Anti Bribery and Corruption Policy
CoinMENA FZE

Our commitment

CoinMENA FZE has zero tolerance for bribery and corruption. We conduct our business honestly and expect the same standard from our Board, Staff, clients, contractors, suppliers, agents, business partners and every person acting for or on behalf of CoinMENA.

This public policy explains the conduct we prohibit, the controls we apply and how any person can report an actual or suspected concern. It is supported by detailed internal procedures for due diligence, approvals, investigations, training and record keeping.

1 Purpose and regulatory basis

This Policy applies to CoinMENA FZE and supports compliance with applicable anti-bribery and anti-corruption laws and regulations in the United Arab Emirates and other jurisdictions relevant to our business.

CoinMENA FZE is licensed by the Dubai Virtual Assets Regulatory Authority to provide Broker-Dealer Services under VASP Licence VL/23/09/001. This Policy has been prepared with reference to Part VI of the VARA Compliance and Risk Management Rulebook, including Rule VI.C.1 on published reporting channels and Rule VI.D.4 on public disclosure and communication of a zero-tolerance approach. If this Policy conflicts with a mandatory legal or regulatory requirement, that requirement prevails.

2 Zero tolerance

CoinMENA prohibits all forms of bribery and corruption, whether direct or indirect and whether offered, promised, given, requested or accepted. The prohibition applies regardless of local custom, perceived commercial benefit or potential loss of business.
No person may use another person or organisation to do anything that would be prohibited if done directly. CoinMENA will not penalise any person for refusing to participate in bribery or corruption, even when that refusal results in delay or loss of business.

3 Scope

This Policy applies to CoinMENA's Board and Staff and to contractors, consultants, agents, intermediaries, suppliers, business partners and any other person acting for or on behalf of CoinMENA. Clients and counterparties are expected to comply with these standards in all dealings with CoinMENA.

4 Prohibited conduct

The following conduct is prohibited:

- offering, promising, giving, requesting or accepting anything of value to obtain or reward an improper advantage;
- making or receiving kickbacks, secret commissions, facilitation payments or other improper payments;
- using gifts, hospitality, travel, donations, sponsorships or employment opportunities to influence a decision improperly;
- using an agent, intermediary, supplier or other third party to conceal or facilitate bribery or corruption;
- creating false, incomplete or misleading records or maintaining undisclosed accounts or funds;
- retaliating against any person who refuses to participate in misconduct or reports a concern in good faith; and
- ignoring warning signs that a payment or benefit may be connected to bribery or corruption.

5 Payments gifts hospitality and travel

CoinMENA does not permit facilitation payments. A payment made solely because of an immediate threat to a person's health, safety or liberty must be reported promptly to the Compliance Officer and recorded accurately. This safety exception does not permit a payment made for commercial convenience.

Gifts, entertainment, hospitality and sponsored travel must be lawful, reasonable, proportionate and connected to a legitimate business purpose. They must never be offered or accepted to influence a decision or secure an improper advantage. Cash and cash-equivalent gifts are prohibited. CoinMENA requires appropriate approval and accurate recording in accordance with its internal controls.

CoinMENA does not make donations or contributions to political parties. Any other sponsorship or contribution must be lawful, transparent, properly approved and must not be used to obtain an improper advantage.

6 Third parties and business partners

CoinMENA engages third parties only for legitimate business purposes. We apply risk-based due diligence before appointment and, where appropriate, during the relationship. Agreements may require compliance with this Policy, accurate invoices and supporting records, audit or information rights and termination rights for breach.
Payments must be reasonable for the services provided, made through approved channels and supported by adequate documentation. CoinMENA investigates material warning signs and will not continue a relationship that exposes CoinMENA to unacceptable bribery or corruption risk.

7 Reporting a concern

Any person, including a client, employee, contractor, supplier or other third party, may report an actual or suspected violation of applicable anti-bribery and corruption laws, this Policy or related requirements involving CoinMENA, its Board, Staff or anyone acting on its behalf.
Reports may be made through any of the following public channels:

Channel	Details
Email	compliance@coinmena.com
Post	25th Floor, Premises No. 2501-EP-26, Sheikh Rashid Tower, Dubai, United Arab Emirates

Reports should be made in good faith and may be made anonymously where permitted by law. CoinMENA treats reports confidentially to the extent permitted by law and prohibits retaliation against any person who raises a genuine concern or participates in an investigation.

8 How reports are handled

All reports will be reviewed by the Compliance Officer and handled fairly, confidentially and in accordance with applicable law, CoinMENA's internal procedures and the VARA Compliance and Risk Management Rulebook. Where appropriate, CoinMENA will conduct or commission an investigation, take necessary remedial or regulatory action and retain relevant records for the required period. Information may be provided to the Board, VARA, law-enforcement agencies or other competent authorities where required by law or regulation.

9 Governance and training

The Board has overall responsibility for ensuring that this Policy remains current and complies with applicable laws and regulations. The Compliance Officer has day-to-day responsibility for implementation and monitoring.

CoinMENA provides regular anti-bribery and corruption training to the Board and Staff. Training forms part of induction, and the current Policy remains available to relevant persons. Material changes are communicated through the appropriate internal and external channels.

10 Consequences of breach

CoinMENA investigates suspected breaches and takes proportionate remedial action. Consequences may include disciplinary action, termination of employment or a business relationship, recovery of losses, and referral to VARA, law enforcement or another competent authority where required by law or regulation.

11 Policy Review

This Policy is reviewed on an annual basis and the Compliance Officer monitors effectiveness via compliance monitoring framework. The Board has overall responsibility for ensuring this Policy is up-to-date and complies with all applicable laws and regulations.