# ZAMBELLI INTERNATIONAL CONSULTING LLC



# CODE OF ETHICS

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# **Code of Ethics**

# of Zambelli International Consulting LLC

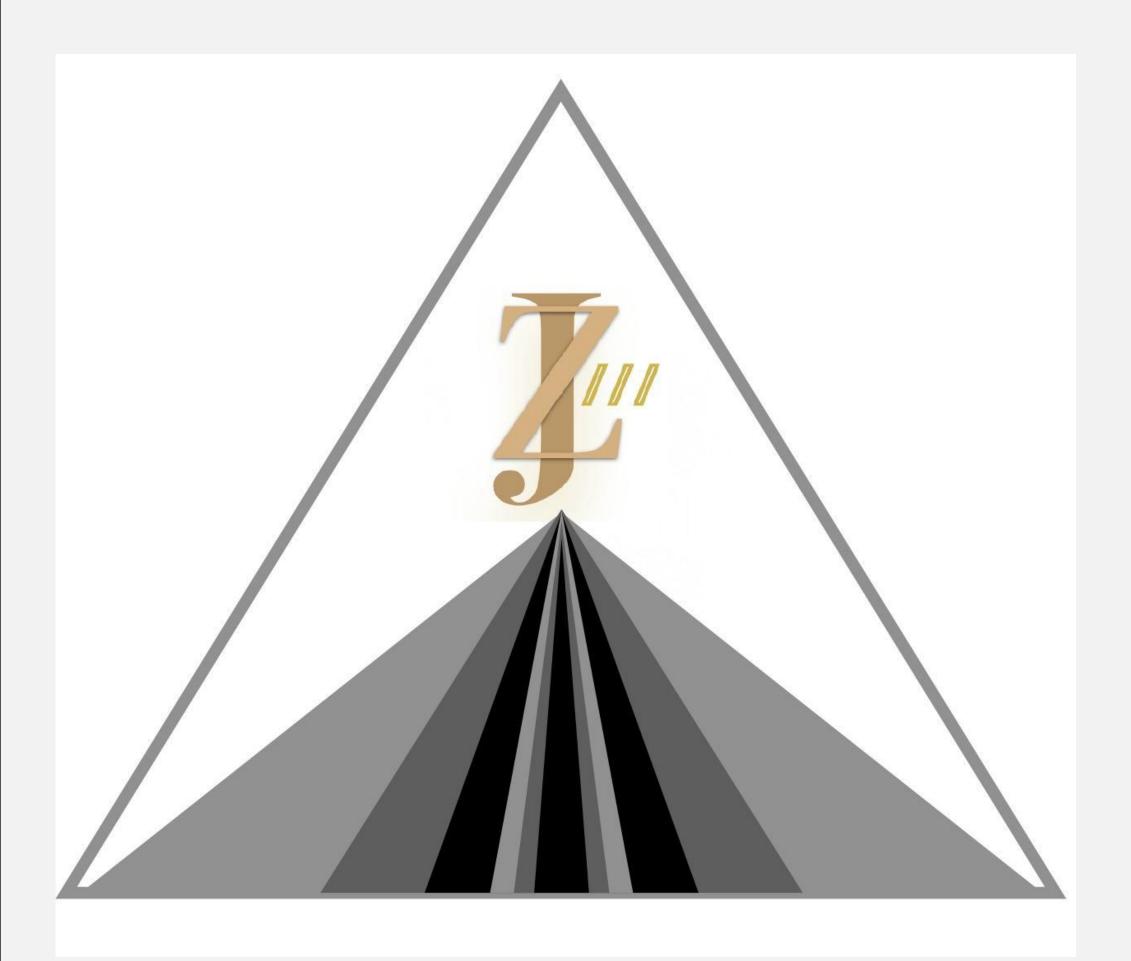
At Zambelli International Consulting LLC, we are unwaveringly committed to conducting our business operations with the highest standards of integrity, transparency, and accountability, in full compliance with relevant local, national, and international legal frameworks and regulations.

This Code of Ethics serves as the cornerstone of our commitment to ethical business practices, and it governs the way we engage with our clients, employees, partners, and other stakeholders. We recognize the importance of fostering an environment of mutual trust and respect, where all parties can be assured that we will act with honesty, fairness, and diligence in every transaction, communication, and decision-making process.

Through the adherence to these 25 articles, we ensure that our actions and services align with the core values of professionalism, fairness, and respect for the law, thus promoting not only legal and regulatory compliance but also a culture of ethical responsibility throughout our global operations. We are dedicated to ensuring that all aspects of our services, from data protection and confidentiality to environmental sustainability and human rights, are executed in a manner that reflects our ethical values, legal obligations, and corporate social responsibility.

As such, we are resolute in maintaining a high standard of business practice that not only meets but exceeds the expectations of our clients, partners, and regulators, contributing to the integrity of the industries in which we operate and promoting a positive, transparent, and accountable business culture.

The following 25 articles outline the specific ethical principles and standards that guide our business operations and interactions with all stakeholders, setting clear expectations for behavior, decision-making, and the resolution of any ethical dilemmas that may arise in the course of our business activities.



# 1. Commitment to Integrity

Zambelli International Consulting LLC will conduct all business activities with honesty, fairness, and transparency. We are committed to upholding the highest standards of integrity in every aspect of our operations and ensuring that our decisions and actions reflect these principles. Our business relationships, whether with clients, employees, partners, or stakeholders, will be built on mutual respect, trust, and adherence to ethical standards.

### 1.1 Ethical Decision-Making

All members of Zambelli International Consulting LLC are expected to make decisions based on ethical considerations, ensuring that actions align with our core values of honesty, fairness, and respect for others. We will not engage in or tolerate any form of unethical conduct, including but not limited to bribery, corruption, fraud, or exploitation. Each decision should be evaluated with a focus on its potential impact on stakeholders, our reputation, and the broader community.

# 1.2 Legal and Regulatory Compliance

In all our business dealings, we are committed to adhering to all applicable laws, regulations, and industry standards. Zambelli International Consulting LLC will ensure compliance with international, national, and local legal frameworks, including data protection laws, anti-money laundering (AML) requirements, and anti-corruption measures. This commitment extends to ensuring that all employees and stakeholders understand their legal responsibilities and obligations, as well as our collective duty to comply with these regulations in every aspect of our operations. Furthermore, we will actively participate in the development of regulatory frameworks that promote ethical business practices and contribute to a fair and transparent business environment globally.

# 1.2 Confidentiality and Privacy

Zambelli International Consulting LLC is committed to upholding the highest standards of confidentiality and privacy in every aspect of our operations. We understand that trust is foundational to our relationships with clients, employees, and partners. As such, we prioritize the protection of sensitive and proprietary information that is entrusted to us. This includes, but is not limited to, personal client data, employee records, financial information, and trade secrets. We adhere to stringent security measures to ensure that this information remains secure and is only accessed by authorized personnel.

We recognize the legal and ethical obligations we have to maintain the privacy of all data under our control. Our commitment extends to ensuring compliance with relevant data protection laws and regulations, such as the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and any other applicable international privacy laws. Zambelli International Consulting LLC will not disclose, share, or misuse confidential information unless required by law or with the explicit consent of the concerned party.

Furthermore, we adopt advanced technologies, including encryption and secure data storage protocols, to safeguard sensitive data from unauthorized access, alteration, or loss. Employees, contractors, and partners are trained to uphold the privacy standards we have set, and any breach of confidentiality will result in appropriate disciplinary action.

We are dedicated to fostering an environment where confidentiality and privacy are respected at all levels of the organization, ensuring the trust and confidence of our clients, partners, and stakeholders.

Zambelli International Consulting LLC is unwavering in its commitment to safeguarding the confidentiality and privacy of all sensitive and proprietary information entrusted to us. Trust is at the core of our relationships with clients, employees, partners, and stakeholders. We prioritize the protection of personal and business data by implementing robust security measures and ensuring compliance with applicable federal, state, and international privacy and confidentiality regulations.

# 2. Compliance with Laws and Regulations

At Zambelli International Consulting LLC, we are fully committed to complying with all relevant local, national, and international laws and regulations in every jurisdiction in which we operate. This comprehensive approach to compliance encompasses, but is not limited to, adherence to financial regulations, data protection laws, anti-money laundering (AML) legislation, tax compliance, and industry-specific regulatory standards. We understand the importance of maintaining legal compliance to safeguard our business, clients, employees, and stakeholders, ensuring that all operations are conducted ethically and in accordance with the law. Our commitment to compliance extends to:

# 2.1 Financial Regulations

We will adhere to all applicable financial regulations, including those governing financial transactions, reporting requirements, and corporate governance. This includes compliance with relevant financial authorities and regulatory bodies, such as the U.S. Securities and Exchange Commission (SEC), the Financial Conduct Authority (FCA) in the UK, and international financial regulations like MiFID II and the Basel III framework.

### 2.2 Data Protection Laws

We are committed to upholding data protection laws, including the General Data Protection Regulation (GDPR) in the European Union, as well as other global data privacy regulations. Personal data will only be processed for lawful, specified purposes, and we will take every necessary step to ensure that personal and sensitive information is stored, processed, and transferred securely, minimizing any risks of unauthorized access or misuse.

# 2.3 Anti-Money Laundering (AML)

Zambelli International Consulting LLC takes its responsibility to prevent money laundering seriously. We adhere to global AML regulations, including the Financial Action Task Force (FATF) standards, the U.S. Bank Secrecy Act (BSA), and other relevant national and international legislation. Our processes include customer due diligence (CDD), transaction monitoring, and reporting suspicious activities to the appropriate authorities.

# 2.4 Tax Compliance

We are committed to full compliance with applicable tax laws in all jurisdictions where we operate. We ensure timely and accurate reporting of our tax obligations and will cooperate fully with tax authorities to maintain our standing as a responsible corporate entity. We also take steps to mitigate any tax risks and ensure our operations are transparent and compliant with international tax standards.

# 2.5 Industry-Specific Regulations

In addition to general legal and regulatory compliance, we also adhere to industry-specific regulations that apply to our business activities, including but not limited to financial services, consulting, and data management. We stay informed of any changes to these regulations and implement necessary changes in our internal processes to ensure ongoing compliance.

By maintaining rigorous adherence to these laws and regulations, we not only protect our company and stakeholders from legal risks, but we also reinforce our reputation as a trustworthy, responsible business committed to ethical practices.

# 3. Confidentiality and Privacy

At Zambelli International Consulting LLC, we recognize the critical importance of privacy and confidentiality in building trust with our clients, employees, and partners. We are dedicated to safeguarding all sensitive and confidential information entrusted to us, and we take every necessary step to ensure that such data is processed, stored, and transmitted securely. Our commitment to confidentiality is in alignment with the highest industry standards and privacy laws, including the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other relevant international privacy laws and frameworks.

### 3.1 Protection of Sensitive Information

We will protect all confidential information, whether it pertains to our clients, employees, partners, or proprietary business data, from unauthorized access, disclosure, alteration, or destruction. This includes ensuring that all sensitive information is securely stored and processed within a controlled environment, accessible only to authorized personnel who need the data to perform their duties.

# 3.2 Compliance with Privacy Laws

We will strictly adhere to the privacy laws and regulations governing the collection, processing, and storage of personal data in all jurisdictions where we operate. This includes, but is not limited to, compliance with the GDPR in the European Union, CCPA in California, and other applicable data protection laws. We will ensure that data processing activities are conducted lawfully, transparently, and with respect for individuals' rights.

# 3.3 Transparency and Consent

We commit to being transparent about how we collect, use, and store personal data. We will inform our clients, employees, and partners about the purposes for which their data is collected, and we will obtain explicit consent where necessary. Consent will be sought in a clear and accessible manner, and individuals will have the right to withdraw their consent at any time.

# 3.4 Data Minimization and Purpose Limitation

We will only collect and process personal data that is necessary for the specific purposes for which it was provided. We will ensure that data is not retained longer than necessary and will regularly review the data we hold to ensure it is relevant, accurate, and up to date. Any data that is no longer required for legitimate purposes will be securely deleted or anonymized.

# 3.5 Secure Data Transmission and Storage

We will implement and maintain the highest security standards for the transmission, storage, and access to personal and confidential information. This includes the use of encryption, secure communication protocols (such as SSL/TLS), and access controls to ensure that data is protected against unauthorized access, cyber threats, and other security risks.

