



**EUROWAG**

**CODE OF CONDUCT**

**A SMALL BOOK  
THAT TELLS YOU ALL YOU NEED TO KNOW  
ABOUT WHAT WE STAND FOR**

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# INTRODUCTION BY MARTIN VOHÁNKA

## DEAR COLLEAGUES, FRIENDS AND BUSINESS PARTNERS,

The document you are about to read is a basic guide to our everyday life here at W.A.G. Group. This text naturally draws on a set of eight corporate values, that we have been living for more than two decades. We believe in everything we do, because our motives are honourable and our conduct is fair, legal, considerate and courteous. It is entirely rational decision to choose this approach, because it enables us with piece of mind to concentrate fully on achieving our objectives and so to triumph over our competition.

Our W.A.G. Group is growing in many respects – in its number of employees, products, services, business models, suppliers, partners, regulations, countries and cultures. With such complexities and quantities as they stand, we need to set the limits of our conduct carefully. We have to make sure, that no team members break the law and thereby threaten values of shareholders, customers, or the community at large. With that in mind, we have drafted this Code of Conduct to cover all aspects of our business within and outside of our organization.

To close, I am keen to stress that no document or instruction can be effective unless we express our own personal commitment to respect it. Accordingly, I would like to appeal to managers to lead by example and everyone to actively promote our beliefs and values, that have been incorporated into this document.

Thank you for your active cooperation.

### **Martin Vohánka**

Founder of the W.A.G. Group  
and Chairman of the Board of Directors  
of W.A.G. payment solutions, a.s.

**WE BELIEVE IN EVERYTHING WE DO,  
BECAUSE OUR MOTIVES ARE HONOURABLE  
AND OUR CONDUCT IS FAIR, LEGAL,  
CONSIDERATE AND COURTEOUS.**

**IT IS ENTIRELY RATIONAL DECISION TO  
CHOOSE THIS APPROACH, BECAUSE IT  
ENABLES US WITH PIECE OF MIND  
TO CONCENTRATE FULLY ON ACHIEVING  
OUR OBJECTIVES AND SO TO TRIUMPH  
OVER OUR COMPETITION.**

# OBJECTIVES OF THIS CODE OF CONDUCT

We, companies belonging to the international W.A.G. Group (the “**W.A.G. Group**”), i.e. in particular W.A.G. payment solutions, a.s., registration number 26415623, and any other related parties (each referred to individually as a “**company**”), have adopted this Code of Conduct to manifest our respect for legislation in the countries in which W.A.G. operates and for the values on which it is based (the “**Code of Conduct**”). We shall always strive to act honourably, professionally and with the greatest professional care.

Our mission is to be the key partner for our customers for on-road mobility solutions integrating a comprehensive set of products and services based on innovative and simple to use digital technologies. A continuous search for improvement and passion for superb customer experience underpin our success, making W.A.G. an attractive employer, a reliable business partner and a very interesting prospect for investment.

## THE OBJECTIVES OF THE CODE OF CONDUCT ARE:

- to ensure that each of the companies in the W.A.G. Group and the employees and associates thereof comply with legislation and prescribed values; and
- to prevent any unlawful conduct, with an emphasis on reducing reputational risk

## and the risk of prosecution of a company and individual employees and associates by government bodies.

We shall honour and abide by any and all rules, principles and values laid down in this Code of Conduct and shall demand the observance thereof by members of the governing (such as directors) and supervisory bodies and employees of each of the companies in the W.A.G. Group, including managers of all levels (“**employees**”), and by other persons with whom we work, including agents, intermediaries and distributors and other persons exercising decisive influence over the management of individual companies (“**associates**”). In addition to complying with the obligations under this Code of Conduct, employees and associates shall also comply with the obligations incumbent on them under legislation, employment and other contracts, and any and all company directives (internal regulations).

This Code of Conduct frames and unifies rules contained in the internal regulations of the W.A.G. Group and individual companies. Any breach of the code of conduct shall be judged with respect for all circumstances, such as breaches of employment legislation and, where appropriate, breaches of an associate’s obligations.

# W.A.G. GROUP VALUES

Each of the companies in the W.A.G. Group during the course of its activities and under all circumstances pays attention in particular to meeting the values as follows:

## INNOVATION

Creativity and a determination to change are the foundations of our competitiveness.

## TRUST

Our honesty and reliability inspire confidence and engender customer loyalty.

## INTEGRITY

Ethical values underpin our everyday decision-making.

