than a fixed achievement. Zambelli International Consulting LLC continuously evaluates service delivery, monitors outcomes, and incorporates lessons learned to enhance performance. Feedback from clients, employees, and partners informs improvements, while staying abreast of industry trends ensures our methodologies remain innovative and effective. Our commitment to continuous professional development and process refinement fosters operational excellence. By embracing a culture of learning, reflection, and adaptation, we ensure that our services evolve with client needs, regulatory requirements, and emerging market conditions, consistently maintaining relevance, efficiency, and the highest standards of quality.

## **19.3 Tailored Solutions for Client Success**

We recognize that each client has unique needs, objectives, and challenges. Zambelli International Consulting LLC customizes its solutions to align with each client's specific requirements, ensuring that outcomes are effective, actionable, and strategically beneficial. Our services are designed to enhance business operations, optimize performance, and support long-term growth. By prioritizing the client's vision, we foster meaningful impact and measurable results. Tailored solutions demonstrate our commitment to client success, reinforce our professional integrity, and ensure that every engagement contributes positively to both the client's objectives and the overall quality standards that define our consulting practice.

## **19.4 Feedback and Adaptation**

Client feedback is essential for maintaining and enhancing quality. We actively solicit insights from clients to assess satisfaction, identify improvement opportunities, and refine our methodologies. Constructive feedback informs our continuous improvement initiatives and ensures that services remain aligned with evolving client expectations. Zambelli International Consulting LLC values transparency and responsiveness in addressing feedback, adapting processes promptly to optimize outcomes. By integrating client perspectives into decision-making, we strengthen partnerships, enhance operational effectiveness, and reinforce accountability. Our approach ensures that feedback is not only received but also acted upon, resulting in sustained excellence and client trust.

## **19.5 Rigorous Internal Quality Assurance**

We implement stringent internal quality assurance procedures to validate the accuracy, reliability, and completeness of all deliverables before client delivery. This includes detailed reviews, testing, verification, and adherence to established methodologies. Quality assurance ensures that our work consistently meets professional standards and client expectations. Any deviations or issues are promptly addressed through corrective measures, demonstrating accountability and commitment to excellence. By embedding internal controls and rigorous evaluation practices, Zambelli International Consulting LLC safeguards service quality, mitigates risks, and reinforces client confidence in the integrity, competence, and reliability of our professional services.

## **19.6 Investing in Tools and Technology**

Zambelli International Consulting LLC invests in advanced tools, technology, and methodologies to enhance service quality and operational efficiency. Modern systems enable precise analysis, efficient workflows, and innovative solutions. Staying current with technological and industry developments allows us to deliver superior results and adapt to evolving client needs. Investments in digital platforms, analytical software, and collaborative technologies ensure that our services are both effective and scalable. By leveraging cutting-edge tools, we increase the accuracy, speed, and impact of our consulting solutions, while reinforcing our commitment to continuous improvement, innovation, and the highest professional standards in client service delivery.

## **19.7 Accountability for Quality Outcomes**

Each employee and consultant is accountable for the quality of their work, fostering a culture of ownership and responsibility. Zambelli International Consulting LLC ensures that team members understand their roles in delivering excellence, and that any shortcomings are addressed promptly. Accountability is reinforced through performance monitoring, internal audits, and management oversight. By holding ourselves responsible for outcomes, we demonstrate integrity and reliability. Every project, deliverable, and client interaction reflects this standard. Our approach ensures that quality is embedded in individual actions and organizational processes, guaranteeing consistent, trustworthy, and high-value outcomes for clients and stakeholders.



## **19.8 Client Satisfaction as a Priority**

Client satisfaction is the ultimate measure of our success. We strive to exceed expectations by delivering professional, high-quality, and tailored solutions that address client needs effectively. By prioritizing client experience, Zambelli International Consulting LLC builds lasting relationships grounded in trust, transparency, and responsiveness. Continuous evaluation of client feedback informs improvements in service delivery, methodologies, and engagement strategies. Ensuring satisfaction reinforces our commitment to ethical practices, operational excellence, and professional integrity. Through dedication to client-centric quality, we strengthen partnerships, enhance reputational capital, and foster mutual success for both our clients and the company.

## **20. PROTECTION AGAINST HARASSMENT**

Zambelli International Consulting LLC is committed to fostering a work environment free from harassment, bullying, or abuse. All individuals—employees, contractors, clients, and partners—deserve to work in a safe, respectful, and professional setting. Harassment of any kind, whether physical, verbal, psychological, or sexual, is strictly prohibited. We promote interactions that encourage mutual respect, collaboration, and professionalism. By maintaining a zero-tolerance approach, providing clear reporting channels, and supporting those affected, we ensure a workplace that protects individual dignity, enhances well-being, and upholds the ethical and professional standards of our organization.

### **20.1 Definition of Harassment**

Harassment at Zambelli International Consulting LLC includes unwelcome or inappropriate behavior that interferes with an individual's work or creates a hostile environment. This encompasses offensive comments, jokes, gestures, or conduct based on race, gender, ethnicity, religion, sexual orientation, disability, or other legally protected characteristics. Harassment also includes unwelcome physical or verbal actions that intimidate, threaten, or demean any person. The company defines harassment broadly to ensure comprehensive protection for all individuals. By clearly defining prohibited conduct, we establish expectations for respectful behavior and create a foundation for a safe and professional work environment.

