

The Paysafe Code



Welcome from the CEO

“ Welcome to our Paysafe Code. This updated Code sets out the rules we must all follow as Paysafe team members, and it also provides information on where you can find more detailed supporting policies, standards and procedures.

Paysafe is a great company of global scope and scale. Central to our success is how we conduct ourselves and serve our customers. Trust is at the heart of what we do – providing trusted services, working with trusted partners and ensuring that we continually build on the trust of our stakeholders.

We must be clear what we expect from ourselves and from other team members and our Code provides us with clear rules and guidance to follow. It sets the standards against which we will all be held accountable.

A failure to follow our Code can put both Paysafe and ourselves at risk. If you ever have any concerns that our Code is not being followed by other team members, or you are unsure about any situation, then you must ask a question or share your concerns. There are many ways of doing this at Paysafe such as speaking to your line manager or executive leader, our Compliance, HR and Legal Teams, contacting our Paysafe whistleblowing champion or using our external confidential whistleblowing channel, Lighthouse Services.

Together we must put our Code into Practice - our reputation and with it our future success, rests on our actions and behaviours every day.”



Philip McHugh,
Chief Executive Officer, Paysafe

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Key notes about this document

Use of language

Throughout this document, the words ‘**may**’, ‘**should**’ and ‘**must**’ when used in the context of actions of the **Paysafe** group of companies (**Paysafe**) or others, have specific meanings as follows:

- (a) ‘**May**’ is used where alternatives are equally acceptable.
- (b) ‘**Should**’ is used where a provision is preferred.
- (c) ‘**Must**’ is used where a provision is mandatory.

Note that alternative or preferred requirements may be qualified by Paysafe in another referenced document.

Each of the companies within the Paysafe group are separate and distinct entities. In this publication, however, the collective expression ‘**Paysafe**’ may be used for convenience where reference is made in general to those companies. Likewise, the words ‘**we**’, ‘**us**’, ‘**our**’ and

‘**ourselves**’ are used in some places to refer to the companies of the Paysafe group in general. These expressions are also used where no useful purpose is served by identifying any particular company or companies.

In this document, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Document approval

Date approved

26th of March 2021

Approved by

Board of Directors

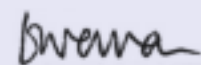
Date Comes Into Force

26th of March 2021

Signed by

Elliott Wiseman
General Counsel & Chief
Compliance Officer, Paysafe

Scope - The Paysafe Code is relevant for:		
Paysafe Business Unit	Paysafe Entity	Paysafe Location
All	All	All



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Introduction

It is our policy to conduct all of our business with integrity and in an honest and ethical manner. We aim to be open, honest and considerate in all our dealings. Any violation of these principles could jeopardise Paysafe's reputation, financial standing and potentially the licences necessary to operate our business.

The Paysafe Code is intended to clarify and guide the conduct of all who work for us and with us, to help us uphold Paysafe's goals and values.

This Code supersedes all previous group policies relating to compliance, and in particular all previous policy documents relating to Codes of Ethics.

First and foremost, we must comply with legal requirements. In the event of a conflict between this Code and a relevant law or regulation, the relevant law or regulation must be followed. If the Code creates a higher obligation, it must be followed as long as this also achieves full compliance with the law or regulation. If you have any questions about this, please talk to your line manager, Human Resources, Legal or Compliance Teams.

Where can I find further information?

More detailed guidance and the procedures used by Paysafe to ensure compliance are set out in the relevant [Paysafe Policies](#).

Who does this policy apply to?

The Paysafe Code applies to all Paysafe employees, board directors and all other workers who work for us (whether as consultants, contractors, secondees, volunteers, sponsors or otherwise). It is important that everyone who works for Paysafe has a good understanding of this Code as well as all our relevant Policies.

We also seek to work with third parties who operate under principles that are similar to this Code. For certain third parties we will seek to have them make a contractual commitment to comply with the applicable laws and work in line with our Code. We expect all those who work with us and their employees to act in a way that is consistent with our Code and follow its principles. Paysafe will consider terminating contracts where we believe they have not met our standards or their contractual commitments.

In the case of Paysafe's non-employee directors, compliance with this Code is subject to the provisions of Paysafe's governing documents and any stockholder's agreement with Paysafe.

