



PAYPOINT SERVICES CODE OF CONDUCT

PAYPOINT SERVICES (hereinafter referred to as PAYPOINT) undertakes to comply with all legal provisions and rules of conduct contained in this document. We encourage our business partners to commit themselves respecting internationally recognized ethical principles and values, and we expect them to comply with all applicable regulations.

- 1. Social responsibility.** Sustainability is a fundamental value of PAYPOINT. It is very important for us that our commitment in this area is always measurable and transparent. We strive acting economically and environmentally rationally and to actively put our social responsibility into practice.
- 2. Human rights.** PAYPOINT regards respect for international human rights and human dignity as an elementary and essential component of its system of values.
- 3. Exploitation of child labour and forced labour.** PAYPOINT condemns the exploitation of children through labour and any form of forced or compulsory labour.
- 4. Freedom of association.** PAYPOINT respects the right to freedom of association and right to collective bargaining and is unambiguously committed to protecting these rights.
- 5. Discrimination.** PAYPOINT recognizes and promotes equal treatment of persons regardless of gender, religion, sexual orientation, ethnic origin, nationality, age, political opinion, trade union activity or disability. Cultural diversity is seen as a valuable asset, and discrimination against individuals or groups of people is not tolerated. We are committed to eliminating discriminatory actions aimed at employment and occupation. We promote equal opportunities in terms of employment, risk management by occupational protection and the implementation of safe working conditions without sexual harassment and gender-based violence or any acts of bullying.
- 6. Lifelong learning.** PAYPOINT regards vocational education and training as a strategic success factor. Employees need to be prepared for current and future professional challenges.
- 7. Safety and health at work.** As part of its business, PAYPOINT takes appropriate preventive measures to guarantee health and safety at work.
- 8. Environmental protection.** PAYPOINT has an environmental management system. We are committed to ensuring quality and acting responsibly, in an environmentally friendly and sustainable way, seeing environmental protection as a challenge worth allocating resources to, both now and in the future. We identify initiatives to promote greater environmental responsibility and encourage the development and implementation of green technologies.



9. **Business partners.** Our goal is to ensure the highest quality of services. Our employees are convinced by their competence and orientation towards finding solutions. We are constantly looking for better solutions and acting proactively.

10. **Procurement of goods and services.** PAYPOINT purchases goods and services directly from suppliers and/or through distributors and/ or intermediaries. The policies practiced regarding purchases made are:
 - a. all purchases are necessary to meet our business requirements
 - b. the procurement process is carried out in a fair, objective, and transparent manner and in accordance with national legislation, as well as with the principles of ethics of PAYPOINT
 - c. minimizing the total cost of purchase by obtaining the best value for all purchased goods/services
 - d. an adequate and permanent identification and management of risks is ensured
 - e. goods / services purchased meet the requirements from a commercial point of view
 - f. continuous review of the purchase process and related activities thereof
 - g. in our work we have implemented fair, standardized purchasing practices and procedures, to ensure that all suppliers and potential suppliers meet the demands of the purchasing process and of the related activities, in such a way
 - h. to establish a long-term relationship with eligible partners in terms of selection and retention criteria, we strive to fulfil our payment obligations, as set out in the contracts concluded with suppliers, within the set deadlines

11. **Competition law.** PAYPOINT supports fair competition and complies with the provisions of competition law and does not tolerate competition restrictive and price agreements. PAYPOINT expects the same attitude from its business partners. From the point of view of PAYPOINT, the quality of the service provided must be the decisive criterion for the customer.

12. **Corruption.** PAYPOINT applies the principles of transparency, accountability, integrity, solidarity, civil courage, justice, democracy, and the supremacy of the rule of law. PAYPOINT expressly opposes all forms of corruption, including blackmail and bribery. Our employees and third parties mandated by PAYPOINT undertake not to offer or accept any kind of benefits that may influence business decisions. The remuneration paid to providers, agents or intermediaries must be proportionate to the services provided by them. Third-party mandate must not be intended to provide unauthorized benefits to business partners. It is forbidden to grant hidden benefits of any kind to employees or representatives of state authorities or enterprises. This also includes contributions or donations to political parties, elected representatives, or candidates for political office.

13. **Donations and sponsorships.** In addition to our commitment to social projects, donations to educational, scientific, sports, artistic or cultural organizations are allowed, if these donations and sponsorships are voluntary and do not expect a counter-service.

14. **Money laundering and the prevention of acts of terrorism.** PAYPOINT is engaged in the fight against money laundering and the prevention of terrorism, taking measures within its sphere of influence to combat any such activities.



15. Responsibility of our employees. PAYPOINT believes that its employees are the company's biggest asset, and their safety and satisfaction is a priority. Employees are obliged to know and comply with the regulations, procedures, decisions, and domestic rules, as well as to apply them in the work within PAYPOINT.

16. Public image. The public perception of PAYPOINT is also influenced by the image of our employees, including in the digital public space. We always treat our customers and business partners in a friendly and service-oriented manner and at the same time give them due respect.

17. Conflicts of interest. Conflicts of interest should be avoided, and if such a conflict is suspected, the hierarchical superior or Compliance Officer should be informed immediately. A conflict of interest exists when employees' own private or financial interests come into conflict with the PAYPOINT policy, i.e. with their relationship with business partners.

18. Privacy.

- a. Information about customers, partners, subcontractors, employees, and competitors, which is not public, must be treated confidentially and must not be passed on to unauthorized third parties or used for private purposes.
- b. PAYPOINT recommendations on information security and data privacy are implemented based on national and international information security, data privacy status, quality systems, best information management practices and other agreed additional standards.
- c. We apply appropriate data management practices to control the processing of personal data. We restrict the disclosure of such data to your partners strictly to what is set out in our privacy notices or to what has been authorized by our partners.

19. Data protection. Data protection principles are respected and guaranteed in accordance with domestic procedures and policies, based on EU laws. Personal data are used and processed only to the extent legally permitted and necessary in the context of business activity. We implement appropriate technical and organizational measures to protect personal data against access, use, modification, or loss. These measures are periodically reviewed to ensure their compliance with legal requirements in the field of personal data protection.

This Code of Conduct applicable within PAYPOINT is reviewed periodically.