

# POLICY OF ETHICAL BUSINESS PRACTICES

Lancelotta Consulting, LLC is committed to the highest level of integrity and standards of ethical business practices in all interactions with clients, vendors, and any other companies or individuals with whom we have a business relationship. Throughout our tenure of business, Lancelotta consulting has adhered to a Code of Business Conduct and Ethics and an Anti-bribery policy to ensure consistency and the highest standards of ethics in our approach to conducting and soliciting business.

As the owner and sole proprietor of Lancelotta Consulting, I, Kevin Lancelotta am fully committed to the principal that the decision to hire Lancelotta Consulting for any business engagement should be solely and exclusively based on my company's professional merits and capabilities to accomplish the stated objectives of a project for which we may be considered, and should in no way be influenced by any type of financial payment or incentive, direct or indirect.

Lancelotta Consulting and any individuals who may conduct business on behalf of my company maintain and strictly adhere to an Anti-Bribery Policy that prohibits the use of any financial incentive, direct or indirect, to entice, encourage, or coerce our clients and business partners from making a business decision on our behalf. Our policy prohibits bribes, kickbacks, or the provision of any type of illegal payments that could be used to influence business decisions and transactions. Lancelotta Consulting's Anti-Bribery policy specifically states the following:

- Lancelotta Consulting will never authorize or condone the use of payments of money or anything else of value, whether directly or indirectly, to a client, potential client or any other business interest to entice, induce, or compel that person to affect any act or decision in a way that would assist Lancelotta Consulting, or any of its associates or agents, to obtain or retain business.
- Lancelotta Consulting, its owner and any contracted associates, has the obligation to record accurately and fairly all transactions involving any expense or any other transaction involving the disposal or transfer of Lancelotta Consulting assets.

In addition to direct payments of money, other examples of prohibited payments would include the following made at the direction, or for the benefit, of a client, potential client or other professional business interest to entice, encourage, or compel a business decision on behalf of Lancelotta Consulting:

- Excessive gifts, travel, meal, entertainment or other hospitality expenses;
- Contributions to any political party, campaign or campaign official; or
- Charitable contributions and sponsorships.

This Anti-Bribery Policy is applicable to all professional activities in which Lancelotta Consulting, its owner or any individuals acting on behalf of Lancelotta Consulting, engage.

Sincerely,

Kevin Lancelotta, PhD  
Principal of Lancelotta Consulting, LLC