

# PayBitoPro

## Anti Bribery and Corruption Policy

(EUROPEAN UNION)



<b>Created by:</b>	Avisek Banerjee
<b>Approved by:</b>	Souhardya Sarker
<b>Documentation Version:</b>	2.7
<b>Last Submission Date:</b>	18th June, 2024

## CONTENTS

<b>INTRODUCTION</b>	<b>2</b>
Definitions:	2
1. Bribery:	2
2. Corruption:	3
3. Facilitation payments:	3
4. Kickbacks	3
5. Gift:	3
The most prevalent forms of bribery and corruption are as follows:	3
● <b>OBJECTIVE</b>	<b>4</b>
● <b>SCOPE</b>	<b>5</b>
● <b>WHAT IS NOT ACCEPTABLE?</b>	<b>5</b>
● <b>PROCEDURE</b>	<b>6</b>
A. How to raise a concern?	6
B. What to do if you are a victim of bribery and corruption?	6
C. Protection	7
D. Maintaining Accurate Books and Records:	7
● <b>WHO IS RESPONSIBLE FOR THE POLICY?</b>	<b>8</b>
● <b>BREACHES OF THIS POLICY &amp; PENALTIES</b>	<b>8</b>
● <b>PENALTIES</b>	<b>9</b>
● <b>GIFTS, HOSPITALITY AND ENTERTAINMENT</b>	<b>9</b>
● <b>OUR EXPECTATIONS</b>	<b>10</b>
● <b>DISPLAY AND COMMUNICATION OF POLICY</b>	<b>11</b>
● <b>PERIODIC REVIEW AND EVALUATION</b>	<b>11</b>



## INTRODUCTION

PayBitoPro is committed to conducting its business in an ethical and transparent manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to implementing and enforcing effective systems to counter bribery. Our designated persons are prohibited from engaging in any bribery or potential bribery. This includes a prohibition against both direct bribery and indirect bribery, including payments through third parties. As a crypto asset company operating in the member states of the European Union, we acknowledge our responsibility to prevent bribery and corruption in all its forms. This Anti-Bribery Policy outlines our commitment to complying with the Bribery laws of the member states of the European Union and the Foreign Corrupt Practices Act, sets out the standards of behavior expected from all employees, contractors, consultants, and business partners. If any associate suspects or becomes aware of any potential bribery involving PayBitoPro, it is the duty of that “designated persons” to report their suspicion or awareness to the Vigilance and Ethics Officer

In this Policy “we”, “us”, “our” means PayBitoPro and the terms “user”, “individuals”, “non-individuals” means the residents of the member states of the European Union and the business enterprises registered in the member states of the European Union.

### **Definitions:**

#### **1. Bribery:**

Bribery means to obtain or accept or attempt to obtain or promise for giving, receiving, soliciting or accepting of financial or other advantages, or any other thing of value, to influence or reward the



behaviour of a person who is in a position of trust to perform a public, commercial or legal function to retain or obtain a commercial advantage. Bribes are payments made in the form of money or anything else of value in return for a business favour or advantage.

**2. Corruption:**

Corruption is dishonest, improper and usually unlawful conduct intended to secure a benefit undertaken by a person or organization entrusted with authority to attain illicit benefit or abuse power for one's private gain.

**3. Facilitation payments:**

These are unofficial payments made to secure or expedite a routine action by authorized officials.

**4. Kickbacks**

Kickbacks are payments made in return for a business favour /advantage.

**5. Gift:**

Gifts means any item of considerable value, given to/received from a party that has business dealings with the organization.

The most prevalent forms of bribery and corruption are as follows:

1. Payments to the company's employees or their relatives, or to a third party, to secure advantage in business transactions from PayBitoPro.



2. Political contributions made to secure advantage in business transactions.
3. Sponsorships used to secure advantage in business transactions.
4. Facilitation payments made to secure or accelerate routine or necessary business actions.
5. Gifts, hospitality and expenses payments made to secure advantage in business transactions.

## • OBJECTIVE

The purpose of this policy is to:

- A. Set out our responsibilities to comply with laws<sup>1</sup> against bribery and corruption; and
- B. Provide guidance on how to recognise and deal with bribery and corruption issues.

PayBitoPro will undertake a periodic bribery and corruption risk assessment across its business to understand the bribery and corruption risks it faces and ensure that it has adequate procedures in place to address those risks. The risk

---

<sup>1</sup> Bribery Act, 2010 for UK and Foreign Corrupt Practices Act, 1977



assessment will be documented and periodically reviewed by the appropriate committee of PayBitoPro.

## ● SCOPE

This policy applies to all dealings, transactions, for and on behalf of PayBitoPro.

This includes senior managers, officers, directors, employees (whether regular, fixed- term or temporary), consultants, contractors, trainees, seconded staff, , casual workers and agency staff, volunteers, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as " designated persons" in this policy).

## ● WHAT IS NOT ACCEPTABLE?

It is not acceptable for any designated person to:

1. Accept an offer of a gift of any size from any Third Party who is willing to take any kind of services from PayBitoPro.
2. Give, promise to give or offer, any payment, gift, hospitality or advantage with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given.



3. Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure.
4. Accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain a business advantage for them.
5. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy.
6. Engage in any activity that might lead to a breach of this Policy.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

## ● **PROCEDURE**

### A. How to raise a concern?

Every person, to whom this policy applies to, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he / she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, these should be



raised with their respective Manager and/or the Vigilance and Ethics Officer.

