

**Paysafe:**

# Paysafe Partner Code



This **Partner Code** sets out Paysafe's expectation that our partners and anyone that they in turn work with to deliver products and/or services to Paysafe will comply with the principles set out in this Code and will share our commitment to conducting our respective businesses with integrity and in an honest and ethical manner.

Paysafe may update this Partner Code from time to time and will include a link to the most recent Partner Code on our website at <https://www.paysafe.com/paysafegroup/culture/>. By working with us, you are accepting the terms of this Partner Code as well as any future updates. The terms set out in this Partner Code are in addition to the terms included in any contract between you and Paysafe (with such contractual terms taking precedence over any conflicting terms in this Partner Code). If you believe that you cannot comply with any of our expectations set forth in this Partner Code, you must tell us immediately.

## Document approval

**Date approved**

1st Sept 2021

**Approved by**

Board of Directors

**Date Comes Into Force**

1st Sept 2021

**Signed by**

Philip McHugh  
Chief Executive Officer, Paysafe



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# Compliance

## Legal Compliance

Each of our partners **must** comply with all laws and regulations applicable to its business. Each partner is responsible for remaining informed about relevant legal and regulatory developments and ensuring continued compliance with changes in any applicable laws and regulations.

To the extent that this Partner Code imposes more stringent requirements than the laws or regulations applicable in the jurisdiction of any of our partners, each partner **must** comply with this Partner Code.

## Consumer Protection Law

We expect our partners to treat consumers fairly and comply with all applicable laws and regulations intended to protect consumers from fraud and unfair practices. Consumers that are particularly vulnerable should be given additional protection and consideration.

## Anti-Corruption and Bribery

Paysafe has zero-tolerance for any form of bribery (including kickbacks), corruption, extortion or fraud, and we expect the same from everyone with whom we work. We expect our partners to comply with all applicable anti-corruption, anti-fraud and bribery legislation.

Our partners **must not**:

- offer, promise, authorize, or give money (or anything of value) to any person (including but not limited to local or foreign public officials) to induce them to act improperly or to obtain an improper advantage. To be clear, this includes offers, promises, authorizations or gifts whether made directly or indirectly;
- request or receive money (or anything of value) from any person (including but not limited to local or foreign public officials) where the purpose is to induce anyone with whom we work to act improperly or provide an improper advantage. To be clear, this includes requests or receipts whether made or obtained directly or indirectly;
- give or receive money (or anything of value) to or from

any person (including but not limited to local or foreign public officials) where the payment is intended as a reward for improper performance of a relevant function or activity or for conferring an improper advantage. To be clear, this includes offers, promises, authorizations or gifts whether made or received directly or indirectly; or

- pay or offer to pay money (or anything of value) to a local or foreign government official for the purpose of expediting otherwise proper and legal administrative processes. This applies whether or not such payments or offers would be legal under applicable law or regulation.

We expect everyone we work with to effectively manage their anti-bribery and corruption risk.

## Anti-Money Laundering

We expect our partners to maintain a zero-tolerance policy with respect to money laundering and terrorist financing, as well as financial crimes in general. All our partners must have controls in place appropriate to the nature of the risks they face of tax evasion, money laundering, and terrorism financing, including “know your customer” (KYC) rules.

## Whistleblowing

If you know of, or suspect, breaches of this Partner Code, you should report it straightaway. You may report your concern by contacting your usual Paysafe contact or alternatively through our confidential whistleblowing channel. The details of the whistleblowing channel can be found on our website at <https://www.paysafe.com/paysafegroup/culture/>. We believe that speaking up is always the right thing to do and, as such, Paysafe has a zero-tolerance policy on retaliation.

## Conflicts of Interest

A conflict of interest may arise when a partner’s obligation toward Paysafe conflicts or appears to conflict with its own interests. All partners must avoid any conflicts of interest that may affect their ability to make objective and effective business decisions with respect to Paysafe’s interests.

# Compliance

## Conflicts of Interest

Should a partner become aware of an actual or apparent conflict of interest, they must promptly notify Paysafe and work together with us to resolve the conflict.

## Record keeping

You are responsible for maintaining adequate internal controls and keeping accurate and complete records of transactions. You must make these records available for inspection by investigating authorities and cooperate in any investigations by external regulators.

You are responsible for managing the lifecycle of personal data (including deletion) and cooperation with Paysafe in meeting obligations under applicable privacy law as they apply to the partner relationship with Paysafe.

## Competition and fair dealing

We seek competitive advantages through superior performance, never through unethical or illegal business practices. We treat everyone in the marketplace with fairness and integrity. Paysafe prohibits taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice. Our partners should not enter directly or indirectly into any illegal arrangements with our competitors nor exchange sensitive information, e.g. regarding markets, customers, strategies, and prices.

# Working together

## Discrimination and harassment

Paysafe has a zero-tolerance policy with respect to discriminatory treatment of people based on sex, race, ethnicity, political affiliation, social background, mental or physical disability, sexual orientation, gender reassignment, marital status, pregnancy or maternity, religious conviction or age. Paysafe expects all of its partners to respect this policy and ensure that all our staff are treated with respect and without discrimination.

Paysafe will not accept any form of abusive treatment of our staff. This includes verbal or physical harassment such as gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.

## Modern Slavery and Human Trafficking

Paysafe has zero-tolerance for slavery and human trafficking in any part of its business. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Paysafe is committed to acting ethically and with integrity in all business dealings and relationships and will enforce systems and controls to ensure slavery and trafficking are not taking place anywhere in our own business.

## Use of language

Each of the companies within the Paysafe Group are separate and distinct entities. In this Partner Code, 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, **partner** means any individual or organisation that works with Paysafe, and includes our suppliers, distributors, agents, advisors and their subcontractors or suppliers (and includes without limitation, our payment processing agents and independent sales organisations with which we work). Paysafe will take any breach by a partner of this Partner Code very seriously and may as a consequence seek to terminate our relationship with the partner (whilst reserving any right to take further action).

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