

NATION BUILDERS UNIVERSITY L.L.C.

Anti-Fraud and Anti-Corruption Compliance Programme

Proportionate controls for a small limited liability company

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Organization	Nation Builders University L.L.C., Washington, District of Columbia
Owner	Chief Executive Officer
Approved by	Members of Nation Builders University L.L.C.
Effective date	22 October 2026
Review	At least annually
Contact	info@nationbuilderuniversity.com

1. Policy statement

Nation Builders University L.L.C. (NBU) has zero tolerance for fraud, bribery and corruption. Fraud means any dishonest act to gain an advantage or cause a loss, including false statements, misuse of funds, forged documents, bid rigging and concealment of conflicts. This programme applies to the Members, the Chief Executive Officer and everyone acting for NBU, and to the third parties who work with it. It is designed to match NBU's size: a small company with a single day-to-day manager. It does not rely on departments that NBU does not have. Where NBU cannot separate duties internally, it uses a second person's review, external professional support and written records instead.

2. Prevention controls

Area	Control
Money and approvals	Business funds are held in NBU's own accounts. Payments above a limit set by the Members, and any payment to a Member or to a person or business related to a Member, need approval from a second person. Bank statements are reviewed monthly by someone other than the person who made the payments, or by an external bookkeeper.
Segregation of duties	Where one person cannot do everything, a second Member or an outside professional reviews the work (for example, invoices, reconciliations and expense claims).
Bribery and improper influence	No payment, gift or benefit may be given or accepted to influence any decision. Gifts and hospitality are recorded.
Procurement and bidding	NBU gives accurate information in every registration, bid and proposal, never contacts evaluators outside the official process, never colludes with competitors, and does not use intermediaries who are paid by success or who are not disclosed.

Area	Control
Statements about NBU	Claims about NBU's status, experience, clients, outcomes and partners must be supported by a document before use. NBU keeps a list of supported claims and does not claim accreditation, licensure, degree authority, or endorsement by any government or international organization without written confirmation.
Conflicts of interest	Disclosed in writing, recorded, and managed by stepping back from the decision.
Third parties	Suppliers, consultants and agents are identified, checked in proportion to risk (existence, ownership, sanctions and adverse-news screening, conflicts), given the Code, and paid only against written terms and evidence of work. Intermediaries used in relation to bids or contracts with public or international organizations are recorded.
Records	Accurate contracts, invoices, approvals and correspondence are kept securely for the period required by law and by NBU's records policy.

3. Detection

- Monthly review of bank and payment records by a second person.
- Review of unusual or duplicate payments, missing documents and changes to supplier bank details, which are confirmed independently before payment.
- Annual review of the risk register, below, and of any reported concerns.

4. Reporting and response

Anyone may report suspected fraud or corruption in good faith at info@nationbuilderuniversity.com, or in writing to the other Member where the concern concerns the CEO. Reports are logged, secured, and reviewed by a person with no interest in the matter. Evidence is preserved. NBU takes proportionate action, which may include stopping a payment, ending a contract, recovering losses, disciplinary action and referral to the competent authorities. Retaliation against a person who reports in good faith is prohibited.

5. Responsibilities

- Members: approve this programme, receive the annual summary, and decide matters involving the CEO.
- Chief Executive Officer: runs the controls, keeps records, ensures that personnel and third parties receive the Code.
- Everyone acting for NBU: follow this programme and report concerns.

6. Training, exceptions and review

Personnel and consultants receive a briefing on the Code and this programme when they start and at least annually, and sign an acknowledgment. Exceptions need the Members' written approval and cannot permit fraud, bribery or false statements. The programme is reviewed at least annually, and legal, accounting and tax advice is sought on matters outside NBU's competence.

Annex. Principal fraud and corruption risks

Risk	Example	Main controls
False statements about NBU	Overstating status, clients or accreditation in a bid or registration	Supported-claims list; second-person review of submissions
Misuse of funds	Personal use of company money; unapproved payments	Approval limits; monthly review; separate accounts
Conflicted dealing	Contracting a relative's business without disclosure	Written disclosure; second approver
Bribery or gifts	Offering or accepting an inducement	Prohibition; gifts record; reporting
Procurement fraud	Collusion, bid rigging, using an undisclosed agent	Prohibition; intermediary record; accurate submissions
Payment diversion	Fake invoice or changed bank details	Independent verification before payment
Data and document fraud	Forged or altered documents	Original records; controlled access

Adoption

Adopted by the Members of Nation Builders University L.L.C. on 22 October 2026. The signed original is held on file and is available to institutional buyers on request at info@nationbuilderuniversity.com.