

Anti-Corruption & Anti-Bribery Policy

Effective date: July 2026

1. Purpose and scope

This policy applies to all work performed under the EEHC brand, including engagements delivered with subcontracted researchers. It reflects the principles of the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010 and the Law of Georgia on Combating Corruption.

2. Zero tolerance

EEHC does not offer, promise, give, request or accept bribes, kickbacks, facilitation payments or anything of value intended to improperly influence any decision, in any country, under any circumstances.

3. Public officials

EEHC provides research and analytics only. EEHC does not interact with public officials on behalf of clients, does not make payments to public officials, and does not engage intermediaries for that purpose.

4. Third parties

Subcontracted researchers are engaged under written agreements that include anti-corruption obligations equivalent to this policy. No third party is authorised to act on EEHC's behalf toward any authority.

5. Gifts and hospitality

Gifts and hospitality are limited to modest, customary business courtesies. Anything that could be perceived as an inducement is declined and documented.

6. Records and reporting

All engagements are invoiced against written agreements with accurate records retained. Suspected violations may be reported to dmitriy.klimchuk@eehc.ge and will be reviewed within 10 business days.

Approved by: Dmitry Klimchuk, Individual Entrepreneur (founder, EEHC)