

Statement

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| Title | Anti-Bribery and Corruption |
| Document ID | 1 |
| Owner | CEO |
| Approver | BoD |
| Parent(s) | Strategy |
| Audience | Inpay Employees |
| Classification | Public |
| Special area of interest | AML |
| Document name | Statement.1.Anti-Bribery and Corruption |

Document History*

| Version | Last changed | Changes | Author | Approval date | Approver |
|---------|--------------|---|----------|---------------|----------|
| 1.04 | 11.09.2019 | Created | | | |
| 2 | 13.09.2020 | Updated to new template | STH | 17.09.2020 | BoD |
| 3 | 08.09.2021 | Processes and procedure mention added | STH | 16.09.2021 | BoD |
| 4 | 01.11.2022 | Reviewed by Legal department – no changes | MAA | | |
| 5 | 04.05.2023 | Reviewed and adjusted. Further definitions, and details on reporting of violations, have been included. | HAI/CLAW | 23.05.2023 | BoD |

*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 is committed to conduct its business ethically and to comply to all applicable laws, including Anti-Bribery and Corruption (“ABC”) laws and regulations. The purpose of this statement is to set Inpay’s stance regarding bribery and corruption and to explicitly define actions that constitute bribery and corruption, ensuring that all employees and third parties are aware of what is and what is not acceptable.

2. Scope

Inpay requires all its employees and controlled subsidiaries to act with honesty and integrity and in accordance with this statement.

3. Definitions

Corruption refers to the abuse of entrusted power for private gain. It includes a range of offenses, such as a bribery, theft, extortion, collusion, fraud, and money laundering. Bribery is a specific form of corruption and refers to giving, offering, promising, demanding, or accepting anything of value as a reward for illegal or unethical behaviour in the conduct of business. A facilitation payment is a type of bribery and is defined as a payment paid to secure, or to speed up the process of securing, a service that the payer is already entitled to.

4. Inpay ABC Requirements

4.1 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.

4.2 Public officials Whilst our policies, processes and procedures do not prohibit legitimate business interactions with public officials or State-owned enterprises, these are subject to heightened attention and stricter conditions, . Therefore, expense approvers should be attentive to the nature and amount of these expenses, and whether they are suitable for that business relationship

4.3 Political contributions/donations Inpay employees are not permitted to make donations to political parties or candidates for political office as part of their employment with Inpay.

4.4 Charitable donations Inpay employees should ensure that charitable contributions made as part of their employment with the company are made to bona fide charities and are not used to conceal a bribe. Page 4 of 4 Inpay Public document

5. Recording, registration and violations

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

Inpay employees are required to report any violations of this statement to their immediate manager or through any of these channels:

- CRO or the CEO
- Chairman of the Board of Directors
- The Whistle-Blower line

When a violation has been reported, the CEO will appoint a relevant investigation team, which should include the CRO. The CEO or the Board of Directors will decide if the matter should be reported to the police or other authorities.