**POLICIES REGARDING ANTI-CORRUPTION AND CONFLICTS OF INTEREST**

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**Policy Statement**

This Policy commits the Voting Associates of DEVxDAO (also known as “**Program Associates**” or “**VAs**”) to conduct business ethically and with the utmost integrity in all its operations under the ETA’s Grant Program (“**Program**”). The purpose of this Policy is to clarify the provision of article 8 and 9 of the [ETA’s Program Associate Code of Conduct](https://emergingte.ch/wp-content/uploads/2021/03/Code-of-Conduct-v2.pdf) and further DEVxDAO’s commitment by explaining the prohibitions against Bribery and Corruption, and identifying the specific compliance requirements that must be observed related to these prohibitions.

This Policy applies globally to all VAs, Grant Applicants, and Grantees, as well as any affiliates thereto. Each of these individuals or entities must comply with all laws applicable to its respective business, wherever it is conducted.

As part of certifying compliance with this Policy, all Grant Applicants, Grantees, and VAs are required to complete [Confirmation of Compliance Questionnaires](https://docs.google.com/document/u/3/d/1l-8ncNhG3IW5xTMvUHY76EgjomHg8fGckDvsERGHqRc/edit) (“**Questionnaire**”).

# 1. Introduction

Every person who engages with the Program will comply strictly with all Swiss laws and regulations and all laws and regulations where the individuals and/or entities reside/are registered and conduct business. The purpose of this Policy and Questionnaire is to obtain full transparency from all Program participants regarding their compliance with such laws and regulations.

This Policy contains rules regarding Anti-Bribery, Conflicts of interest, and several other key areas of compliance.

The fact that competitors or others are doing something does not make that conduct legal or acceptable. If you are ever unsure about your legal obligations, you should contact the ETA Compliance Director for guidance and act in accordance with the advice you receive. Their contact information is set forth in Section 11 of this Policy.

## 1.1. Scope of application

This Policy applies broadly to any apparent or actual Conflict of interest scenario. This Policy applies to all VAs, Grantees, Grant Applicants, vendors, and other individuals within the Program, whether permanent or temporary and anyone else providing services.

Every VA and Grant Applicant, Grantee is responsible for:

* reading and knowing the contents of this Policy.
* keeping full and accurate records of all cases where Bribery is suspected.
* reporting cases where you know, or have a reasonable suspicion, that Bribery has occurred or is likely to occur in any of our businesses.
* knowing what to do and acting accordingly if you think something is wrong.
* maintain books and records that reflect all transactions in an accurate, honest, complete and timely way.

VAs and Grantees shall cooperate with any information requests or audits DEVxDAO or ETA may initiate to confirm compliance.

## 1.2. Overview

It is impossible to anticipate and to address every issue that may arise in the course of your duties. This Policy contains guidelines for handling the following issues that are most frequently encountered:

* General prohibition against kickbacks, bribes and payoffs
* Selection, retention and compensation of foreign agents, consultants, contractors or vendors
* Handling of Conflicts of interest
* Reporting prohibited conduct, Enforcement and compliance, Discipline

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## 1.3. Definitions

*See also* [Shared Definitions](https://www.emergingte.ch/wp-content/uploads/2021/03/ETA-Shared-Definitions-v3.pdf)

**Bribery** is a form of Corruption and means "receiving, accepting or offering of a financial or non-financial advantage (for example, gifts, return favor or hospitality) by, or to, any person in order to influence them, or another, to perform a duty improperly, or to reward that person for having already done so". Bribery is designed to make a person act wrongly to secure an advantage for the giver. Bribery can occur in both the public and private sectors.

**“Code Review DAO” (“CRDAO”)** is a specific DAO which reviews grant milestone deliverables submitted by Grantees as part of administration of the Program.

