

REGULATORY COMPLIANCE

MediCoin is committed to ensuring that the organization is not used to launder money, finance terrorism, evade government sanctions or otherwise facilitate criminal activity. It is MediCoin's policy to comply fully and continuously with Anti-Money Laundering ("AML"), counter-financing of terrorism ("CTF"), and anti-proliferation financing ("APF") regulatory requirements in the jurisdictions in which it operates.

Global Anti-Bribery and Corruption ("ABC") Statement

MediCoin, its subsidiaries, and its employees (collectively "MediCoin" or "the Company"), is committed to conducting business in accordance with the highest ethical standards. Our leadership has established the values of "Own It" and "Say It" as core values for conduct for MediCoin and its employees (inclusive of contractors and interns). These values include zero tolerance for any activity involving bribery or corruption or the appearance of bribery or corruption in any jurisdiction in which we operate and a strong value of reporting of activities that may not fit with the Company's risk appetite.

The Global Code of Conduct, and internal policies set forth general standards of conduct and ethical behavior that is expected from all persons that support the firm, whether it be an employee, contractor or intern. MediCoin reinforces these standards through regular leadership communication, training and management oversight of direct reports, including MediCoin team members taking steps to imbed such values when dealing with third parties who provide services to the Company.

As part of this global ethics and compliance program, MediCoin has adopted ABC policies and procedures to ensure compliance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, the Irish Criminal Justice (Corruption Offences) Act 2018, the Singapore Prevention of Corruption Act 1960 and other anti-corruption laws that apply to the company in the countries in which we do business ("Anti-Bribery Laws").

These ABC policies and procedures provide important guidelines and set minimum standards for all employees to follow when doing business with third parties, including applying heightened safeguards around our employees' interactions with individuals who work at government entities and companies that are state-owned or controlled ("Government Officials").

MediCoin does not authorize, involve itself in, or tolerate any business practice or employee action – even if considered "customary" in a particular region – that does not fully comply with our ABC policies and procedures, or Anti-Bribery Laws.

Employee Training and Responsibilities

MediCoin mandates employee participation in ongoing training that details our ABC policies and procedures and employees' roles and responsibilities. In particular, employees are:

- Strictly prohibited from offering, making, or accepting a bribe; or making a facilitation payment¹, either directly or through a third party - for any reason.
- Subject to a pre-approval process for the exchange of gifts, travel, or entertainment with Government Officials, and notification requirement in instances of accepting the same from, or offering to, anyone with whom MediCoin does or wishes to do business, beyond items of de minimis value.
- Required to recruit and hire based on candidates' merit and achievements. While third party referrals are permitted, hiring will not be done in exchange for favors or benefits to MediCoin.

Charitable Donations and Third Party Relationships

MediCoin is committed to supporting global initiatives such as financial inclusion, sustainability, blockchain research and innovation and empowering MediCoin employees to give back in our communities. All charitable donation and partnership requests are independently assessed for consideration, with full due diligence being conducted on the non-profits that we support to ensure compliance with MediCoin's ABC policies and procedures.

Considering the heightened bribery and corruption risks associated with third parties (including introducers, vendors, agents and business partners), MediCoin subjects these relationships to risk-based due diligence, monitoring and oversight.

MediCoin expects all employees to act ethically and has established a confidential ethics hotline to encourage reporting of actions that violate the Company's ABC policies or Anti-Bribery Laws.

¹Facilitation payments are minimal gratuities provided to low-level Government Officials to perform routine, non-discretionary functions, such as customs clearance, police protection, vehicle registration, visa renewal, and utilities, cargo or similar services. While the FCPA permits facilitation payments in some circumstances, other laws, such as the UK Bribery Act, prohibit them.

If you have any questions about our compliance policies, please contact us at compliance@medicoi.com