### 3.6 Third-Party Disclosures

We will not disclose any sensitive or confidential information to third parties without the prior consent of the data subject, except where required by law, regulation, or to fulfill contractual obligations. In cases where data sharing with third parties is necessary, we will ensure that such third parties are bound by appropriate confidentiality agreements and data protection clauses.

# 3.7 Data Subject Rights

In accordance with privacy laws such as GDPR, we recognize the rights of individuals regarding their personal data, including the right to access, correct, erase, or restrict the processing of their data.

We are committed to providing individuals with a clear process for exercising these rights and will respond to any requests in a timely manner.

By maintaining a robust framework for confidentiality and privacy, we uphold the trust placed in us by our clients, employees, and partners and demonstrate our commitment to ethical and responsible data management practices.

### 4. Professionalism and Competence

At Zambelli International Consulting LLC, we are committed to maintaining the highest standards of professionalism and competence in all aspects of our operations. We recognize that our reputation and success depend on our ability to consistently deliver exceptional services that meet the needs and expectations of our clients, employees, partners, and stakeholders. As part of our commitment to excellence, we will continuously strive to enhance our knowledge, skills, and capabilities, ensuring that we remain at the forefront of industry developments and best practices.

### **4.1 Continuous Professional Development**

We will provide our employees and consultants with ongoing opportunities for training, professional development, and knowledge enhancement. We believe that fostering a culture of learning is essential to ensuring that our team remains proficient, informed, and capable of providing the highest quality services to our clients. Regular participation in relevant industry conferences, workshops, and training programs will be encouraged to promote the continuous growth and development of our staff.

### 4.2 Adherence to Best Practices

We are committed to following industry best practices and maintaining a high level of ethical standards in all of our professional engagements. This includes employing proven methodologies, tools, and techniques to deliver reliable and effective solutions. We will also regularly review and update our processes and systems to ensure they remain aligned with the latest standards and regulations in the fields in which we operate.

# **4.3 Client-Centered Approach**

In all of our professional interactions, we prioritize our clients' needs and interests. We will provide clear, objective, and well-reasoned advice that is tailored to the unique circumstances of each client. By listening actively, understanding the client's goals, and maintaining open communication, we will ensure that our services align with their expectations and contribute to their success.

# 4.4 Accountability and Responsibility

We take full responsibility for the quality of the services we provide. Our commitment to professionalism means that we will be transparent about any challenges or limitations we face and take immediate corrective action when necessary. We will hold ourselves accountable for the outcomes of our work and ensure that any mistakes are addressed promptly and transparently.

### 4.5 Ethical Decision-Making

We are dedicated to making decisions based on integrity, fairness, and the highest ethical standards. Our consultants and employees will be expected to demonstrate sound judgment, maintain objectivity, and act in the best interests of our clients and stakeholders. We will always strive to avoid conflicts of interest and ensure that our professional decisions are made with the utmost respect for ethical considerations.

# 4.6 Quality Assurance

We will implement quality assurance protocols to monitor the effectiveness and accuracy of the services we provide. Regular internal audits and reviews will be conducted to ensure that our work meets the highest standards of quality and that any improvements or corrective actions are identified and implemented in a timely manner. Feedback from clients and stakeholders will also be actively sought to ensure continuous improvement in our services.

By upholding these principles of professionalism and competence, we will maintain the trust of our clients and stakeholders, ensuring that we deliver services that are not only effective but also grounded in expertise, integrity, and accountability.

### 5. Conflict of Interest

At Zambelli International Consulting LLC, we are committed to maintaining the highest standards of integrity, transparency, and objectivity in all our business activities. To uphold these values, employees, directors, and consultants must avoid situations where their personal interests could conflict with their professional responsibilities or the interests of the company. Any potential or actual conflict of interest—whether real or perceived—must be promptly disclosed to the appropriate authorities within the company and managed in a way that protects the integrity and reputation of the organization.

### **5.1 Disclosure of Conflicts**

Employees, directors, and consultants are required to immediately disclose any potential conflicts of interest that may arise in the course of their work. This includes situations where personal, financial, or familial interests could reasonably influence or be perceived to influence their professional judgment or decision-making. Such disclosures must be made in writing to the compliance officer or designated company representative for review.

# **5.2 Mitigation of Conflicts**

Once a conflict of interest has been disclosed, the company will take steps to assess and manage the situation. This may involve reallocating responsibilities, adjusting decision-making processes, or taking other corrective measures to mitigate the potential impact on the company's operations and reputation. Zambelli International Consulting LLC reserves the right to take appropriate action in response to any conflict of interest that could adversely affect its business operations or the trust of its clients and stakeholders.

### **5.3 Avoiding Conflicting Interests**

Employees, directors, and consultants must actively avoid situations in which personal relationships, outside business interests, or financial activities could create conflicts with the interests of the company or its clients. This includes, but is not limited to, owning shares or other financial interests in competitors, engaging in business relationships that could influence objectivity, or participating in external activities that may appear to conflict with professional duties.

### 5.4 Prohibition of Undue Influence

Zambelli International Consulting LLC does not tolerate the use of personal or financial interests to exert undue influence over business decisions or relationships. Employees, directors, and consultants must not use their position or access to confidential information for personal gain or to benefit others inappropriately. Any attempt to manipulate decisions, distort information, or use a position of power for personal advantage will result in disciplinary action.

### 5.5 Continuous Monitoring and Reporting

To ensure that potential conflicts of interest are managed effectively, Zambelli International Consulting LLC will implement procedures for continuous monitoring of business activities. Employees, directors, and consultants are encouraged to raise concerns or report any situations they believe may constitute a conflict of interest, without fear of retaliation. The company will maintain an open-door policy for addressing such issues promptly and transparently.

# **5.6 Ethical Decision-Making and Professional Integrity**

Even in the absence of a direct conflict of interest, employees, directors, and consultants must always act in a manner that is consistent with the highest ethical standards. In situations where a conflict of interest may arise, the guiding principle will always be the protection of the company's integrity, the interests of our clients, and the public trust. All decisions should be made based on objective and unbiased judgment, free from external influence or personal gain.

By adhering to these conflict of interest principles, Zambelli International Consulting LLC ensures that its operations and decision-making processes remain transparent, trustworthy, and focused on the long-term success and reputation of the company.

### 6. Transparency and Accountability

At Zambelli International Consulting LLC, we hold transparency and accountability as core values fundamental to maintaining the trust and confidence of our clients, partners, and stakeholders. We are committed to conducting our business operations in an open and honest manner, ensuring that all actions, decisions, and policies are communicated clearly and effectively to those impacted.

# 6.1 Transparent Decision-Making

We will provide clear and comprehensible explanations for the decisions made by our leadership and management teams, particularly when those decisions affect our clients, partners, or stakeholders. All significant actions, including strategic choices, financial decisions, and operational changes, will be made in full consideration of their potential impact on the company and the broader community. Whenever possible, we will share relevant information in a timely and accessible manner to ensure that those affected have the knowledge they need to make informed decisions.

# 6.2 Accountability for Actions and Results

Zambelli International Consulting LLC will take full responsibility for its actions and decisions. This includes accepting the consequences of both positive and negative outcomes and striving to learn from every situation. We recognize that accountability is essential not only for our reputation but also for fostering trust with our clients, employees, and other stakeholders. As part of our commitment to accountability, we will maintain internal mechanisms to review our actions and decisions, ensuring they align with our ethical standards and regulatory obligations.

# **6.3 Open Communication**

We encourage open, honest, and constructive communication both internally and externally. Employees, directors, and consultants are expected to engage in dialogue that promotes transparency in all aspects of their work. We believe that fostering an environment where feedback is encouraged and acted upon is essential to improving our processes and relationships.

# 6.4 Regular Reporting and Monitoring

To ensure that we remain transparent and accountable, Zambelli International Consulting LLC will implement regular reporting and monitoring systems. These systems will track progress against strategic goals, ensure compliance with applicable laws and regulations, and identify any areas where improvements can be made. We will provide regular updates on our performance to stakeholders and will be responsive to inquiries regarding the outcomes of our work.

# 6.5 Responsibility to Clients and Stakeholders

We are committed to acting in the best interests of our clients, partners, and stakeholders. We recognize our responsibility to ensure that our decisions and actions are not only lawful but also ethical and in line with the values of transparency and accountability. When issues arise, we will take immediate steps to address them, and where applicable, we will be proactive in offering solutions to mitigate any negative impacts.

### 6.6 Ethical Leadership

Zambelli International Consulting LLC's leadership team will lead by example in promoting transparency and accountability. We hold ourselves to the highest standards and are dedicated to modeling the ethical behavior expected from all employees, directors, and consultants. We will regularly evaluate our leadership practices and take steps to ensure that we set a positive example in every aspect of our operations.

# 6.7 Collaboration and Stakeholder Engagement

We value the input and feedback of our clients, partners, employees, and other stakeholders. We are committed to fostering collaboration and engagement throughout our operations, seeking opportunities to improve our services and better meet the needs of those we serve. Transparency and accountability are not only internal principles but also extend to how we interact with the communities and industries in which we operate.

Through these commitments, Zambelli International Consulting LLC will uphold the principles of transparency and accountability, ensuring that we maintain the trust of our stakeholders and continue to provide ethical, high-quality services. We understand that our credibility is built on our willingness to take responsibility for our actions and be open in all that we do.

### 7. Anti-Corruption and Bribery

Zambelli International Consulting LLC is unwavering in its commitment to maintaining the highest ethical standards and fully complies with all applicable anti-corruption and anti-bribery laws, both domestic and international. We prohibit any form of corruption, bribery, or unethical business practices within our organization and expect the same from all of our employees, consultants, partners, and stakeholders. We firmly believe that all business dealings must be conducted in a fair, transparent, and lawful manner, without the use of improper incentives or financial transactions that could compromise integrity.

### 7.1 Prohibition of Bribery and Kickbacks

We will not, under any circumstances, engage in or tolerate bribery or the offering, accepting, or soliciting of kickbacks. Employees, directors, consultants, or any other individual acting on behalf of Zambelli International Consulting LLC are prohibited from offering, promising, giving, receiving, or accepting any bribe or kickback, whether in the form of money, gifts, services, or any other form of inducement. This includes not only direct transactions but also indirect or concealed arrangements intended to influence decision-making.

### 7.2 Zero Tolerance for Unethical Transactions

Zambelli International Consulting LLC has a zero-tolerance policy toward any unethical financial transactions. We will not condone or engage in any practices that may involve money laundering, fraudulent activities, or any other illegal financial conduct. Our internal systems and controls are designed to detect, prevent, and address any attempt to engage in such activities, ensuring that all transactions are properly documented, lawful, and aligned with our ethical standards.

### 7.3 Compliance with Anti-Corruption Laws

We are committed to complying with all national and international anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, the OECD Anti-Bribery Convention, and other relevant legislation in the jurisdictions where we operate. Our compliance with these regulations ensures that we operate with integrity, promote fair competition, and foster an environment of trust with all our stakeholders.

### 7.4 Training and Awareness

To maintain a culture of integrity and compliance, Zambelli International Consulting LLC will provide ongoing training and awareness programs to our employees and partners. These programs will educate them on the risks and consequences of bribery and corruption, as well as provide guidance on how to identify and report potential violations. We encourage open dialogue regarding ethical concerns and ensure that every employee and consultant understands their responsibility in upholding this policy.

### 7.5 Reporting Mechanism

We provide a confidential and secure reporting mechanism for anyone who suspects or becomes aware of any form of bribery, corruption, or unethical behavior within the organization. All reports will be thoroughly investigated, and any retaliation against individuals reporting such activities will not be tolerated. Zambelli International Consulting LLC is committed to taking appropriate disciplinary action, including legal proceedings if necessary, to address and prevent corruption and bribery.

### 7.6 Vendor and Third-Party Relations

We require all vendors, business partners, and third-party agents to adhere to the same anti-corruption and anti-bribery standards as we do. Before engaging with any third parties, we conduct due diligence to ensure they are in compliance with applicable laws and regulations. We expect all parties involved in our business dealings to share our commitment to ethical practices, and we reserve the right to terminate any relationship that is found to be in violation of these principles.

### 7.7 Integrity in Government Relations

Zambelli International Consulting LLC will never offer or promise anything of value to government officials or employees, whether domestic or foreign, in exchange for influence or favorable treatment. Our interactions with government entities will always be conducted with the highest respect for the law and in alignment with ethical standards.

### 7.8 Continuous Monitoring and Improvement

We continuously monitor our business practices and update our policies and procedures to ensure they remain in compliance with the latest legal and ethical standards. Zambelli International Consulting LLC is committed to fostering an environment where corruption is actively discouraged and will take swift action to address any potential risks to our reputation and integrity.

