



Anti-Corruption and Anti-Bribery Policy

Effective Date: Immediately

Posting: All Break Rooms and Website

Applies To: All employees, officers, directors, contractors, consultants, and business partners of NewVac LLC, in California and worldwide.

1. Purpose

NewVac is committed to conducting business in an ethical, transparent, and lawful manner. Corruption, bribery, and unethical conduct undermine fair competition and damage trust. This policy establishes clear standards to ensure compliance with:

- **California law** (including California Penal Code §67–68, §85–86 prohibiting bribery of public officials).
 - **U.S. federal law**, including the **Foreign Corrupt Practices Act (FCPA)**.
 - All applicable international anti-bribery standards where NewVac LLC operates.
-

2. Scope

This policy applies to:

- All employees, officers, directors and managers of NewVac LLC.
 - Third parties acting on behalf of NewVac, including consultants, agents, distributors, suppliers, and contractors.
-

3. Prohibited Conduct

No employee or representative of NewVac LLC may, directly or indirectly:

1. Offer, give, solicit, or accept any **bribe, kickback, or improper payment** to influence a decision.
 2. Provide **gifts, entertainment, travel, or hospitality** that are excessive, intended to secure business advantage, or could appear improper.
-



NewVac, LLC



NewVac (Cage Code 63127) and American Defense Interconnect (Cage Code 60118)
Divisions of ADI * American Distributors LLC

3. Use **company funds or assets** for unlawful or unethical purposes.
 4. Facilitate or ignore corrupt practices by third parties.
-

4. Permitted Conduct (with Restrictions)

- **Nominal gifts** (e.g., company-branded items under \$50) may be acceptable if lawful, customary, and not intended to influence a decision.
 - **Reasonable business meals or entertainment** may be permitted if directly related to legitimate business purposes, modest in value, and properly recorded.
 - **Political contributions:** Employees may make personal contributions, but company funds or resources cannot be used for political donations without prior legal approval, consistent with California's Fair Political Practices Commission (FPPC) rules.
-

5. Recordkeeping

- All expenses, gifts, donations, or hospitality provided on behalf of NewVac must be **accurately recorded** in company books.
 - False, misleading, or incomplete entries are strictly prohibited.
-

6. Responsibilities

- **Employees:** Must comply with this policy and report concerns immediately.
 - **Managers:** Must monitor compliance and ensure teams are trained.
 - **Compliance Officer/HR/Legal:** Responsible for oversight, training, investigations, and reporting violations.
-

7. Reporting Violations

- Employees must report suspected violations to their supervisor, HR, or the Compliance Officer.
- Anonymous reporting may be made through Sales@adicorp.biz



NewVac, LLC



NewVac (Cage Code 63127) and American Defense Interconnect (Cage Code 60118)
Divisions of ADI * American Distributors LLC

- **Retaliation** against whistleblowers is strictly prohibited under **California Labor Code §1102.5**.

8. Disciplinary Action

Violations of this policy may result in:

- Disciplinary action up to and including termination.
- Referral to law enforce