## TEAMWORK

We support each other, because only a well-functioning team can be successful.

## EXCELLENCE

We strive relentlessly to be the best we can be.

## INDEPENDENCE

We value our freedom, which also implies a commitment to act whenever needed.

## JOY

A good vibe in the workplace is essential for delivering outstanding performance.

## SOCIAL RESPONSIBILITY

Our actions aim to create a balanced portfolio of positive values for the benefit of the whole of human society.

The W.A.G. Group projects these values to each of the roles which it strives to perform – as an exemplary upholder of the law, a fair competitor, a reliable business partner, an attractive employer, a relentless champion of new technology and a conscious member of society.





## WE ARE AN EXEMPLARY UPHOLDER OF THE LAW

AS "LAW IS AN ETHICAL MINIMUM"  
(GEORG JELLINEK),

INTEGRITY AND AN EMPHASIS ON RESPECT  
FOR LAWS ARE PART AND PARCEL  
OF OUR BUSINESS DEALINGS.

## RESPONSIBLE CONDUCT

In all of their activities, our employees and associates must proceed in accordance with legislation, the W.A.G. Group's internal regulations and, first and foremost, this Code of Conduct. **We will not tolerate unlawful conduct** even where it might be described as an "everyday business practice". We will not help anyone to engage in unlawful conduct.

All of the W.A.G. Group publicly rejects all unlawful or unethical conduct on the part of our employees, associates, suppliers, customers and other persons. We shall strive to detect and combat any and all lawful activity that might take place in connection with our business operations.

**We are aware of the consequences of breaking the law and we shall disseminate awareness of such consequences among our employees and associates. Those consequences may be:**

- the imposition of steep fines on individual companies in the W.A.G. Group;
- the obligation to pay significant damages to all injured parties;
- the imprisonment of individual employees and associates;
- the irreparable tarnishing of the whole W.A.G. Group's reputation;
- the revocation of business permits or the complete shutdown of any of the companies in the W.A.G. Group.

We bear in mind that unlawful conduct on the part of a company **may be perpetrated by any person** exerting influence over the company, whether managers or rank-and-file employees in the performance of their work tasks. Both a company and a person acting on its behalf (an employee or associate) may be punished for unlawful conduct. We stand ready to file claims against any employees and associates whose breach of this Code of Conduct causes loss or damage to the W.A.G. Group.

A shareholder's and/or manager's instructions contravening legislation or this Code of Conduct shall not absolve a person carrying out such instructions or orders of liability. With this in mind, in their own interest no employees or associates shall carry out an instruction that would be unlawful or otherwise incompatible with this Code of Conduct. No punishment of discrimination shall be inflicted in any way on anyone for not heeding such an instruction.

We will not tolerate the slightest indication of conduct relating to **corruption, bribery, infringements of competition rules**, or any other unlawful activity.

## WHISTLEBLOWING AND PROTECTING THE WHISTLEBLOWERS

In order to combat illegal or unethical conduct, the W.A.G. Group encourages current and former employees, associates, and third parties to provide timely and active notification of unlawful and unethical conduct, orders to engage in such conduct, and any suspicions thereof.

We support open and fast communication at all levels so that any problems can be identified and tackled in a timely manner.

**The W.A.G. Group has set up the following contact channels for the notification of unlawful conduct (or any suspicions thereof) and for the collection of enquiries and improvement proposals related to compliance with regulations:**

- email address: [compliance@eurowag.com](mailto:compliance@eurowag.com);
- the address of the company's registered office, addressed "c/o Compliance Office". The Compliance Officer's name is available in the internal information system.
- JIRA ticket (com)

If the Compliance Officer or members of the governing, management or supervisory bodies are **suspected of unlawful conduct**, notification may be sent directly to any of the members of the supervisory board of the company affected by the infringement, or directly to any of the members of the governing body of the parent company within the W.A.G. Group.

We shall ensure **the confidentiality of the notifier and the information received**. Any notification shall be properly investigated and an anonymised report shall be drawn up thereon that does not contain details that could identify the notifier.

Employees or associates who make a notification in good faith shall not suffer any punishment or discrimination for such notification.

## NON-CORRUPTION

We are categorically opposed to corruption.

We shall not provide, offer or promise, directly or otherwise, any gifts or favours to any person if the objective or consequence thereof is support for illegal or unethical conduct. This prohibition shall not only apply to our business partners (present or future), it shall **especially apply in relation to public officials**.