“**Conflicts of interest**” A Conflict of interest arises when a person has an actual or potential interest that impairs, or might appear to impair his or her independence or objectivity in the discharge of his or her responsibilities and duties. Related Party Transactions (as defined below) always involve Conflicts of interest. They are not necessarily improper, but must be handled in accordance with the procedures outlined below to ensure that such transactions are only entered into, if they are in the best interests of the Program.

**“Corruption”** is the misuse of office or power for private gain.

“**DEVxDAO**” is a specific DAO which shares ETA’s Mission and, as a DAO, serves both as a model and a testbed with respect to the Mission.

“**ETA**” Emerging Technology Association is the legal wrapper for the DEVxDAO.

“**Emerging Technology Association Program Associate Code of Conduct**” <https://emergingte.ch/wp-content/uploads/2021/03/Code-of-Conduct-v2.pdf>

**“ETA Compliance Director”** means Hayley Howe, Director of Legal and Compliance.

“**ETA Grant Program**” or “**Program**” means that certain program created and operated by ETA in furtherance of the Mission. The Program broadly consists of proposing, and identifying proposals for, projects which will serve the Mission, and then selectively and competitively awarding Grants to a diverse array of developers, scientists, and subject-matter experts around the globe in order that these projects might be gainfully pursued.

“**Grantee**” means any individual and/or entity who has signed a contract with the Emerging Technology Association or the Casper Association to receive a grant that is overseen by the Program.

“**Grant Applicant**” any individual and/or entity who has submitted a grant application within the Program.

**“OP”** short for Original Poster means the person who originally posted the proposal into the DEVxDAO portal.

**“Pre-Existing Relationship”** - includes friendship and animosity.

**“Program Associate**” means someone who signed the initial terms and conditions to access the DEVxDAO portal. This includes all Grantees and VAs. This person is a party to a non-terminated Program Associate Agreement by and between that party and ETA and who has been, and remains, designated as a Program Associate by ETA.

“**Questionnaire**” Confirmation Form A and B re: Grantees and VAs.

“**Related Party**” a VA, a Grantee, a VA Candidate, another key person of the DEVxDAO, a member of the board, a director or officer of the ETA, another key person of the ETA, a relative of any of the above mentioned persons, an entity in which an above mentioned person has a ten percent (10%) or greater ownership or beneficial interest or, in the case of a partnership or professional corporation, a direct or indirect ownership interest in excess of five percent (5%).

“**Related Party Transaction**” Any transaction, agreement, or other arrangement in which a Related Party has an interest and in which the ETA, or any affiliate of the ETA (including Casper Association) is a party or participant.

“**Substantial Financial Interest**”means a financial interest that is above 10’000 CHF and/or more than 25% of the total transaction value.

“**VA**” is an individual who has been made a voting associate of the DEVxDAO via passing formal simple vote and being rewarded reputation tokens.

“**VA Candidate**” is an individual who has submitted a grant to the DEVxDAO but has not yet received reputation tokens.

# 2. Laws governing your conduct

As a Program Associate, you must comply with all applicable laws, regulations and policies in the jurisdictions in which you conduct business or activities with the Program. Every person within the Program will be held personally responsible for any improper or illegal acts or policy violations committed. Such violations may lead to disciplinary actions including possible termination of applicable contracts as well as further actions by regulators and/or criminal authorities. Ignorance of the law or rules is not a defense for acting improperly or illegally.

The legislation referred to in this Policy as “Anti-Bribery Law” is the Swiss Anti-Money Laundering Act (AMLA), Swiss Criminal Code, Swiss Federal law against Unfair Competition, as well as other relevant regulations such as data privacy act / GDPR rules and OFAC regulations.

Under Swiss Law, the following is criminal:

* Any person who offers, promises or gives an employee, partner, agent or any other auxiliary of a third party in the private sector an undue advantage for that person or a third party in order that the person carries out or fails to carry out an act in connection with his official activities which is contrary to his duties or dependent on his discretion (Bribery of private individuals); and
* Any person who as an employee, partner, agent or any other auxiliary of a third party in the private sector demands, secures the promise of, or accepts an undue advantage for himself or for a third party in order that the person carries out or fails to carry out an act in connection with his official activities which is contrary to his duties or dependent on his discretion (Accepting bribes).

