



## PTL Anti-Bribery Policy

### 1. Purpose

PaytestLab, Inc. (PTL) is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable anti-bribery laws. This policy provides guidelines to prevent bribery and corruption in all business dealings.

### 2. Scope

This policy applies to all employees, officers, directors, agents, consultants and partners (such as distributors and resellers) and any other third parties acting on behalf of PTL worldwide.

### 3. Definitions

- Bribery: Offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in a position of authority.
- Corruption: Abuse of entrusted power for private gain.
- Facilitation Payments: Small, unofficial payments made to expedite or secure the performance of a routine governmental action.

### 4. Policy Statements

- Prohibition of Bribery: PTL prohibits all forms of bribery and corruption, whether direct or indirect. Employees and associated persons must not offer, give, solicit, or accept bribes in any form.
- Facilitation Payments: Facilitation payments are prohibited. Any requests for such payments must be reported to the CEO of PTL immediately.
- Gifts and Hospitality: Gifts, hospitality, or entertainment must not be offered or accepted with the intent to influence business decisions. All such expenses must be reasonable, appropriate, and approved in accordance with PTL's guidelines.
- Political Contributions: Political contributions must not be made to gain any business advantage. Any political contributions must be transparent, legal, and approved by the CEO.
- Charitable Donations: Charitable donations must not be used as a subterfuge for bribery. All donations must be transparent, legal, and approved by the CEO.

### 5. Responsibilities

- Employees and Partners: All employees, resellers, and other partners must read, understand, and comply with this policy. They are responsible for reporting any suspected or actual breaches of this policy.
- Management: Managers are responsible for ensuring that their teams and associated partners understand and comply with this policy. They must also report any concerns to the PTL CEO.

## **6. Reporting and Investigation**

- Reporting: Employees, resellers, and partners are encouraged to report any concerns or suspicions regarding bribery and corruption to the CEO.
- Investigation: All reports of potential breaches will be investigated promptly and thoroughly. The CEO will oversee investigations and take appropriate action, including disciplinary measures and reporting to relevant authorities if necessary.

## **7. Communication**

This policy will be communicated to all employees, officers, directors, agents, consultants and partners (such as distributors and resellers) and any other third parties acting on behalf of PTL worldwide.

## **8. Record Keeping**

All financial records, expenses, and transactions must be accurately and transparently recorded in accordance with PTL's accounting policies and legal requirements.

## **9. Monitoring and Review**

The CEO will regularly review this policy and its effectiveness.

## **10. Consequences of Non-Compliance**

Non-compliance with this policy may result in disciplinary action, including termination of employment or partnership agreements, and may also lead to legal action.

## **11. Acknowledgment**

All employees, resellers, and partners must acknowledge receipt and understanding of this policy.