VERITY COMPLIANCE

STANDARDS MADE OPERATIONAL

Corporate Compliance Policy

A company policy defining expected conduct, conflicts of interest, gifts, reporting channels, investigations, controls, training, and accountability.

CONTROLLED DOCUMENT · NS-032-2026

Mara Klein · 4 August 2026

Contents

Document contents

Document status	Review basis	Version
Draft for review	Organization-specific adaptation required	1.0

0.1 Purpose and application

Define policy objective, covered people and entities, geographic reach, relationship to local law, and responsibilities.

Document control	Detail
Owner	Mara Klein
Reference	NS-032-2026
Effective date	4 August 2026
Status	Ready for review

0.2 Expected conduct

Set standards for legality, integrity, records, fair dealing, human rights, safety, information, and speaking up.

- Confirm the responsible owner and decision deadline.
- Record evidence, assumptions, and dependencies explicitly.
- Convert the agreed outcome into a trackable next action.

0.3 Conflicts, gifts, and third parties

Explain disclosure, approval, prohibited situations, gifts and hospitality thresholds, diligence, and intermediary controls.

Requirement	Position	Evidence	Owner
Conflicts, gifts, and third parties	Drafted for review	Linked record	Mara Klein
Jurisdiction check	Required	Legal review	Counsel

0.4 Financial and information controls

Require accurate books, authorization, segregation, expense integrity, asset protection, privacy, security, and retention.

- Confirm the responsible owner and decision deadline.
- Record evidence, assumptions, and dependencies explicitly.
- Convert the agreed outcome into a trackable next action.

0.5 Reporting and non-retaliation

Describe confidential channels, anonymous options where lawful, emergency paths, protection, and good-faith expectations.

Requirement	Position	Evidence	Owner
Reporting and non-retaliation	Drafted for review	Linked record	Mara Klein
Jurisdiction check	Required	Legal review	Counsel

0.6 Assessment and investigation

Set triage, independence, confidentiality, evidence preservation, fairness, updates, remediation, and documentation standards.

- Confirm the responsible owner and decision deadline.
- Record evidence, assumptions, and dependencies explicitly.
- Convert the agreed outcome into a trackable next action.

0.7 Training and monitoring

Define risk-based training, attestations, advice, monitoring, testing, reporting, and continuous improvement.

Requirement	Position	Evidence	Owner
Training and monitoring	Drafted for review	Linked record	Mara Klein
Jurisdiction check	Required	Legal review	Counsel

0.8 Accountability and governance

State consequences, consistent enforcement, board and management oversight, policy ownership, exceptions, and revision history.

- Confirm the responsible owner and decision deadline.
- Record evidence, assumptions, and dependencies explicitly.
- Convert the agreed outcome into a trackable next action.

0.9 Important review notice

> This template is a general starting point. Adapt it to the organization, transaction, applicable law, and jurisdiction, and obtain qualified professional review before relying on it.

0.10 Approval and signatures

By signing, the parties confirm that they have reviewed the document and accept the recorded decision or terms.

Name *

Title or role *

Signature *

Date *