# 8. Equal Opportunity and Non-Discrimination

At Zambelli International Consulting LLC, we are committed to creating and maintaining an inclusive environment where all individuals are valued and respected for their unique contributions, perspectives, and abilities. We believe in fostering a workplace and business relationships that embrace diversity and uphold the principles of equal opportunity and non-discrimination. This commitment extends to all aspects of our operations, including recruitment, hiring, training, professional development, compensation, promotion, and the overall treatment of our employees, clients, and partners.

# 8.1 Equal Employment Opportunity

We ensure that all employment decisions, including hiring, promotion, and termination, are made based on qualifications, experience, and performance without regard to race, color, national origin, gender, sexual orientation, religion, age, disability, veteran status, or any other characteristic protected by law. Our hiring practices are designed to ensure that our workforce reflects the diverse communities in which we operate, and we actively encourage individuals from underrepresented groups to apply for opportunities within our organization.

# 8.2 Commitment to Diversity and Inclusion

Zambelli International Consulting LLC believes that diversity enriches the workplace, fosters creativity, and enhances decision-making. We are dedicated to creating an inclusive culture that promotes collaboration, innovation, and mutual respect. By embracing diversity in all its forms—whether related to race, ethnicity, gender, sexual orientation, religion, disability, or any other dimension—we ensure that everyone has an equal opportunity to thrive and succeed.

# 8.3 Non-Discrimination in Business Relationships

We also extend our commitment to non-discrimination to our business relationships with clients, vendors, partners, and other stakeholders. Zambelli International Consulting LLC is dedicated to ensuring that all individuals and organizations, regardless of their background or characteristics, are treated with fairness, respect, and professionalism. We will not engage in discriminatory practices or support business relationships that perpetuate inequality or injustice.

# 8.4 Accessibility and Accommodation

Zambelli International Consulting LLC will take reasonable steps to ensure that our workplace and services are accessible to all employees, clients, and partners, including individuals with disabilities. We are committed to providing reasonable accommodations as needed to ensure that all individuals can fully participate in the workplace and in our services. This includes providing accessible workspaces, communication methods, and any necessary adjustments to support employees and clients with disabilities.

### 8.5 Harassment-Free Workplace

We have a zero-tolerance policy for any form of harassment, including but not limited to, sexual harassment, bullying, or discriminatory behavior based on an individual's race, gender, sexual orientation, religion, age, disability, or any other protected characteristic. Any employee, client, or partner engaging in discriminatory behavior or harassment will be subject to immediate disciplinary action, including possible termination of employment or business relationships.

# 8.6 Training and Awareness

Zambelli International Consulting LLC is committed to providing ongoing training and education to our employees and business partners on topics related to diversity, equity, inclusion, and non-discrimination. This training is designed to raise awareness, promote respect for diversity, and prevent discriminatory practices. We will continually evaluate our training programs to ensure they reflect the latest best practices and legal requirements.

# 8.7 Reporting and Remedying Discrimination

We provide a safe and confidential mechanism for employees, clients, and partners to report instances of discrimination, harassment, or unequal treatment. All complaints will be investigated promptly, fairly, and thoroughly. We are committed to taking appropriate corrective actions in response to any verified discrimination or harassment, ensuring that any affected individual is treated fairly and equitably.

# 8.8 Compliance with Equal Opportunity Laws

Zambelli International Consulting LLC fully complies with all local, national, and international equal employment opportunity laws and anti-discrimination regulations, including the Civil Rights Act, the Equal Pay Act, the Americans with Disabilities Act (ADA), and other applicable labor and employment laws. We ensure that our practices align with these legal frameworks to protect the rights of our employees and clients and to maintain an equitable business environment.

### 8.9 Promoting Gender Equality

We are dedicated to promoting gender equality within our organization and in our business dealings. This includes ensuring that women have equal access to opportunities for employment, leadership roles, and compensation. We actively seek to eliminate the gender pay gap and provide equal opportunities for career advancement to all employees, regardless of gender.

• 40 Commitment to Social Deponds bility

# 8.10 Commitment to Social Responsibility

As part of our broader commitment to diversity and inclusion, we strive to make a positive social impact in the communities we serve. This includes supporting initiatives that promote education, employment, and empowerment for marginalized and underrepresented groups, both in the workplace and within the broader community. We believe that through our work, we can contribute to creating a more equitable and inclusive society.

Through these commitments, Zambelli International Consulting LLC fosters an environment where all individuals are treated with respect, dignity, and fairness. By embracing and valuing diversity, we create a stronger, more innovative, and more successful organization that benefits our employees, clients, and the communities in which we operate.

# 9. Respect for Human Rights

At Zambelli International Consulting LLC, we recognize that human rights are fundamental to the dignity and well-being of individuals. We are fully committed to upholding the principles of human rights in all aspects of our business operations, ensuring that our actions, decisions, and interactions respect and promote the rights of all individuals. We will not engage in or support any activities that contribute to human rights abuses, including but not limited to human trafficking, forced labor, child labor, discrimination, or exploitation.

### 9.1 Commitment to Ethical Business Practices

Zambelli International Consulting LLC adheres to the highest ethical standards and will ensure that our operations and business relationships comply with international human rights standards, such as those set out by the United Nations Universal Declaration of Human Rights (UDHR), the International Labour Organization (ILO) conventions, and the OECD Guidelines for Multinational Enterprises. We will also ensure that we abide by national and international laws that protect human rights and promote ethical business practices.

### 9.2 Supply Chain Monitoring and Risk Management

We will actively monitor and assess the practices of our suppliers, contractors, and other business partners to ensure that their operations align with our commitment to human rights. We will take all reasonable steps to identify and mitigate risks related to human rights abuses within our supply chains, including conducting due diligence on the sourcing of goods and services. We require our suppliers and partners to adhere to the same ethical standards and to operate in compliance with human rights laws. Any identified violations will be addressed promptly and, where necessary, remedial actions will be taken to ensure that our supply chains do not contribute to human rights abuses.

### 9.3 Zero Tolerance for Human Trafficking and Forced Labor

Zambelli International Consulting LLC has a zero-tolerance policy for human trafficking, forced labor, and any form of exploitation within our operations or supply chain. We are committed to ensuring that our business practices do not contribute to these crimes, and we will take decisive action against any employee, contractor, or partner found to be involved in such activities. We will comply with relevant international and national laws, such as the U.S. Trafficking Victims Protection Act (TVPA) and the UK Modern Slavery Act, and strive to promote awareness and compliance among our partners.

### 9.4 Protection of Vulnerable Populations

We recognize that certain groups, such as women, children, minorities, migrants, and indigenous peoples, may be particularly vulnerable to human rights abuses. We are committed to protecting the rights of these groups, both within our own operations and in our broader business interactions. We will strive to create an inclusive and equitable environment that respects the rights of all individuals, ensuring that no one is subjected to discrimination, exploitation, or violence.

### 9.5 Prohibition of Child Labor

Zambelli International Consulting LLC will not tolerate the use of child labor in any aspect of our business or supply chain. We will adhere to all applicable child labor laws and conventions and ensure that no children under the legal working age are employed in any capacity within our operations. We will actively monitor and enforce these standards to prevent any form of child exploitation.

### 9.6 Support for Labor Rights and Fair Working Conditions

We are committed to providing fair and safe working conditions for all our employees and partners. This includes ensuring that workers are treated with dignity and respect, receive fair wages, have access to safe working environments, and are not subjected to discrimination or exploitation. Zambelli International Consulting LLC supports the right of workers to freely associate, organize, and collectively bargain in accordance with local labor laws.

### 9.7 Anti-Discrimination Policy

We are fully committed to eliminating any form of discrimination or unfair treatment based on race, gender, age, disability, sexual orientation, religion, or any other protected characteristic in our workplace and business activities. We strive to create an environment where all individuals are treated equally and have the opportunity to contribute fully to our business and society without facing discrimination or bias.

### 9.8 Education and Awareness

Zambelli International Consulting LLC will provide education and training to our employees, contractors, and partners regarding human rights, ethical business practices, and our specific commitment to preventing human rights abuses. We will promote awareness of human rights issues and encourage our stakeholders to raise concerns about any potential human rights violations they may encounter in the course of their work.

# 9.9 Monitoring and Reporting Mechanisms

We will establish and maintain effective mechanisms for monitoring and reporting human rights issues within our operations and supply chains. Employees, clients, and partners will have access to confidential channels through which they can report any concerns related to human rights abuses. We will investigate any reported incidents thoroughly and take corrective action as necessary, ensuring that all individuals are treated fairly and justly in line with our human rights principles.

# 9.10 Transparency in Reporting

Zambelli International Consulting LLC is committed to transparency in our operations and will report on our human rights practices and progress annually. We will publish a statement on our website outlining the steps we have taken to respect and promote human rights in our business activities, including any challenges we have encountered and the measures we have implemented to address them.

### 10.1 Reduction of Environmental Impact

We will actively work to reduce the environmental footprint of our operations by implementing practices that limit pollution, conserve energy, and minimize waste. This includes efforts to reduce carbon emissions, improve resource efficiency, and enhance the sustainability of the products and services we provide. We will also strive to integrate sustainability into our corporate culture, encouraging our employees, partners, and stakeholders to adopt environmentally friendly practices in their professional and personal activities.

### **10.2 Waste Reduction and Resource Conservation**

Zambelli International Consulting LLC will adopt strategies that prioritize waste reduction and the efficient use of resources in our daily operations. We will minimize the consumption of paper, plastic, and other non-renewable materials by transitioning to digital solutions wherever possible and promoting the recycling and reuse of materials in our offices. We will also encourage our suppliers and partners to adopt similar sustainability practices to reduce their environmental impact.

### 10.3 Eco-Friendly Practices in Supply Chain Management

As part of our environmental responsibility, we will evaluate the environmental impact of our supply chain and seek to partner with vendors and suppliers who demonstrate a commitment to sustainability. We will work with our suppliers to ensure that their practices align with our environmental goals, and we will prioritize the purchase of products and services that are environmentally friendly, ethically sourced, and produced with minimal environmental harm.

### **10.4 Energy Efficiency and Carbon Footprint**

Zambelli International Consulting LLC is committed to reducing energy consumption and lowering our carbon footprint. We will implement energy-efficient measures in our office spaces, including the use of energy-efficient lighting, heating, and cooling systems, and encourage the use of renewable energy sources where feasible. We will also take steps to measure and report our carbon emissions and actively seek ways to reduce our environmental impact through offset programs, eco-friendly initiatives, and sustainability-focused technology.

### 10.5 Green Technologies and Innovation

We will stay informed about emerging green technologies and environmentally sustainable practices and incorporate them into our operations where possible. By adopting innovative solutions, we aim to create a more sustainable business model that not only enhances our environmental performance but also sets an example for others in our industry. This includes embracing digital transformation and minimizing paper-based processes to reduce our environmental footprint.

### **10.6 Promoting Environmental Awareness**

Zambelli International Consulting LLC recognizes that environmental sustainability is a shared responsibility. Therefore, we are committed to promoting environmental awareness among our employees, clients, and stakeholders. We will provide training and resources to help employees understand the environmental impact of their actions and encourage them to adopt sustainable habits both in and outside of the workplace. We will also engage with our clients and partners to raise awareness of the environmental impact of business decisions and help them make sustainable choices.

### 10.7 Compliance with Environmental Laws and Regulations

We will ensure that our business operations fully comply with all environmental laws, regulations, and standards at the local, national, and international levels. We will continuously monitor and evaluate the environmental regulations that apply to our business and take appropriate actions to ensure that we are meeting all legal requirements. This includes obtaining necessary permits, submitting environmental reports, and following the guidelines provided by regulatory agencies.

### 10.8 Continuous Improvement and Accountability

Zambelli International Consulting LLC is committed to continuously improving our environmental performance. We will regularly assess our environmental impact and set measurable targets to reduce our carbon footprint, waste production, and energy consumption. Through ongoing evaluation, we will ensure that we are meeting our sustainability goals and making meaningful progress toward environmental responsibility. Furthermore, we will hold ourselves accountable by publicly reporting on our environmental performance and sharing our achievements and challenges with stakeholders.

# **Commitment to Global Environmental Goals**

Zambelli International Consulting LLC aligns with global environmental initiatives, such as the United Nations Sustainable Development Goals (SDGs), particularly Goal 13 on climate action, Goal 12 on responsible consumption and production, and Goal 15 on life on land. We will strive to contribute to these global goals through our sustainability efforts and encourage others to do the same.

