



80 Coleman street  
London EC2R 5BJ  
United Kingdom

Registered address

23 July 2021

## Anti-corruption and bribery statement

PayAlly is a financial institution that offers expertise and an in-depth understanding of every client we onboard. We operate in the United Kingdom and we pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation.

The board of directors condemns corruption in all its forms and we will not tolerate it in our business or in those we do business with. From the confines of our working environments, it is sometimes difficult to grasp the scale of the damage that bribery does to societies. It is not a victimless crime; far from it:

*"Corruption ... undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish. This evil phenomenon is found in all countries - big and small, rich and poor...corruption hurts the poor disproportionately by diverting funds intended for development, undermining a government's ability to provide basic services, feeding inequality and injustice and discouraging foreign aid and investment. Corruption is a key element in economic under-performance and a major obstacle to poverty alleviation and development." (Kofi Annan, former UN Secretary General)*

Our Anti-corruption and bribery policy sets out in detail how you should behave and what you should do if you are confronted with corruption. We expect that all of you will embrace the Handbook and its values and use them in all aspects of your day-to-day work.

The policy is for your benefit as much as for PayAlly's. If convicted of a bribery offence, PayAlly might get a significant fine and suffer lasting reputational damage. We may also lose our authorisation to provide payment services and may be forced to wind the company down.

If you are convicted of a bribery offence, you could face up to ten years in prison. The potential harm done by bribery, both to PayAlly and to you, is long term and hugely outweighs any potential short term gain. Bribery is just not worth the risk.

If you have any doubts about anything at all, refer to the Anti-corruption and bribery policy or you can speak to our Head of Legal in complete confidence. We are committed to eradicating corruption and we will stand by you in acting ethically.

Remember, take the RIGHT approach, and we can eradicate corruption together:

- **Responsibility.** You are responsible for your actions. If you break the law, you will have to face the consequences - which could mean a fine, imprisonment, or both.



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- **Integrity.** Don't compromise your integrity. If you think something is wrong, ALWAYS report it. If you aren't sure, consult the Anti-corruption and bribery policy. Don't ever let yourself be forced into doing something you know or suspect is wrong.
- **Genuineness.** Always pay genuine prices for genuine goods and services. Never pay over the odds. Agents who ask for especially large fees or commissions may do so in order to pay bribes on your behalf. If this happens, you will be responsible. Excessive payments are obvious and will always be uncovered.
- **Honesty.** Act honestly and in good faith at all times and in all aspects of your work.
- **Transparency.** Keep accurate records (including all invoices and receipts) of everything that you do, especially in relation to the payments you make and what they are for. Full and accurate records demonstrate complete transparency and that you have nothing to hide.

Don't bribe. Do the RIGHT thing.

### Board of directors

Rafal Andzejewski

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**PayAlly**