### **20.2 Zero-Tolerance Policy**

Zambelli International Consulting LLC maintains a strict zero-tolerance policy toward harassment. Any employee, contractor, or partner who engages in harassing behavior will face immediate disciplinary action, up to and including termination of employment or contractual relationships. The company prioritizes swift, decisive responses to all incidents of harassment, ensuring accountability and the protection of all parties involved. By implementing this zero-tolerance approach, we reinforce our commitment to a safe, equitable, and professional workplace where employees and associates can perform their roles without fear of intimidation, discrimination, or inappropriate conduct.

### **20.3 Reporting Mechanisms**

Employees and associates are encouraged to report any harassment incidents through confidential channels. Zambelli International Consulting LLC ensures that all reports are handled in a safe, non-retaliatory, and supportive environment. Reports are thoroughly investigated with sensitivity and discretion. The company provides multiple avenues for reporting, ensuring accessibility and transparency, and protects whistleblowers from any form of retaliation. By maintaining clear reporting mechanisms, we empower individuals to take action against harassment while promoting accountability and integrity in our organizational culture, reinforcing the values of respect, safety, and professional conduct.

### **20.4 Support for Victims of Harassment**

Individuals reporting harassment will receive full support throughout the investigation process. Zambelli International Consulting LLC offers access to counseling, safe spaces for discussion, and workplace adjustments where necessary to ensure well-being and security. We actively prevent retaliation against those reporting harassment in good faith. Supporting victims is a key component of our ethical responsibilities, ensuring that affected individuals feel valued, protected, and respected. By providing resources and proactive assistance, we create a culture that prioritizes safety, mental health, and dignity, while demonstrating our commitment to a harassment-free and inclusive workplace.



## **20.5 Training and Awareness**

Zambelli International Consulting LLC provides ongoing training to employees, contractors, and partners on harassment prevention. Training covers the identification of harassment, reporting procedures, the consequences of misconduct, and legal rights and responsibilities. By raising awareness and educating individuals on expected behavior, the company reinforces a culture of respect and inclusivity. Training sessions are regularly updated to reflect legal requirements, evolving best practices, and organizational policy improvements. Through consistent education, we ensure that all members of the organization are empowered to prevent, recognize, and address harassment effectively, maintaining a safe and professional workplace.

## **20.6 Prevention and Proactive Measures**

We actively promote a culture of respect, inclusivity, and professionalism to prevent harassment. Zambelli International Consulting LLC conducts regular assessments of workplace culture to identify and address potential issues proactively. Leadership models exemplary behavior, reinforcing organizational values of fairness and respect. Policies, communications, and training programs are continuously evaluated and enhanced to prevent harassment. By embedding prevention into daily operations, we reduce risk, encourage positive behavior, and create an environment in which all employees, contractors, and partners feel valued, supported, and safe. Our proactive measures demonstrate the company's commitment to ethical, respectful, and compliant workplace conduct.

## **20.7 Investigations and Corrective Actions**

All harassment allegations are promptly and impartially investigated. Zambelli International Consulting LLC takes appropriate corrective actions to address misconduct, ranging from counseling and training to termination, depending on severity. Investigations prioritize fairness, confidentiality, and thorough documentation. By holding perpetrators accountable, we protect victims, reinforce ethical behavior, and maintain organizational integrity. Corrective measures aim not only to remedy the immediate incident but also to prevent recurrence. Through consistent enforcement of policies and procedures, the company ensures that harassment is addressed decisively and that all employees understand the consequences of violating workplace standards.

## **20.8 Commitment to a Respectful Work Environment**

Zambelli International Consulting LLC is committed to cultivating a workplace where every individual feels safe, respected, and valued. We recognize that harassment undermines productivity, morale, and overall well-being. By promoting inclusivity, cooperation, and dignity, we create an environment that fosters collaboration, innovation, and employee engagement. Our policies, procedures, and training programs are designed to reinforce respect and fairness across all interactions. This commitment ensures that all employees, contractors, clients, and partners can contribute fully and confidently to the organization's success, free from intimidation, hostility, or discriminatory behavior.

## **20.9 Confidentiality and Privacy**

All information related to harassment claims is treated with strict confidentiality. Zambelli International Consulting LLC limits disclosure to individuals directly involved in the investigation or resolution process. Personal and sensitive details are protected, and parties are informed of investigation outcomes with respect to privacy. Confidentiality safeguards help maintain trust in the reporting process, encourage reporting, and protect the rights of all individuals involved. By upholding privacy standards, the company demonstrates its commitment to ethical practices, ensuring that investigations are conducted professionally, responsibly, and respectfully for both complainants and respondents.

## **20.10 Responsibility of All Employees**

Every employee, contractor, and partner is responsible for fostering a harassment-free workplace. Individuals are encouraged to speak up if they witness harassment and to support colleagues in maintaining a respectful environment. Zambelli International Consulting LLC provides resources, guidance, and support to empower all members to act against harassment. By cultivating shared responsibility, promoting ethical conduct, and reinforcing organizational values, the company ensures that harassment is addressed proactively. Collective engagement in maintaining respect, safety, and professionalism strengthens organizational culture, protects individual well-being, and upholds the integrity and reputation of Zambelli International Consulting LLC.



## 21. INNOVATION AND CONTINUOUS IMPROVEMENT

**Zambelli International Consulting LLC** is committed to fostering a culture of innovation and continuous improvement. We encourage creative thinking, exploration of new ideas, and the adoption of more efficient practices. Innovation is central to enhancing our services, streamlining operations, and strengthening business strategies. By promoting adaptability, collaboration, and employee development, we ensure that our organization remains competitive while delivering value-driven solutions to clients. Our approach balances creativity with accountability, aligning all improvement initiatives with ethical principles, client needs, and long-term organizational goals, ensuring sustainable growth and meaningful impact.