By adhering to these principles, Zambelli International Consulting LLC strives to be a responsible corporate citizen committed to protecting the planet and promoting sustainable practices within our industry and the communities in which we operate. Our dedication to environmental responsibility will continue to guide our business decisions and ensure that we contribute positively to the long-term well-being of the environment.

# 11. Protection of Intellectual Property

At Zambelli International Consulting LLC, we fully recognize and respect the importance of intellectual property (IP) and are committed to protecting the proprietary rights of our clients, employees, and partners. We understand that intellectual property is a valuable asset and play a key role in fostering innovation, creativity, and business success. As such, we will take all necessary steps to safeguard the intellectual property that belongs to our clients, employees, and partners, and ensure that it is not misused, disclosed, or exploited in any unauthorized manner.

### 11.1 Respect for Third-Party Intellectual Property

We will ensure that we do not infringe upon or misuse the intellectual property rights of third parties in the course of our business activities. This includes refraining from using or disclosing any third-party intellectual property without obtaining proper authorization or licensing agreements. We will also respect patents, trademarks, copyrights, trade secrets, and other forms of intellectual property that are owned by others.

### 11.2 Confidentiality of Proprietary Information

Zambelli International Consulting LLC will uphold strict confidentiality regarding any proprietary or confidential information entrusted to us by our clients, employees, or partners. We will ensure that any intellectual property shared with us is kept secure and is used only for the purposes for which it was provided. We will not disclose such proprietary information to any third parties without explicit consent from the owner, except where required by law or as necessary for business operations under confidentiality agreements.

### 11.3 Protection of Internal Intellectual Property

We will take steps to protect our own intellectual property, including but not limited to proprietary methodologies, tools, trademarks, logos, and other assets that are integral to our operations and business model. Zambelli International Consulting LLC will ensure that these assets are properly secured through the use of copyrights, trademarks, patents, or other appropriate legal mechanisms. We will actively monitor for potential infringements of our intellectual property and take appropriate legal action when necessary to enforce our rights.

### 11.4 Legal Compliance and Intellectual Property Agreements

In all instances where intellectual property is involved, Zambelli International Consulting LLC will ensure compliance with relevant intellectual property laws and regulations. This includes adhering to the principles of international IP treaties and local intellectual property legislation. We will implement clear and enforceable intellectual property agreements, such as non-disclosure agreements (NDAs), licensing agreements, and contracts with clients, employees, and third-party service providers to safeguard the intellectual property that is shared during the course of our business relationship.

### 11.5 Ethical Use of Technology and Creative Works

We will use technology, software, and creative works in an ethical manner, ensuring that we do not engage in activities such as piracy, unauthorized software use, or the distribution of counterfeit materials. Zambelli International Consulting LLC will prioritize the use of legitimate, licensed technology and software to ensure that we uphold the highest standards of intellectual property compliance.

### 11.6 Enforcement and Action Against Infringements

Zambelli International Consulting LLC is committed to taking immediate and appropriate action to address any instances of intellectual property infringement, whether those infringements are committed by internal or external parties. This includes working with legal experts and regulatory authorities to prevent and address any misuse of intellectual property, as well as seeking appropriate remedies through legal channels when necessary. We will also educate our employees, partners, and stakeholders about the importance of respecting intellectual property rights and the legal and ethical consequences of infringement.

### 11.7 Sharing Intellectual Property

In situations where intellectual property is shared between Zambelli International Consulting LLC and a third party, we will ensure that clear terms are established regarding the ownership, use, and protection of such intellectual property. This may include negotiating licenses, confidentiality agreements, or other contracts that set forth the rights and responsibilities of each party regarding the shared intellectual property.

### 11.8 Training and Awareness

Zambelli International Consulting LLC is committed to providing regular training to its employees and stakeholders on the importance of intellectual property protection. We will raise awareness about the legal and ethical considerations surrounding the use of intellectual property, ensuring that all individuals within the organization understand their responsibilities when handling intellectual property.

# 11.9 Innovation and Development of Intellectual Property

Zambelli International Consulting LLC encourages innovation and the development of new intellectual property within the company. We will provide an environment where employees, consultants, and partners can create and develop new ideas, solutions, and technologies, and we will ensure that any intellectual property generated as part of our work is protected and appropriately attributed. When intellectual property is developed in collaboration with clients or partners, we will negotiate clear agreements to ensure fair ownership and protection of these assets.

11.10 Acknowledgment of Third-Party Contributions: We acknowledge the valuable contributions of third-party entities that help us enhance our services and capabilities. When utilizing third-party intellectual property, including technology, research, or creative works, we will give proper acknowledgment, attribution, and compensation as required by licensing agreements, contracts, or legal obligations.

In summary, Zambelli International Consulting LLC is dedicated to upholding the highest standards of intellectual property protection. We will respect the intellectual property rights of all parties and take the necessary steps to protect our own proprietary assets. Through compliance with relevant laws and ethical standards, we aim to foster innovation, ensure fair use of intellectual property, and maintain a culture of integrity and respect in all aspects of our business.

### 12. Fair Competition

At Zambelli International Consulting LLC, we are committed to engaging in fair and ethical competition in the marketplace. We understand that healthy competition drives innovation, improves products and services, and benefits consumers and businesses alike. As such, we will operate in accordance with all applicable antitrust and competition laws to ensure that our business practices are in line with legal requirements and promote fairness within the industry.

### 12.1 Compliance with Antitrust Laws

We will adhere strictly to all local, national, and international antitrust and competition laws, including regulations that prohibit anti-competitive practices such as price-fixing, bid-rigging, market manipulation, and unfair trade practices. We will not engage in collusion or any form of coordinated action with competitors that could harm the integrity of the marketplace or restrict free competition.

### 12.2 Prohibition of Price-Fixing and Collusion

We will not enter into any agreements or understandings with competitors regarding the pricing of products or services, the allocation of markets, or the division of customers. Zambelli International Consulting LLC strongly opposes price-fixing, market division, or any form of agreement designed to limit competition, and we will take all necessary steps to ensure that such practices do not occur within our organization or business operations.

### 12.3 Promotion of Healthy Competition

We believe that competition should be based on merit, innovation, and the quality of services offered. We will continuously strive to provide our clients with superior services, innovative solutions, and value-driven approaches that differentiate us in the marketplace. Our goal is to maintain competitive pricing, high-quality service offerings, and ethical business practices that contribute positively to the industry as a whole.

### **12.4 Protection of Competitive Information**

While we embrace fair competition, we also recognize the importance of safeguarding proprietary and competitive information. We will respect the confidentiality of our competitors' trade secrets, pricing models, business strategies, and other confidential data. We will not engage in or support any form of corporate espionage, including the theft of trade secrets or unlawful acquisition of competitive information.

### 12.5 Transparency in Marketing and Advertising

Zambelli International Consulting LLC will ensure that all marketing and advertising practices are truthful, transparent, and do not mislead or deceive consumers or potential clients. We will avoid making false claims or exaggerations about our products, services, or capabilities that could unfairly harm competitors. All advertising materials, whether digital, print, or broadcast, will accurately reflect the true nature of the services we offer.

### 12.6 Avoidance of Unfair Business Practices

We will not engage in or condone unfair practices such as false advertising, misleading claims, or any form of deception that could undermine the competitive process. We will ensure that all business transactions are conducted ethically and in compliance with the relevant advertising and marketing laws.

### 12.7 Encouragement of Innovation and Creativity

Zambelli International Consulting LLC encourages the continuous development and enhancement of services, products, and solutions that foster competition through innovation. We will prioritize creativity and technological advancements that improve service delivery and contribute to the industry's evolution, allowing us to compete in a manner that benefits the wider marketplace and supports fair competition.

# 12.8 Reporting Anti-Competitive Behavior

If any employee, partner, or stakeholder becomes aware of actions that may violate competition laws or undermine fair competition, we encourage them to report such concerns through the appropriate channels. Zambelli International Consulting LLC will take any such reports seriously, investigate thoroughly, and take corrective actions if necessary to ensure compliance with applicable laws and ethical standards.

### 12.9 Training and Education on Antitrust Compliance

We will provide regular training and resources to our employees and consultants to ensure they understand antitrust laws and the importance of fair competition. This will help prevent unintentional violations of competition laws and promote an organizational culture that respects ethical business practices and fair competition.

### 12.10 Fair Competition in Contractual Relationships

In our contractual relationships, we will ensure that our agreements with clients, suppliers, and partners do not contain clauses or provisions that could unduly restrict competition or create unfair market conditions. We will avoid exclusive arrangements or other practices that could limit market access or prevent other businesses from competing fairly.

In conclusion, Zambelli International Consulting LLC is committed to fostering fair and ethical competition in all aspects of our business. We will comply with antitrust laws, refrain from any practices that undermine free competition, and actively promote a marketplace that encourages innovation, transparency, and merit-based success. Our dedication to fair competition will support the integrity of the industry and contribute to an environment where all businesses have the opportunity to succeed based on their abilities and contributions.

### 13. Responsible Marketing and Communication

At Zambelli International Consulting LLC, we are committed to upholding the highest standards of honesty, integrity, and transparency in all our marketing and communication efforts. We recognize the significant impact that our marketing materials, advertising, and public statements have on our reputation and the trust placed in us by our clients, partners, and the public. Therefore, we pledge to ensure that every communication we issue accurately reflects our company values and ethical principles, and aligns with the best practices in responsible marketing.

# 13.1 Truthfulness in Advertising

We will ensure that all advertising, promotional content, and public statements accurately represent our services, capabilities, and commitments. We will avoid making exaggerated claims or promises that cannot be substantiated. All marketing messages will be clear, truthful, and easy to understand, providing potential clients with a true representation of what they can expect from our services.

### 13.2 No Misleading or Deceptive Practices

Zambelli International Consulting LLC will never engage in deceptive marketing tactics or present false or misleading information to clients, prospects, or the public. We will not engage in "bait-and-switch" practices or misrepresent the value, benefits, or quality of our services. All marketing practices will be designed to promote honest and ethical business conduct, fostering trust with all stakeholders.

### 13.3 Accurate and Clear Communication

We will ensure that all information we share through our marketing, website, and other communication channels is presented clearly, with accuracy, and without ambiguity. Whether we are communicating with clients, partners, regulators, or the general public, our communications will be easy to understand, relevant, and helpful. We will avoid jargon or overly complex language that may obscure the true nature of our messages.

### **13.4 Ethical Content Creation**

We commit to ethical content creation in all of our marketing efforts. We will avoid using content that infringes on the intellectual property rights of others, including copyrights, trademarks, and patents. We will give proper attribution when referencing third-party materials and ensure that the content we create is respectful and culturally sensitive.

### 13.5 Compliance with Advertising Regulations

Zambelli International Consulting LLC will adhere to all applicable advertising regulations and industry guidelines, including those related to online advertising, privacy, and data protection. We will comply with all relevant laws, including the GDPR in Europe, the CCPA in California, and other applicable regulations to ensure our marketing practices respect the privacy and rights of individuals. Our marketing strategies will always align with both legal and ethical standards, and we will continuously monitor changes to advertising laws to remain compliant.

### 13.6 Clear Representation of Risks

When providing information about services that involve risks, such as financial advisory services or investment opportunities, we will clearly and accurately represent the potential risks involved. We will ensure that our marketing materials provide balanced and realistic portrayals of the services, including any potential downside or risks. Transparency in risk communication will be a cornerstone of our responsible marketing efforts.

### 13.7 Honesty in Testimonials and Endorsements

We will ensure that all testimonials, case studies, and client endorsements used in our marketing materials are truthful and represent genuine experiences with our services. We will not fabricate or manipulate testimonials, and any compensation provided for endorsements will be disclosed transparently. Any success stories or achievements shared will be based on real results and accurately presented.

### 13.8 Protecting Client Privacy in Marketing

Zambelli International Consulting LLC will not use any personal information obtained from our clients for marketing purposes without their explicit consent. We will respect client privacy and ensure that their personal data is not exploited for promotional purposes. Additionally, we will honor all confidentiality agreements and legal obligations related to client information, especially when featuring client success stories or testimonials in our marketing materials.

### 13.9 Social Media Responsibility

We will ensure that all social media activity conducted on behalf of Zambelli International Consulting LLC adheres to the same ethical standards as other forms of marketing communication. Our presence on social media will be respectful, responsible, and aligned with our company values. We will engage with our audience in an honest, professional, and transparent manner, responding to feedback in a constructive and respectful way.