Our Commitment to the Code and our shared responsibilities

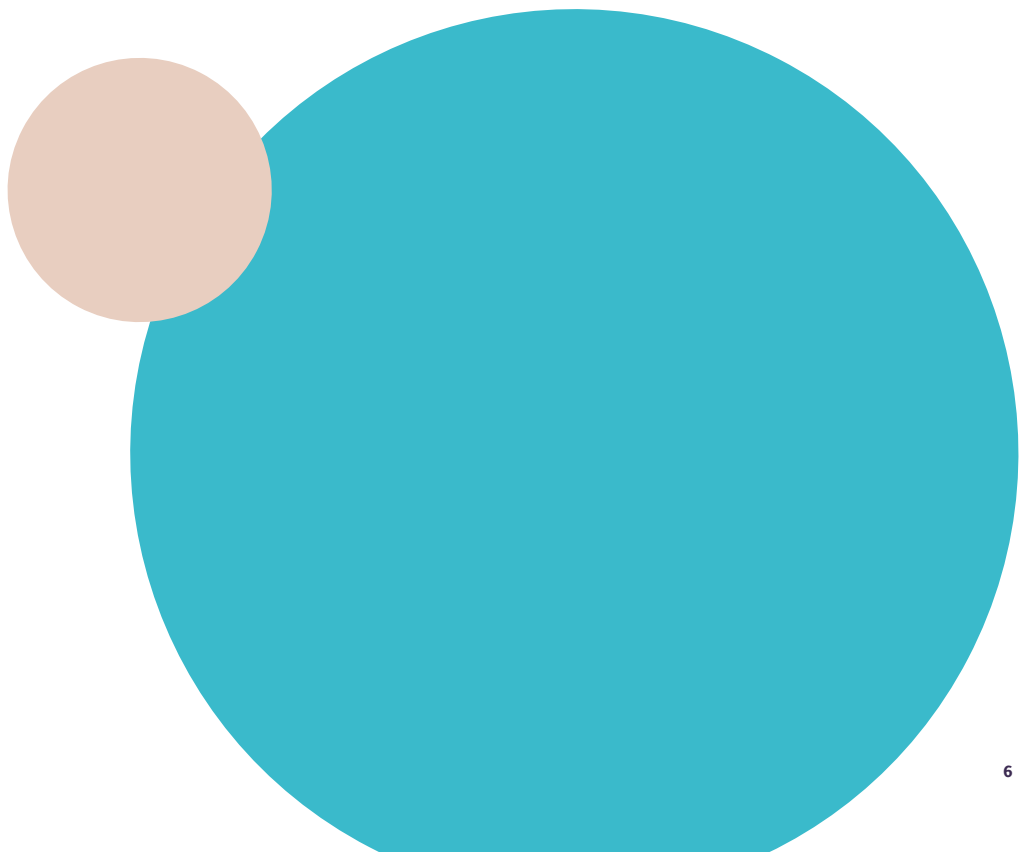
The Paysafe Code provides us with support and guidance to ensure that we conduct our business ethically and comply with the law. This is central to Paysafe's success.

We expect everyone at Paysafe to commit to the Code and follow it at all times. If you do not, you could put yourself, other team members and Paysafe at risk. A failure to follow this Code is misconduct, which could result in disciplinary action and even dismissal.

If you manage others

All our managers have additional responsibilities under the Code to:

- make sure all your team members understand the requirements of the Code and applicable legal requirements and follow them;
- hold your team members to account to behave ethically and to follow the Code and legal requirements;
- be a role model for ethical leadership and to enforce the Code consistently;
- support compliance activities in Paysafe and ensure that appropriate compliance controls are implemented in your teams; and
- encourage your team to ask questions and raise concerns and to make sure no one who speaks up suffers any retaliation.



Speaking up

Everyone at Paysafe has a responsibility to speak up whenever we have a question about the Code or think that a breach or wrongdoing may have occurred.

If you know of, or suspect, breaches of the Paysafe Code or other workplace misconduct, malpractice, illegal or unethical behaviour, you must report it straightaway – whether it is related to you, your manager or anyone else.

There are many ways that you can report a concern:

- speaking to:
 - your line manager (usually the best option);
 - your local HR;
 - executive leader; or
 - our Compliance and Legal Teams;
- contacting our Paysafe whistleblowing champion; or
- using our external whistleblowing channel managed by an impartial third party, Lighthouse Services, where you can report a concern on-line or by phone in fully confidentiality.

You can visit the following link to report your concerns **anonymously** (<https://www.lighthouse-services.com/paysafe>) or via the QR code below.



Zero tolerance on retaliation

We believe that speaking up is always the right thing to do. As such, Paysafe has a zero-tolerance policy on retaliation. If you raise a concern or report misconduct in good faith you are following our Code. Paysafe will not tolerate any retaliation against you. Retaliation will be an act of misconduct which, if substantiated, could result in disciplinary action and even dismissal.

If you think that you or someone you know has suffered retaliation, please tell us by contacting your local Human Resources Team or through any of the channels above.