### 21.1 Commitment to Creativity and New Ideas

Employees at Zambelli International Consulting LLC are encouraged to challenge the status quo, propose innovative solutions, and share creative ideas. We value diverse perspectives and believe collaboration across teams leads to breakthroughs that enhance services and client outcomes. New ideas are welcomed at every level of the organization, fostering an environment where experimentation and ingenuity are integral to business success. By cultivating a culture that rewards creativity, we continuously evolve our approaches, refine our methodologies, and develop solutions that provide measurable value to clients while supporting the company's long-term strategic vision.

### 21.2 Embracing Change and Adaptability

We actively embrace change and adaptability to remain at the forefront of industry developments. Zambelli International Consulting LLC monitors trends, technologies, and market shifts to ensure we respond effectively to emerging opportunities and challenges. Flexible processes, structures, and strategies enable the organization to pivot when necessary, maintaining client satisfaction and operational efficiency. By encouraging adaptability, we strengthen resilience, drive innovation, and support continuous growth. Employees are empowered to implement new approaches, experiment responsibly, and adopt best practices that align with ethical standards and company objectives, ensuring sustained competitive advantage.

### 21.3 Focus on Efficiency and Effectiveness

Innovation at Zambelli International Consulting LLC includes improving operational efficiency and effectiveness. We continuously assess internal processes, identify redundancies, and optimize workflows to enhance service delivery and reduce operational waste. Implementing best practices and streamlining procedures ensures high-quality outcomes for clients while maximizing resource utilization. Our commitment to efficiency extends to project management, knowledge sharing, and process improvement initiatives. By refining existing operations, we ensure that our services remain cost-effective, reliable, and impactful, providing clients with consistent value while supporting the company's strategic, ethical, and performance objectives.

### 21.4 Encouraging Employee Development and Learning

We invest in professional development to empower employees to drive innovation. Zambelli International Consulting LLC provides training, skill development, and exposure to emerging technologies and methodologies. Employees are encouraged to expand expertise, collaborate across disciplines, and apply new knowledge to enhance client services and operational effectiveness. By equipping staff with the tools and competencies to innovate, we ensure continuous organizational improvement. Employee growth directly contributes to the development of creative solutions and improved business practices, reinforcing the company's commitment to excellence, client value, and sustainable long-term success.

### 21.5 Client-Centered Innovation

All innovation initiatives at Zambelli International Consulting LLC are aligned with client needs. We design solutions to enhance client experiences, streamline processes, and deliver measurable value. New technologies, service enhancements, and tailored strategies are evaluated for their impact on client outcomes. By prioritizing client-centric innovation, we ensure that improvements support long-term success and satisfaction. Feedback from clients guides our development efforts, enabling us to refine offerings continuously. This approach reinforces trust, strengthens relationships, and demonstrates our dedication to delivering solutions that address real challenges while advancing both client and organizational objectives.

### 21.6 Encouraging Collaboration and Cross-Functional Teams

Innovation thrives in collaborative environments. Zambelli International Consulting LLC promotes cross-functional teams that leverage diverse expertise to tackle complex challenges. By sharing knowledge, perspectives, and skills, employees develop more effective solutions and implement ideas with broader organizational support. Collaborative innovation ensures alignment with company values, enhances operational efficiency, and improves client service. We foster teamwork through structured projects, brainstorming sessions, and open communication channels, ensuring that all team members contribute to meaningful improvements.

This collective approach strengthens organizational creativity and drives continuous enhancement across all areas of the business.



### **21.7 Performance Metrics and Continuous Evaluation**

We regularly evaluate the impact of innovation initiatives using performance metrics and key performance indicators (KPIs). Zambelli International Consulting LLC monitors outcomes to assess effectiveness, identify areas for improvement, and ensure alignment with strategic objectives. Continuous evaluation allows us to refine processes, optimize resource allocation, and enhance solution quality. Lessons learned from successes and failures are applied to future projects. By embedding systematic assessment and accountability into innovation, we maintain high standards, reinforce ethical decision-making, and ensure that all improvements contribute meaningfully to client satisfaction, operational excellence, and long-term organizational growth.

### **21.8 Open Feedback Culture**

Zambelli International Consulting LLC fosters a culture of open feedback to support innovation and continuous improvement. Employees, clients, and stakeholders are encouraged to provide constructive input, challenge assumptions, and suggest improvements. Feedback is treated as a valuable tool for learning, personal growth, and organizational enhancement. By listening to diverse perspectives, we identify opportunities for refinement and respond proactively to evolving needs. Open dialogue ensures transparency, empowers employees, and strengthens collaboration. This inclusive approach enables the company to adapt quickly, implement effective solutions, and maintain high standards of service and ethical responsibility.

### **21.9 Research and Development**

Zambelli International Consulting LLC dedicates resources to research and development, exploring new methodologies, technologies, and service innovations. R&D efforts focus on creating cutting-edge strategies, improving consulting practices, and anticipating regulatory or market changes. By staying ahead of trends, we ensure our clients receive solutions that are effective, forward-looking, and sustainable. Research-driven innovation enhances service quality, operational efficiency, and competitive advantage. We collaborate with industry experts and internal teams to translate insights into actionable improvements, reinforcing the organization's commitment to excellence, adaptability, and ethical, value-driven service delivery.

