plan your edge

Anti-Corruption Policy

Plan Your Edge LLC

Effective date: December 10, 2024
Revised: October 8, 2026
Policy owner: Company Management

1 Purpose and scope

Plan Your Edge LLC and its affiliated companies (collectively, the Company) prohibit bribery and corruption in all business dealings. We compete on the quality and value of our services and comply with applicable anti-corruption laws wherever we operate.

This policy applies to the Company's managers, employees, and anyone acting on its behalf, including contractors, consultants, agents, and intermediaries. We expect business partners and suppliers to uphold comparable standards.

2 Prohibited conduct

No covered person may offer, promise, authorize, give, request, or accept a bribe, kickback, or other improper benefit, directly or through another person. This prohibition applies to dealings with public officials and private businesses, whether or not an improper payment succeeds.

A benefit can include money, gifts, meals, travel, entertainment, employment opportunities, favors, donations, discounts, or access to services. Legitimate commercial arrangements must never be used to conceal an improper reward or influence a decision dishonestly.

Using personal funds, relatives, intermediaries, false invoices, or reimbursements to bypass this policy is prohibited. Business pressure, local custom, or instructions from a customer do not justify a violation.

3 Gifts hospitality and travel

Business gifts, meals, entertainment, and travel must have a legitimate business purpose, be lawful and reasonable in context, comply with the recipient's rules, and be accurately documented. They must not create an improper obligation or influence a pending decision. Cash and cash-equivalent gifts, including gift cards, are prohibited.

Prior written management approval is required for gifts or hospitality involving public officials, any customer or partner travel or accommodation, and anything beyond modest, infrequent business courtesies. Expenses must identify the recipient, purpose, value, and approval. If uncertain, obtain approval before offering or accepting a benefit. Approval cannot authorize unlawful conduct.

4 Facilitation payments and personal safety

The Company prohibits unofficial payments to speed up routine government actions, even where such payments may be customary or permitted under a narrow legal exception. Published, lawful expedited-service fees paid to the relevant agency and supported by a receipt are not facilitation payments.

If an immediate threat to life or physical safety makes a payment unavoidable, prioritize safety and report the circumstances to management as soon as safely possible. Record the payment accurately. Commercial pressure or the threat of losing business does not constitute a personal-safety emergency.

5 Third parties and business relationships

Before engaging an intermediary or another party to act for the Company, management must assess the corruption risks appropriate to the relationship. Review the business need, qualifications, reputation, relevant ownership or official connections, proposed compensation, and payment arrangements.

Services and compensation must be clearly documented and proportionate to legitimate work. Agreements should include appropriate anti-corruption commitments and rights to address misconduct. Monitor relationships in proportion to their risk.

Warning signs include unexplained commissions, requests for payment to unrelated accounts, vague services, refusal to identify owners, or claims of improper influence. Pause the affected transaction and refer unresolved concerns to management before proceeding.

6 Donations sponsorships and political activity

Charitable donations and sponsorships made with Company resources require prior written management approval, a legitimate purpose, appropriate recipient checks, and accurate records. They must never be linked to an improper business advantage or used to channel benefits to a decision-maker.

Political contributions using Company funds or resources require prior written management approval and confirmation that they are lawful. Personal political activity must remain separate from Company business, must not imply Company endorsement, and must not be reimbursed by the Company.

7 Conflicts of interest and accurate records

Disclose personal, family, financial, or other relationships that could improperly influence a business decision. A person with a conflict must not approve the related benefit or transaction; an uninvolved authorized decision-maker must review it.

Keep complete and accurate records of payments, expenses, approvals, and services. False descriptions, hidden accounts, unsupported invoices, and splitting expenses to avoid review are prohibited. Retain relevant records under applicable legal and contractual requirements, and preserve materials relating to a reported concern or investigation.

8 Reporting concerns and protection from retaliation

Promptly report suspected bribery, improper payment requests, questionable records, or other possible violations to Company management or contact@planyouredge.com. Reports may also be raised by telephone at +1 305-320-3343. Proof is not required before raising a concern honestly.

If a concern involves the usual management contact, raise it directly with another uninvolved manager or an independent representative designated by the Company. Do not route a report solely to the person implicated.

The Company prohibits retaliation against anyone who raises a concern in good faith, refuses to participate in suspected misconduct, or cooperates honestly with a review. Protection applies even if a concern is not substantiated. Knowingly false reports are not protected, but an honest mistake is not a false report.

Information will be shared only as reasonably needed to assess and address the concern or meet legal obligations. Absolute confidentiality cannot be guaranteed. Nothing in this policy restricts lawful reporting to authorities, cooperation with an official investigation, or seeking independent legal advice; prior Company approval is not required.

9 Review and corrective action

Management will assess reports promptly, arrange an impartial review appropriate to the circumstances, and address identified misconduct or control weaknesses. Persons implicated in a concern must not direct its review. Personnel must cooperate honestly and must not conceal, alter, or destroy relevant records.

Violations may result in disciplinary action up to termination of employment, or suspension or termination of a business relationship, subject to applicable law and contractual rights. The Company may seek legal advice and refer matters to authorities when appropriate or required.

10 Responsibility and policy maintenance

Management is responsible for implementing this policy, reviewing approval requests, providing guidance and training appropriate to each person’s role and risk, and periodically reviewing the policy and related controls. Covered persons must read and follow this policy and seek guidance when a situation is unclear.

No manager or representative may authorize bribery, retaliation, or false records. Where this policy establishes a stricter standard than local custom or a legal exception, follow the policy. Any conflict with applicable law must be referred to management for legal advice before acting.

Policy questions and reporting: contact@planyouredge.com | +1 305-320-3343