Scope

The Paysafe Code covers the following:

- **Laws, regulations and Paysafe Policies**
you must know and comply with the laws, regulations and our Paysafe Policies applicable to your role and business activities (including those related to securities trading);
- **Risk management and control**
all of us at Paysafe must play our part in business risk management, regardless of position, function or location. You must understand the key risks affecting your area of responsibility and your role in implementing and operating fit-for-purpose and cost-effective internal controls to mitigate these risks;
- **Insider trading**
you must not trade on the basis of Material Non-Public Information or “tip” others by giving them Material Non-Public Information. You must not comment on stock price movements or rumours of other significant corporate developments;
- **Information management**
you must understand how information is managed and ensure that all Paysafe information is high-quality, remains relevant and is removed when appropriate, and that there are effective internal controls in place to prevent improper disclosure;
- **Our customers**
you must ensure customers are at the heart of all we do. You must follow our principles on treating customers and other third parties with whom we do business fairly;
- **Fair dealing**
you are expected to behave in a professional and ethical manner, and treat all fellow employees, business partners, vendors and suppliers fairly, honestly and with integrity;
- **Privacy Function and Global Privacy Policy**
you must treat all personal data in accordance with the Paysafe Global Privacy Policy, Global Privacy Standards and all applicable laws;
- **Information security**
you must protect customer data, intellectual property and other information assets held in any form from theft, unauthorised disclosure and/or alteration;
- **Fraud prevention and asset protection**
you must protect Paysafe’s assets from loss, theft, misuse, damage and waste in order to preserve their value;
- **Conflicts of interest**
you must always act in the best interests of Paysafe and avoid conflicts of interest that threaten objective, effective business decisions;
- **Anti-bribery, gifts and entertainment**
you must not offer, give, solicit or accept inappropriate gifts or benefits to or from third parties or engage in any form of corruption;
- **Accuracy of records and financial reporting**
you must keep complete and accurate records and ensure the information you provide to others is reliable;
- **Group workplace**
all employees are entitled to a meaningful and respectful working environment. We are committed to providing a workplace that supports our values, recognises and rewards performance, encourages trust, respect for others, and professional development. We will not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we deal with;
- **Enquiries from the public or external parties**
you must not speak on behalf of Paysafe or release information to the public domain unless you are authorised to do so; and
- **Speaking up**
if you know of, or suspect, breaches of the Paysafe Code or other workplace misconduct, malpractice, illegal or unethical behaviour, you must report it straightaway through our various channels.

Paysafe's policy framework

Paysafe's policy framework is designed to set group-level expectations and standards as well as give practical support and operational guidance for our businesses.

To achieve this we have implemented a global policy framework consisting of the Paysafe Code and TIER 1 – TIER 4 policies:

- The Paysafe Code: the overarching policy with the derivative documents Paysafe Partner Code and Senior Managers' Code;
- TIER 1 Policies: high-level strategic corporate policies with global application across Paysafe which are the overarching and governing policy documents for the relevant business or function;
- TIER 2, 3 and 4 Policies: support the internal implementation of TIER 1 Policies.

This global framework is set out on the next page and consists of ten TIER 1 Policies (which are, in turn, supported by underlying TIER 2, 3 and 4 Policies):

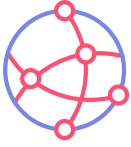
- **Global Compliance**
How we prevent our products from being used for illegal activities such as money laundering;
- **Global Conduct**
How we conduct our business (including our responsibilities with regard to treating customers fairly and data protection and privacy);
- **Global Information Management**
How information is managed throughout Paysafe throughout its lifecycle, from creation to destruction or archival. This is done in line with legal, regulatory and business need;
- **Global Our People**
How we work together;
- **Global Business Continuity Management**
How we manage business continuity;
- **Global Security**
How we keep our systems and premises safe as well as how we protect our confidential data;
- **Global Risk Management**
How we maintain an effective system of internal control and manage risk;
- **Global Privacy**
How we manage data and individuals' rights in accordance with both legal and regulatory obligations;
- **Global Information Technology**
How we organise our Information Technology Teams and support our businesses' processes; and
- **Global Assets and Financial Integrity**
How we maintain accurate business records, ensure the information we provide to others is reliable and protect and properly use company resources.



¹ Including the Paysafe Partner Code and the Senior Managers' Code

Paysafe's values

Paysafe proudly upholds four main values that are at the heart of everything we do. These are reflected throughout the Paysafe Code. We expect and encourage employees to be:



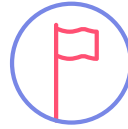
OPEN

We are open and transparent in the way we work together, building trustworthy relationships with our colleagues, customers and shareholders.



FOCUSED

We are results-driven, achieving our goals by delivering relevant solutions that meet our customers' needs.



PIONEERING

We are curious and collaborate to find innovative ways to improve our business.



COURAGEOUS

We encourage empowered people to be brave when challenging the status quo, and decisive when proposing and implementing the resulting change.

Laws, regulations and Group Policies

Any violation of applicable laws, regulations or Paysafe Policies could jeopardise Paysafe's reputation, financial standing and potentially the licences necessary to operate our business.