### 13.10 Measuring Effectiveness and Integrity

We will regularly assess and evaluate the effectiveness of our marketing strategies, both in terms of reaching our audience and ensuring that our practices remain ethical. We will take steps to measure the impact of our marketing campaigns on the reputation and trustworthiness of Zambelli International Consulting LLC and adjust strategies as needed to align with our ethical standards and commitment to responsible communication.

n conclusion, Zambelli International Consulting LLC's marketing and communication practices will always prioritize honesty, transparency, and ethical conduct. We will work diligently to promote our services in a way that is clear, truthful, and reflective of our values. By doing so, we aim to build lasting relationships based on trust, integrity, and mutual respect with our clients, stakeholders, and the wider community.

### 14. Due Diligence and Risk Management

At Zambelli International Consulting LLC, we are committed to maintaining the highest standards of due diligence and risk management in every aspect of our business operations. We understand that the ability to make well-informed decisions is fundamental to the success and sustainability of our company, and therefore, we prioritize assessing and managing risks in every business venture, partnership, and decision we make.

### 14.1 Comprehensive Due Diligence

Before entering into any new business relationship, partnership, or venture, we will conduct thorough due diligence to ensure that we have a complete understanding of all relevant risks, legal obligations, and potential challenges. This includes investigating financial stability, compliance with relevant laws and regulations, and assessing the reputations of potential partners or collaborators. Our due diligence process will ensure that every decision we make is based on accurate, complete, and up-to-date information.

### 14.2 Identification of Risks

Zambelli International Consulting LLC will identify, evaluate, and document all potential risks associated with a business decision, whether it be financial, operational, reputational, or legal. We will continuously monitor potential risks in our business environment and make adjustments to mitigate any negative impacts. This process includes assessing external factors such as economic shifts, regulatory changes, and market fluctuations, as well as internal factors such as operational weaknesses or employee-related risks.

### 14.3 Risk Mitigation and Control Measures

Once risks have been identified, Zambelli International Consulting LLC will implement appropriate measures to minimize or mitigate those risks. This includes developing and adopting strategies that reduce the likelihood of risks occurring and preparing contingency plans to address potential adverse scenarios. We will also establish internal controls and monitoring systems to ensure ongoing risk management and prompt responses to any emerging risks.

### 14.4 Financial and Legal Risk Assessment

Financial risk assessments are a critical part of our due diligence process, especially when considering investments, partnerships, or new business ventures. We will ensure that all financial transactions are thoroughly evaluated for risk, including credit risks, market volatility, liquidity, and return on investment. Legal risks will also be carefully examined, ensuring compliance with all applicable laws, regulations, and contractual obligations to protect the company from potential litigation or other legal complications.

### 14.5 Ongoing Monitoring and Review

Risk management is an ongoing process, and as such, Zambelli International Consulting LLC will continually monitor business activities, investments, and partnerships. We will review and assess risks periodically, making adjustments and improvements to our strategies as necessary. This dynamic approach will help us proactively identify emerging risks and implement corrective actions before they can harm the organization or its stakeholders.

### 14.6 Stakeholder Communication

Transparency in risk management is critical to maintaining trust with our clients, partners, and stakeholders. Zambelli International Consulting LLC will maintain open lines of communication regarding potential risks and our mitigation efforts. We will inform our clients and stakeholders of any significant risks that may impact the business or their interests, ensuring that they are kept informed and involved in the decision-making process when appropriate.

### 14.7 Ethical Considerations in Risk Management

While managing financial, operational, and legal risks is essential, we are equally committed to addressing ethical risks that may arise. Zambelli International Consulting LLC will never compromise its ethical standards in the pursuit of business opportunities, and will proactively identify any risks that may compromise the company's integrity, reputation, or adherence to our ethical code. We will ensure that all risk mitigation strategies are aligned with our ethical principles and that no decision is made that could harm our reputation or the trust placed in us by clients, partners, or the public.

### 14.8 Training and Awareness

To support our commitment to due diligence and risk management, we will provide ongoing training for employees and stakeholders to raise awareness about risk identification and mitigation practices. This will ensure that all individuals within the organization understand the importance of risk management and can contribute to maintaining the company's ethical standards while protecting the interests of the organization and its stakeholders.

# 14.9 External Expertise

In cases where specialized knowledge or expertise is required to assess and manage risks effectively, Zambelli International Consulting LLC will seek external experts or consultants to assist in the due diligence process. We will collaborate with legal, financial, and industry experts as necessary to ensure that all risks are properly identified, assessed, and mitigated, and that the company is well-positioned to make sound, informed decisions.

In conclusion, Zambelli International Consulting LLC is committed to a rigorous and ethical approach to due diligence and risk management. By carefully assessing and mitigating risks, we aim to protect the interests of the company, our clients, partners, and stakeholders, ensuring the long-term success and sustainability of our operations.

# 15. Data Protection and Cybersecurity

At Zambelli International Consulting LLC, we recognize the critical importance of safeguarding sensitive and personal data in an increasingly interconnected digital world. We are committed to protecting the privacy and security of the information entrusted to us by our clients, employees, and partners. In line with our core values of integrity, professionalism, and accountability, we have implemented a comprehensive and proactive approach to data protection and cybersecurity to mitigate risks and prevent unauthorized access, data breaches, or cyberattacks.

### 15.1 Protection of Sensitive Data

We will take all necessary precautions to safeguard sensitive data from unauthorized access, alteration, disclosure, or destruction. This includes ensuring the confidentiality of both personal and corporate data, whether stored in physical or digital formats. Our data protection measures are designed to meet or exceed the highest industry standards, providing the utmost security for the information entrusted to us.

### 15.2 Cybersecurity Framework

Zambelli International Consulting LLC will implement a robust cybersecurity framework that aligns with internationally recognized standards, such as ISO/IEC 27001, NIST Cybersecurity Framework, and other applicable security protocols. Our framework will include multi-layered security measures designed to prevent, detect, and respond to cyber threats promptly. This includes firewalls, encryption, intrusion detection systems, and secure access controls to protect against external and internal threats.

### 15.3 Data Encryption

We will utilize encryption technologies to protect sensitive data both at rest and in transit. Data encryption ensures that even if unauthorized access occurs, the information remains unreadable and secure. This is a critical measure to protect data during transmission over public networks, as well as for data stored on our servers, databases, and backup systems.

### 15.4 Access Control and Authentication

We will implement strict access controls to ensure that only authorized individuals have access to sensitive data. Access will be granted based on roles, ensuring that employees, contractors, and third-party partners can only access the information necessary to perform their duties. We will use strong authentication mechanisms, including multi-factor authentication (MFA), to verify the identity of users and prevent unauthorized access to critical systems and data.

### 15.5 Regular Security Audits and Assessments

We will conduct regular security audits, penetration tests, and vulnerability assessments to identify and address potential weaknesses in our systems. These evaluations will help ensure that our cybersecurity defenses remain effective in the face of evolving threats. We will work with external experts, when necessary, to conduct comprehensive security assessments and keep our systems up to date with the latest security patches and best practices.

### 15.6 Data Backup and Disaster Recovery

Zambelli International Consulting LLC will implement a comprehensive data backup and disaster recovery plan to ensure that in the event of a cyber incident, natural disaster, or system failure, data can be quickly restored. Our data backup systems will be regularly tested and updated to ensure their effectiveness, and we will ensure that disaster recovery procedures are in place to minimize any potential disruption to business operations.

### 15.7 Compliance with Privacy Laws and Regulations

We will comply with all applicable data protection and privacy laws, including GDPR, CCPA, and any other relevant regulations governing the collection, processing, storage, and transfer of personal data. Our privacy policies and data protection measures will be continually reviewed and updated to ensure compliance with these laws, as well as any changes in regulatory requirements. We will ensure that our clients and stakeholders are informed of their rights and how their data is being used, processed, and protected.

# 15.8 Employee Training and Awareness

We will provide regular training to employees on data protection and cybersecurity best practices. This includes educating staff on how to recognize and respond to phishing attacks, social engineering, and other cybersecurity threats. We will also ensure that employees understand the importance of safeguarding client and company data and adhere to the company's security protocols at all times.

### 15.9 Third-Party Vendors and Partners

Zambelli International Consulting LLC will ensure that any third-party vendors or partners with whom we share sensitive or personal data are also committed to implementing robust cybersecurity measures. We will conduct due diligence to verify that these partners comply with relevant data protection standards, and we will include contractual clauses requiring them to maintain appropriate security measures and notify us in the event of a data breach.

## 15.10 Incident Response and Notification

In the event of a data breach or cybersecurity incident, we will act swiftly to contain the situation, assess the impact, and mitigate any damage. We will notify affected individuals and relevant authorities promptly, in accordance with applicable legal and regulatory requirements. Our incident response team will follow an established protocol to manage the incident, conduct a root cause analysis, and implement corrective measures to prevent similar events in the future.

### **15.11 Continuous Improvement**

Zambelli International Consulting LLC will continually review and improve our data protection and cybersecurity policies to keep pace with new threats and technological advancements. We will actively monitor the cybersecurity landscape, adapt our security protocols to mitigate emerging risks, and maintain a proactive approach to protecting sensitive data. This commitment to continuous improvement will help ensure that we remain resilient against evolving threats and that our clients, employees, and partners can trust us with their valuable information.

In conclusion, Zambelli International Consulting LLC is dedicated to maintaining the highest standards of data protection and cybersecurity, ensuring that sensitive information remains secure and compliant with relevant regulations. By implementing robust security measures, conducting regular audits, and staying informed of emerging threats, we will continue to protect the integrity and confidentiality of all data entrusted to us

# 16. Client-Centered Approach

At Zambelli International Consulting LLC, we firmly believe that the success of our business is directly linked to the satisfaction and success of our clients. As such, we place the needs and interests of our clients at the center of all our operations. Our goal is to provide every client with professional, unbiased, and value-driven solutions that are tailored to their unique requirements and challenges.

# **16.1 Understanding Client Needs**

We will actively listen to our clients to fully understand their objectives, needs, and concerns. By cultivating open communication, we aim to develop a deep understanding of their expectations and business goals, ensuring that the solutions we propose are aligned with their vision. We will ensure that our clients feel heard and valued, fostering strong relationships based on trust and mutual respect.

# **16.2 Delivering Value-Driven Solutions**

Zambelli International Consulting LLC is committed to offering solutions that add real value to our clients' operations. We will approach every project with the goal of enhancing our clients' business outcomes, whether through operational efficiency, strategic guidance, or financial growth. Our solutions will be evidence-based, data-driven, and designed to achieve the best possible results, ensuring that our clients achieve their objectives in a sustainable and effective manner.

# **16.3 Transparency in Communication**

We will maintain clear, transparent, and consistent communication with our clients at all stages of the engagement. Our clients will be kept informed of progress, timelines, and any potential challenges, ensuring that they can make informed decisions throughout the process. We will also be open and transparent about our pricing structures, avoiding any hidden fees or surprises, and ensuring that our clients understand the value they are receiving for their investment.

### 16.4 Professionalism and Unbiased Advice

Our consultants will provide advice that is always professional, unbiased, and in the best interest of our clients. We will refrain from any practices that could lead to conflicts of interest or recommendations driven by external pressures. We will only propose solutions that we believe are genuinely in the best interest of our clients, adhering to the highest standards of professional ethics and integrity.

# **16.5 Timeliness and Efficiency**

- We understand that our clients' time is valuable, and as such, we are committed to delivering services in a timely and efficient manner. We will work diligently to meet deadlines, manage expectations, and provide solutions that are both effective and prompt. Our clients will never feel neglected or forgotten; we strive to consistently exceed their expectations and provide a seamless experience.
- 16.6 Confidentiality and Privacy: We will safeguard all sensitive and confidential information entrusted to us by our clients, ensuring that it is handled with the utmost care and in compliance with the highest security standards. Clients can trust that their proprietary data and business strategies are secure with us, and that we will never disclose their confidential information without their consent, except when required by law.
- 16.7 Client Feedback and Continuous Improvement: We value feedback from our clients and will actively seek their input to improve our services. Client feedback is essential to our continuous improvement efforts, helping us to refine our processes and ensure that we are always aligned with their evolving needs. We will regularly engage with our clients to ensure their satisfaction and will make any necessary adjustments to meet their expectations more effectively.
- 16.8 Long-Term Partnerships: At Zambelli International Consulting LLC, we aim to build long-term partnerships with our clients, grounded in trust, mutual respect, and shared goals. We recognize that our clients' success is also our success, and we are dedicated to fostering lasting relationships that extend beyond individual projects. We will continue to offer ongoing support, advice, and solutions to help our clients grow and thrive in their respective industries.
- In summary, our client-centered approach ensures that we remain fully committed to understanding, meeting, and exceeding the needs and expectations of our clients. By providing tailored, high-quality solutions, fostering open communication, and consistently delivering value, we aim to establish and maintain lasting partnerships that contribute to the long-term success of both our clients and our business.

