

# Synthetic Users Anti-Bribery & Anti-Corruption Policy

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**Owner:** CEO — Kwame Ferreira

**Approved By:** CEO — Kwame Ferreira

**Classification:** Internal – Confidential

**CRA Control:** CRA 26.1.1

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## 1. Purpose

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Synthetic Users, Inc. is committed to conducting all business activities with integrity and in compliance with applicable anti-bribery and anti-corruption laws. This policy establishes clear prohibitions, responsibilities, and reporting procedures to prevent bribery and corruption in all forms — whether involving public officials, government entities, private-sector counterparties, or financial institution clients including JPMC.

This policy applies globally to all Synthetic Users personnel and business activities, regardless of jurisdiction.

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## 2. Scope

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This policy applies to:

- All full-time and part-time employees of Synthetic Users, Inc.
  - All contractors, consultants, and contingent workers engaged by Synthetic Users
  - All directors and officers of Synthetic Users
  - All third parties acting on behalf of Synthetic Users (agents, referral partners, resellers)
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### 3. Core Prohibitions

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#### **Synthetic Users strictly prohibits:**

- Offering, promising, paying, or authorizing payment of any bribe, kickback, or improper benefit — whether in cash or in any other form — to any person, company, or government official to obtain or retain business, or to secure an improper advantage
- Accepting or soliciting any bribe, kickback, or improper benefit from any person or entity
- Making facilitation payments — small payments to expedite routine governmental actions — even where such payments may be customary locally
- Directing or authorizing a third party to engage in any of the above on Synthetic Users' behalf
- Retaliating against any employee or third party who reports a genuine concern about bribery or corruption in good faith

These prohibitions apply regardless of local custom, competitive pressure, or whether the payment would be legal in a particular jurisdiction.

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### 4. Gifts, Hospitality, and Entertainment

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Business gifts and hospitality can be legitimate when they are transparent, proportionate, and not intended to influence business decisions. The following standards apply:

Category	Permitted	Prohibited
<b>Gifts (given)</b>	Modest branded merchandise (< \$50 value); gifts of nominal value consistent with local business custom	Cash or cash equivalents; gifts to government officials or their families; gifts during active procurement or contract negotiation; gifts designed to influence a decision
<b>Gifts (received)</b>	Modest branded merchandise (< \$50 value) accepted transparently and reported if > \$25	Cash or cash equivalents; gifts that create a sense of obligation; gifts from vendors during active procurement
<b>Meals &amp; entertainment</b>	Business meals in a reasonable business context with a legitimate business purpose; costs proportionate to the seniority of participants	Lavish entertainment with no clear business purpose; entertainment for government officials without pre-approval; any expense designed to influence a procurement decision
<b>Travel &amp; accommodation</b>	Travel to a business meeting or client event where paid by Synthetic Users; modest client-sponsored travel with CEO pre-approval	Leisure travel; luxury travel unrelated to a business event; client-paid travel without prior approval

**Government officials:** Additional restrictions apply to interactions with government officials (including JPMC employees acting in a governmental capacity). Any gift, meal, or entertainment involving a government official requires advance written approval from the CEO.

## 5. Controls and Approvals

- All expenditure on gifts, hospitality, and entertainment must be submitted through the company's expense reporting process with a documented business purpose

- Expenses relating to government officials require CEO pre-approval regardless of amount
- No off-books accounts, undisclosed funds, or falsified records may be maintained for any purpose
- All JPMC-related engagements are subject to JPMC's supplier code of conduct requirements, which are incorporated by reference into this policy

## 6. Reporting and Escalation

Employees and third parties who become aware of potential bribery or corruption — or who are asked to participate in conduct that may violate this policy — must report it promptly.

Step	Action	Responsible Party
1. Initial Report	Report concern to the CEO directly, or to any director if the concern involves the CEO	Reporting individual
2. Acknowledgement	CEO (or designated director) acknowledges receipt within 2 business days	CEO
3. Assessment	Preliminary assessment of the reported concern; determination of whether an investigation is required	CEO + Legal advisor
4. Investigation	Independent investigation conducted; relevant personnel interviewed; evidence reviewed	CEO + Legal advisor (external if required)
5. Resolution	Findings documented; remedial action taken if warranted (including disciplinary action, contract termination, or law enforcement referral)	CEO
6. JPMC Notification	If the concern involves JPMC engagements, JPMC is notified within 30 days of confirmed finding, as required by JPMC SCA CRA 26.1.1	CEO

**No retaliation:** Synthetic Users will not retaliate against any employee or third party who reports a concern in good faith. Retaliation is itself a disciplinary offence.

**Anonymous reporting:** Concerns may be reported anonymously to the CEO in writing. Anonymous reports will be investigated to the extent possible.

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## 7. Training and Awareness

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- All employees receive anti-bribery and anti-corruption training as part of onboarding
  - Refresher training is conducted annually
  - Employees in client-facing, procurement, or finance roles receive enhanced training appropriate to their risk exposure
  - Training completion is tracked and recorded
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## 8. Third-Party Due Diligence

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Before engaging agents, referral partners, resellers, or consultants who will interact with customers or government officials on Synthetic Users' behalf:

- A third-party due diligence check is conducted to identify corruption risk
  - Contracts with such third parties include anti-bribery representations and warranties
  - Payment structures for third parties are reviewed to ensure they do not incentivize improper conduct
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## 9. Record Keeping

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All records relating to gifts, hospitality, expense approvals, third-party due diligence, and any anti-bribery investigations are retained for a minimum of 7 years in accordance with the [Information Governance & Records Management Standard](#).

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## 10. Policy Violations

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Violations of this policy may result in:

- Disciplinary action up to and including termination of employment
  - Termination of contractor or third-party engagement
  - Civil or criminal referral to relevant authorities
  - Notification to JPMC or other financial institution clients as required by contract
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## 11. Review

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This policy is reviewed annually by the CEO and updated as required by changes in law, regulation, or business circumstances.

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## 12. Related Documents

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- [Employee Code of Conduct](#)
  - [Third-Party Risk Management Policy](#)
  - [Third-Party Code of Conduct](#)
  - [Transactional Authority Levels](#)
  - [Information Governance & Records Management Standard](#)
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