

RampedUp Anti-Bribery, Anti-Corruption & Anti-Modern Slavery Compliance Brief

Effective Date: August 2026

1. Commitment to Ethical Business Practices

RampedUp, LLC (“RampedUp”) is committed to conducting business ethically, transparently, and in compliance with applicable anti-bribery, anti-corruption, human trafficking, forced labor, and modern slavery laws.

RampedUp maintains a zero-tolerance approach to bribery, corruption, forced labor, human trafficking, slavery, servitude, and other forms of unlawful or coercive labor. These principles apply to RampedUp’s employees, officers, contractors, representatives, and, where appropriate, third-party vendors and other business partners acting on RampedUp’s behalf.

Because RampedUp provides data and technology services to customers operating across multiple jurisdictions, our compliance approach is intended to reflect internationally recognized standards and the requirements of applicable laws in the jurisdictions in which we conduct business.

Anti-Bribery and Anti-Corruption

2. Prohibition on Bribery and Corruption

RampedUp prohibits offering, promising, giving, requesting, authorizing, accepting, or receiving anything of value for the purpose of improperly influencing a business or governmental decision, securing an improper advantage, obtaining or retaining business, or inducing another person to improperly perform their duties.

This prohibition applies regardless of whether the proposed recipient is:

- a government official;
- an employee of a government-controlled organization;
- a political candidate or political organization;
- a private-sector employee or executive;
- a customer or prospective customer;
- a vendor, supplier, consultant, or intermediary; or
- any other person or organization.

The prohibition applies both to direct payments and to payments or benefits provided indirectly through agents, consultants, vendors, resellers, contractors, or other intermediaries.

RampedUp's policy is informed by applicable anti-corruption legislation, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act 2010, as applicable to RampedUp's activities. The FCPA prohibits corrupt offers or payments of money or anything of value to foreign officials for purposes including obtaining or retaining business. The UK Bribery Act establishes offenses covering giving and receiving bribes, bribery of foreign public officials, and, for covered commercial organizations, failure to prevent bribery by associated persons.

3. Gifts, Entertainment and Business Courtesies

RampedUp permits reasonable and legitimate business entertainment, meals, gifts, promotional items, and other customary business courtesies only when they:

- have a legitimate business purpose;
- are reasonable and proportionate;
- are permitted by applicable law;
- are not intended to improperly influence a business decision;
- do not create an obligation or appearance of improper influence; and
- are accurately documented when reimbursement or company funds are involved.

Cash payments, cash equivalents, kickbacks, secret commissions, or other benefits intended to improperly influence a recipient are prohibited.

Additional scrutiny is appropriate whenever a government official, government-controlled organization, political organization, or similar public-sector entity is involved.

4. Facilitation Payments and Kickbacks

RampedUp prohibits kickbacks and other payments made in exchange for favorable treatment or an improper business advantage.

RampedUp also does not permit employees or representatives to use small or unofficial payments as a routine means of accelerating governmental actions or obtaining preferential treatment merely because such payments may be customary in a particular location.

No RampedUp employee, contractor, consultant, or representative may use a third party to make a payment that RampedUp itself would be prohibited from making.

5. Third-Party Relationships

Bribery and corruption risks may arise through third parties acting for or on behalf of an organization. RampedUp therefore expects vendors, contractors, consultants, agents, and other relevant business partners to conduct business lawfully and ethically.

Depending upon the nature and risk of the relationship, RampedUp may perform reasonable due diligence relating to a prospective vendor or business partner and may require contractual commitments addressing compliance with applicable anti-bribery, anti-corruption, sanctions, labor, or other laws.

Third parties may not be retained for the purpose of concealing or facilitating conduct that would violate RampedUp policy or applicable law.

RampedUp's approach is consistent with the risk-based principles identified in UK Bribery Act guidance, including proportionate procedures, management commitment, risk assessment, due diligence, communication and training, and ongoing monitoring and review.

6. Accurate Books and Records

RampedUp requires business transactions and expenditures to be accurately represented in its business and financial records.

False, misleading, incomplete, fictitious, or intentionally mischaracterized transactions are prohibited. Company funds may not be maintained or used for undisclosed or unlawful purposes.

Employees and contractors responsible for approving invoices, expenses, vendor payments, commissions, or reimbursements are expected to exercise reasonable care to ensure that payments correspond to legitimate business activities.

Anti-Modern Slavery and Human Rights

7. Prohibition on Modern Slavery and Human Trafficking

RampedUp opposes modern slavery and human trafficking in all forms.

For purposes of this policy, prohibited conduct includes, as applicable:

- forced or compulsory labor;
- human trafficking;
- slavery and servitude;
- debt bondage;
- involuntary prison labor;
- unlawful child labor;
- withholding identification documents as a means of coercion;
- recruitment practices involving unlawful coercion or exploitation; and
- threats, violence, deception, or abuse of vulnerability used to compel labor.

RampedUp does not knowingly employ individuals under conditions constituting forced labor, trafficking, slavery, or servitude and does not knowingly engage suppliers or contractors that employ such practices.