"Public officials" means officers, politicians, judges and other employees working for central or local government or for international institutions.

We shall not provide, offer or promise gifts or other favours to public officials, their families and other persons associated with them where this could give the impression that such gifts or other favours are intended to influence decision-making by public officials, in particular in connection with:

- the procurement of items of general interest; or
- the business operations of the company or other persons.

Where a gift or other favour is solicited in this context, the employee or associate shall refuse to provide that gift (or favour) and shall **report the matter to his or her superior and the Compliance Officer** without undue delay.

Furthermore, we, the individual companies in the W.A.G. Group, our employees and our associates shall not allow ourselves to be promised or offered, and we shall not accept, any gifts or favours if the objective or consequence thereof is support for illegal or unethical conduct.

An exception to the rule on gifts and favours shall be the provision or acceptance of token gifts provided in the course of everyday business to the extent laid down by other W.A.G. Group rules.

## MONEY LAUNDERING, NEGOTIATING WITH PUBLIC OFFICIALS, AND INTERNATIONAL TRADE

**Money laundering** denotes conduct intended to conceal the illegal origin of money in a bid to give the impression that it has been obtained legally. More broadly, it also includes the financing of illegal activities with legal resources. The W.A.G. Group shall strive to comply with rules combating money laundering in the broadest sense. Under no circumstances shall we participate in activities associated – even if only putatively – with money laundering. We shall always stand ready to comply with any and all obligations deriving from national and international money laundering legislation.

We shall engage with all public officials courteously. Only employees and associates authorised by dint of their position shall hold negotiations **with public authorities**. We shall disclose only truthful information about our company in accordance with legislation. We shall cooperate with all oversight and inspection bodies and with other public authorities. We shall keep due and truthful accounts on all transactions. We shall pay tax and make social security and health insurance contributions dutifully and on time, and we shall make all other obligatory payments.

As international market players, we shall also **respect the rules of cross-border business and taxation**, including (inter)national sanctions. We shall analyse thoroughly the need to procure any permits for imports and exports. We shall apply for and handle such permits in accordance with applicable legislation.

# WE ARE A FAIR COMPETITOR

**TRUST AND INTEGRITY  
ARE AT THE CORE  
OF A FAIR COMPETITION.**

## FAIR COMPETITION

We want – and shall not abuse our participation in – open competition, and we shall not engage in any conduct that could distort or restrict competition.

In the course of competition, we shall **act in accordance with principles of public decency** in this field – we shall abide by the rules of fair competition. We shall use only those business and marketing practices that are not misleading or otherwise unfair (e.g. we shall not create misconceptions about our services, and we shall not make unfair comparisons with the competition).

**We shall not abuse any dominant position** we may hold; in particular, we shall avoid coercing partners into unfair terms in contracts. Where we play a dominant role, we shall maintain an equal, or comparable, approach to all customers and suppliers. We shall not offer our goods or services at disproportionately low prices over extended periods while we have a dominant position.

We, our employees and our associates shall not engage in any formal or informal negotiations and agreements with business partners that could undermine the existence of competition (this practice is known as forming of cartels). We shall **steadfastly avoid agreements with competitors** to divide up the market or to set profit margins, and we shall not coordinate our customer approach with competitors. We shall not be involved in collective boycotts of other competitors organised by customers or suppliers. We shall act with due caution to avoid exchanges of sensitive business information with competitors at informal meetings and social or training events.

We shall not force customers into binding commitments concerning the prices at which they are to sell on to end users the products and services provided by our company.

**„WE SHALL ACT WITH  
DUE CAUTION TO  
AVOID EXCHANGES  
OF SENSITIVE  
BUSINESS  
INFORMATION  
WITH COMPETITORS.”**



# WE ARE A RELIABLE BUSINESS PARTNER

A RELIABLE BUSINESS PARTNER RESPECTS THE VALUES OF TRUST, INTEGRITY AND EXCELLENCE.



## RELATIONS WITH CUSTOMERS AND SUPPLIERS

We shall ensure that our employees and associates always conduct themselves in keeping with the highest standards of personal and professional approach so that they do not tarnish our good reputation or that of the W.A.G. Group as a whole.

We shall strive to gain a deep insight into our business partners (customers and suppliers). Prior to entering into a business relationship, **available information about business partners shall be examined** and their trustworthiness shall be verified. These areas shall also be investigated as and when required during the course of cooperation.

