



A  BANKING CIRCLE GROUP COMPANY

Anti-Bribery and Corruption Policy (for B4B website)

Owner: Compliance department

December, 2023

www.b4bpayments.com

Policy Statement

It is the policy of Payment Card Solutions (UK) Ltd and UAB B4B Payments Europe ("B4B Payments") trading as B4B Payments ("B4B") that all Business Partners shall actively avoid and prevent incidents of bribery involving B4B, its staff and any persons or organisations associated with it.

Application of this Policy

Business Partners (you) will ensure that:

- you don't promise, offer, pay, solicit or accept bribes in any form, or employ any third party to do so
- you don't make facilitation payments (backhanders, kickbacks or palm greasers) to officials or decision makers
- neither commercial considerations nor a sense of loyalty to clients, suppliers or other parties shall be permitted to take precedence over this Policy

Bribery and Corruption

Bribery is offering, promising, giving, requesting, agreeing to receive, or accepting a financial or other advantage (for example, money, gifts, loans, hospitality, services, discounts, the award of a contract or anything else of value), to induce a person to act improperly in the performance of their relevant function, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

A person acts improperly where they act illegally, unethically, or contrary to the expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts during employment, or other activities by, or on behalf of, any organisation of any kind.

Bribery can take many forms, including:

- 'Facilitation payments' (also known as 'back-handers' or 'grease payments') are small, unofficial payments made to secure or expedite a routine or necessary action. They are also illegal in many countries, including the UK and Lithuania.
- 'Kickbacks' are incremental payments negotiated and paid in return for a business favour or advantage. A typical example might be a commission paid in exchange for selecting a particular vendor. Kickbacks are bribes and are prohibited under this Policy. They are also illegal in many countries, including the UK and Lithuania.

Corruption is the abuse of entrusted power or position for private gain.

Hospitality and Gifts

'Entertainment' or 'hospitality' is generally where you accompany or invite a third party to an event. It includes, for example, business meals, invitations or tickets to recreational, cultural or sports events and venues, as well as any associated travel, accommodation, meals and refreshments.

Offering or accepting hospitality is permitted, provided that the hospitality is:

- for the purposes of:
 - establishing or maintaining a good business relationship;
 - improving or maintaining B4B's image or reputation; or
 - marketing or presenting B4B's products and/or services effectively;
- and is:
 - reasonable and appropriate (an objective assessment based on the jurisdiction);
 - within the reasonable financial threshold

For example, accepting or providing invitations to domestic sporting events for existing clients or suppliers with whom B4B is not currently negotiating is acceptable.

'Gifts' are non-cash items given as a token of appreciation or gesture of gratitude.

Giving or receiving cash or cash equivalents (such as gift certificates or vouchers) is not permitted.

Giving or accepting non-cash gifts is permitted, provided that the gift is:

- not made with the intention of influencing a third party to obtain or retain business or a business advantage for B4B, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits; and
- given in the company's name.
- appropriate in the circumstances, taking account of the reason for the gift, its timing and value;
 - given openly, not secretly;
 - in compliance with any applicable local law;
 - within the reasonable financial thresholds;

Suspicion of Bribery

If there is reason to suspect that, even though the value of a gift or offer of entertainment is reasonably low, it is being offered, given, requested or received to encourage or reward improper performance (particularly during commercial negotiations), then the offer shall be declined and B4B shall be notified as soon as possible.