### 17. Commitment to Quality

At Zambelli International Consulting LLC, we believe that quality is the cornerstone of our business. Our commitment to providing the highest quality services is reflected in every aspect of our operations, from initial client interactions to the delivery of solutions and ongoing support. We understand that our clients rely on us to provide not only effective solutions but also exceptional service that enhances their business outcomes.

# 17.1 Consistent Quality Standards

We are dedicated to maintaining consistent quality across all of our services. This includes adhering to industry best practices, aligning with regulatory requirements, and ensuring that our work is accurate, comprehensive, and reliable. Our clients can expect a high standard of performance in every project, regardless of its scale or complexity. We measure our work against rigorous criteria to ensure it is always aligned with our clients' needs and the highest industry benchmarks.

### **17.2 Continuous Improvement**

Quality is not a static achievement, but an ongoing process of refinement and enhancement. Zambelli International Consulting LLC is committed to continuously evaluating and improving the quality of our services. We regularly assess our processes, review feedback from clients, and stay updated on the latest industry trends to ensure that we deliver solutions that are not only relevant but also at the forefront of innovation and efficiency. We value continuous learning and professional development as tools to improve our service delivery.

### 17.3 Tailored Solutions for Client Success

We recognize that every client has unique needs, challenges, and goals. Therefore, we are committed to tailoring our services to meet these specific requirements, ensuring that the solutions we provide are not only effective but also directly aligned with the client's vision and business objectives. Our focus is on delivering results that make a meaningful impact, improving the client's operations, and driving long-term success.

### 17.4 Feedback and Adaptation

We actively seek feedback from our clients to gauge the effectiveness of our services and to identify areas for improvement. Our clients' insights are essential to ensuring that we continuously adapt and refine our approaches. We value constructive criticism and see it as an opportunity to further elevate the quality of our work. By listening to our clients and adapting based on their input, we can consistently exceed their expectations.

# 17.5 Rigorous Internal Quality Assurance

To ensure the highest standards of quality, we implement rigorous internal quality control measures. Our team follows established procedures to evaluate the quality of every project and service before it is delivered to clients. This includes detailed reviews, testing, and validation processes to ensure that all work meets the required standards. We take full responsibility for the work we deliver and will make necessary adjustments to correct any issues promptly.

# 17.6 Investing in Tools and Technology

Zambelli International Consulting LLC is committed to investing in the latest tools, technology, and methodologies that enhance the quality of our services. We understand that the business environment is continuously evolving, and to remain competitive, we must stay ahead of technological advancements and industry developments. Our investments in advanced systems and tools empower us to deliver more precise, efficient, and impactful solutions to our clients.

# 17.7 Accountability for Quality Outcomes

Our team members are individually accountable for ensuring the quality of their work. We foster a culture of ownership, where every employee understands their role in contributing to the overall quality of the services we provide. Each member of our team is expected to uphold the highest standards in their area of responsibility, and we hold ourselves accountable for delivering results that not only meet but exceed client expectations.

### 17.8 Client Satisfaction as a Priority

Ultimately, the measure of our success is the satisfaction of our clients. We are committed to ensuring that each client experience reflects the highest levels of quality, professionalism, and service. Through our unwavering commitment to excellence, we aim to build lasting relationships with our clients based on trust and satisfaction.

In conclusion, Zambelli International Consulting LLC's commitment to quality is central to our ethos and operations. We are dedicated to providing the highest level of service to our clients by maintaining rigorous quality standards, continuously improving our processes, and ensuring that every solution is tailored to our clients' specific needs. Through a relentless focus on excellence, we aim to exceed expectations and deliver exceptional value at every stage of our engagement with clients.

### 18. Health and Safety

At Zambelli International Consulting LLC, the well-being of our employees, clients, and partners is of paramount importance. We are committed to providing a work environment that is not only conductive to productivity but also ensures the health and safety of everyone involved in our operations. Our goal is to foster a workplace that is free from hazards, promoting a culture of care and responsibility for all individuals.

### 18.1 Compliance with Health and Safety Regulations

We will fully comply with all local, national, and international health and safety regulations that apply to our business operations. This includes adherence to laws and standards governing workplace safety, hygiene, and employee well-being. We will regularly review and update our policies to ensure compliance with changing laws and best practices, ensuring that our work environment remains secure and legally compliant.

### **18.2 Risk Prevention and Hazard Management**

Zambelli International Consulting LLC will take proactive measures to identify, assess, and mitigate risks in the workplace. We are committed to maintaining a hazard-free environment, conducting regular safety audits, and ensuring that all identified risks are addressed through corrective actions. We will also ensure that employees and partners are educated about potential workplace hazards and given the tools to prevent accidents and injuries.

### 18.3 Health and Well-Being of Employees

We recognize the importance of promoting the health and well-being of our employees, both physically and mentally. We will encourage a healthy work-life balance and provide resources to support the mental, physical, and emotional well-being of our team. This includes access to health programs, wellness initiatives, and support services for employees who may need assistance. We are committed to creating a supportive environment where employees feel valued and can thrive.

### 18.4 Workplace Cleanliness and Hygiene

We will maintain a clean and hygienic working environment at all times. Regular cleaning, sanitation, and maintenance protocols will be established to ensure that our facilities are consistently safe for use. Proper waste management and cleanliness standards will be strictly followed to minimize the risk of health hazards, and all necessary precautions will be taken to prevent contamination, particularly in areas with high employee or visitor traffic.

### 18.5 Emergency Procedures and First Aid

We will establish clear emergency protocols and procedures to respond swiftly and effectively in the event of an emergency. This includes training employees in first aid, emergency response, and evacuation plans. Adequate first-aid supplies will be readily available in all workspaces, and employees will be informed about emergency exits and procedures. We aim to ensure that our employees are prepared to handle any situation that may arise.

### **18.6 Mental Health and Stress Management**

Zambelli International Consulting LLC is committed to supporting the mental health of our employees. We understand that work-related stress can affect overall well-being, and we strive to create a supportive atmosphere that fosters open communication and stress management. We will provide resources and counseling services to help employees manage stress and maintain a healthy mindset while at work.

# 18.7 Employee Training and Awareness

We will provide regular training and awareness programs on health and safety standards, ensuring that employees are equipped with the knowledge and skills to contribute to a safe working environment. Training will include information on how to identify and address potential hazards, how to use safety equipment, and the importance of following established health and safety procedures. All employees will be encouraged to report unsafe practices or conditions and will be provided with the necessary channels to do so without fear of retaliation.

### 18.8 Commitment to Visitors and Contractors

In addition to safeguarding the health and safety of our employees, we will ensure that all visitors, contractors, and other external individuals who enter our facilities are treated with the same level of care and consideration. We will make certain that visitors are briefed on health and safety protocols and that necessary precautions are taken to protect them while they are on-site.

### 18.9 Continual Improvement in Health and Safety Practices

Zambelli International Consulting LLC is committed to continually improving its health and safety standards. We will regularly review and update our health and safety policies and procedures to ensure that they meet evolving needs, challenges, and industry standards. Feedback from employees and partners will be used to assess the effectiveness of our health and safety practices, and necessary improvements will be implemented in a timely manner.

### 18.10 Reporting and Addressing Health and Safety Concerns

Employees are encouraged to report any health or safety concerns without fear of retaliation. We will establish clear reporting mechanisms to ensure that concerns are raised and addressed quickly. Zambelli International Consulting LLC will investigate all reported concerns thoroughly and take appropriate action to resolve any issues that may pose a threat to health or safety.

In conclusion, the health and safety of our employees, clients, and partners are integral to our business operations. Zambelli International Consulting LLC is committed to providing a safe, healthy, and supportive work environment where everyone can perform to the best of their abilities without fear of harm. By adhering to the highest health and safety standards and continually improving our practices, we aim to foster a secure, thriving workplace that prioritizes the well-being of all individuals.

### 19. Protection Against Harassment

Zambelli International Consulting LLC is deeply committed to creating and maintaining a work environment that is free from any form of harassment, bullying, or abuse. We believe that every individual deserves to work in a space where they are treated with respect, dignity, and professionalism. Any form of harassment, whether it be physical, verbal, psychological, or sexual, is strictly prohibited within our organization. Employees, contractors, clients, and associates are expected to interact with each other in a way that fosters mutual respect and cooperation.

### 19.1 Definition of Harassment

Harassment can include, but is not limited to, offensive comments, jokes, or conduct based on an individual's race, gender, ethnicity, religion, sexual orientation, disability, or any other characteristic protected by law. It can also involve any unwelcome behavior that creates a hostile or intimidating work environment. Zambelli International Consulting LLC defines harassment as any unwelcome or inappropriate conduct that interferes with an individual's ability to work, or creates an intimidating, hostile, or offensive environment.

### **19.2 Zero Tolerance Policy**

We maintain a strict zero-tolerance policy for harassment of any kind. Any employee, contractor, or partner who engages in harassment will face disciplinary action, which may include termination of employment or partnership, depending on the severity of the incident. We are committed to taking swift and appropriate actions to address any harassment issues and prevent recurrence.

### 19.3 Reporting Mechanisms

We encourage any employee or associate who experiences or witnesses harassment to report the incident immediately through confidential channels. Zambelli International Consulting LLC will provide a safe, non-retaliatory environment for individuals to report concerns. We will investigate all reports of harassment thoroughly, with sensitivity and respect for the individuals involved. All complaints will be handled with the utmost confidentiality and will be addressed promptly.

### 19.4 Support for Victims of Harassment

Individuals who report harassment will receive support throughout the process. This may include access to counseling services, a safe space for discussion, and any necessary adjustments to their work environment to ensure their well-being and safety. Zambelli International Consulting LLC will take measures to prevent any form of retaliation against those who report harassment in good faith.

# 19.5 Training and Awareness

We will provide regular training for employees and associates on the importance of maintaining a harassment-free work environment. This training will cover what constitutes harassment, how to recognize it, how to report it, and the consequences of engaging in harassing behavior. Employees will be educated about their rights and responsibilities in ensuring a safe and respectful workplace for everyone.

### 19.6 Prevention and Proactive Measures

In addition to responding to complaints, Zambelli International Consulting LLC is proactive in preventing harassment by promoting a culture of respect, inclusivity, and understanding. We will conduct regular assessments of our workplace culture to identify and address any potential issues before they escalate. Our leadership team will lead by example, demonstrating respectful and professional behavior that reinforces the organization's values of respect and fairness.

### 19.7 Investigations and Corrective Actions

Any allegations of harassment will be investigated promptly and impartially. Zambelli International Consulting LLC will take appropriate corrective actions to ensure that the individual responsible for harassment is held accountable. Depending on the nature and severity of the incident, these actions may range from counseling and training to termination of employment or contract.

# 19.8 Commitment to a Respectful Work Environment

Zambelli International Consulting LLC remains dedicated to cultivating a work environment where every individual feels safe, respected, and valued. We understand that harassment undermines productivity, employee morale, and overall well-being. Our commitment is to ensure that our workplace is conducive to collaboration, innovation, and mutual respect.

### 19.9 Confidentiality and Privacy

We will respect the confidentiality of all parties involved in harassment claims. Any information shared during the investigation process will be treated with the highest level of privacy and care, ensuring that personal details are disclosed only to those directly involved in addressing the issue. All parties will be informed of the outcome of the investigation, with due respect for their privacy.

### 19.10 Responsibility of All Employees

Every employee, contractor, and partner has a responsibility to contribute to a harassment-free workplace. We encourage individuals to speak up if they witness harassment and to support colleagues in maintaining a respectful environment. Zambelli International Consulting LLC is committed to providing resources and support to ensure that everyone is empowered to take action against harassment.

In conclusion, Zambelli International Consulting LLC is unwavering in its commitment to providing a work environment that is free from harassment, bullying, or abuse. We believe that a culture of respect, inclusivity, and support is essential for the well-being of our employees and the success of our organization. Our zero-tolerance policy on harassment, combined with clear reporting mechanisms and support structures, ensures that we address and prevent harassment in all its forms.