In contact with customers, employees shall always bear in mind that a satisfied customer is more important than short-term profit. In all circumstances, customers and prospects shall be entitled to a **fair and non-discriminatory approach**.

We shall cooperate only with suppliers where we can expect not only a guarantee of due and timely compliance with their commitments, but also the upholding of elementary principles of ethical business. In particular, we shall refuse to cooperate with business partners who systematically and seriously break the law, profit from the results of child or forced labour, or process conflict (blood) minerals.

## CONFLICT OF INTEREST

We strive to prevent conflicts of interest. In working matters, we require negotiations exclusively in the best interest of the W.A.G. Group.

No work decisions shall be influenced by individual, family or friendly interests. Employees and associates shall notify a manager immediately of any **personal interests** that could affect the assignment and performance of their work activities.

All employees and associates who themselves (or whose family members) participate in any way in companies which are in business or competitive relations with us **shall notify their superior thereof**. If there is a risk of a conflict of interest or if the results of the tasks assigned to them might be undermined, employees or associates shall stop their work on such a task and notify this situation to their superior or to the contact officer of the relevant W.A.G. Group company.

„A SATISFIED CUSTOMER IS MORE IMPORTANT THAN SHORT-TERM PROFIT.“



# WE ARE AN ATTRACTIVE EMPLOYER

TRUST, TEAMWORK, INDEPENDENCE AND JOY ARE THE VALUES THAT MAKE AN EMPLOYER ATTRACTIVE.



## RELATIONSHIP WITH EMPLOYEES

We shall work towards a safe, satisfying, dignified and stable working environment and working conditions. **We shall encourage the training of our employees** and innovation within the scope of our operations. **We value** parenthood and we shall support employees looking after their children.

We shall support each other, because we want to form a well-functioning team. **We shall trust each other.** Managers shall set their subordinates only targets that are clear and achievable and they shall foster a sense of responsibility in them. We shall set great store by freedom, balanced by the need for cooperation whenever required.

We shall endorse and advocate respect for human rights, with a particular stress on the prohibition of child and forced labour.

„WE SHALL SUPPORT EACH OTHER, BECAUSE WE WANT TO FORM A WELL-FUNCTIONING TEAM“



## NON-DISCRIMINATION AND THE BAN ON HARASSMENT

We shall ensure **the fair treatment** of all employees and associates, and equal opportunities for all persons without discrimination on grounds of race, ethnic origin, nationality, sex, sex life, sexual orientation, age, disability, trade union membership, religion, belief, philosophical beliefs or world view. We shall also honour the presumption of innocence.

We shall brook no harassment (including but not limited to sexual harassment), intimidation, insults or other inappropriate behaviour in the workplace. We shall demand that our employees and associates behave considerately to one another, in particular, we shall **take into account the special needs** of the disabled, the seriously ill, seniors, and families with children.

We shall **treat all employees and associates transparently and fairly** in their recruitment, evaluation, remuneration, training, promotion and other aspects of employment and contractual relations.

## PRIVACY PROTECTION AND COMMUNICATIONS

We shall respect the **privacy** of our employees and associates and their personal and family lives. We shall encourage freedom of expression both in ordinary forms of communication and in relation to conventional and social media. Our employees may, naturally, make use of **social networks** outside of working hours, but they shall always ensure that any type of communication they make on those social networks is clearly and unambiguously understood to be their private opinion and not the official comments of their company or of the W.A.G. Group, and does not contravene the legitimate interests of their company or the W.A.G. Group.

**Official statements** may be made on behalf of the W.A.G. Group or any of the companies thereof only by employees and associates specifically authorised to do so (e.g. from the marketing and communication department).

„WE SHALL TREAT ALL EMPLOYEES AND ASSOCIATES TRANSPARENTLY AND FAIRLY.”