Across our operations, we comply with relevant applicable law, including UK, EU, Irish, Swiss, Japanese, Canadian and US legislation. These include laws covering money laundering, e-money/money transmission, payment processing, data protection, consumer protection and fraud among others. Compliance requirements also arise from the numerous contractual relationships that we have with card schemes, banks and other payment-related partners in order to do business.

Given that Paysafe is present in multiple jurisdictions and the laws and regulations vary from country to country, ensure you understand the applicability of relevant regulations by speaking with your line manager, the Compliance Department, Privacy or Legal Team, as appropriate.

You must:

- read and commit to comply with the anti-money laundering, regulatory (as set out in our Global Conduct and Global Compliance Policies and supporting documents) and contractual requirements relevant to your business;
- take part in all required training, for example, anti-money laundering annual refresher training, and seek to keep informed about legal and regulatory developments relevant to your role and business activities;
- immediately report actual or potential suspicious activities that may be linked to financial crime (e.g. money laundering, terrorist financing), to the Compliance Department. Failure to report actual or potential suspicious activity will result in violation of our regulatory commitments and will expose us to penalties and fines. Failure to report may also constitute a criminal offence.

Please see the [Global Compliance Policy](#) and [Global Conduct Policy](#) for further guidance.

Risk management and control

As a large, regulated company, Paysafe's ongoing approach to risk is to be able to constantly manage our risks responsibly and effectively, enabling us to drive and inform the right decisions across the business. This allows us not only to reduce the likelihood and impact of these risks materialising but also to take informed risk decisions in planning, delivering and executing an innovative payments strategy to generate more revenue and avoid wasting resources.

All of us must play our part in business risk management, regardless of position, function or location. We must each be familiar with the risk management processes relevant to our work and understand how to escalate actual or potential risks. We must be clear and hold ourselves and others to account for the ownership of our businesses' risks and our mitigation strategies.

Controls are any actions that mitigate risk (reduce uncertainty). Effective control helps Paysafe achieve its commercial objectives in addition to effective and efficient operations, reliable reporting, and robust compliance. If we want an activity to be well controlled, the people involved in the activity must:

- understand what management expects of them;
- be motivated and competent to achieve planned objectives;
- be deterred from undesirable practices;
- have relevant information at the right time to make better decisions; and
- be supported by ongoing monitoring to detect, prevent and correct errors.

You must:

- understand your role in the identification of risks and management of our businesses;
- understand the key risks affecting successful completion of the activities you are responsible for;
- understand your role in implementing fit-for-purpose, cost-effective controls to mitigate these key risks;

- discuss potential new risks, or raise concerns about your ability to execute effective controls, with your line manager;
- co-operate fully with Paysafe incident investigations and audits; and
- seek advice from your line manager, a member of the Risk Department or the Compliance Department if you have a question about risk management or control.

Refer to the **Global Risk Management Policy** for further guidance.

Insider trading

We Do Not Trade on Insider Information

United States securities laws prohibit buying and selling shares of stock or other securities on the basis of Material Non-Public Information. This is called "insider trading." If you have access to Material Non-Public Information about Paysafe or another company, regardless of the source, you are not permitted to use or share that information for your personal benefit. All Material Non-Public Information about us, our owners, our customers, business partners, contractors, consultants, suppliers or vendors should be considered confidential information.

If a team member trades securities of these entities while having Material Non-Public Information, or if a team member shares Material Non-Public Information with others who trade, this may constitute insider trading. We are all responsible for reviewing, understanding, and complying with the Securities Dealing Policy. Anyone found to have broken securities laws may be subject to personal liability and could face significant fines and criminal penalties, including imprisonment.

Key concepts

- Material Non-Public Information is information that has not been communicated to the public and that a reasonable investor would consider in making a decision to buy, sell or hold stock in a company. This may include financial results or projections, significant litigation exposure or developments, major transactions with other companies, such as joint ventures, potential mergers, acquisitions, or divestitures, and new product announcements.
- You must not "tip" others – whether family members, friends, or anyone else – by giving them Material Non-Public Information so that they can trade in stock, either for themselves or on your behalf. Like insider trading, tipping is illegal and prohibited under the Securities Dealing Policy.
- You must not comment on stock price movements or rumours of other corporate developments (including discussions in Internet "chat rooms" or on social media platforms). Simply report anything you see to the Communications team.

You must:

- ensure you understand the concept of Material Non-Public Information as it applies to Paysafe and your role;
- understand how the Securities Dealing Policy applies to you and in particular whether you are restricted to trading during "open window periods" given your role in Paysafe. For example, members of our Executive and Senior Management Teams (as well as certain others) are prevented from trading in the time leading up to Paysafe's quarterly market updates;
- follow any specific rules related to trading notified to you if you are working on a confidential or secret project for Paysafe.

