



Code of Conduct for Companies of the easycash Group

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Table of contents

Preamble	3
Law-Abiding and Observation of Regulations	4
Personal Conduct	4
Professional Standards	4
Conflicts of Interest.....	5
Independence.....	5
Partnership with Customer	6
Information	7
Confidentiality	7
Communication.....	7
Diversity	8
Equality of Opportunity	8
Problem Solution.....	8
Fairness	8
Corporate Property.....	9
Environmental Preservation.....	9
Safety	9

easycash is Germany's biggest bank-independent POS network operator and transaction processor. Within the framework of the changing regulatory environment (SEPA), easycash pursues the strategy to become one of the most important payment service providers operating Europe-wide. The aim is to increase sustainably and to ensure permanently the value of the Group for the benefit of our customers, investors, and employees.

We intend to be perceived as a respectable, credible, and reliable partner – by business partners and employees, as well as by public authorities, institutions, and the public. We consider this to be one of the major prerequisites to achieve our entrepreneurial objective.

The present Code of Conduct has been developed in order to be able to constantly guarantee a high degree of integrity and consistency in our overall activities. It comprises the basic requirements regarding the entrepreneurial and personal conduct of each individual. The Code of Conduct shall apply to each employee of the easycash Group – to general managers, executives, and all employees, as well as to all persons who will be employed or act for the Company in similar functions (e.g. temporary employees and consultants). It does not provide any detailed action-related instructions, but is meant to be a binding orientation framework for all organisational entities.

In particular, executives must come up to their role model function and demonstrate a high degree of social and ethical competence. They shall ensure that their staff members know the Code of Conduct and observe it. They shall recognise any misconduct and shall bring it up as an issue and punish it consistently.

The Code of Conduct reflects the internal guidelines which have been worked out together - the easyGuidelines – and supplements them with external components. easyGuidelines are readily available via easycash's information portal.

Law-Abiding and Observation of Regulations

It goes without saying that we respect and observe any laws and official regulations being applicable in the respective legal areas in which we are operating.

Should any laws and/or official regulations be disregarded by employees in connection with their employment relationship, then labour-related measures may also be taken – irrespective of any possible legally provided consequences. The same shall apply to any disregard of internal regulations, including the present Code of Conduct.

Personal Conduct

Our employees shall always perform their job responsibility with a maximum of professionalism and integrity, both inside and outside of easycash. This does not only mean to respect the rights of others, but also to avoid both professionally and privately anything which might inflict damage to other employees or to the easycash Group. Since the conduct of an employee will also always reflect on easycash, it is a special requirement that any conduct be avoided both inside or outside of easycash which might have any adverse impact for easycash on the part of customers, other employees and/or in the public.

Professional Standards

We expect our employees always to act according to highest professional standards. Therefore, employees violating any existing guidelines, regulations, or rules of easycash with their performance or conduct must also be prepared for labour-related consequences. The same shall also apply to any violations in connection with events and other activities in connection with the easycash Group or with customer events, including such cases where employees use to file an application for a reimbursement of expenses according to the respectively applicable travel expense regulations. The same requirements shall apply to their conduct at other external events where employees and customers meet and come together.

Conflicts of Interest

We shall take all necessary measures in order to avoid as far as possible any conflicts of interests which may exist between different customers, customers and the easycash Group itself, customers and individual employees, as well as between the easycash Group and individual employees, or to resolve such conflicts where they are inevitable.

All our employees shall devote their capacity to work to the easycash Group. Accordingly, our employees shall not carry out any secondary activities without prior notification of easycash and without the prior explicit written consent of easycash. They shall not operate any business independently neither for themselves nor for others, and they shall not engage in any direct competition – even if only in part – to the easycash Group or engage themselves as a business partner in another company. In cases where the interests of easycash will not be impaired, the possibility of granting such an approval will always be reviewed benevolently.