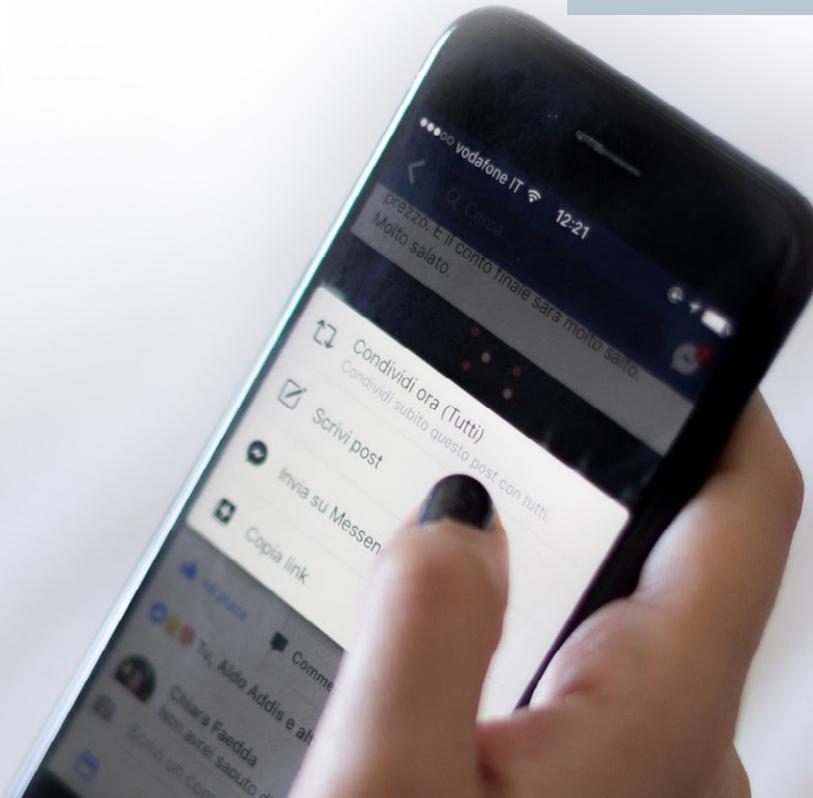


## ASSET PROTECTION

Our employees and associates may **use company assets only for work purposes**, unless stated or agreed otherwise in writing. Together with our employees and associates, we shall take the utmost care in protecting company assets from loss and/or damage.

**If there is any risk to the company or its assets**, all employees or associates shall attempt to avert that risk by reasonable means as far as they are able, but in all cases in such a way that they do not place their life or health in danger. In any event, they shall report such a risk immediately to a manager and/or other persons who are able to prevent or at least mitigate the risk.

„WE SHALL TAKE THE UTMOST CARE IN PROTECTING COMPANY ASSETS“



# WE ARE A RELENTLESS CHAMPION OF NEW TECHNOLOGY

INNOVATION AND THE EXCELLENCE ARE PIVOTAL VALUES IN THIS RESPECT.



## INTELLECTUAL PROPERTY AND INFORMATION SECURITY

We shall support **innovation-driven initiatives** in all areas of the W.A.G. Group's operations, and the protection of the fruits of those initiatives. Together with our employees and associates, we shall respect and uphold property rights in general and the intellectual property of other persons in particular. We shall not violate those rights in any way whatsoever.

We shall ensure the security, integrity and confidentiality of information and, in particular, **business secrets**. Employees and associates shall not exploit any private information and business secrets of the W.A.G. Group for other than business purpose in the best interests of W.A.G. Group. Persons who have access to such private information shall protect and secure it so that it is not published, disclosed or exploited to the benefit of unauthorised persons.

**As the use of external files or software** may constitute serious risks to security and/or a violation of intellectual property, we shall not use unauthorised software and shall not download unknown files that could compromise the security of our information or infringe rights attaching to third-party intellectual property.

We shall require our employees and associates to handle **corporate names, logos, trademarks and other symbols** representing the W.A.G. Group or any of the companies belonging thereto with respect and not to use them in an inappropriate or harmful manner.

„WE SHALL USE ONLY AUTHORIZED SOFTWARE AND WE SHALL DOWNLOAD ONLY FILES FROM SECURED SOURCES“



# WE ARE A CONSCIOUS MEMBER OF SOCIETY

**SOCIAL RESPONSIBILITY  
AND ACTIONS ARISING  
HEREOF IS NATURAL PART OF  
OUR CONSIDERATIONS.**



## SOCIAL RESPONSIBILITY

As a responsible member of society at large, **we take the economic, environmental and social aspects of our conduct seriously.** We are striving to create a balanced portfolio of positive values. Those values underpin our understanding of everything – profit-making, tax payments, the inspiration of others, the personal development of our employees and associates, the shaping of an environment of productive emotion, and job creation, helping us to be a success with our customers and fuelling the prosperity of our business partners. We shall also lend support to charity organisations and benefit events, the proceeds of which are transparently distributed among the needy. Such involvement shall never take place in connection with election campaigns and shall not constitute the veiled bribery of public officials or private entities.