The ETA endeavors to mitigate or exclude criminal liability for crimes of Corruption.

Program Associates who break the law will also be disciplined internally and may have their relationship within the Program terminated.

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## 2.3. Specific rules governing all Grantees, VAs, and vendors

Agreements within the Program must be in writing (DocuSign sufficient) and must describe the services to be performed, the fee basis, the amounts to be paid and other material terms and conditions of the representation. Such agreements must be approved by the ETA. These agreements must contain provision that the counterparty follows any applicable law during the execution of the agreement.

The following rules apply to all Grantees and VAs in order to ensure compliance with this Policy and applicable laws, to the extent possible, should include the following protections:

1. Retaining the contractual right to terminate the contract for any breach of contract, violation of policy, or illegal or unethical conduct
2. Requiring detailed invoices for services performed
3. Defining payment terms strictly, and making only appropriate payments for services actually provided in accordance with the terms of the contract
4. Obtaining appropriate approval of all reimbursements of expenses, and requiring adequate documentation to support all charges associated with the activities

Furthermore, payments by the ETA must bear a reasonable relationship to the value of the services received and must be fully and accurately documented. Payments should never be made in cash, and should be made either to a respective CSPR Wallet or to a bank account in the country where the services are performed or where the offices of the contracting party is located. Payments to other locations must be approved beforehand by the ETA Compliance Director.

Personnel responsible for the administration of such payments should be able to identify and examine closely any “red flags” that may suggest potential violations under this Policy, Anti-Bribery Law and any other applicable foreign anti-Corruption laws, and, to the extent appropriate under the circumstances, other potentially applicable civil or criminal statutes. Any information about the prospective counterparty that indicates or merely suggests the possibility of conduct that is inconsistent with this Policy should be forwarded promptly to the ETA Compliance Director. Although there is not an exhaustive list of “red flags,” frequently cited cautionary signs include:

1. Requests for payments out of proportion to, or otherwise inconsistent with, the terms of the contract;
2. Unusual or excessive payment requests, such as requests for over-invoicing, up-front or advance payments, ill-defined or last-minute payments, success fees, unusual commissions;
3. Requests for payments to third parties;
4. The contracting party obtains assistance from another third party in providing services;
5. Requests for payments in a form or to a bank or business location inconsistent with the terms of the contract;
6. Lack of documentation supporting a payment request or invoice.

Personnel responsible for the administration of payments should periodically examine those payment histories.

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# 3. Anti-Bribery and Corruption

*The Program is operated on a meritocratic basis. No payoff, kickbacks, commissions, favor trading or the like is allowed in connection with any of the Program’s activities, including but not limited to the Grant Application, review, consideration and approval process.*

Anti-Bribery Law and this Policy absolutely prohibit directly or indirectly (i) the offering, promising or giving; and (ii) the requesting, agreeing to receive, or accepting of any type of kickback, bribe or payoff (whether in cash or any other form) made in order to influence any decision affecting the Program or ETA’s business or for the personal gain of an individual. This prohibition includes third parties.

Any form of Corruption and Bribery are prohibited. Every VA, Grantee as well as Grant Applicants conducts activities transparently, without accepting or offering advantages intended to improperly influence or appear to influence decision-making. We take a zero-tolerance approach to Bribery and Corruption by our people and our third-party representatives.

Everyone, including VAs, Grantees, Grant Applicants must ensure that all laws and regulations are fully complied with in relation to Bribery, Corruption, and any other prohibited or improper business practices and that it complies with the policies set forth in this section.

Everyone has a responsibility to speak out if you discover anything Corrupt or otherwise improper occurring in relation to our business. If you discover or suspect Corruption, report it to the ETA Compliance Director.

