

NATION BUILDERS UNIVERSITY L.L.C.

Code of Ethics and Business Conduct

How Nation Builders University L.L.C. conducts its business

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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. Purpose and scope

This Code sets the standards of integrity that Nation Builders University L.L.C. (NBU) expects of itself and of everyone who acts for it. It applies to the Members, the Chief Executive Officer, employees, contractors, consultants, instructors, volunteers, interns and anyone else acting on NBU's behalf. NBU is an education and professional training company based in Washington, D.C. It is in an institutional development phase; its District of Columbia higher-education licensure process is in progress, and it does not claim accreditation, licensure or degree-granting authority.

2. Standards of conduct

Integrity and honesty

We are truthful in everything we say and write about NBU. We never misstate our legal status, qualifications, experience, clients, results or relationships, and we never imply that a government, the United Nations, a university or any other body endorses us unless it has said so in writing.

Compliance with law

We comply with the laws and regulations that apply to us, including those on tax, employment, anti-corruption, sanctions, data protection and education, and with the terms of any contract we sign.

No bribery or corruption

We do not offer, give, ask for or accept bribes, kickbacks, facilitation payments or any improper advantage, directly or through anyone else, to or from any person, including public officials and staff of international organizations.

Fair competition and procurement

We compete fairly. We do not collude with other bidders, rig bids, give false information in a bid or registration, or seek inside information about a procurement.

Conflicts of interest

We disclose any personal, family, financial or other interest that could affect, or appear to affect, our judgment, and we step back from related decisions. Disclosures are made in writing to the Chief Executive Officer, or, if the conflict concerns the CEO, to the other Member.

Gifts and hospitality

We do not accept or give gifts, meals or hospitality that could influence a decision or appear to do so. Cash or cash equivalents are never acceptable. Anything beyond a token courtesy is declined or reported and recorded.

Protection of assets and information

We use NBU's funds, systems and data only for legitimate NBU purposes, keep accurate records, and protect confidential and personal information, including that of learners, partners and clients.

Respect and non-discrimination

We treat everyone with dignity. We do not tolerate discrimination, harassment, exploitation, forced or child labour, or human trafficking in NBU's activities or supply chain.

Responsible relationships

We choose suppliers, partners and consultants on merit, check them proportionately, and require them to act consistently with this Code. We keep a record of any intermediary or agent used in relation to a bid or contract with a public or international organization.

Speaking up and non-retaliation

Anyone may raise a concern in good faith at info@nationbuilderuniversity.com, or by writing to the other Member where the concern is about the CEO. Concerns are reviewed fairly and confidentially as far as the law allows. NBU does not tolerate retaliation against anyone who raises a concern in good faith.

3. Responsibilities

- The Members approve this Code, set the example and receive the annual compliance summary.
- The Chief Executive Officer applies the Code, keeps records, ensures that new personnel receive it and acknowledge it in writing, and reports serious matters to the Members.
- Everyone acting for NBU reads and follows the Code, completes any assigned briefing and reports suspected breaches promptly.

4. Breaches

Suspected breaches are recorded, reviewed by someone with no personal interest in the matter, and addressed proportionately. Outcomes may include corrective action, ending a relationship or contract, recovery of losses and, where appropriate, referral to the competent authorities.

5. Records, exceptions and review

Acknowledgments, conflict disclosures and case records are kept securely by the Chief Executive Officer. Exceptions to this Code require written approval of the Members and a recorded reason; no exception may

permit bribery, fraud or a false statement. The Code is reviewed at least once a year and whenever the law or NBU's activities change.

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.