### **21.10 Sustainability and Long-Term Innovation**

Innovation at Zambelli International Consulting LLC is guided by long-term objectives, emphasizing sustainability and responsible practices. Solutions are developed with consideration for environmental, social, and ethical impacts. We ensure that new initiatives contribute positively to clients, communities, and society while supporting business growth. By embedding sustainable practices in innovation, we balance short-term performance with long-term value creation. This approach fosters resilience, ethical responsibility, and stakeholder trust, demonstrating our commitment to corporate citizenship while ensuring that innovative solutions deliver meaningful, enduring benefits across all facets of our operations.

### **21.11 Encouraging Risk-Taking within Safe Boundaries**

Zambelli International Consulting LLC encourages calculated risk-taking to foster innovation, provided it aligns with company values and strategic objectives. Employees are empowered to experiment, explore new approaches, and learn from both successes and failures. Risks are assessed carefully to protect resources, reputation, and ethical standards. By balancing creativity with responsibility, we promote a culture that supports innovation while maintaining operational stability and client trust. Safe, guided risk-taking ensures that innovative ideas are evaluated thoroughly, implemented effectively, and contribute to continuous improvement without compromising the integrity or long-term objectives of the company.

## **22. FINANCIAL INTEGRITY**

Zambelli International Consulting LLC is dedicated to maintaining the highest standards of financial integrity. We recognize that client, partner, and stakeholder trust relies on the transparency, accuracy, and reliability of our financial practices. All financial records and reporting will be prepared with diligence, ensuring full compliance with applicable laws, regulations, and accounting standards. We are committed to responsible stewardship of resources, accurate reporting, and adherence to ethical financial practices, providing confidence in the company's financial health and promoting long-term sustainability while upholding the organization's reputation for honesty and accountability.



### **22.1 Accurate and Transparent Financial Reporting**

We ensure that all financial transactions are recorded truthfully and transparently, reflecting the company's actual financial position. Financial statements and reports are prepared in accordance with generally accepted accounting principles (GAAP) and are subject to regular independent audits. Stakeholders receive timely disclosures to provide a clear understanding of financial performance. All reports, statements, and disclosures will be comprehensive, accurate, and readily available to relevant parties. This transparency fosters trust and accountability, reinforcing our commitment to ethical financial management and ensuring stakeholders can make informed decisions based on reliable, verifiable financial information.

### **22.2 Compliance with Financial Regulations**

Zambelli International Consulting LLC strictly adheres to all relevant financial laws and regulations, including anti-money laundering (AML) legislation, tax compliance, and industry-specific standards. We ensure that our financial operations meet all statutory requirements and reporting obligations. Compliance extends to local, national, and international jurisdictions, reflecting our commitment to lawful and ethical conduct. Employees and management are trained to recognize regulatory obligations and integrate compliance into everyday financial decisions. Through proactive adherence to these rules, we mitigate legal and reputational risk, demonstrate responsible corporate citizenship, and maintain the confidence of clients, partners, and regulatory authorities.

### **22.3 Prevention of Financial Mismanagement**

We establish robust internal controls to prevent fraud, mismanagement, or unethical financial practices. All employees, managers, and associates are accountable for their financial decisions and are expected to uphold the highest standards of responsibility and integrity. Any irregularities or violations are addressed promptly, with appropriate disciplinary action. Policies and procedures are regularly reviewed and updated to prevent vulnerabilities, ensuring consistent compliance and ethical conduct. This proactive approach protects company assets, maintains stakeholder confidence, and reinforces the organization's reputation for financial integrity, responsibility, and transparency across all operations and business activities.

### **22.4 Transparency in Financial Decision-Making**

All financial decisions are made transparently and based on accurate, verifiable information. Zambelli International Consulting LLC provides clear justifications for financial choices, particularly when they impact clients, partners, or stakeholders. Decision-making processes are documented and communicated to relevant parties, ensuring that stakeholders understand the reasoning behind strategic and operational financial actions. Transparency strengthens accountability, supports informed decision-making, and reduces the risk of misunderstandings or disputes. By consistently prioritizing openness and clarity in financial matters, we uphold ethical standards, safeguard the company's reputation, and ensure that financial management aligns with organizational values and long-term objectives.

### **22.5 Timely and Accurate Tax Compliance**

Zambelli International Consulting LLC complies fully with all tax obligations in every jurisdiction in which we operate. Taxes are calculated accurately, filed on time, and paid in full. The company maintains precise and complete tax records, cooperating with relevant authorities transparently. Compliance includes monitoring changes in tax laws, regulations, and reporting requirements to ensure ongoing adherence. This proactive approach prevents legal exposure, supports fiscal responsibility, and demonstrates our ethical commitment to both public obligations and stakeholder trust. Our dedication to accurate and timely tax compliance is an essential component of the company's overall financial integrity and accountability.

### **22.6 Ethical Investment Practices**

All investment decisions and management of client funds are conducted with the highest ethical standards. Zambelli International Consulting LLC ensures that investments are responsible, aligned with client interests, and avoid exploitative or harmful practices. Potential risks and impacts are assessed carefully, and investment strategies are evaluated for compliance with ethical and legal standards. We commit to transparency, fairness, and accountability in all financial dealings, safeguarding the financial well-being of our clients, stakeholders, and the organization. Ethical investment practices reflect our dedication to trust, long-term value creation, and the protection of the company's reputation.