8. Supply Chain Expectations

RampedUp is primarily a technology and information-services organization. Consequently, its supply chain is substantially composed of technology providers, cloud and infrastructure providers, software vendors,

professional-service providers, data providers, independent contractors, and other business-service organizations rather than manufacturing or physical-goods supply chains.

Nevertheless, RampedUp recognizes that human-rights and labor risks can arise in any supply chain.

RampedUp expects its material suppliers, contractors, and business partners to:

- comply with applicable employment and labor laws;
- prohibit slavery, forced labor, and human trafficking;
- comply with applicable minimum-age and child-labor requirements;
- maintain lawful employment relationships;
- provide compensation in accordance with applicable wage and hour requirements; and
- maintain business practices consistent with applicable human-rights and modern-slavery laws.

Where circumstances indicate an elevated risk, RampedUp may conduct additional inquiries or due diligence concerning a supplier or business partner.

9. Modern Slavery Legislation

RampedUp's approach takes into consideration internationally recognized anti-modern-slavery principles, including those reflected in the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

Section 54 of the UK Modern Slavery Act requires qualifying commercial organizations carrying on business in the United Kingdom and meeting the applicable turnover threshold to publish annual statements describing the steps they have taken to manage modern-slavery risks within their operations and supply chains. Current UK government guidance identifies a £36 million annual turnover threshold.

Australia's Modern Slavery Act similarly requires qualifying entities operating in the Australian market with annual consolidated revenue of at least A\$100 million to prepare annual statements concerning actions taken to assess and address modern-slavery risks in their operations and supply chains.

Whether or not RampedUp is independently subject to a particular jurisdiction's mandatory reporting threshold, RampedUp supports the underlying principles of transparency, risk assessment, responsible procurement, and prevention of forced labor and human trafficking.

Compliance Controls

10. Risk-Based Due Diligence

RampedUp applies a risk-based approach to compliance.

The level of diligence applied to a transaction or third-party relationship may vary based upon factors including:

- geographic location;
- type of service;
- access to company systems or funds;
- interaction with government entities or officials;
- payment structure;
- use of intermediaries;
- unusual payment requests;
- labor-intensive subcontracting arrangements; and
- other indicators of bribery, corruption, trafficking, or forced-labor risk.

RampedUp may decline, suspend, investigate, or terminate relationships where identified risks cannot reasonably be addressed.

11. Employee and Contractor Responsibilities

Individuals acting on behalf of RampedUp are expected to:

- comply with applicable anti-bribery and anti-corruption laws;
- refrain from offering or accepting improper payments or benefits;
- identify and disclose material conflicts of interest;
- accurately document business expenses;
- exercise appropriate diligence when engaging third parties;
- avoid knowingly supporting forced labor, trafficking, or modern slavery; and
- report suspected violations or material compliance concerns.

Violations may result in disciplinary action, termination of employment or contractual relationships, and, when appropriate, referral to relevant authorities.

12. Reporting Concerns and Non-Retaliation

RampedUp encourages employees, contractors, customers, suppliers, and other business partners to raise concerns regarding suspected bribery, corruption, fraud, forced labor, trafficking, modern slavery, or other unethical conduct involving RampedUp or persons acting on its behalf.

Reports may be made to appropriate RampedUp management or through the company's designated legal or compliance contact.

RampedUp prohibits retaliation against an individual who makes a good-faith report of suspected misconduct or participates in a legitimate investigation.

Reports are evaluated based upon the circumstances presented, and RampedUp may conduct an internal review, request additional information, suspend a relationship, implement remediation, terminate a relationship, or refer a matter to appropriate authorities where warranted.

13. Monitoring and Continuous Improvement

RampedUp periodically evaluates its compliance practices in light of the nature and scale of its operations, changes in applicable laws, customer requirements, geographic expansion, new business relationships, and evolving compliance risks.

Controls may include:

- contractual compliance provisions;
- supplier and contractor screening;
- management review of higher-risk relationships;
- expense and payment controls;
- conflict-of-interest requirements;
- compliance communications;
- investigation and remediation procedures; and
- periodic review of compliance policies.

RampedUp's objective is not merely to prohibit unlawful behavior in written policies but to maintain practical controls proportionate to the risks presented by its business operations.

Client and Partner Assurance

14. Our Commitment to Customers

RampedUp recognizes that its customers may maintain their own supplier codes of conduct, anti-bribery programs, responsible-procurement requirements, and environmental, social and governance ("ESG") standards.

Subject to reasonable contractual requirements and applicable law, RampedUp is prepared to work with customers to provide appropriate information concerning its anti-bribery, anti-corruption, human-rights, and modern-slavery practices as part of supplier due diligence and compliance reviews.

RampedUp expects business conducted on behalf of the company to be based upon the quality, value, performance, and legitimate commercial merits of its products and services—not improper payments, coercion, exploitation, or unethical conduct.

RampedUp, LLC

Anti-Bribery, Anti-Corruption & Anti-Modern Slavery Compliance Brief

August 2026