Refer to the [Securities Dealing Policy and External Communications and Disclosure Policy](#) for further guidance.

Information management

Information is fundamental to Paysafe. In order to provide high quality financial products and services and to continue to be trusted by our customers, our information and data must be of the highest quality, available to the right people, at the right time and in the right format.

The Compliance Process and Information Governance function will oversee all Data Governance aspects within Paysafe, covering the management and control of all information and data throughout the group. Information will be managed throughout its lifecycle, created for specific purposes, will be available for re-use and will have secure access. It will also be removed at the correct juncture to keep our pool of information relevant and valuable.

The [Global Information Management Policy](#) is Paysafe's high level overview of the approach we will take for all aspects of information management and curation.

Key concepts

- Security classification – all (structured) data in our databases and all (unstructured) information or 'content' in other repositories will have a marking from 'Secret' to 'Public' to enable users to know how to handle and share the information.
- Open access – in order to maximise the value of our information it needs to be retrievable so it can be re-used. Therefore, all non-sensitive content (documents) will be retrievable although access is provided on a strict role-based "needs" approach.
- Information lifecycle – all information will be created, classified, stored securely, used and shared, held if necessary and then removed or archived.
- Information ownership – all information in Paysafe will be owned by someone. This is so that at each point in the lifecycle of information someone is responsible for making a decision on information they own. This can be delegated.

Refer to the [Global Information Management Policy](#) for further guidance.

You must:

- give some thought to how you create information so that it is classified correctly, created in the correct place and given the correct access controls;
- pay due regard to the interests of customers and treat them fairly and in accordance with this Code and our Policies;
- take extra care when creating or handling personal information or any information classified as confidential or secret;
- **not** use email to store documents that may need to be shared – MS Outlook is not a document management system;
- **not** take a copy of a document 'just in case' – this duplication of information can increase the risk of the incorrect version of a document becoming the one that is used and is also costly;
- use metadata or tagging where available in order to make information more findable;
- data identified for deletion must be fully deleted and not further archived. All systems must be built with data deletion or obfuscation capability.

Our customers

Our customers are central to all that we do at Paysafe and our strategy is built around customer loyalty. The customer must be the heart of everything we do from the beginning to the end of the customer relationship. In particular, we strive to ensure that:

- we treat customers fairly at all times;
- our product development process is customer-centric;
- we listen to customers to understand their experience of our products and services and act on that feedback;
- we generate insights from customer feedback and use them to improve our products and services;
- we ensure that our customers have all the information they need to make the best possible choices;
- we always communicate with our customers in a way that is clear, fair and not misleading; and
- we identify and recognise the needs of vulnerable customers.

Treating Customers Fairly (TCF) is central to Paysafe and this is set out in our **Global Conduct Policy**. This sets out how Paysafe is committed to ensuring that the principle of treating customers fairly is applied in all areas of our day to day business activities whether within Paysafe or by suppliers providing outsourced services.

Paysafe recognises the needs of vulnerable customers and our responsibilities to them and seeks to take a proactive role in engaging with industry associations and government bodies on customer topics that support access and inclusion.

Key concepts

- Our customers should always be confident that fair treatment of customers is central to Paysafe's culture.
- We will provide customers with clear information about our products and services (including fees and other charges) and keep them informed throughout their relationship with us.
- We will always seek to give reasonable notice of changes to Paysafe's terms and conditions including our fees and charges.
- We actively seek feedback from customers and promptly act on their concerns.
- All complaints received by us will be investigated and handled sympathetically, as quickly as possible and in accordance with regulatory requirements.
- Our teams are trained and managed in ways which promote fair treatment of customer and Paysafe.

You must:

- pay due regard to the interests of customers and treat them fairly and in accordance with this Code and our Policies;
- ensure all communications with customers are clear, fair and not misleading;
- be mindful of the specific needs of vulnerable customers, respectful of their circumstances and proactive in ensuring that Paysafe fulfils its responsibilities to them;
- always acknowledge and seek to resolve any mistakes in dealing with our customers; and
- follow the **[Information Request and Complaints Handling Policy](#)** when dealing with customer complaints.

Refer to the **[Global Conduct Policy](#)** for further guidance.

Fair dealing

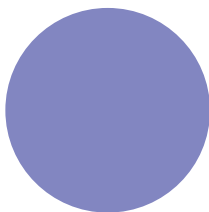
In daily interactions with fellow employees, business partners, vendors and suppliers, honesty and integrity are essential. The consequences of unethical behaviour can be devastating for individuals and/or Paysafe.

You are expected to behave in a professional and ethical manner. It is your responsibility to deal honestly, ethically and fairly with each other and with Paysafe's, business partners, vendors, suppliers, competitors, governmental and quasi-governmental agencies and the public, and to follow Paysafe Policies.

