

# **ANTI-BRIBERY AND CORRUPTION POLICY**

## POLICY AMENDMENT HISTORY

Version Number	Approval Date	Amended by	Reasons for Amendment
V1	26/4/2021	-	-
V2	22/2/2022	CO	Amendment of Articles 7, 9 and 12
V3	21/3/2022	Administration	
V4	4/5/2022	CO	Amendment of Articles 7, 9.1.5 and 12
V5	8/3/2023	CO	Amendment of Articles 10 and 12
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V7	08/04/2024	CO	Amendment of Articles 6.1.8, 9, 11 and Annex I

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## 1. Definitions/Interpretations

“Authority” means that National Betting Authority.

“Board” means the Board of Directors of the National Betting Authority.

“Bribery” means the direct or indirect offer, promise, delivery, acceptance or solicitation of an unjustified advantage of any value (financial or otherwise), regardless of location, in violation of applicable laws, as an incentive or reward for a person to act or refrain from acting in accordance with their duties.

“Active Bribery” means bribery in which a person promises or provides an employee with improper benefits of any nature so as to act or refrain from acting in accordance with their duties, either directly or through the intermediary of a third party.

"Compliance Officer" under this Policy means the Compliance Officer of the Authority appointed pursuant the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007 (Law 188(I)/2007).

“Passive Bribery” means bribery in which an employee, in violation of their duties, requests or receives any unlawful benefits of any kind for themselves or for a third party for an act or omission in the course of or contrary to their duties, directly or through the intermediary of a third party.

"Facilitation Payment" means payment of an amount aimed at encouraging an employee to perform their duty, especially in cases where the amount of the payment exceeds the value of the ordinary fee. This is a widely used practice in some countries for the purpose of expediting or securing ordinary public services or documents.

“Policy” means the current Anti-Bribery and Corruption Policy.

“Personnel” includes the President and the Board Members, officers, employees, temporary employees and volunteers of the Authority.

The above definitions of the terms “bribery”, “active bribery”, “passive bribery” and “facilitation payment” are provided merely to facilitate understanding of the current Policy. They do not replace the definitions of the corresponding criminal offences as defined in the legislative framework set out in Annex A hereto.

## **2. Purpose of the Policy**

The purpose of the Policy is to strengthen the commitment of the Authority’s Board to zero tolerance for bribery, by creating a framework of obligations and guidelines that will be used as tools for preventing, deterring, and combating bribery. More specifically, the Policy aims to:

- a) Comply with the current legal and regulatory framework for combating bribery;
- b) Facilitate better understanding of the definition of bribery and its various forms;
- c) Encourage confidential reporting of any incidents or suspicions of bribery through specific communication channels;
- d) Raise awareness and provide guidance to the Authority’s personnel and partners to recognize actions related to bribery;
- e) Protect the Authority’s reputation.

## **3. Anti-Bribery Statement of the organisation**

3.1 The Authority is committed to conducting its operations in an ethical and transparent manner. To adopt, implement and improve processes that ensure the prevention of bribery. To maintain zero tolerance towards bribery and corruption activities. It is also committed to acting professionally, fairly and with integrity in all its business transactions and relationships.

3.2 The Authority complies with all laws related to the fight against bribery and corruption, including both national legislation as listed in Annex A and relevant European or international laws, directives and regulations.

## **4. Scope**

4.1 This anti-bribery and corruption policy applies to the Authority's personnel and business partners (external parties with whom the Authority already has, or plans to establish, business relationship) such as supervised parties, joint ventures, partners, external service providers, consultants, subcontractors, suppliers, bookmakers or representatives, intermediaries and investors.

4.2 within the framework of this policy, the term "third party" refers to any person or organisation that the Authority interacts and works with. It includes the above-mentioned business partners, as well as other business contacts, government and public entities, including their advisors, representatives and officials, and political and public institutions.

4.3 Any agreements that the Authority carries out with third parties shall be subject to clear contractual terms, including specific provisions requiring the third party to comply with minimum standards and procedures relating to the fight against bribery and corruption.

## **5. All Forms of Bribery are Forbidden**

5.1 Bribery is illegal. It is prohibited for all personnel and all persons referred to in paragraph 5 to engage in any form of bribery, regardless of the amount and/or frequency and/or active and/or passive and/or through a third party.