Independence

Decision-making processes may only be influenced by factual considerations. In order to maintain our independence and as an expression of our high ethical requirements, our employees shall neither ask for nor accept any monetary allowances, presents, or other advantages, or favours from persons with whom they come into touch in an official capacity, or accept without any contradiction that such allowances, presents, advantages, or favours be promised by such persons.

Accordingly, it is prohibited to influence any employees of companies, public authorities, governmental institutions etc. by offering, promising, or granting them the advantages mentioned above.

Entertainment in accordance with general business practices and other allowances of a low value, where an influence on a business decision or an official decision may generally be excluded, shall be excluded from the above restrictions. Offering, granting, requesting, or accepting any monetary sums shall always be inadmissible. In case of doubt, the management shall decide on how to proceed further in such a case.

Partnership with Customer

easycash shall always and everywhere do its best in order to ensure highest quality of its products and services.

Increasing our customers' satisfaction is deemed to be a commitment to quality on the part of all employees. Integrity, an open dialogue, and operating consistently in line with the needs of our customers are the basics of our partnership with our customer.

Information

Great importance shall be attached to the correctness and completeness of any information prepared and/or documented by us.

Confidentiality

All business matters of which we will be informed within the framework of our activities shall be treated strictly confidentially – irrespective of the fact whether they refer to the easycash Group or to the customer – and any such information shall be dealt with and stored with greatest care. Any confidential information received shall neither be forwarded to any third party without a prior authorisation nor used improperly.

Communication

We use to communicate openly with each other and to exchange information with each other within legally, officially, and internally established limits. In order to ensure that information given to the public and the press will always be transparent and logical, our employees bear a special responsibility to ensure that the respectively applicable communication guidelines and legal provisions with regard to false or misleading information be observed.

Diversity

We feel obliged to treat every human being with dignity and respect, irrespective of his or her origin or circumstances of life. We are anxious to know and to understand any ideas and concerns of others.

Equality of Opportunity

We are anxious to recruit employees with the highest possible competence and a strongly developed sense of commitment for us. In connection with the selection and the further development of our employees we are committed to the idea of equal opportunities, without any discrimination in terms of age, handicaps, ethnic origin, skin colour, gender, pregnancy, sexual identity, nationality, religion, civil status, or any other characteristics.

Our employees shall be assessed on the basis of their performance, and to that end they shall receive an honest and fair feedback. We cannot tolerate any false or malicious insinuations or similar actions of our employees, which might inflict damage to our customers, employees, shareholders, easycash itself, or society.

Problem Solution

Based on our values and commitments, we shall always endeavour to solve any possible problems in such a way that the persons involved will be respected and their interests and needs be taken into consideration as far as possible. We shall ensure the existence of appropriate procedures in order to be able to solve problems at the workplace seriously and confidentially, and as quickly as possible.

Fairness

While operating in a competition-oriented global environment, we still want to be a fair competitor, always and everywhere, and we never want to revile other companies or institutions. When dealing with external partners, we do this in a professional, transparent, respectful, and fair way to the benefit of our stakeholders.

Corporate Property

Any facilities and all other assets which are the property of easycash or of our business partners shall be treated very carefully and shall only be used for the respectively stipulated intended purpose. A target-oriented, efficient, and cost-conscious use shall be ensured in this connection.

Corporate property also includes intangible assets such as know-how and industrial property rights. They are of special importance for the long-term success of our Company. Confidential business information shall always be kept secret and protected against any unauthorized access by third parties. The same shall also apply to any information being made available to us by third parties.

Any facilities or objects of the Company must not be used for private purposes or be removed from the Company's premises without explicit approval.

Environmental Preservation

Dealing responsibly with our environment is self-evident for easycash's self-conception. This does not only imply that we shall observe environmental laws but also aim at protecting natural resources and at finding environmentally friendly solutions. We have integrated environmental protection into our operational procedures and are using as far as possible environmentally most friendly technologies. Environmental aspects shall also be taken into consideration in connection with business decisions.

Safety

We are anxious to safeguard a healthy and safe working environment for our employees.