

# Statement

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<b>Title</b>	<b>Anti-Bribery and Corruption</b>
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<b>Owner</b>	CEO
<b>Approver</b>	Board of Directors
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## Document History

<b>Version</b>	<b>Last changed</b>	<b>Changes</b>	<b>Author</b>	<b>Approval date</b>	<b>Approver</b>
1.04	11.09.2019	Created		dd.mm.20yy	BoD
2	13.09.2020	Updated to new template	STH		

\*Remember to track changes, before editing, and summarize the changes in the "Document History". If track changes is not on, the approver will not approve the updated version

## 1. Purpose

INPAY has a zero tolerance towards bribery and corruption, regardless of the identity or position of the originator or recipient of the bribe.

INPAY expects all our employees to always do business in accordance with the highest standards of ethical behavior and honesty. This also means we are committed to the prevention, deterrence and detection of bribery and corruption.

Bribery and corruption are criminal offences and are clear violations of the INPAY Values. Engaging in behavior or activities contrary to INPAY's Values, as well as all other applicable laws and regulations, violates our promise to our stakeholders. We do not and will not pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we accept bribes or improper inducements or anything that could be perceived as such and we have similar expectations of our third parties and clients.

The INPAY zero tolerance principles towards bribery and corruption thus also apply to third parties with whom INPAY does business with or who are retained by INPAY to perform services or deliver business for and on behalf of INPAY.

The INPAY anti-bribery and anti-corruption principles are summarized below.

## 2. Bribery and facilitation payment

All forms of bribery and all actions that in our opinion give the appearance of offering or accepting a bribe, including facilitation payments, are prohibited.

## 3. Gifts and Entertainment

No INPAY employee may offer or receive a Gift or an Entertainment, regardless of its value, which in our opinion might create or give the appearance of creating a conflict of interest, constitute an inducement or bribe, or violate applicable laws, regulations and/or the INPAY Values. Any form of gifts, entertainment or other advantage offered and received must be subject to an assessment on its acceptability and appropriateness regardless of the amount or value.

## 4. Public Officials

Whilst our Policies do not prohibit legitimate business interactions with Public Officials or State-owned enterprises, these are subject to heightened attention and stricter conditions, such as pre-approvals and lower limits.

## 5. Political Contributions/donations

INPAY employees are not permitted to make gifts or political donations or to offer entertainment to political parties or candidates for political office as part of their employment with INPAY.

## 6. Charitable donations

INPAY employees should ensure that charitable contributions are made to bona fide charities and are not used to conceal a bribe.

## 7. Recording, registration & violations

INPAY employees should ensure that expenses and payments related to third parties are registered and accurately recorded in the financial books.

Any violations of this statements should be reported and recorded with Risk & Compliance