



ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Varayo

302 E Carson St Ste 330

Las Vegas, NV 89101

Phone: 888-4-VARAYO

Email: legal@varayo.com

Version 2.0

Effective Date: March 3, 2026

1. Purpose

Varayo is committed to conducting business ethically, transparently, and in full compliance with all applicable anti-corruption and anti-bribery laws. This Policy establishes mandatory standards designed to prevent bribery, corruption, kickbacks, and improper influence in all business dealings.

2. Legal Framework

This Policy is designed to comply with applicable laws including, but not limited to:

- The U.S. Foreign Corrupt Practices Act (FCPA)
- The UK Bribery Act 2010
- Applicable U.S. federal and state anti-corruption statutes
- International anti-money laundering and anti-corruption regulations where applicable

3. Scope

This Policy applies to all directors, officers, employees, contractors, consultants, and third parties acting on behalf of Varayo, including agents, representatives, intermediaries, vendors, and business partners.

4. Zero-Tolerance Standard

Varayo maintains a strict zero-tolerance approach. No individual may directly or indirectly offer, promise, authorize, solicit, or accept anything of value to improperly influence a decision or secure an unfair advantage.

5. Prohibited Conduct

Prohibited conduct includes, but is not limited to:

- Bribery involving public officials or private individuals
- Kickbacks or undisclosed commissions
- Facilitation payments (except where legally required for health or safety)
- Use of third parties to circumvent this Policy
- False, misleading, or incomplete records

6. Gifts, Hospitality & Entertainment

Business hospitality must be modest, reasonable, lawful, properly documented, and never intended to influence a decision. Cash or cash equivalents are strictly prohibited.

7. Political & Charitable Contributions

Political contributions and charitable donations must never serve as a substitute for bribery and must comply with all applicable laws and internal approvals.

8. Books, Records & Internal Controls

All transactions must be accurately recorded with reasonable detail. Off-the-books accounts and mischaracterized expenses are strictly prohibited.

9. Reporting & Non-Retaliation

Suspected violations must be reported to legal@varayo.com or 888-4-VARAYO. Varayo strictly prohibits retaliation against individuals who report concerns in good faith.

10. Enforcement

Violations may result in disciplinary action up to and including termination of employment or business relationships and referral to law enforcement where appropriate.

11. Policy Administration

This Policy will be reviewed periodically and updated as necessary to reflect evolving legal requirements and business risks.

Approved By:

Darrell Nelson, Chief Executive Officer

Signature:  _____

Date: March 3, 2026

© 2026 Varayo. All rights reserved.