

At Talenterra, we are committed to conducting our business with the highest level of integrity and ethical standards. We recognize that corruption, in any form, undermines trust and damages the reputation of our company and the broader business community. Our Anti-Corruption Policy is designed to ensure that all employees, representatives, and third parties associated with Talenterra adhere to strict anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), and uphold our commitment to ethical business practices.

- COMPLIANCE WITH ANTI-CORRUPTION LAWS

Talenterra is committed to full compliance with the U.S. Foreign Corrupt Practices Act (FCPA) and all other applicable anti-corruption laws globally. All employees, agents, and representatives of Talenterra must strictly adhere to these laws, ensuring that our business is conducted with the highest levels of integrity and transparency.

We prohibit any form of bribery, including offering, promising, giving, or receiving anything of value to influence the actions of an individual or organization in an official capacity.

- INTERACTIONS WITH GOVERNMENT OFFICIALS

Talenterra recognizes the heightened risks associated with interacting with government officials. Employees and representatives must exercise the utmost care and integrity in all dealings with government entities or officials.

Any interaction with government officials must be conducted in a transparent and ethical manner, strictly adhering to all applicable laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws in other jurisdictions.

- GIFTS AND HOSPITALITY

Employees and representatives of Talenterra must not offer, give, or receive gifts, hospitality, or other benefits that could be perceived as an attempt to improperly influence business decisions or secure an unfair advantage.

Modest gifts and hospitality that are customary and reasonable in value are allowed, provided they are not intended to influence a decision or breach any laws or company policies. All such offerings must be transparently reported to management for approval.

- AVOIDANCE OF CONFLICTS OF INTEREST

All employees and representatives of Talenterra must avoid situations where their personal interests conflict, or appear to conflict, with the interests of the company. Such conflicts could compromise our ethical standards and damage our reputation.

Any potential or actual conflicts of interest must be disclosed to management immediately. Employees are expected to act with integrity and prioritize the company's interests in all business dealings.

- DONATIONS AND SPONSORSHIPS

Talenterra prohibits the use of company funds for political donations or sponsorships that could be perceived as an attempt to influence government officials or gain improper business advantages.

Charitable donations and sponsorships are allowed, provided they are made transparently, without any expectation of business favor, and in compliance with all applicable laws. All such contributions must be approved by senior management.

- WHISTLEBLOWER PROTECTION

Talenterra encourages employees to report any suspected violations of this Anti-Corruption Policy or any unethical behavior, without fear of retaliation. We are committed to maintaining a safe and confidential environment for whistleblowers.

Retaliation against anyone who, in good faith, reports a concern or participates in an investigation is strictly prohibited. All reports will be investigated thoroughly and fairly, and appropriate actions will be taken in response to any confirmed violations.