You must not take unfair advantage of anyone through manipulation, abuse of seniority, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice. Dishonest and/or unethical behaviour will not be tolerated.

You must:

- conduct business with uncompromising integrity and professionalism;
- if you know of a mistake, whether it is in Paysafe's favour or not correct it;
- treat all fellow employees, business partners, vendors and suppliers fairly and honestly; always adopting an inclusive and non-discriminatory approach;
- notify the Compliance Department or Legal Team immediately if you believe that you have received competitively sensitive or trade secret information from a competitor;
- **not** mislead, misrepresent, deceive, or take unfair advantage of fellow employees, business partners, vendors or suppliers;
- **not** share non-public, price-related information with competitors; and
- **not** engage in any conduct that is detrimental to Paysafe's image.



Privacy Function and the Global Privacy Policy

Individuals have a number of rights with regard to the way their personal information (or data) is handled. During the course of our business we will collect, store and process personal data about our employees, customers, suppliers and other third parties. Paysafe recognises that the lawful handling of data is necessary in order to meet our regulatory and contractual obligations to business partners and strengthens our business operations.

You must:

- comply with the requirements of the Global Privacy Policy and the related Global Privacy Standards;
- if you manage a team, ensure that your team members are aware of their responsibilities under the above policies and standards;
- take a 'Think Privacy' approach (aka 'Privacy by Design'), ensuring you engage Privacy and Information Security at early-stage development of new products or services or changes to data systems and management;
- any 'rights' requests from individuals should be identified and forwarded to your local Rights Guardian immediately; and
- seek advice from your line manager or the Privacy Team at (privacyteam@paysafe.com) if you have questions or compliance concerns in respect of implementing the Privacy Standards, concerns with how data is being managed or dealing with individuals' rights.

Information security

Paysafe has a commitment to protect customer data and business information, in order to preserve both our reputation as a trusted payment service provider and our competitive advantage. You must protect customer data, intellectual property and other information assets held in any form from theft, unauthorised disclosure and/or alteration.

Remember that everyone who works for us or with us has a responsibility to protect customer data, intellectual property and our other information assets from theft, unauthorised disclosure and/or alteration.

You must:

- comply with the **Global Security Policy** and **Global Conduct Policy** (and their supporting documents) to ensure we protect customer and business information;
- follow our 10 Golden Rules:
 1. protect your information at all times and ensure your passwords are protected;
 2. be cautious about the information you share and who you share it with;
 3. use our classification levels: Secret, Confidential, Internal and Public;
 4. read our internal and external security policies;
 5. keep a close eye on who can see information on your devices when you are travelling or when working from home;
 6. think twice before you click, search, browse or download;
 7. always use VPN when working remotely and be careful using public WiFi;
 8. keep your desk clean and follow the access policy when hosting guests at the office; be equally mindful in your home office environment;
 9. familiarise yourself with our detailed personal data and privacy policies;
 10. report any security incidents or concerns (including any failure to follow our **Global Security Policy** or any of its supporting documents) to the Security Operations Centre: soc@paysafe.com or +359 888 203 412.
 - if you manage a team, you are accountable for and must ensure your team members are complying with Paysafe Policies;
 - seek advice from your line manager or the Information Security Team if you have difficulty complying with any aspect of the security policy or have questions about how the policy should be implemented within the business activities you are responsible for.

Refer to the **Global Security Policy** and **Global Conduct Policy** for further guidance.

Fraud prevention and asset protection

You must protect Paysafe's assets from loss, theft, misuse, damage and waste in order to preserve their value. Our assets should be used for legitimate and authorised business purposes only. Paysafe will not tolerate any level of fraud within the business.

Where we hold customer funds that must be safeguarded, you must ensure that these amounts are correctly safeguarded at all times by following our relevant Policies, and applicable regulations. This way we can ensure that these amounts are always clearly identified and protected.

In addition to information assets (see above), examples of Paysafe assets include own funds, regulatory licences and IT equipment. This is not an extensive list of Paysafe assets and you should always confirm with your line manager should you have any questions.

Refer to the [Global Our People Policy](#), [Global Assets and Financial Integrity Policy](#), [UK Safeguarding & Operational Investment and Exposure Policy](#), [Irish Safeguarding & Operational Investment and Exposure Policy](#), and [Internal Fraud Risk Management Policy](#) for further guidance.

You must:

- claim expenses in accordance with the travel and expenses policy applicable to your business;
- purchase goods and services, and obtain approval for operating expenditure, staff recruitment and contracts with third parties, in accordance with relevant procurement policy applicable to your business; and
- ensure that all documents which may legally bind Paysafe entities, and which deviate from templates approved by the Legal Team, are sent to the Legal Department for review and sign off prior to signing.

Conflicts of interest

You must always act in the best interests of Paysafe and its customers and avoid conflicts of interest that threaten your ability to make objective and effective business decisions.