## **22.7 Internal Audits and Financial Oversight**

Regular internal audits and financial reviews are conducted to verify accuracy, detect potential issues, and enhance operational integrity. Zambelli International Consulting LLC employs oversight mechanisms to monitor compliance with financial policies, regulations, and ethical standards. Audit results are analyzed and addressed promptly to improve controls and processes. Internal audits provide assurance to stakeholders that financial operations are transparent, accurate, and reliable. This continuous oversight demonstrates the company's commitment to accountability, risk management, and proactive correction of errors, ensuring that all financial activities consistently align with organizational values and maintain the trust of clients, partners, and regulators.

## **22.8 Accountability for Financial Practices**

Every member of Zambelli International Consulting LLC is responsible for upholding financial integrity. Employees, managers, and executives involved in financial decision-making are expected to adhere to strict ethical standards, policies, and legal obligations. Any irregularities or non-compliance are addressed immediately with appropriate consequences. Accountability extends to maintaining accurate records, reporting financial information transparently, and implementing controls to prevent errors or misuse. By fostering a culture of personal and organizational responsibility, we ensure that financial practices reflect integrity, protect stakeholder interests, and reinforce confidence in the company's long-term financial sustainability.

## **22.9 Stakeholder Engagement and Financial Disclosure**

Zambelli International Consulting LLC commits to open communication with stakeholders regarding financial performance and condition. Clients, partners, and investors are provided with timely, accurate financial reports that enable informed decisions. Significant changes in financial circumstances are disclosed promptly, maintaining transparency and trust. Engagement includes regular updates on financial strategies, risk management, and sustainability initiatives. By maintaining a dialogue with stakeholders, we reinforce accountability, ensure confidence in our management practices, and demonstrate our dedication to ethical financial reporting and responsible stewardship of organizational resources.

## **22.10 Long-Term Financial Sustainability**

We prioritize sound financial management that ensures the long-term sustainability of Zambelli International Consulting LLC. Our approach balances growth, stability, and ethical responsibility, ensuring that the company remains resilient in the face of market fluctuations and operational challenges. Strategic financial planning, rigorous controls, and prudent investment decisions support enduring success. By maintaining financial integrity and promoting transparency, we build long-term trust with clients, partners, and stakeholders. Sustainable financial practices contribute to organizational resilience, ethical business conduct, and continued ability to deliver value-driven solutions while safeguarding the company's reputation and long-term objectives.

## **23. LEGAL INTEGRITY**

**Zambelli International Consulting LLC** is fully committed to upholding legal integrity across all operations, ensuring compliance with applicable laws, regulations, and contractual obligations. Legal integrity is central to our business ethics, fostering trust with clients, partners, regulators, and stakeholders. We will conduct all activities in accordance with both local and international legal frameworks, maintaining transparency, accountability, and adherence to statutory requirements. Employees and management are expected to respect the law in every business decision, while proactively identifying and mitigating legal risks, reinforcing the organization's reputation as a responsible, law-abiding, and ethical consulting firm.

### **23.1 Compliance with Applicable Laws**

We will ensure that all business activities strictly adhere to applicable local, national, and international laws, regulations, and industry-specific standards. Zambelli International Consulting LLC proactively monitors changes in legislation to remain compliant and prevent legal exposure. Employees and associates are trained to recognize legal obligations and incorporate compliance into daily operations. By embedding legal compliance into our organizational culture, we minimize risks, promote ethical conduct, and maintain stakeholder trust. Adherence to legal requirements guides decision-making at all levels and reinforces our reputation for integrity and responsible business practices.



### **23.2 Contractual Obligations and Ethical Agreements**

All agreements, contracts, and partnerships entered into by Zambelli International Consulting LLC are governed by clear, legally compliant terms. We respect contractual obligations with clients, suppliers, and partners, ensuring that commitments are fulfilled responsibly and ethically. Contracts are reviewed to prevent conflicts, enforce compliance with laws, and safeguard organizational interests. Employees are trained to understand and execute contractual responsibilities diligently. Maintaining contractual integrity protects stakeholder interests, mitigates legal risk, and reinforces the company's commitment to fairness, reliability, and accountability in all professional relationships.

### **23.3 Prevention of Legal Violations and Misconduct**

Zambelli International Consulting LLC implements policies and procedures to prevent legal violations, misconduct, and unethical behavior. This includes monitoring adherence to laws covering financial management, data protection, employment, and anti-corruption. Employees are encouraged to seek guidance when legal uncertainty arises and to report concerns promptly. Preventative measures, including internal controls, audits, and compliance checks, help mitigate risks before they result in violations. This proactive approach fosters a culture of responsibility, ensures organizational adherence to the law, and protects the company from legal penalties, reputational harm, and loss of stakeholder confidence.

### **23.4 Anti-Corruption and Ethical Business Practices**

We are committed to conducting all business activities free from corruption, bribery, or undue influence. Zambelli International Consulting LLC strictly prohibits any form of improper payment, kickback, or facilitation of unethical practices. Employees and partners are trained on anti-corruption regulations and ethical decision-making, including international standards such as the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Ethical business practices guide our interactions with clients, government officials, and third parties, ensuring compliance, protecting organizational integrity, and fostering trust in our operations globally.