## PROTECTION OF PERSONAL DATA

We shall respect everyone's privacy. **We shall ensure the protection of personal data**, duly comply with all obligations concerning the protection thereof, and demand that our employees and associates also provide the protection of personal data. In this respect, in particular we shall not abuse personal data, we shall process it solely for predetermined legitimate purposes, openly, and for the time necessary for that purpose, and we shall duly notify the data subjects of the processing of such data.

We shall work with personal data that may constitute grounds for discrimination particularly sparingly and only if such processing is unavoidable. Such personal data comprises information on race, ethnic origin, nationality, sex, sex life, sexual orientation, age, disability, trade-union membership, religion, belief, philosophical beliefs, world view, and judgments in criminal cases.

We shall take technical and organisational measures to preserve data subjects' right to the protection of their privacy.

**"WE TAKE THE ENVIRONMENTAL  
AND SOCIAL ASPECTS OF OUR  
CONDUCT SERIOUSLY."**



## SUSTAINABLE DEVELOPMENT

We shall take care of the environment and protect natural resources. We shall **honour the legacy of previous generations and conduct ourselves responsibly for future generations**. In this respect, we shall always act in such a way that:

- we make highly efficient use of our resources;
- we reduce the adverse effect that our operations have on the environment and social sphere;
- we prevent environmental pollution; and
- we protect natural, historical, cultural and archaeological heritage and the socio-economic environment.

Our employees and associates shall not infringe regulations on environmental protection. On the contrary, we shall strive, together with our employees and associates, to improve our technology in order to burden the environment as little as possible.

**„WE ARE STRIVING TO ENSURE  
WE MINIMISE OUR IMPACT  
ON THE ENVIRONMENT. ”**



## RECOMMENDED RESPONSE TO BREACHES OF RULES

**ANY OF THE W.A.G. GROUP'S EMPLOYEES  
OR ASSOCIATES MAY FACE A SITUATION  
WHERE LEGISLATION OR THIS CODE OF CONDUCT  
HAS BEEN BREACHED. IT IS IN THE INTERESTS OF  
SUCH AN EMPLOYEE (ASSOCIATE) TO COMPLY  
WITH THE FOLLOWING RULES:**

## HOW TO RESPOND

### 1 ACTIVE PROTEST

Actively, explicitly and sufficiently clearly oppose breaches of legislation or the Code of Conduct. This can be done by means of a notification that the employee (associate) refuses to engage in such conduct, accompanied by justification. However, remaining silent shall not be accepted as a sufficient protest.

### 2 SECURING OF EVIDENCE

Document the protest without undue delay after it has been made. For example, ensure that the record of the conduct clearly states who has protested, when, and against what, accompanied by brief justification. If no record of such conduct is drawn up, this may be replaced, for instance, by a prompt summary of the protest in an email addressed to the others engaging in the conduct, or by other means.

### 3 CESSATION OF CONDUCT

If the unlawful conduct continues after the protest, the employee (associate) involved should cease such conduct without undue delay. The fact that the employee (associate) has ceased such conduct, including the time, should also be documented.

### 4 CONFIDENTIALITY

Except in the circumstances below, keep the information of which the employee or associate learns in connection with the lawful conduct entirely confidential.

### 6 COOPERATION ON OTHER STEPS

The Compliance Officer, in cooperation with the employee's superior (if possible) or other appropriate persons, shall decide on further steps that are to be taken.

### 5 NOTIFICATION OF A SUPERIOR OR THE COMPLIANCE OFFICER

The employee or associate shall notify his or her superior or the Compliance Officer immediately of any incident in which he or she was or should have been involved. The superior or Compliance Officer, in relation to the unlawful conduct, shall also be bound by the obligation of confidentiality, unless decided otherwise in the planning on how to proceed.

## WHAT SHOULD I DO WHEN...

### HOW TO CLEAR UP ANY CONFUSION

**If there is any confusion about legislation,** internal regulations or responsible persons' instructions, employees and associates shall solicit all information, professional opinions and consultations with managers on how to proceed so that legislation, internal regulations and this Code of Conduct are not breached.

**Do you have any questions relating to compliance?**

**Do you believe that anyone acts illegally or in contradiction to this Code of Conduct?**

### CONTACT COMPLIANCE OFFICER!

- e-mail address [compliance@eurowag.com](mailto:compliance@eurowag.com);
- the address of the company's registered office, addressed "c/o Compliance Office". The Compliance Officer's name is available in the internal information system.
- JIRA ticket (COM)



**W.A.G.payment solutions, a.s.**

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