You may violate this Policy and be subject to discipline:

* Even if you played no role in making a prohibited payment, if you nevertheless knew about the activity and failed to report it to the ETA Compliance Director in accordance with the procedures described herein.
* If you deliberately “*put your head in the sand*” to avoid obtaining actual knowledge of a prohibited payment that you would then be obliged to report.

Bribery and Corruption may be committed by VAs, Grantees, Grant Applicants, ETA contractors or directors or VA Candidates and all of their representatives and other third parties who act on their behalf.

Examples include but are not limited to:

* VAs promising each other to support their respective request/grants/motions.
* Process is bypassed for approval or sign-off of terms or submission of documents, payments, or other commercial matters; those whose job it is to monitor commercial processes may be prevented from or hindered in doing so.
* Individuals are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation.
* Decisions are taken for which there is no clear rationale.
* Records are incomplete or missing.
* Payments are for abnormal amounts (e.g. commission), or made in unusual ways.
* Quid pro quo (a favor or advantage granted or expected in return for something).

# 4. Conflicts of interest

In order to make sound decisions when faced with a Conflict of interest, everyone needs to understand the risks of organizational and personal Conflicts of interest, what situations to avoid, why they should be avoided and how to report Conflicts. Knowing the “what”, “why” and “how” enables everyone to make sound decisions when faced with a Conflict of interest by identifying, disclosing and mitigating the conduct appropriately.

Conflicts of interest are unavoidable. We manage Conflicts of interest in a manner consistent with the highest standards of integrity and professionalism. Compliance with law and regulations is a basic requirement, but it is not always enough. In order to ensure that these standards are met, everyone must continually and proactively identify and manage Conflicts of interest to avoid both the appearance of, as well as actual, improprieties. Any Conflict of interest must be disclosed in case it cannot be prevented.

You must avoid situations and Conflicts of interest that may compromise, or give the appearance of compromising, your ability to carry out your responsibilities. You must also escalate potential Conflicts of interest as they arise to the ETA Compliance Officer. Some potential Conflicts of interest involve your role personally and you must promptly report to the ETA Compliance Officer any potential or actual Conflict of interest that results from your position or duties, including potential or actual Conflicts related to personal account trading and outside business affiliations that you may have.

Under any circumstances you shall prioritize the interests of the Program and ETA always over your own interests, and never try to resolve a Conflict of interest by yourself.

VAs and Grantees are expected to self-monitor and demonstrate their compliance with this Policy. Each VA and Grantee is responsible for ensuring that its employees, representatives and subcontractors comply with this Policy.

## 4.1. Conflict Types

While it is not possible to define precisely or create an exhaustive list of the relevant Conflicts of interest that may arise, there are several identifiable categories of Conflicts of which you should be cognizant and which you should disclose: Grantee Conflicts, Voting Associate Conflict, CRDAO Conflicts, Program Manager Conflicts, Admin function persons Conflicts and VA Candidate Conflicts.

### 4.1.1. Grantee Conflicts

#### Grantee is a VA.

A Grant Agreement may be entered into between the ETA and one or more of its VAs. These Related Party Transactions shall follow the arm's length disclose-and-abstain process outlined below. The Related Party shall abstain from voting within the applicable DEVxDAO voting procedure.

This applies to milestone review votes as well.

Neither the grant nor the vote approving the grant shall be voided as long as the ***disclose-and-abstain process outlined in Section 4.2.3*** is followed in approving the grant.

#### Grantee is a Non-VA.

A Grant Agreement may be entered into between the ETA and a party with whom a VA has a Pre-Existing Relationship, acts as an employee, consultant, director, advisor, shareholder or any other similar position where such VA has an financial or non-financial interest. In such a case, the Conflicted VA shall follow the disclose-and-abstain process. This applies to milestone review votes as well.

### 4.1.2. VA Conflict

Anyone who has a permanent Conflict of interest cannot be a VA. Some potential Conflicts involve your role personally, including potential or actual Conflicts related to personal account trading and outside business affiliations that you may have.