Responsible use of Paysafe's systems and products

All Paysafe employees should have a deep knowledge of Paysafe's products, so that you can appreciate what our customers experience on a daily basis, and in turn become a valuable ambassador for Paysafe. Loans to you, or guarantees of your obligations by Paysafe are of special concern.

If you are a consumer of Paysafe's products and services, and you have a level of access to our corporate systems that allows you to view customer account data and/or change the state or configuration/capabilities of the account – including your own account or the account of someone who has a close relationship with you (members of your family, household, your business partners or anyone who could influence your objectivity) you must observe the following:

- you **must not** use your access to the Paysafe systems, or your knowledge of internal controls and potential deficiencies, to intentionally or negligently harm the reputation of Paysafe or gain improper benefits for yourself or any third party;
- you **must** only view those customer account details, verification documents and transaction histories that are required to fulfil your professional duties at Paysafe. Please respect the privacy of your colleagues or other Paysafe customers you may know, and **do not** access their accounts unless there is a valid business need to do so. Failure to comply with this requirement may subject Paysafe to liability, as it may be in violation of applicable Data Protection laws and regulations;
- Paysafe will respect the privacy of its staff, although it reserves the right, at its sole discretion and without notice, to investigate accounts owned by staff or those in a close relationship to the staff member, in the event of suspected fraudulent or other inappropriate behaviour. Any personal information disclosed in the course of such investigation will remain confidential and will be accessible by authorised staff only;
- if you are a VIP account holder in accordance with the Paysafe VIP Terms and Conditions or intend to apply for VIP status, you **must** immediately disclose this to the Compliance Department; and
- you **must** act with integrity and in the best interests of customers at all times.

Corporate Opportunities

You owe a duty to Paysafe to advance Paysafe's business interests when the opportunity to do so arises. Except with authorization from the General Counsel and Chief Compliance Officer, you are prohibited from personally taking (or directing a third party to take) a corporate opportunity that is discovered through the use of company property, information or position. In addition, except with authorization from the General Counsel and Chief Compliance Officer, you are prohibited from using Paysafe property, information or position for personal gain and from competing with Paysafe.

Other potential conflicts of interest

Examples include, but are not limited to:

- you or someone with a close relationship to you receives improper benefits such as cash, discounts, or being selected as a supplier or business partner, as a result of your position in Paysafe;
- a former Paysafe staff member contacts you in order to obtain confidential internal information about Paysafe's affairs, business or customers, and/or solicits you to act in any other way that may be adverse to Paysafe's interests. You **must** immediately report such conduct to your line manager and Compliance and stop communicating with them;
- you allow any investments held by you or someone with a close relationship to you to influence your work in a way that is not in the best interests of Paysafe, including investments in any competitor, customer or supplier of Paysafe;
- someone that has a close relationship with you, directly reports to you, or you have the ability to influence their performance appraisal, salary and benefits; or
- if you are considering taking on additional roles outside of Paysafe (including board positions) or any existing affiliations with competitors, customers or suppliers.

Report actual, potential or perceived conflicts of interest to your line manager and Compliance as soon as they arise, or if you are unsure whether a potential relationship or transaction represents a conflict of interest, before engaging in such conduct.

Refer to the [Global Conduct Policy](#), [Conflicts of Interest Policy](#) and [Related Party Transactions Policy](#) for further guidance.

Anti-bribery, gifts and entertainment

You must not offer, give, solicit or accept inappropriate gifts or benefits to or from third parties or engage in any form of corruption.

You must not:

- offer or make an unauthorised payment or authorise an improper payment (cash or otherwise) to a local or foreign official or any related person or entity or private individual. If you are faced with a request for such a payment, you must consult the Compliance Department before taking any action;
- make charitable or political donations on behalf of Paysafe without prior approval from the Compliance Department;
- offer or receive money (or anything of value), gifts, kickbacks in relation to obtaining business benefit or awarding contracts which is outside approved remuneration arrangements; or
- induce or facilitate others to breach laws or regulations.

You must:

- report to giftsandhospitality@paysafe.com before you offer, accept or decline gifts and hospitality above the limits outlined in the **Anti-Bribery and Corruption Policy**.

Refer to the **Global Conduct Policy** and **Anti-Bribery and Corruption Policy** for further guidance.

Accuracy of records and financial reporting

You must keep complete and accurate records and ensure the information you provide to others is reliable. We require complete and accurate operational information to support effective business decision-making and accurate and complete external reporting.

Our financial and accounting records are used to produce reports for the Board, investors, regulators and other stakeholders. Financial accuracy and reporting is critical to Paysafe's ongoing success. It is key to our reputation for integrity and provides assurance as to our stable foundations and ongoing sustainability as a business. It is also critical that we make full, fair, accurate, timely, and understandable disclosure in reports and documents that we file with, or submit to our regulatory bodies and in all other public communications made by us.