### **23.5 Reporting Legal Concerns and Whistleblower Protection**

Zambelli International Consulting LLC provides confidential reporting channels for employees and stakeholders to report potential legal violations, misconduct, or unethical behavior. All reports are handled with strict confidentiality, and no individual will face retaliation for reporting concerns in good faith. Whistleblower protections ensure that potential issues are addressed responsibly and promptly, preserving legal compliance and organizational integrity. By encouraging proactive reporting, we foster accountability, detect potential violations early, and reinforce a culture where legal and ethical responsibilities are upheld consistently.

### **23.6 Monitoring and Continuous Legal Review**

To maintain legal integrity, Zambelli International Consulting LLC continuously monitors compliance with relevant laws, regulations, and contractual obligations. Legal reviews are conducted periodically to assess risks, update policies, and ensure alignment with evolving legislation. External legal expertise may be engaged for complex matters, guaranteeing accurate interpretation and application of laws across jurisdictions. Continuous review promotes awareness of legal requirements, reduces organizational risk, and ensures that all business operations remain lawful, ethical, and aligned with the company's commitment to integrity and responsible corporate conduct.

### **23.7 Employee Training on Legal Compliance**

Employees at Zambelli International Consulting LLC receive ongoing training on relevant laws, regulations, and company policies to ensure understanding and compliance. Training covers topics including contractual obligations, data privacy, anti-corruption, and other industry-specific legal requirements. Employees are equipped with practical guidance to identify potential legal risks, respond appropriately, and escalate concerns when necessary. By fostering legal literacy, we empower staff to act responsibly, make informed decisions, and uphold the organization's commitment to legal and ethical integrity across all aspects of business operations.

### **23.8 Accountability and Consequences**

All members of Zambelli International Consulting LLC are accountable for adhering to legal requirements and internal policies. Violations of laws, regulations, or contractual obligations are addressed swiftly, with appropriate disciplinary measures applied. Accountability extends from employees to senior management, ensuring that ethical and legal standards are consistently enforced. By holding individuals responsible for compliance, we protect the organization, maintain stakeholder trust, and reinforce a culture where legal integrity is a fundamental principle guiding all professional conduct.



### **23.9 Collaboration with Legal Authorities**

Zambelli International Consulting LLC cooperates fully with regulatory and legal authorities in all jurisdictions of operation. We provide accurate information during audits, investigations, or inquiries, and comply with lawful requests promptly. Collaboration with authorities ensures transparency, fosters regulatory confidence, and mitigates potential legal exposure. By maintaining open communication with regulators, we strengthen our reputation as a law-abiding and responsible organization committed to ethical and legal compliance in every aspect of business operations.

### **23.10 Ethical Decision-Making and Legal Alignment**

All business decisions at Zambelli International Consulting LLC are made with consideration for legal requirements and ethical principles. Legal alignment is integrated into strategic planning, operational procedures, and client engagements. By ensuring that decisions comply with laws and internal policies, we safeguard the organization from legal risks, uphold our corporate reputation, and maintain the trust of clients, partners, and stakeholders. Ethical decision-making in tandem with legal integrity reinforces our commitment to responsible, transparent, and accountable business conduct across all facets of the company's operations.

## **24. LEGAL, ECONOMIC, AND FINANCIAL PROFESSIONAL SECRECY**

Zambelli International Consulting LLC is committed to maintaining strict confidentiality and professional secrecy regarding all legal, economic, and financial information obtained in the course of its operations. We recognize that safeguarding sensitive client, partner, and organizational data is essential to preserving trust, ensuring compliance, and protecting proprietary interests. Our practices ensure that information is accessed, used, and disclosed only on a need-to-know basis and in full accordance with applicable laws, regulations, contractual obligations, and ethical standards. Confidentiality is integral to our professional integrity and operational excellence.

### **24.1 Confidential Handling of Client Information**

We will safeguard all legal, financial, and economic information entrusted to us by clients. Access to such information is strictly limited to authorized personnel and is used exclusively for the purposes for which it was provided. Zambelli International Consulting LLC ensures that clients' proprietary data, including contracts, strategies, and financial statements, is never disclosed to third parties without explicit consent, except as required by law or professional obligations. Maintaining strict client confidentiality protects the trust placed in us and ensures compliance with professional secrecy standards.

### **24.2 Internal Confidentiality Protocols**

Zambelli International Consulting LLC implements rigorous internal procedures to manage and protect sensitive information. This includes secure storage, encryption, access controls, and monitoring systems. Employees, contractors, and partners are trained to adhere to these protocols, ensuring that legal, financial, and economic data are not misused or inadvertently disclosed. Confidentiality obligations continue even after an individual leaves the organization, ensuring sustained protection of professional information. Compliance with these protocols reinforces organizational integrity and mitigates risks associated with unauthorized data access.

### **24.3 Compliance with Legal and Regulatory Requirements**

We comply fully with all applicable laws and regulations governing the confidentiality of legal, economic, and financial information. This includes adherence to data protection, financial disclosure, and professional secrecy obligations in all jurisdictions where we operate. Zambelli International Consulting LLC ensures that internal policies and employee practices align with statutory requirements, industry standards, and contractual obligations. Compliance protects both our clients and the organization, and ensures that confidential information is handled in a legally sound and ethically responsible manner.

### **24.4 Protection Against Unauthorized Disclosure**

Zambelli International Consulting LLC strictly prohibits the unauthorized disclosure of legal, economic, or financial information. Any intentional or negligent sharing of confidential data may result in disciplinary measures, including termination or legal action. All employees and partners are expected to exercise discretion and safeguard information during business operations, communications, and collaborations. This commitment ensures that sensitive data is never exploited or exposed to unauthorized parties, thereby protecting client interests, company assets, and the organization's professional reputation.