5.2 In case of uncertainty as to whether something constitutes a bribe or gift or an act of hospitality, personnel must seek further advice from the Authority's Compliance Officer in accordance with paragraph 11.

## **6. Acceptable and Non-acceptable Matters**

### **6.1. Gifts and Hospitality**

6.1.1 Hospitality gestures may be considered acceptable in order to develop and maintain business relationships. However, personnel must avoid acts or behaviors that could reasonably be interpreted as an attempt to obtain or maintain an unfair commercial advantage or that may have an unfair or negative impact on the Authority's reputation.

6.1.2 The Authority accepts gestures of hospitality and goodwill (whether given to or received from third parties) provided that the provision or receipt of gift meets the following conditions:

- It is in compliance with the legislation;
- It is accurately and thoroughly recorded, following the Authority's policies;
- It is not conditional on any quid pro quo;
- It is not in the form of cash or cash equivalent;
- It is of an appropriate type and value and given at an appropriate time, taking into account the occasion for the gift (e.g. small gifts during the Christmas period, small thank you presents to a company for the assistance provided in a major project after its completion);
- The frequency of gifts of hospitality gestures should not imply an improper purpose;
- The gifts should be symbolic, made on the occasion of name days or religious celebrations or other occasions that are considered proper and should be offered within the framework of established customs and social practices;
- The gifts should be of low financial value within the framework of normal business practices (e.g. office supplies, calendars, etc.);
- The gift does not exceed the maximum acceptable value of €100. In the case of a gift reasonably believed to be of greater value, this should be disclosed to the Compliance Officer and subsequently to the President who shall inform the Board, which is responsible to decide on the subsequent actions.

6.1.3 Gifts of low and reasonable value may include:

- Meals of reasonable value (up to €80 per person), provided that the frequency of such meals is not higher than twice annually for the same person,
- Form of entertainment in line with the business relationship,
- Gifts that bear the corporate logo of the business partner (e.g. t-shirts, notebooks, mugs, etc.),

- Small objects or memorabilia related to the country of origin of the business partner (e.g. local food, drinks, traditional items, etc.).

6.1.4 It is not allowed to offer or receive presents of the following form:

- Money, regardless of value
- Cash equivalent gifts (e.g. prepaid cards, vouchers, travel cheques, etc.)
- Any kind of gift during open procurement period or during negotiations of contract from related parties
- Travel or accommodation (e.g. five-star hotel accommodation)
- Type of entertainment that may be considered luxurious or expensive
- Jewellery, pieces of art and other items of large value
- Personal gifts

6.1.5 The Authority acknowledges that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions, therefore definitions of what is acceptable and what is not might differ for parties involved. In cases when it is inappropriate to reject a gift, i.e. an individual of a particular religion/culture may be offended by the rejection, the gift may be accepted, provided that it is disclosed to the Compliance Officer, who will evaluate the circumstances.

6.1.6 Prior to offering or accepting a gift or a hospitality gesture, members of the personnel must ensure that –

- (a) hospitality gestures are proper to the situation and circumstances;
- (b) they are offered in good faith and for no other purpose;
- (c) they will have no negative impact on the Authority's reputation;
- (d) they are in compliance with the legislation, and the Authority's regulations and the anti-bribery policy.

6.1.7 Gifts and hospitality gestures must always be disclosed to the Compliance Officer and the President on the same day that are given or received.

6.1.8 The Compliance Officer maintains a register of all approvals and relevant documentation relating to receiving or offering hospitality or gifts. This register is audited by the President of the Authority on a quarterly basis. All gifts that are received by the reception staff and are addressed to the Authority's employees, are recorded. Then, the reception staff notifies the person the gift is addressed, the Compliance Officer and the President as soon as possible and in case no later than 48 hours.

6.1.9 The Compliance Officer and the President may draft a procedure and/or instructions for the implementation of this paragraph. The procedures and instructions for implementation shall be approved by the Board.