Each VA shall arrange their personal business affairs so as to avoid, as far as possible, Conflicts of interest with the Program. These Conflicts involve competing interests between different VAs and where a VA’s interests may not necessarily align with the interests of the DEVxDAO.

You must avoid situations and Conflicts of interest that may compromise, or give the appearance of compromising, your ability to carry out your responsibilities to the DEVxDAO, the ETA.

Each VA is excluded from voting on any resolution concerning a transaction or dispute where the transaction or dispute constitutes a Related Party Transaction and/or such VA has a Conflict of interest (except for the VA salary vote, or where all VAs at the same time would have a Conflict of interest).

Under all circumstances you shall prioritize the interests of the DEVxDAO and ETA over your own interests, and never try to resolve a Conflict of interest by yourself.

As a VA, you must devote appropriate time and effort to the performance of your responsibilities and avoid activities outside of the DEVxDAO and affiliations that pose unacceptable risks to the DEVxDAO and ETA. In general, these activities must not:

* Create material Conflicts of interest between your interests and the interests of the ETA, the DEVxDAO, Sponsor (Casper Association);
* Pose unacceptable reputational, financial, legal, regulatory or other risks for the ETA and/or the DEVxDAO;
* Involve a substantial time commitment so as to detract from your ability to perform your responsibilities towards the Program; or
* Involve use of the proprietary information, assets, infrastructure, or resources of the ETA, DEVxDAO, or its Sponsor (Casper Association).

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### 4.1.3. Code Review DAO (“CRDAO”) Conflicts

These Conflicts arise if a member of the CRDAO is part of a grant project itself. Such a grant project and corresponding milestone submissions shall not be reviewed by the Conflicted member of the CRDAO. An independent person within the CRDAO shall take over this task.

### 4.1.4. Grant Program Manager Conflicts

These Conflicts arise where the Grant Program Manager’s interest may not necessarily align with the interests of the ETA/DEVxDAO.

Ordinarily, grant recipients are accountable to the DEVxDAO Grant Program Manager (the "**Program Manager**”) to set and fulfill milestones, who supervises grants. From time to time during the bootstrapping phase, a grant may be given to the Program Manager or the Program Manager is part of a grant project itself. Such a Related Party Transaction shall not be supervised by the Conflicted Program Manager themself. An independent person within the DEVxDAO shall take over this task.

Furthermore, the Program Manager shall disclose any other Conflict of interest arising out of a specific grant project and shall be replaced by an independent person within the DEVxDAO for this specific grant project.

The Program Manager will abstain from voting within the applicable DEVxDAO voting procedure in case he/she has a Conflict of interest.

### 4.1.5. Admin Function Persons Conflicts

During the bootstrapping phase of the DEVxDAO, certain persons have DEVxDAO portal access beyond the default user access which may include an admin function within the DEVxDAO portal. Without actions from such persons, the process within the DEVxDAO portal is on hold.

From time to time, such a person might have a Conflict of interest. These Conflict of interest arise where such a person's interest may not necessarily align with the interests of the ETA/DEVxDAO. The respective portal action shall not be done by the Conflicted person themself.

An independent person within the DEVxDAO shall take over this task.

### 4.1.6. Voting Associate Candidate Conflicts

These Conflicts arise when a current Voting Associate has a Pre-Existing Relationship, actual or potential interest with a VA Candidate that impairs, or might appear to impair his or her independence or objectivity in the discharge of his or her responsibilities and duties when voting on the candidacy of the VA.

If a Conflict of interest arises, the VA shall:

1. Disclose their Pre-Existing Relationship with the Candidate.
2. Abstain from the simple vote on the candidacy.

## 4.2. Procedure to disclose and manage Conflicts of interest and Related Party Transactions

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### 4.2.1. Disclosure

Everybody must disclose in good faith any possible Conflict of interest at the earliest stage possible. This includes any interest which they have (or, to the best of their knowledge, any of their relatives or businesses have) in any proposed transaction, agreement or other arrangement, as soon as they become aware of the interest. Disclosure must be made before the DEVxDAO and/or ETA considers the transaction, agreement or other arrangement.