- 20. Innovation and Continuous Improvement
- At Zambelli International Consulting LLC, we believe that innovation is key to maintaining a competitive edge and delivering exceptional value to our clients. We are committed to fostering a culture where creative thinking, continuous improvement, and the exploration of new ideas are actively encouraged. Innovation is not just about adopting the latest technologies, but also about finding new and more efficient ways to enhance our services, streamline our operations, and strengthen our business strategy.
- 20.1 Commitment to Creativity and New Ideas: We recognize that the best solutions often come from thinking outside the box. Employees at all levels are encouraged to share new ideas, challenge the status quo, and explore innovative approaches to address the evolving needs of our clients and stakeholders. We believe that a collaborative environment where diverse perspectives are valued will lead to creative breakthroughs that can transform our services and offerings.
- 20.2 Embracing Change and Adaptability: We are committed to staying ahead of industry trends and technological advancements by being adaptable and open to change. Zambelli International Consulting LLC encourages flexibility in our processes, structures, and strategies, ensuring that we can quickly respond to new opportunities or challenges in the marketplace. By embracing change, we can better meet the demands of our clients and maintain our position as a leader in the consulting industry.
- 20.3 Focus on Efficiency and Effectiveness: Innovation goes beyond new ideas; it also involves improving the efficiency and effectiveness of our existing operations. We are dedicated to continually assessing our internal processes and procedures to identify areas for improvement. This includes eliminating redundancies, optimizing workflows, and implementing best practices that improve both the quality of our work and the value we deliver to clients.
- 20.4 Encouraging Employee Development and Learning: To drive innovation and continuous improvement, Zambelli International Consulting LLC invests in the professional development of our employees. We provide opportunities for training, skills development, and exposure to new technologies and methodologies. By empowering our employees with the knowledge and tools they need to succeed, we ensure that they are capable of driving innovative solutions and implementing improvements across all aspects of the business.
- 20.5 Client-Centered Innovation : Innovation at Zambelli International Consulting LLC is always aligned with the needs and expectations of our clients. We focus on developing new solutions that enhance the customer experience, streamline service delivery, and provide added value. Whether through the adoption of advanced technologies, the creation of customized services, or the continuous enhancement of our service offerings, we strive to deliver innovative solutions that make a tangible impact on our clients' success.
- 20.6 Encouraging Collaboration and Cross-Functional Teams: Innovation thrives in an environment where collaboration is encouraged. Zambelli International Consulting LLC promotes cross-functional teams that bring together diverse skill sets, knowledge, and perspectives to develop innovative solutions. By working together, we can tackle complex challenges more effectively, leverage the expertise of various departments, and bring new ideas to life.
- 20.7 Performance Metrics and Continuous Evaluation: To ensure that innovation and improvements are achieving the desired results, we regularly evaluate the performance of our initiatives. Key performance indicators (KPIs) are used to measure progress and identify areas for further development. This continuous evaluation allows us to refine our strategies, assess the effectiveness of new ideas, and ensure that the outcomes align with our strategic objectives and client expectations.
- 20.8 Open Feedback Culture: Zambelli International Consulting LLC fosters a culture of open feedback, where constructive criticism and suggestions for improvement are welcomed. We believe that feedback is essential for personal and professional growth and can be a catalyst for innovation. Employees are encouraged to share their thoughts and ideas for improvement, and we actively listen to feedback from clients and stakeholders to enhance our services and operations.
- 20.9 Research and Development: As part of our commitment to innovation, we allocate resources to research and development efforts aimed at exploring new technologies, methodologies, and service offerings. Whether it's developing new consulting strategies, implementing cutting-edge tools, or staying ahead of regulatory changes, we ensure that we are constantly evolving and improving our ability to meet client needs in a rapidly changing environment.
- 20.10 Sustainability and Long-Term Innovation :Innovation at Zambelli International Consulting LLC is not just about short-term gains; we are also focused on long-term solutions that promote sustainable growth and responsible business practices. Our innovation efforts take into consideration environmental sustainability, social responsibility, and ethical business practices to ensure that the solutions we develop contribute to both business success and societal well-being.
- 20.11 Encouraging Risk-Taking within Safe Boundaries: While we value innovation, we also understand the importance of managing risks responsibly. We encourage our employees to take calculated risks, experiment with new approaches, and learn from both successes and failures. However, these risks will always be assessed within the context of protecting the company's values, resources, and long-term goals.
- In conclusion, Zambelli International Consulting LLC views innovation and continuous improvement as integral to our mission and vision. By fostering a culture of creativity, adaptability, and ongoing development, we aim to consistently enhance the services we offer and provide value-driven solutions that meet the ever-changing needs of our clients. Our commitment to innovation ensures that we stay competitive, efficient, and able to deliver exceptional results in all aspects of our business.

### 21. Reporting Violations and Whistleblower Protections

At Zambelli International Consulting LLC, we are committed to maintaining the highest standards of integrity and accountability. To ensure that ethical violations, illegal activities, or misconduct are promptly identified and addressed, we encourage employees, partners, clients, and stakeholders to report any concerns they may have in confidence. We have implemented clear procedures for reporting violations, ensuring that whistleblowers can come forward without fear of retaliation or adverse consequences.

# 21.1 Confidentiality and Protection of Whistleblowers

We recognize the importance of safeguarding the identity of individuals who report misconduct. All reports made through our whistleblower channels will be treated with the utmost confidentiality, and any information regarding the individual making the report will only be disclosed when absolutely necessary and with the individual's consent. Zambelli International Consulting LLC is committed to protecting whistleblowers from retaliation, ensuring that they are not subject to any adverse treatment or negative consequences as a result of their decision to report concerns.

# **21.2 Reporting Channels**

We have established accessible and secure reporting channels for employees, partners, clients, and other stakeholders to report any ethical violations, legal infractions, or concerns related to misconduct. These channels may include anonymous reporting options, email addresses, designated hotlines, and in-person meetings with compliance officers. We will ensure that these reporting channels are clearly communicated to all employees and stakeholders, and they will remain available and accessible at all times.

### 21.3 No Tolerance for Retaliation

Zambelli International Consulting LLC has a strict no-retaliation policy. No employee or individual will face retaliation, discrimination, or any negative consequences for reporting violations or misconduct in good faith. This includes protection against any form of job-related retaliation, such as termination, demotion, or any other form of adverse treatment that could harm an individual's career or well-being. We will take all necessary steps to prevent retaliation and ensure that whistleblowers feel safe and supported throughout the reporting process.

# 21.4 Investigation and Resolution of Violations

All reports of misconduct or ethical violations will be thoroughly and promptly investigated by appropriate personnel. Zambelli International Consulting LLC is committed to conducting impartial investigations, respecting the rights of all parties involved, and addressing violations in a fair and transparent manner. If the investigation reveals that a violation has occurred, appropriate corrective or disciplinary actions will be taken to remedy the situation, prevent further misconduct, and ensure compliance with our ethical standards.

# 21.5 Training and Awareness

To promote a culture of openness and accountability, we will provide regular training to our employees, partners, and stakeholders about the importance of reporting violations and misconduct. This training will emphasize the company's commitment to ethical behavior and ensure that everyone understands their responsibility to report any concerns. We will also highlight the available reporting channels and the protections afforded to whistleblowers.

### 21.6 Commitment to Ethical Behavior

By encouraging reporting of violations and protecting whistleblowers, we reaffirm our commitment to upholding the highest ethical standards in all aspects of our business operations. Zambelli International Consulting LLC believes that creating an environment where ethical concerns can be raised freely and without fear is essential to maintaining a culture of trust, integrity, and accountability. We are dedicated to ensuring that any unethical behavior is addressed swiftly and effectively, reinforcing our commitment to doing business with honesty, fairness, and respect for all stakeholders.

### 21.7 Follow-Up and Feedback

To ensure that whistleblower concerns are taken seriously and appropriately addressed, we will keep the individual who made the report informed of the progress and outcome of the investigation, while maintaining confidentiality and discretion. Where appropriate, we will provide feedback to the individual making the report, acknowledging their contribution to upholding the ethical standards of the company and improving business practices.

### 22. Financial Integrity

Zambelli International Consulting LLC is committed to maintaining the highest standards of financial integrity in all aspects of its operations. We recognize that the trust and confidence of our clients, partners, and stakeholders are built upon the transparency and accuracy of our financial practices. Therefore, we will ensure that all financial records are prepared and maintained with the utmost care, accuracy, and completeness, adhering strictly to applicable legal and regulatory requirements.

### 22.1 Accurate and Transparent Financial Reporting

We will ensure that all financial transactions are recorded truthfully and transparently, reflecting the true financial position of the company. Our financial records will be consistent with generally accepted accounting principles (GAAP) and will be subject to regular audits by independent third parties to ensure their integrity. All financial statements, reports, and disclosures will be made available to stakeholders in a timely and transparent manner, providing them with a clear understanding of the company's financial health.

### 22.2 Compliance with Financial Regulations

Zambelli International Consulting LLC is committed to complying with all relevant local, national, and international financial regulations, including anti-money laundering (AML) laws, tax compliance regulations, and other industry-specific financial standards. We will ensure that our financial activities align with these regulations and that we meet all obligations concerning financial reporting, audits, and disclosures.

### **22.3 Prevention of Financial Mismanagement**

We will establish and enforce internal controls to prevent financial mismanagement, fraud, or any unethical financial practices. All employees, directors, and associates will be held accountable for their actions and are expected to adhere to the highest standards of financial responsibility. Any instances of financial mismanagement or violations of financial policies will be addressed immediately and appropriately.

### 22.4 Transparency in Financial Decision-Making

Zambelli International Consulting LLC will ensure that all financial decisions are made with transparency and based on accurate data and information. We will provide clear justifications for financial choices made by the company, particularly when such decisions impact clients, partners, or stakeholders. We are committed to ensuring that our stakeholders are informed about the financial considerations that drive the company's strategic decisions.

### 22.5 Timely and Accurate Tax Compliance

We will comply with all tax obligations in every jurisdiction where we operate, ensuring that all taxes owed are paid on time and in full. Zambelli International Consulting LLC will maintain accurate tax records, file all necessary tax returns, and cooperate with tax authorities in a transparent and compliant manner. We are dedicated to upholding our responsibilities to the relevant authorities and stakeholders regarding tax reporting.

### 22.6 Ethical Investment Practices

When making investment decisions or managing client funds, we will operate with the highest level of financial integrity, ensuring that investments are made in a manner consistent with our ethical standards and aligned with the best interests of our clients. We will never engage in investments or financial practices that could be considered unethical, exploitative, or harmful to the financial well-being of stakeholders.

### 22.7 Internal Audits and Financial Oversight

To ensure ongoing financial integrity, we will conduct regular internal audits and reviews of financial processes. These audits will help us identify potential issues and areas of improvement, ensuring that our financial activities continue to meet our high standards of transparency, accuracy, and accountability. We will also ensure that appropriate oversight mechanisms are in place to monitor financial performance and compliance continuously.

### 22.8 Accountability for Financial Practices

Every member of Zambelli International Consulting LLC, from employees to senior management, is responsible for maintaining the company's financial integrity. We will ensure that all individuals involved in financial decision-making and reporting understand the importance of their roles in upholding the company's financial reputation. Any financial irregularities or non-compliance will be addressed in a timely and appropriate manner, with clear consequences for those involved.

### 22.9 Stakeholder Engagement and Financial Disclosure

We believe in open and honest communication with our stakeholders regarding the financial health and performance of Zambelli International Consulting LLC. We will ensure that stakeholders, including clients, investors, and partners, have access to relevant financial information that allows them to make informed decisions. Regular financial reports will be made available to all stakeholders, and any significant changes in the company's financial situation will be communicated promptly.

# **22.10 Long-Term Financial Sustainability**

Zambelli International Consulting LLC is committed to ensuring the long-term financial sustainability of the company. We will prioritize sound financial management practices that promote stability and growth, ensuring that the company's financial position remains strong and resilient. By maintaining financial integrity, we aim to build long-term relationships with clients, partners, and stakeholders based on trust, transparency, and mutual benefit.

### 23.1 Ethical Service Provision

We will ensure that our services are provided in a manner that upholds the dignity, rights, and well-being of all individuals, particularly those from vulnerable groups. Our business practices will prioritize ethical considerations, ensuring that no individual or community is taken advantage of, manipulated, or harmed in any way.

### 23.2 Protection Against Exploitation

Zambelli International Consulting LLC will implement policies and procedures to prevent the exploitation of vulnerable groups in any form. This includes preventing exploitative practices in our marketing, service delivery, and business partnerships. We will strive to create an environment where vulnerable individuals and communities are treated with respect, dignity, and fairness.