## **6.2 Facilitation Payments**

6.2.1 The Authority neither accepts nor makes facilitation payments of any kind. It recognizes that facilitation payments are a form of bribery involving the offer of an illegal or unofficial payment in exchange for expedited services, which the paying party is anyway legally entitled to receive without making such payment.

## **6.3 Political Donations**

6.3.1 The Authority does not make cash or any other type of in-kind donations to support political parties or candidates.

6.3.2 Members of the organisation who wish to support or contribute to a political party or candidate may do so only in their personal capacity. Accordingly, any use of Authority data, information or resources for this purpose is prohibited.

## **6.4 Charity Donations**

6.4.1 The Authority is allowed to make donations to charitable institutions - either in the form of services, knowledge, time, or financial contribution (cash or otherwise) - and shall disclose all its charitable contributions.

6.4.2 It shall be ensured in advance that all charitable donations are legal and ethical, in accordance with laws and practices, and that donations are not offered or made without the approval of the Compliance Officer.

6.4.3 Charitable donations of any kind, cash and/or material, to the Authority and its personnel are prohibited.

## **6.5 Conflict of Interest**

6.5.1 The concealment of any internal or external conflict of interest is prohibited. Personnel is responsible for reporting any actual or potential conflict of interest, such as family, financial or other connection, directly or indirectly related to their responsibilities and duties. This practice contributes to the identification of circumstances under which members of the personnel could facilitate, or fail to prevent or report, bribery.

6.5.2 A register of actual or potential conflict of interest and actions taken to mitigate the conflict is kept.

## **7. Independence of Compliance Officer**

The Authority shall ensure that there are no conflicts of interest with other responsibilities and tasks performed by the Compliance Officer and that he/she is not involved in activities of the organisation that involve more than low bribery risk, so as to ensure his/her independence. Furthermore, the Authority shall ensure that the Compliance Officer is adequately resourced and is delegated sufficient authority by the Authority, enabling him/her to carry out his/her responsibilities effectively. The Compliance Officer shall report directly to the management of the organisation, such as the President and/or the Internal Audit Committee and/or the Board of the Authority.

## **8. Personnel Responsibilities**

8.1 The personnel of the Authority must read, understand and comply with the information contained in this policy and any anti-bribery and corruption training or other information provided to them.

8.2 All members of personnel are equally responsible for preventing, detecting and reporting bribery and other forms of corruption. They are required to avoid any activities that could lead to or imply a breach of this anti-bribery policy.

8.3 If there is a belief or suspicion that bribery or corruption in breach of this policy has occurred, or might occur in the future, the Compliance Officer must be informed.

8.4 Senior members of the personnel must inform their subordinates about this Policy and its related procedures, and encourage them to adopt a positive, transparent work ethic, that enables them to freely express their concerns.

8.5 It is prohibited to obstruct the investigation of suspected or actual bribery, whether the audit is conducted internally or an investigation is carried out by external competent authorities.

## **9. Reporting Suspicions or Incidents of Bribery**

### **9.1 Reporting Concerns**

9.1.1 Compliance with and enforcement of this Policy, and the procedure for reporting and notifying potential breaches, is the responsibility of the Compliance Officer.

9.1.2 The Authority shall inform all members of the personnel regarding the complaints procedures so that members can raise concerns quickly and confidentially.

9.1.3 Any member of personnel who discovers or has reasonable grounds to suspect that an act of corruption or bribery has been or is likely to occur by another member of the personnel shall report it in writing to the Compliance Officer as soon as possible, providing all necessary evidence to support their claim. Reports must be made in good faith on the basis of a sincere and reasonable belief that an event of non-compliance with this Policy has occurred or is likely to occur.

9.1.4 Persons in doubt about the compatibility of a particular action or the application of this Policy may either contact the Compliance Officer directly, or submit written queries seeking clarification, advice and guidance.

9.1.5 Internal reports and queries -

- should be made directly to the Compliance officer or

- should be emailed to [complianceofficer@nba.gov.cy](mailto:complianceofficer@nba.gov.cy), or
- should be submitted in the box located on the office mezzanine anonymously.

## **9.2 Necessary Actions of Parties Involved in Bribery**

A person who, while performing his/her duties, discovers or has reasonable cause to believe that an act of corruption or bribery has been committed by another member of the personnel (in the performance of his/her duties) must report it in writing to the Compliance Officer as soon as possible.