In case it is unclear whether a Conflict of interest arises or not, anyone can report and request a determination by the ETA Compliance Director. The disclosing party is protected. The party making such reporting shall not be subject to any retaliation by the potentially Conflicted individual.

Disclosure shall be made in writing via email to the ETA Compliance Director whose contact information is in Section 13 of this Policy.

### 4.2.2. Determination

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Upon receiving a disclosure (or otherwise becoming aware) that a Conflict of interest and/or a Related Party has an interest in a proposed Related Party Transaction, the ETA Compliance Director shall determine whether a Conflict of interest exists and /or the transaction, agreement or other arrangement in fact meets the definition of a Related Party Transaction. In case, the ETA Compliance Director is Conflicted itself, the ETA Swiss legal counsel shall take over and in case this counsel is Conflicted to, the ETA shall hire an independent investigator.

The ETA Compliance Director shall inform the concerned person(s) about its decision. If ETA Compliance Director finds there is a Conflict of interest and/or a Related Party has an interest in a proposed Related Party Transaction, the Conflicted person(s) can OP a simple vote appealing the compliance director’s decision. If ETA Compliance Director finds there is not a Conflict and a VA disagrees with this finding, that VA may OP a simple vote appealing the compliance director’s decision. Such a decision by the VAs is final and binding.

Upon the introduction of a simple vote appeal, the DEVxDAO shall immediately appoint, through the ETA, an independent arbiter, or, upon availability, an independent arbitration forum (such as an arbitration DAO). The appeal process should take no longer than three (3) months. During the arbitration proceeding the concerned person(s) as well as the ETA Compliance Director shall have the possibility to submit their positions, reasons and opinions. The proceeding shall be in English language. The cost of the arbitration proceeding shall be covered by the ETA but shall not exceed CHF 3’000.00 per case. ETA and the concerned person(s) shall bear their own costs. During the pendency of an appeal, the status quo remains (i.e., a VA appealing a decision remains a VA until said appeal is complete

### 4.2.3. Taking Action pursuant to determination / Arms-Length Consideration - Disclose-and-Abstain

In case of Conflict of interest, the person concerned must abstain from voting and discussing the matter. Abstaining of voting shall not affect the quorum requirements within the DEVxDAO. Voting against in order to preserve quorum counts as abstaining.

If a Related Party has a Substantial Financial Interest in the proposed Related Party Transaction, the DEVxDAO shall consider alternatives to the Related Party Transaction to the extent available (e.g., alternatives that would be equally or more advantageous that could be obtained with reasonable effort).

After considering alternatives if required, the DEVxDAO shall determine via simple vote by majority vote of the Voting Associates present, whether the Related Party Transaction is fair, reasonable and in the organization's best interest at the time of the determination, and, if so, whether to enter into the Related Party Transaction.

Related Party Transaction shall be carried out “at arm’s length”. If necessary, an impartial opinion shall be obtained.

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# 5. Reporting prohibited conduct

If you have information or knowledge of any conduct or transaction prohibited by this Policy, you must promptly report such matter to the ETA Compliance Director. A failure to report a known violation is itself a violation and may subject you to disciplinary action.

No person reporting a suspected violation will be subject to retaliation because of a good faith report.

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# 6. Consequences for violations of this Policy

## 6.1. Consequences for VA / Grantees

Violations of the directives described in this Policy, or of any other applicable Policy of DEVxDAO or ETA will result in disciplinary action and could lead to the exclusion of a VA from the DEVxDAO. Depending on the circumstances, including the nature and severity of the violation, disciplinary action may include a warning, fine of up to CHF 1’000, a temporary suspension, termination of a grant Agreement, removal from DEVxDAO and/or termination of any and all relationship between you and the ETA and DEVxDAO. The ETA has the right to request repayment for any and all funds it has paid to the violating individual under a grant agreement and/or Voting Associate position.