#### **24.5 Confidentiality in Professional Relationships**

We maintain strict confidentiality in all professional relationships with clients, partners, regulators, and other stakeholders. Legal, financial, and economic information shared during consultations, negotiations, audits, or advisory services is handled with the highest discretion. Agreements, contracts, and NDAs are established to formalize confidentiality obligations and clarify responsibilities. By upholding these principles, Zambelli International Consulting LLC fosters trust, ensures compliance with ethical standards, and reinforces its reputation as a reliable and professional advisory organization.

#### **24.6 Data Access and Role-Based Permissions**

Access to sensitive legal, economic, or financial data is granted solely on a need-to-know basis. Zambelli International Consulting LLC implements role-based permissions to ensure that employees and partners can only view or handle information necessary for their responsibilities. Access controls, authentication protocols, and monitoring systems are applied to prevent unauthorized exposure or misuse. These measures reinforce professional secrecy while enabling efficient, secure, and accountable handling of critical organizational and client information.

#### **24.7 Protection of Proprietary Economic and Financial Analysis**

We safeguard all proprietary economic models, financial analyses, business strategies, and research developed internally or in collaboration with clients. Zambelli International Consulting LLC ensures that such intellectual property is secured through legal mechanisms, access controls, and contractual protections. Unauthorized use or reproduction of proprietary information is strictly prohibited. By protecting analytical and financial assets, we preserve competitive advantage, maintain professional integrity, and honor our commitment to clients and stakeholders who entrust us with sensitive information.

#### **24.8 Employee Training and Awareness**

All employees, consultants, and partners receive regular training on legal, economic, and financial confidentiality obligations. Training covers professional secrecy, ethical handling of sensitive data, secure communications, and consequences of unauthorized disclosure. Zambelli International Consulting LLC ensures that personnel understand their responsibilities, including compliance with internal policies, laws, and professional standards, and are equipped to protect confidential information effectively in all professional interactions.

#### **24.9 Third-Party and Partner Confidentiality**

When working with external partners, vendors, or subcontractors, Zambelli International Consulting LLC ensures that confidentiality obligations are clearly established. Agreements, NDAs, and contractual clauses require third parties to protect sensitive legal, financial, and economic information in accordance with our policies and applicable regulations. Ongoing monitoring ensures compliance, reinforcing the integrity of professional secrecy across all collaborations and mitigating the risk of unauthorized disclosure or misuse.

#### **24.10 Long-Term Commitment to Confidentiality**

Zambelli International Consulting LLC maintains a long-term commitment to protecting sensitive legal, economic, and financial information. We continuously evaluate and enhance confidentiality protocols, security measures, and compliance programs to adapt to evolving risks, technological advancements, and regulatory changes. By safeguarding professional secrecy, we build trust with clients, partners, and stakeholders, reinforce ethical business practices, and maintain the organization's reputation as a reliable, secure, and principled advisory firm.

### **25. ETHICAL SUPPLY CHAIN MANAGEMENT**

Zambelli International Consulting LLC recognizes that the integrity of our supply chain is a vital component of our ethical business practices. We are fully committed to ensuring that all suppliers, partners, and contractors we engage with adhere to the same high standards of ethics, transparency, and responsibility that guide our own operations. Maintaining an ethical, sustainable, and socially responsible supply chain strengthens trust with clients, partners, and stakeholders while promoting long-term positive impact.



### **25.1 Supplier Selection and Evaluation**

We will implement a rigorous supplier selection process to ensure that we partner with businesses and organizations that share our commitment to ethical practices. Evaluation criteria include adherence to international human rights standards, compliance with environmental regulations, respect for labor rights, and the absence of corruption or unethical behavior. Preference will be given to suppliers demonstrating proactive commitments to sustainability, transparency, and social responsibility.

### **25.2 Human Rights and Fair Labor Practices**

All suppliers must comply with fundamental human rights standards and provide fair and safe working conditions. Zambelli International Consulting LLC will not engage with suppliers involved in exploitative labor practices, including child or forced labor, or violations of workers' rights. Suppliers are expected to adhere to local and international labor laws, provide fair wages, maintain safe working environments, and uphold non-discriminatory practices.

### **25.3 Environmental Sustainability**

We are dedicated to minimizing environmental impact and require suppliers to do the same. Suppliers must engage in eco-friendly practices, such as reducing waste, conserving energy, and minimizing pollution. Commitment to environmental responsibility includes compliance with relevant environmental regulations, sustainable sourcing, and active efforts to enhance sustainability throughout the supply chain.

### **25.4 Anti-Corruption and Ethical Practices**

Zambelli International Consulting LLC will only engage suppliers who prohibit bribery, corruption, and other unethical behaviors. Suppliers must operate with integrity, honesty, and transparency and comply with anti-bribery and anti-corruption laws. We expect suppliers to maintain internal policies and practices that reflect ethical conduct and demonstrate accountability in all business dealings.

### **25.5 Supply Chain Audits and Monitoring**

To ensure compliance with ethical standards, we will monitor and audit supplier practices regularly. This includes on-site inspections, document reviews, and third-party assessments to evaluate adherence to human rights, environmental, and ethical guidelines. Violations may result in corrective actions or, in severe cases, termination of the business relationship.

### **25.6 Continuous Improvement and Capacity Building**

We collaborate with suppliers to promote continuous improvement in ethical practices and sustainability efforts. Through training programs, capacity-building initiatives, and ongoing communication, we support suppliers in advancing social responsibility, environmental stewardship, and ethical behavior, fostering a stronger and more responsible supply chain.