## **9.3 Protection of Reporting Personnel**

9.3.1 In the event of refusal to accept or offer a bribe or in the event of reporting a concern about possible acts of bribery or corruption, it is understood that there might be fears of potential reprisal. The Authority will support anyone who raises concern about bribery or corruption in good faith, even if the resulting investigation concludes that their report was incorrect.

9.3.2 The Authority will ensure that no one is discriminated against as a result of refusing to accept or to offer a bribe or to be involved in other corrupt activities or for reporting a concern about possible acts of bribery or corruption.

9.3.3 In the event of adverse treatment as a result of a reported concern or refusal to accept a bribe, the Compliance Officer and the President must be informed immediately.

9.3.4 The Authority seeks to strengthen the protection of persons who submit a report in relation to specific violations of European Union law, acts or omissions related to the commission or possible commission of a criminal offense or to a person's non-compliance with his legal obligation, violations that endanger or likely to endanger the safety or health of any person, violations that cause or are likely to cause damage to the environment. The 490-WHISTLEBLOWING POLICY is relevant on this matter.

## **10. Training and Communication**

10.1 The Authority shall provide training on this Policy on a regular basis and in proportion to the potential risk of bribery and corruption arising from each position in the organisation. Training shall be provided to all new personnel members as part of the recruitment process or within the first month of appointment to the Authority's Board. The Compliance Officer shall be responsible for conducting at least three training sessions per year to the personnel and one training session annually to the Board. In addition, the Compliance Officer shall notify the personnel regarding any modifications to the Policy via email. It is also understood that the Compliance Officer may recommend to the President the outsourcing of training. Moreover, the Authority shall provide specialized annual training to the Compliance Officer to ensure the effective implementation of this Policy.

10.2 The Authority's anti-bribery and corruption and zero tolerance policy are explicitly communicated to all suppliers, contractors, business partners and third parties by the Compliance Officer at the beginning of the business partnership. In case of amendments thereto during the course of the relationship, the Compliance Officer shall notify the business partners by email. The Compliance Officer is also responsible for making the policy public on the Authority's website.

10.3 The Authority shall provide specialist anti-bribery and corruption training to employees and other business partners when it is deemed necessary to enhance their knowledge on compliance with this Policy.

10.4 All procedures, seminars, training material or any other type of material that may be needed by the personnel in order to better understand and implement this policy are located in the internal folder named "Policies and Procedures" which is accessible to all personnel.

10.5 After an NBA personnel member attends a training, they shall submit a Compliance Program - Certificate of Participation as set out in Annex II, as well as a completed questionnaire prepared by the Compliance Officer on a case-by-case basis, so as to verify the level of training and comprehension of this Policy. It is understood that the Compliance Officer shall conduct additional seminars and/or training depending on the findings of the questionnaire.

## **11. Violations and Sanctions**

### **11.1 Disciplinary Sanctions**

11.1.1 The Authority has zero tolerance for any conduct that does not comply with this Policy and any violation of this Policy by its personnel is considered a very serious event, which constitutes disciplinary offense that will result in penalties, in accordance with Article 50 of the National Betting Authority (Employee Terms of Service) Regulations of 2017 RAA.247/2017.

11.1.2 The Authority reserves the right to terminate a contractual relationship with an employee if they breach the anti-bribery policy.

### **11.2 Criminal Sanctions**

Part III of the Criminal Code (Chapter 154) provides for some of the most common criminal offences related to bribery and related offences. The below are indicatively listed:

Article 100: Any person who is employed in the public service and is charged with the performance of any duty by virtue of such employment corruptly asks, receives or obtains, or agrees or attempts to receive or obtain, any property or benefit of any kind for himself or any other person on account of anything already done or omitted to be done, or to be afterwards done or omitted to be done, by him in the discharge of the duties of his office; or corruptly gives, confers or procures, or promises or offers to give or confer, or to procure or attempt to procure, to, upon, or for any person employed in the public service, or to, upon, or for any other person, any property or benefit of any kind on account of any such act or omission on the part of the person so employed, is guilty of a misdemeanour, and is liable to imprisonment for seven years, and also to a fine of up to a hundred thousand euro or both. Their property which was acquired via bribery or corrupted methods shall be confiscated, pursuant Concealment, Investigation and Confiscation of Income from Certain Criminal Acts Law.