#### B. What to do if you are a victim of bribery and corruption?

It is his / her responsibility to inform / report it to their respective Managers and the Vigilance and Ethics Officer via [compliance@paybitopro.com](mailto:compliance@paybitopro.com) as soon as possible if you are offered a bribe by any third party, you are asked to make one, suspect that this may happen in the future or believe that you are a victim of another form of corruption or other unlawful activity. You must refuse to accept or make the payment from or to a third party, explain our policy against accepting or making such payment and make it clear that the refusal is final and non-negotiable because of this Policy. If you encounter any difficulty making this refusal, you should seek assistance from your immediate Manager.

#### C. Protection

Those who refuse to accept or offer a bribe or those who raise concerns or report another's wrong-doing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offence has taken place or may take place in the future. If any employee believes that he / she has



suffered any such treatment, he / she should inform your Manager or the Vigilance and Ethics Officer via [compliance@paybitopro.com](mailto:compliance@paybitopro.com)

#### D. Maintaining Accurate Books and Records:

No payment by or on behalf of PayBitoPro shall be approved or made if any part of the payment is to be used for an unlawful or improper purpose, or for any purpose other than that described by valid documents supporting the payment. No false or misleading entries should be made in any books or financial records of PayBitoPro for any reason.

### • WHO IS RESPONSIBLE FOR THE POLICY?

The Chief Executive Officer of PayBitoPro has the overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that all those under our control comply with it. Managers at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy, undertake training on how to implement and adhere to it and also monitor compliance of it. The Vigilance and Ethics Officer is responsible for this Policy and for monitoring its use and effectiveness (and dealing with any queries on its interpretation). Management at all levels is responsible for ensuring that those reporting to them are made aware of and understand this Policy and attend regular training on how to implement and adhere to it. Every person to whom this policy applies is responsible for the success of this Policy and should ensure that he / she should use it to disclose any suspected activity or wrong-doing.



## • **BREACHES OF THIS POLICY & PENALTIES**

The breach of this policy by the designated persons of PayBitoPro may lead to disciplinary action being taken in accordance with the PayBitoPro's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal. All designated persons are expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures. If any part of this policy is unclear, clarification should be sought from the Vigilance and Ethics Officer who is responsible for this policy. If necessary, corrective actions shall be prescribed or suggested to appropriate managers, officers and employees for implementation.

## • **PENALTIES**

The Chief Executive Officer shall, after considering inputs, if any, from the Vigilance and Ethics Officer have the discretion to recommend appropriate disciplinary action, including suspension and termination of service of such a defaulting Designated Person. The Vigilance and Ethics Officer shall also recommend if the violation is potentially criminal in nature and should be notified to the authorities. In the event of criminal or regulatory proceedings, the Designated Persons shall co-operate with relevant authorities. Depending on the nature and scale of default by the defaulting Designated Person, the Vigilance and Ethics Officer may also recommend to the Board to commence



civil and/or criminal proceedings against such a Designated Person in order to enforce remedies available to PayBitoPro under applicable laws<sup>2</sup>.

## ● GIFTS, HOSPITALITY AND ENTERTAINMENT

This policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest, and bona fide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or establish cordial relations.

Gifts, Hospitality & Entertainment must be:

1. Legal under all applicable anti-corruption laws.
2. Must be duly approved. Normal business hospitality must always be approved at the appropriate level of PayBitoPro's management.
3. Not cash or a cash equivalent.
4. Never given or accepted if any improper action is expected in return.
5. Modest promotional gifts are permitted. It is acceptable to offer modest promotional materials to contacts, for instance branded pens. Use of one's position with the PayBitoPro to solicit a gift of any kind is not acceptable. However, PayBitoPro allows associates occasionally to receive unsolicited gifts of a very low intrinsic value (maximum

---

<sup>2</sup> Reg. 11 of Bribery Act, 2010



valuation of 100 USD) from business contacts provided the gift is given unconditionally and not in a manner that could influence any decision-making process.

In some cultures / countries, it may be seen as an insult to reject a gift, and refusals may adversely affect business relationships. In these circumstances, and if the gift is anything other than moderate, the gift should be reported to the reporting manager who will decide whether such gift will be retained or returned. If your reporting manager is uncertain how to treat the gift, s/he should seek clarification from his/her relevant Human Resource (HR) contact.

## ● **OUR EXPECTATIONS**

PayBitoPro's reputation depends on the conduct of our employees as well as the conduct of those with whom we do business. It is our goal to ensure that PayBitoPro's People and the third parties with whom we work reflect the same high ethical standards and demonstrate a commitment to compliance with all applicable laws. We further expect our third parties to ensure that their employees and subcontractors understand and comply with this Anti-Bribery Policy.

Failure to comply with this Anti-Bribery Policy or any applicable anti bribery laws, may result in civil or criminal penalties, as well as termination of the employment or business relationship.

## ● **DISPLAY AND COMMUNICATION OF POLICY**



1. The Policy shall be displayed to all employees through the intranet portal of PayBitoPro.
2. Any changes in the Policy shall be notified through the intranet portal by way of an updated Policy document.
3. Policy Awareness shall be conducted regularly through various discussion / communication forums.

## ● PERIODIC REVIEW AND EVALUATION

PayBitoPro's Board of Directors will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. PayBitoPro reserves the right to vary and/or amend the terms of this Policy from time to time.