### **25.7 Transparency and Reporting**

Zambelli International Consulting LLC maintains transparency in all supply chain operations. Any issues affecting supply chain integrity, including violations of ethical standards, will be reported and addressed promptly. We communicate openly with stakeholders, including clients, partners, and the public, to ensure accountability and reinforce trust.

### **25.8 Supplier Agreements and Ethical Commitments**

Ethical clauses will be included in all supplier contracts, requiring acknowledgment and compliance with our standards. Agreements cover human rights, environmental responsibility, anti-corruption, and adherence to relevant laws. Failure to meet these commitments may result in reevaluation or termination of the supplier relationship.

### **25.9 Collaboration for Positive Impact**

We actively work with suppliers to support initiatives that generate positive social and environmental outcomes. By fostering sustainable, long-term relationships, we aim to build a supply chain that not only fulfills operational needs but also contributes to economic development, environmental conservation, and the promotion of human dignity and rights.

### **25.10 Commitment to Long-Term Ethical Standards**

Maintaining an ethical supply chain is a long-term commitment. Zambelli International Consulting LLC will continuously review and enhance supply chain policies and practices to ensure alignment with core values and industry best practices. Our objective is to build a supply chain that reflects integrity, responsibility, and sustainability in all aspects of our business operations.



**At Zambelli International Consulting LLC, the responsibility to uphold this Code of Ethics extends to every individual who represents the company, including employees, contractors, and business partners. Each member of our organization is expected to embody the principles of integrity, professionalism, and ethical conduct in all decisions and actions taken on behalf of the company. By committing to these standards, our stakeholders actively contribute to a culture of trust, transparency, and fairness. Ethical behavior is not merely aspirational—it is a requirement, guiding the way we interact with clients, colleagues, and partners, ensuring that every action reflects our shared values and long-term vision for responsible business practices.**

**Accountability is a cornerstone of our ethical framework. Zambelli International Consulting LLC provides clear and accessible channels for reporting violations, fostering an environment where concerns can be raised without fear of retaliation. Alleged breaches of the Code are treated with seriousness and investigated thoroughly, with corrective or disciplinary measures applied fairly and consistently. We recognize that maintaining compliance requires vigilance, and all members of the organization are expected to report misconduct, seek guidance when facing ethical uncertainty, and take ownership of their professional responsibilities. Confidentiality and protection are afforded to those acting in good faith, reinforcing a culture in which ethical accountability is shared by all.**

**The company's leadership is committed to leading by example, integrating ethical considerations into strategic and operational decisions, and ensuring ongoing education and awareness for all stakeholders. Through regular training, guidance, and continuous review of this Code, Zambelli International Consulting LLC strengthens its capacity to navigate complex ethical challenges while upholding legal, financial, and social responsibilities. Ultimately, this Code serves as a binding commitment to integrity, respect, and mutual accountability, establishing a foundation upon which the company can continue to operate responsibly, earn stakeholder trust, and sustain a culture of ethical excellence.**



## Commitment to Ethical Business Practices

This Code of Ethics serves as a fundamental guiding document for all employees, associates, and business partners of Zambelli International Consulting LLC. It represents our unwavering commitment to conducting business with the highest level of integrity, respect, and professionalism, ensuring that all our operations reflect ethical standards and align with the values we uphold. At Zambelli International Consulting LLC, we are dedicated to fostering a business culture built on transparency, accountability, and ethical decision-making, striving to create an environment where our stakeholders feel confident in our practices and operations.

By adhering to this Code, we affirm our responsibility not only to comply with legal and regulatory requirements but also to contribute positively to society. We recognize that our actions impact not just our clients and business partners, but also the broader community. As such, we are committed to conducting our business with a strong sense of social responsibility, ensuring that our services, policies, and practices promote fairness, respect for human rights, and sustainability.

We understand that the trust and confidence of our stakeholders are vital to the long-term success of our company. This Code of Ethics is not only a reflection of our commitment to ethical conduct but also a promise to maintain and strengthen the trust placed in us by our clients, partners, employees, and the communities we serve. By upholding the principles set forth in this document, we will continue to build a sustainable, ethical, and responsible business that sets a positive example for others in the industry.

In conclusion, Zambelli International Consulting LLC strives to be a responsible corporate entity that not only meets the highest standards of professionalism but also contributes to making a meaningful and positive impact on the world. We are proud of our commitment to integrity and ethics, and we will continue to uphold these principles in every aspect of our operations and relationships.

The Code of Ethics of Zambelli International Consulting LLC, updated on May 2, 2025, reflects our ongoing commitment to integrity, transparency, and accountability in all our business activities.

This code aligns with applicable local and international laws and regulations, including U.S. federal legislation, privacy regulations such as GDPR, CCPA, and specific state laws like those in Delaware and New York. It also complies with the regulations of FINCEN, SEC rules, FCA guidelines, and the UAE Central Bank of Dubai. By adhering to these legal and ethical frameworks, Zambelli International Consulting LLC ensures that all our operations are conducted in an ethical, respectful manner, fully compliant with the highest legal and regulatory standards, fostering trust and respect from our clients, employees, and business partners.





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**INTERNATIONAL CONSULTING LLC**  
[WWW.ZAMBELLIINTERNATIONALCONSULTINGLLC.COM](http://WWW.ZAMBELLIINTERNATIONALCONSULTINGLLC.COM)



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