Article 101: Any person who, being employed in the public service, takes, or accepts from any person for the performance of his duty as such officer, any reward beyond their proper pay and emolument or any promise of such reward is guilty of a misdemeanour, and is liable to imprisonment for three years, and also to a fine.

Article 102: Any person who, being employed in the public service, receives any property or benefit of any kind for himself, on the understanding, express or implied, that he shall favour the person giving the property or conferring the benefit, or any one in whom that person is interested, in any transaction then pending, or likely to take place, between the person giving the property or conferring the benefit, or any one in whom he is interested, and any person employed in the public service, is guilty of a misdemeanour, and is liable to imprisonment for two years and also to a fine.

Article 103: Any person who, being employed in the public service, and being charged by virtue of his employment with any judicial or administrative duties respecting properties of a special character, or respecting the carrying on of any manufacture, trade or business of a special character, and having acquired or holding, directly or indirectly, a private interest in any such property, manufacture, trade or business, discharges any such duties with respect to the property, manufacture, trade or business, in which he has such interest or with respect to the conduct of any person in relation thereto, is guilty of misdemeanour, and is liable to imprisonment for one year.

Article 105A: (1) Any person who shall attempt in any manner to influence any authority, commission, collective body or member thereof or any public official in the performance of their duties in connection with a recruitment, appointment, promotion, placement procedure, transfer or exercise of disciplinary authority in a public service, in favour of themselves or in favour or against any other person, shall be guilty of a criminal offence and is liable to imprisonment for a term not exceeding twelve months or to a fine not exceeding one thousand pounds or to both.

(2) Any member of an authority, committee, collective body or any public officer has been approached for the purpose of influencing as referred to in the preceding subsection and has failed to report the approaching person to the Chief of Police of the district where the offence was committed within three days of the offence, shall be guilty of an offence and on conviction shall be liable to imprisonment for a term not exceeding twelve months or to a fine not exceeding two thousand pounds or to both.

## **12. Monitoring and Review**

12.1 The Compliance Officer shall assess the adequacy and effectiveness of the system on an ongoing basis and shall submit a report with observations and recommendations to the President and the Internal Audit Committee of the Authority annually in accordance with paragraph 12.2, and ad-hoc if necessary and/or required by the Audit Committee.

12.2 The suitability, adequacy and effectiveness of the entire system is reviewed annually by the Authority's Internal Audit Committee, in accordance with the Information Security Management System and Anti-Bribery Management System Review Policy (II-140 - Management Review Policy). The Committee's findings, as well as any recommendations for revisions to the system, are submitted for review to the Authority's Board, which makes decisions on the matter. Furthermore, the Board shall review the results of the latest internal audit (paragraph 14.3) and the results of the Compliance Officer's risk assessment (paragraph 13) and revise and/or set new objectives for the system accordingly. The objectives of the system should include clear timeframes, allocation of resources to achieve them, a mechanism for monitoring and evaluation, and sanctions if these are not achieved. The Compliance Officer shall include an update on the development of the above during the assessment of paragraph 12.1.

12.3 The Policy is approved by the Authority's Board, it is reviewed every six months and revised whenever necessary. The President is responsible for preparing and proposing revisions to the Policy, acting on his/her own initiative or on the recommendation of the Compliance Officer.

12.4 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

12.5 Any need for improvements is implemented as soon as possible. The personnel is encouraged to offer feedback on the policy if they have any suggestions on how to improve it. Feedback should be directed to the Compliance Officer and the President.

## **13. Risk Assessment**

13.1 This Policy requires a risk assessment to be carried out among the personnel, business partners and stakeholders to identify the level and potential risks of bribery and corruption. It is the

responsibility of the Compliance Officer to conduct the assessment and, depending on the results, to take appropriate actions or adopt such measures to reduce the risk of bribery and corruption.

13.2 The risk assessment methodology and model are contained in the Authority's "160 - Risk Assessment Framework Policy".

