

Anti-Corruption Policy

1. Introduction

iVote dooel Skopje is committed to conducting its business in accordance with the highest standards of ethical conduct, compliance with all applicable laws, and a staunch stance against corruption in any form. This Anti-Corruption Policy is designed to provide guidance to all employees, contractors, and third parties associated with iVote, ensuring that the company's operations worldwide adhere to our core values of integrity, transparency, and accountability.

2. Scope

This Policy applies to all employees, officers, directors, and any individuals or entities acting on behalf of iVote, including agents, consultants, contractors, and other third parties, regardless of geographic location.

3. Prohibition of Corruption

iVote LLC prohibits corruption in any form, including but not limited to bribery, kickbacks, embezzlement, and extortion. Specifically, the company prohibits:

Offering, promising, giving, or authorizing the giving of anything of value, directly or indirectly, to any government official, political party, candidate for public office, or any private sector employee or representative, in order to influence official action or obtain an improper advantage.

Soliciting, accepting, or receiving any form of bribe or kickback from any individual or entity in exchange for providing business advantages.

4. Compliance with Laws

iVote LLC is committed to full compliance with all relevant anti-corruption laws and regulations in every jurisdiction in which it operates, including but not limited to the United States Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

5. Gifts, Hospitality, and Expenses

The exchange of gifts or hospitality (including travel expenses) is subject to the following restrictions:

Must be reasonable, transparent, and justifiable as a legitimate part of doing business.

Must not be offered or accepted with the expectation or implication of influencing the decision-making process.

Must comply with applicable laws and professional standards.

6. Political Contributions and Charitable Donations

iVote LLC does not make political contributions. Charitable donations are permitted but must be made transparently, without any intent to influence business decisions or government actions, and in compliance with applicable laws.

7. Record Keeping

Accurate records of all transactions and financial dealings must be maintained in detail, reflecting the true nature of the transactions, to ensure compliance with applicable legal and regulatory standards.

8. Reporting and Whistleblower Protection

Employees and associates are encouraged to report any suspicious activities or violations of this Policy confidentially and without fear of retaliation. iVote LLC is committed to protecting whistleblowers from any form of reprisal or discrimination.

9. Policy Enforcement

Violations of this Policy will result in disciplinary action, up to and including termination of employment or contracts, and may subject the individual to legal penalties.

10. Training and Awareness

All employees and relevant third parties will receive regular training on this Policy and the importance of ethical conduct and compliance with anti-corruption laws.

11. Review and Update

This Policy will be reviewed and updated periodically to ensure it remains effective and aligned with best practices and legal requirements.

Agreement to Comply:

Silvija Gelevski, CEO representing iVote

Date & Signature:

01.01.2024