You must:

- ensure all your records and accounts, including timesheets, sales records, invoices and expense reports, are complete and accurate;
- never falsify any document or distort the facts

relating to a particular transaction;

- never sign off documents unless you have been duly authorised in writing to do so;
- record transactions as soon as possible after they have occurred and retain appropriate supporting documentation;
- retain financial, accounting and/or transaction records for as long as needed to meet applicable legal and regulatory requirements. If you are informed about an impending internal or external investigation, you may not destroy any records (including emails) unless you have been authorised to do so by the Legal Department .

Refer to the [Global Assets and Financial Integrity Policy](#) for further guidance.

Group workplace

We want Paysafe to be a meaningful and respectful place to work.

As such, we are committed to a workplace that:

- supports our values of **Open, Focused, Pioneering** and **Courageous** which underpin our culture of collaboration, optimism, inclusion, fun and success;
- has an inclusive and supportive environment in which each employee is able to fulfil their potential and maximise their contribution as well as recognises and values the creative potential that individuals of different backgrounds, abilities or working styles bring to their work;
- ensures that everyone delivers a high-quality, customer focused service;
- welcomes different styles and fresh ways of thinking, encourages innovation, empowerment and a culture of speaking up where things can be done better;
- recognises and rewards performance;
- is attractive to prospective candidates and customers;
- breeds trust, drives respect for other and provides continuous improvement through personal and professional development;
- is free from discrimination, harassment and inappropriate conduct; and
- is a safe place to work.

Contact the Human Resources Team covering your specific business function or refer to the [Global Our People Policy](#) for further guidance.

Enquiries from public or external parties

You must not speak on behalf of Paysafe or release information to the public domain unless you are authorised to do so. When third parties including the media, investors, financial analysts, regulatory or other public bodies contact Paysafe to request information, the response could have a significant impact on Paysafe's reputation.

You must:

- immediately forward any third-party requests for information to your line manager or the Corporate Communications Team (as appropriate) if you have not been authorised to speak on behalf of Paysafe;
- **not** make inappropriate comments about Paysafe or act in a manner that may damage Paysafe's reputation; and
- be particularly careful of content you post on your social media channels.

Whistleblowing

Paysafe is committed to conducting our business with honesty and integrity and with a culture of openness, accountability and high business ethics. Our employees are our most important insight for uncovering possible misconduct that needs to be corrected.

If you become aware or suspect an issue of misconduct that is not in line with our values and the Paysafe Code, you should raise the issue. There are many ways of doing this at Paysafe and these are set out in the [Whistleblowing Policy](#). They include speaking to your line manager or executive leader, our HR, Compliance and Legal Teams, contacting our Paysafe whistleblowing champion or using our external confidential whistleblowing channel, Lighthouse Services.

If you know of, or suspect, breaches of the Paysafe Code or other workplace misconduct, malpractice, illegal or unethical behaviour, you are encouraged to report it in accordance with the various channels set out in the [Whistleblowing Policy](#). This Policy aims to protect those who speak up in good faith about possible or actual breaches, and ensure that concerns are subject to an appropriate investigation. Paysafe will not tolerate the victimisation of anyone who speaks up in good faith. If you are an employee and would like to report a concern anonymously, we encourage you to use our confidential reporting system managed by an impartial and external service provider, Lighthouse Services, where you have the options to make a disclosure via the web or by phone (operational 24/7).

You must:

- **not** use the [Whistleblowing Policy](#) for general complaints or personal grievances – discuss these with your line manager or the Human Resources Team;
- **not** use the [Whistleblowing Policy](#) with malicious intent to harm an individual or entity. If this is discovered to be the case, you may be subject to disciplinary action;
- ensure that no one who speaks up suffers any retaliation.

Refer to the [Global Conduct Policy](#) and [Whistleblowing Policy](#) for further guidance.

Notwithstanding any confidentiality requirements in this Code, and notwithstanding any other confidentiality or non-disclosure agreement (whether in writing or otherwise, including without limitation as part of an employment agreement, separation agreement or similar employment or compensation arrangement) applicable to current or former employees, this Code does not restrict any current or former employee from communicating, cooperating or filing a complaint with any U.S. federal, state or local governmental or law enforcement branch, agency or entity (collectively, a “Governmental Entity”) with respect to possible violations of any U.S. federal, state or local law or regulation, or otherwise making disclosures to any Governmental Entity, in each case, that are protected under the whistleblower provisions of any such law or regulation, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former employee through a communication that was subject to the attorney-client privilege, unless such disclosure of that information would otherwise be permitted by an attorney pursuant to 17 CFR 205.3(d)(2), applicable state attorney conduct rules, or otherwise. Any agreement in conflict with the foregoing is hereby deemed amended by the Company to be consistent with the foregoing.

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