### 23.3 Inclusive Practices

We are committed to creating an inclusive environment where all individuals, regardless of their background or vulnerabilities, are treated with fairness and equality. We will ensure that our hiring practices, services, and communications are inclusive, non-discriminatory, and supportive of vulnerable populations. Our aim is to empower individuals, provide opportunities, and promote equitable treatment in all business activities.

# 23.4 Sensitivity to Power Imbalances

We recognize the existence of power imbalances in business relationships, particularly in situations where clients or partners may be in a weaker negotiating position. Zambelli International Consulting LLC is committed to addressing and mitigating these power imbalances, ensuring that vulnerable parties are not subjected to undue pressure or unfair terms. We will foster relationships based on mutual respect and understanding, empowering vulnerable groups to make informed and independent decisions.

# 23.5 Avoiding Exploitative Partnerships

We will ensure that all business relationships, including partnerships, collaborations, and contractual agreements, do not involve or support the exploitation of vulnerable individuals or groups. Zambelli International Consulting LLC will conduct thorough due diligence to assess potential risks related to human rights abuses, exploitation, or unethical practices in our partnerships.

# 23.6 Support for Vulnerable Groups

As part of our commitment to ethical practices, Zambelli International Consulting LLC will actively support initiatives and programs that aim to protect and uplift vulnerable groups. This may include partnerships with organizations that provide support to disadvantaged communities, advocating for social justice, and promoting awareness of the needs and rights of vulnerable populations.

# 23.7 Employee Education and Awareness

We will ensure that all employees, contractors, and partners are educated about the importance of protecting vulnerable groups and preventing exploitation. Through ongoing training and awareness programs, we will foster a culture that actively discourages any form of discrimination, abuse, or exploitation, and promotes the fair and ethical treatment of all individuals.

# 23.8 Compliance with Human Rights Standards

Zambelli International Consulting LLC will adhere to international human rights standards and regulations, such as the United Nations Universal Declaration of Human Rights and the principles outlined by the International Labour Organization (ILO). We will ensure that our operations do not violate these principles and that we are actively promoting and respecting the human rights of vulnerable groups in all jurisdictions where we operate.

# 23.9 Advocacy for Vulnerable Populations

We will use our platform, influence, and resources to advocate for the rights and protection of vulnerable groups. Whether in the context of our clients, business practices, or social initiatives, Zambelli International Consulting LLC will work toward raising awareness, promoting policy changes, and supporting initiatives that safeguard vulnerable populations from exploitation and harm.

# 23.10 Commitment to Long-Term Social Responsibility

Zambelli International Consulting LLC will continuously evaluate and improve our business practices to ensure that we remain aligned with our commitment to non-exploitation and social responsibility. We will seek to create long-term, positive impact by investing in projects, policies, and partnerships that prioritize the welfare of vulnerable groups, ensuring that our operations contribute to a fairer and more just society for all.

### 24. Ethical Supply Chain Management

Zambelli International Consulting LLC recognizes that the integrity of our supply chain is a critical component of our overall commitment to ethical business practices. We are fully committed to ensuring that all suppliers, partners, and contractors we engage with adhere to the same high standards of ethics, transparency, and responsibility that we uphold in our own operations.

### 24.1 Supplier Selection and Evaluation

We will implement a robust supplier selection process to ensure that we partner with businesses and organizations that share our commitment to ethical practices. Our evaluation criteria will include, but are not limited to, adherence to international human rights standards, compliance with environmental regulations, respect for labor rights, and the absence of corruption or unethical behavior. We will prioritize working with suppliers who demonstrate a proactive commitment to sustainability, transparency, and social responsibility.

# 24.2 Human Rights and Fair Labor Practices

Zambelli International Consulting LLC expects all suppliers to comply with fundamental human rights standards and to ensure fair and safe working conditions for their employees. We will not engage with any suppliers who exploit labor, engage in child or forced labor, or violate workers' rights in any way. Our suppliers must also ensure that they operate in full compliance with local and international labor laws, including providing fair wages, safe working environments, and non-discriminatory practices.

### 24.3 Environmental Sustainability

We are dedicated to minimizing our environmental footprint and expect the same from our suppliers. We will collaborate with suppliers who engage in eco-friendly practices, such as reducing waste, conserving energy, and minimizing environmental pollution. Suppliers must demonstrate a commitment to environmental responsibility, including adherence to relevant environmental regulations and sustainable sourcing practices.

### 24.4 Anti-Corruption and Ethical Practices

Zambelli International Consulting LLC will only engage with suppliers who prohibit bribery, corruption, and other unethical practices. We expect our suppliers to operate with the highest level of integrity, honesty, and transparency. Suppliers must adhere to anti-bribery and anti-corruption laws and will be required to demonstrate their commitment to ethical conduct through their own internal policies and practices.

### 24.5 Supply Chain Audits and Monitoring

To ensure compliance with these ethical standards, we will regularly monitor and audit the practices of our suppliers. This may include on-site inspections, document reviews, and third-party assessments to evaluate compliance with human rights, environmental, and ethical guidelines. We will take appropriate action if any supplier is found to be in violation of our ethical standards, including corrective actions or, in extreme cases, termination of the business relationship.

### 24.6 Continuous Improvement and Capacity Building

Zambelli International Consulting LLC is committed to promoting continuous improvement within our supply chain. We will collaborate with suppliers to help them improve their ethical practices and environmental sustainability efforts. Through training programs, capacity-building initiatives, and ongoing communication, we will work together to drive positive change and promote shared values of social responsibility, environmental stewardship, and ethical behavior.

### 24.7 Transparency and Reporting

We will maintain transparency in our supply chain operations and communicate openly about our supplier relationships. We will ensure that any issues related to supply chain integrity, including violations of ethical standards, are reported and addressed in a timely and transparent manner. We are committed to sharing information about our supply chain practices with relevant stakeholders, including clients, partners, and the public, to foster accountability.

### 24.8 Supplier Agreements and Ethical Commitments

We will include ethical clauses in our contracts with suppliers, ensuring that they acknowledge and agree to abide by our ethical standards. These agreements will outline expectations regarding human rights, environmental sustainability, anti-corruption practices, and adherence to local and international laws. Any failure to meet these commitments will result in a reevaluation of the business relationship, and may lead to the termination of the contract.

### 24.9 Collaboration for Positive Impact

Zambelli International Consulting LLC will actively collaborate with suppliers to support initiatives that promote positive social and environmental impact. By fostering long-term, sustainable relationships, we aim to build a supply chain that not only meets our operational needs but also contributes to broader societal goals, including economic development, environmental conservation, and the promotion of human dignity and rights.

# 24.10 Commitment to Long-Term Ethical Standards

We understand that maintaining an ethical supply chain is a long-term commitment. Zambelli International Consulting LLC will continue to review and enhance our supply chain policies and practices, ensuring that they remain aligned with our core values and industry best practices. We will strive to build a supply chain that reflects our dedication to integrity, responsibility, and sustainability in every aspect of our business operations.

# 25.1 Responsibility to Uphold the Code

All individuals who represent Zambelli International Consulting LLC—whether they are employees, business partners, or contractors—are expected to uphold this Code of Ethics in both their professional and personal conduct when acting on behalf of the company. By working with us, you agree to follow these ethical guidelines and to make decisions that align with the values and principles set forth. We expect everyone to lead by example and hold themselves to the highest standards of integrity and professionalism.

# 25.2 Accountability and Reporting Violations

Each employee, partner, and contractor has an obligation to report any behavior or actions that violate this Code of Ethics. Zambelli International Consulting LLC encourages a culture of openness, where violations or concerns can be raised without fear of retaliation. We provide clear and accessible channels for reporting misconduct, and all reports will be taken seriously and thoroughly investigated. Confidentiality and protection from retaliation will be afforded to those who report violations in good faith.

# 25.3 Investigation and Disciplinary Action

Zambelli International Consulting LLC will thoroughly investigate any alleged violations of this Code. When a violation is confirmed, disciplinary action will be taken, which may include warnings, corrective actions, suspension, or, in the most severe cases, termination of employment or contractual agreements. The company is committed to ensuring fairness and consistency in the application of disciplinary procedures and will handle each case with due diligence and care.

### 25.4 Commitment to Continuous Training and Education

We recognize that upholding this Code of Ethics requires ongoing education and awareness. As part of our commitment to maintaining high ethical standards, we will provide regular training and resources to our employees, partners, and contractors. This training will focus on ethics, compliance, and best practices to ensure that everyone understands the importance of ethical behavior and is equipped to make responsible decisions. We will also review and update the Code periodically to ensure it reflects the latest legal, regulatory, and best practice standards.

# 25.5 Support for Ethical Decision-Making

Zambelli International Consulting LLC will provide guidance and support to employees and stakeholders in situations where they are unsure about ethical decisions. This includes offering advice from senior leadership, legal teams, or designated ethics officers. We encourage all members of our organization to seek guidance if they are ever in doubt about the ethical implications of their actions.

### 25.6 Legal and Contractual Implications

Any violation of this Code of Ethics can have serious legal, financial, and reputational consequences for Zambelli International Consulting LLC. We hold all individuals and entities connected to our business responsible for their actions, and breaches of this Code may result in legal actions in addition to internal disciplinary measures. All contracts, agreements, and terms of service will clearly specify that adherence to this Code is mandatory and violations will not be tolerated.

# 25.7 Commitment to Ethical Leadership

The leadership of Zambelli International Consulting LLC is committed to setting a positive example by embodying the ethical principles outlined in this Code. Senior management will take proactive steps to ensure that ethical considerations are integrated into every aspect of our operations and decision-making. We believe that ethical leadership is essential to fostering a culture of integrity and trust, both within our company and in our relationships with clients, partners, and the broader community.

# **25.8 Final Authority and Enforcement**

Zambelli International Consulting LLC reserves the right to take whatever measures are necessary to enforce this Code of Ethics, including modifying or terminating relationships with individuals or organizations that fail to adhere to the established standards.

This Code of Ethics is not merely a set of guidelines but a binding commitment to uphold the values and standards that make Zambelli International Consulting LLC a responsible and respected business. By working with us, all stakeholders agree to abide by these principles, ensuring a business environment built on integrity, respect, and mutual accountability.



### **Commitment to Ethical Business Practices**

This Code of Ethics serves as a fundamental guiding document for all employees, associates, and business partners of Zambelli International Consulting LLC. It represents our unwavering commitment to conducting business with the highest level of integrity, respect, and professionalism, ensuring that all our operations reflect ethical standards and align with the values we uphold. At Zambelli International Consulting LLC, we are dedicated to fostering a business culture built on transparency, accountability, and ethical decision-making, striving to create an environment where our stakeholders feel confident in our practices and operations.

By adhering to this Code, we affirm our responsibility not only to comply with legal and regulatory requirements but also to contribute positively to society. We recognize that our actions impact not just our clients and business partners, but also the broader community. As such, we are committed to conducting our business with a strong sense of social responsibility, ensuring that our services, policies, and practices promote fairness, respect for human rights, and sustainability.

We understand that the trust and confidence of our stakeholders are vital to the long-term success of our company. This Code of Ethics is not only a reflection of our commitment to ethical conduct but also a promise to maintain and strengthen the trust placed in us by our clients, partners, employees, and the communities we serve. By upholding the principles set forth in this document, we will continue to build a sustainable, ethical, and responsible business that sets a positive example for others in the industry.

In conclusion, Zambelli International Consulting LLC strives to be a responsible corporate entity that not only meets the highest standards of professionalism but also contributes to making a meaningful and positive impact on the world. We are proud of our commitment to integrity and ethics, and we will continue to uphold these principles in every aspect of our operations and relationships

The Code of Ethics of Zambelli International Consulting LLC, updated on May 2, 2025, reflects our ongoing commitment to integrity, transparency, and accountability in all our business activities.

This code aligns with applicable local and international laws and regulations, including U.S. federal legislation, privacy regulations such as GDPR, CCPA, and specific state laws like those in Delaware and New York. It also complies with the regulations of FINCEN, SEC rules, FCA guidelines, and the UAE Central Bank of Dubai. By adhering to these legal and ethical frameworks, Zambelli International Consulting LLC ensures that all our operations are conducted in an ethical, respectful manner, fully compliant with the highest legal and regulatory standards, fostering trust and respect from our clients, employees, and business partners.



# INTERNATIONAL CONSULTING LLC

www.jzambelliconsulting.com