Failure to abide by this Policy could also result in civil or criminal liability for you as well as for the ETA.

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## 6.2. Self-enforcement mechanism

The DEVxDAO is committed to not waiving any compliance veto. If the policies outlined herein are not followed, the vote involving the conflicted party does not count, and another vote needs to be called. At that vote, the participants can also vote to void the transaction altogether.

## 6.3. DAO violation

In case an applicable DEVxDAO voting procedure violates the fundamental principles of this Policy, the ETA Board may declare that the outcome of that voting is against applicable law and shall be able to reject the execution of that voting.

# 7. Enforcement and compliance

The ETA shall be responsible for the enforcement of and compliance with this Policy.

The ETA may in its sole discretion impose any disciplinary actions as outlined above in section 6.1. In case the ETA is conflicted itself, the ETA shall hire an independent investigator.

The ETA shall inform the concerned person(s) about its decision. The person concerned may OP a simple vote appealing the ETA’s decision. If ETA decides not to take any decision and a VA disagrees with this, that VA may OP a simple vote appealing the ETA non decision making.

Upon the introduction of a simple vote appeal, the DEVxDAO shall immediately appoint, through the ETA, an independent arbiter, or, upon availability, an independent arbitration forum (such as an arbitration DAO). The appeal process should take no longer than three (3) months. During the arbitration proceeding the concerned person(s) as well as the ETA shall have the possibility to submit their positions, reasons and opinions. The proceeding shall be in English language. The cost of the arbitration proceeding shall be covered by the ETA but shall not exceed CHF 3’000.00 per case. ETA and the concerned person(s) shall bear their own costs. During the pendency of an appeal, the status quo remains (i.e., a VA appealing a decision remains a VA until said appeal is complete).

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# 8. Training

All new VAs and Grantees shall undergo training on complying with this Policy. Training on this Policy thereafter is periodically provided for all VAs and ETA contractors.

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# 9. Annual certifications

All grant recipients and VAs shall review this Policy and certify, by completing the relevant Questionnaires that they have complied with its directives and are not aware of anyone at the DEVxDAO who did not so comply.

All existing Grantees and VAs shall review and certify such upon adoption of this Policy. For Grantees, payment of their next milestone or signing of a new grant agreement shall not occur until Certification Form A is completed. For existing VAs, they shall not receive VA salary and/or payment of their next milestone or signing of a new grant agreement shall not occur until Questionnaires are completed.

In the future, in order for a new Grant Applicant to receive a grant they must complete Certification Form A before compliance can pass on their grant proposal.

In the future, in order for a grant recipient to become a VA they must complete Certification Form B.

These Certifications shall be renewed each year.

## 9.1. Certification and Cure

As part of certifying compliance with this Policy, all Grantees and VAs are required to complete Confirmation of Questionnaires. All VAs must complete both Questionnaires.

Not completing the Questionnaires on time results in a violation of this Policy.

Upon reviewing Questionnaire answers, if it is determined that you have breached this Policy, you have three days to cure with full transparency required, or this results in a violation of this Policy.

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# 10. Compliance reviews and document retention

The defined principles, procedures and measures set forth in this Policy are reviewed and, to the extent necessary or appropriate, updated at least once a year.

ETA is required to keep books, records, and accounts in reasonable detail that accurately reflect the transactions and disposition of ETA assets. ETA books and records and accounts include, among other things, balance sheets, expense reports, contracts and agreements, and other documentation. This recordkeeping obligation falls on every contractor of ETA. ETA personnel are responsible for reviewing third party invoices and supporting documents to ensure their completeness and accuracy.

# 11. Contact information for ETA’s Director of Legal and Compliance

The contact information for ETA’s Director of Legal and Compliance is:

HAYLEY HOWE

Director, Legal and Compliance

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