#### **14. Final Provisions**

14.1 This policy forms part of the contract of employment of personnel, and the Authority may amend it at any time to improve its effectiveness in combating bribery and corruption.

14.2 The retention period for records and documents in this policy and information and data concerning a violation or non-compliance with the policy by partners or personnel shall comply with the 210-Data Retention Policy.

14.3 The Authority shall carry out internal audits for the purpose of ascertaining the organisation's compliance with this policy and the provisions of ISO37001 at least annually.

14.4 This policy came into force on 27 April 2021 and was reviewed on 31 January 2022, 23 March 2022, 4 May 2022, 8 March 2023, 29 March 2023 and 8 April 2024.

## **Annex I**

### **Legal Framework**

1. Criminal Code (articles 100, 101, 102, 103, 105A, 369)
2. Prevention of corruption law (Chapter 161)
3. Criminal law convention on corruption (penal) law of 2000 (23(III)/2000)
4. Criminal law convention on corruption (amended) law of 2012 (22(III)/2012)
5. Additional Protocol to the Criminal Law Convention on Corruption (Penal) Law of 2006 (22(III)/ 2006)
6. Additional Protocol to the Criminal Law Convention on Corruption (Penal) Law of 2012 (23(III)/ 2012)
7. United Nations Convention Against Corruption (Penal) Law of 2008 (25(III)/2008)
8. General Administrative Law Principles Law 1999 (158(I)/1999)
9. Regulating Access to Private Sector by Former Public Sector Officers Law (114(I) of 2007)
10. Public Service Laws of 1990-2013 – Particularly with regard to corruption, the following Articles are noted: Article 60: Fundamental duties of public officers; Article 65: Private employment and interest in companies; Article 66: Acquisition of property; Article 67: Official information, evidence and documents; Article 69: Gifts and bribes; Article 69A: Obligation to report acts of corruption or bribery to the appropriate authority

11. Part VII Disciplinary Code; Public Servants Code of Conduct
12. The Illicit Acquisition of Property Benefits by State Officials and Public Officers Law (51(I)/2004)
13. The Professional Incompatibility of certain Officers for certain professional and other activities Law (7(I)/2008)
14. The certain officers of the Republic of Cyprus (property statement and monitor) Law of 2004 (50(I)/2004)
15. The ninth amendment to the Constitution Law (69(I)/2016)
16. The National Code of Conduct on Public Procurements (Treasury of the Republic)
17. The Regulation of procedures for the award of public contracts and for related matters law of 2016 (73(I)/2016) and relevant regulations 47
18. The protection of confidentiality of private communication (surveillance of conversations and access to registered content of private communication) (amended) law of 2015 (216(I)/2015)
19. The prevention and suppression of money laundering and terrorist financing law (amended) of 2016 (8(I)/2016)
20. The agreement for the establishment of the International Anti-Corruption Academy as an international organization law of 2011 (19(III)/2011)
21. The internal audit law of 2003 (114(I)/2003)

22. The civil law convention on corruption and supplementary provisions law of 2004 (7(III)/2004)

23. The Protection of Persons Reporting Violations of Union and National Law N. 6(I)/2022

## ANNEX II

### Compliance Programme – Certification of Participation

I hereby certify that:

1. I participated in the training program ..... in compliance with the Policy Against Bribery and Corruption of the NBA, which was held on .....
2. During the training program I was informed around the importance of adhering to the Policy, and I learned about the mechanisms and procedures for reporting potential breaches of the law against corruption to the relevant people, offices and departments of NBA.
3. I am fully aware of the impact of the law against bribery and corruption on my daily actions, as well as of the severity of the sanctions that may be imposed on any employee of the NBA under the applicable law, individually or jointly, and on the NBA as a whole, in case of a violation.
4. I understand that conduct that falls within the scope of NBA’s Policy against Bribery and Corruption is taken into account in the evaluation and career development of each NBA employee in the same way that non-compliance and non-implementation of the Policy is taken into account. I further understand that such conduct may result in sanctions being imposed on the person personally liable in accordance with the NBA Regulations.

Full name:.....

Position in NBA :.....

Date :.....

Comments / Suggestions:

.....  
.....  
.....

Signature