

# Code of Ethics

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# CEO introduction

As the leading pan-European organisation in our sector, Worldline's purpose is to create and manage top-tier digital payment and transactional services that foster sustainable economic growth while strengthening trust and security in our societies. Being a regulated entity in several countries, that processes billions of transactions monthly, the significance of trust and security in all our operations cannot be overemphasised.

At Worldline, we constantly work to conduct our activities ethically and with integrity, in order to honour the trust placed in us by all our stakeholders – consumers, customers, regulators, partners, and shareholders alike. We believe that the long-term success of the Group lies in the manner in which we embody this ethical foundation, thereby building our reputation and competitive excellence. This goes beyond simply adhering to the relevant laws and regulations; it entails allowing our business conduct and decisions to be constantly guided by a code of conduct reflecting our values.

Consequently, the Code of Ethics and Integrity applies to everyone employed by Worldline, as it translates our values into tangible actions when competing in the marketplace and interacting with our stakeholders. We are committed to extending our values beyond our company and incorporating them into our relationships with stakeholders and across our supply chain.

To achieve this, each individual is responsible for maintaining the highest ethical standards in their daily tasks. Adopting an ethical and integral approach to business is an integral part of Worldline's culture and strategy across all areas of influence, ingrained in the company's thought processes and operations.

This Code of Ethics does not cover every possible situation but instead it acts as a guiding principle embedded in our company culture, business philosophy, and corporate policies – a principle we expect all our collaborators to respect and embody.

I have full confidence in all Worldliners to uphold these commitments and express my gratitude to them for maintaining the highest standards in all professional endeavours.



**Pierre-Antoine Vacheron**  
Worldline's CEO

## Our values and commitment



**Innovation:** Our definition of innovation goes beyond just generating great new ideas, whether they concern a product or a process, big or small, disruptive or incremental. What we define as success lies in bringing these ideas to life, and with that, making tangible improvements for customers, society and employees.



**Cooperation:** Our whole is greater than the sum of our parts – we build long-lasting relationships with our co-workers, customers and ecosystem. We leave our egos aside to realise our common purpose. We support each other and share successes, small and big, on the journey towards a trusted world.



**Excellence:** A trusted world is built on superior results – and we don't settle for less. We set ambitious targets. We have the best experts who brilliantly execute the commitments we make. We don't rest on our laurels and constantly progress to continue realising our purpose.



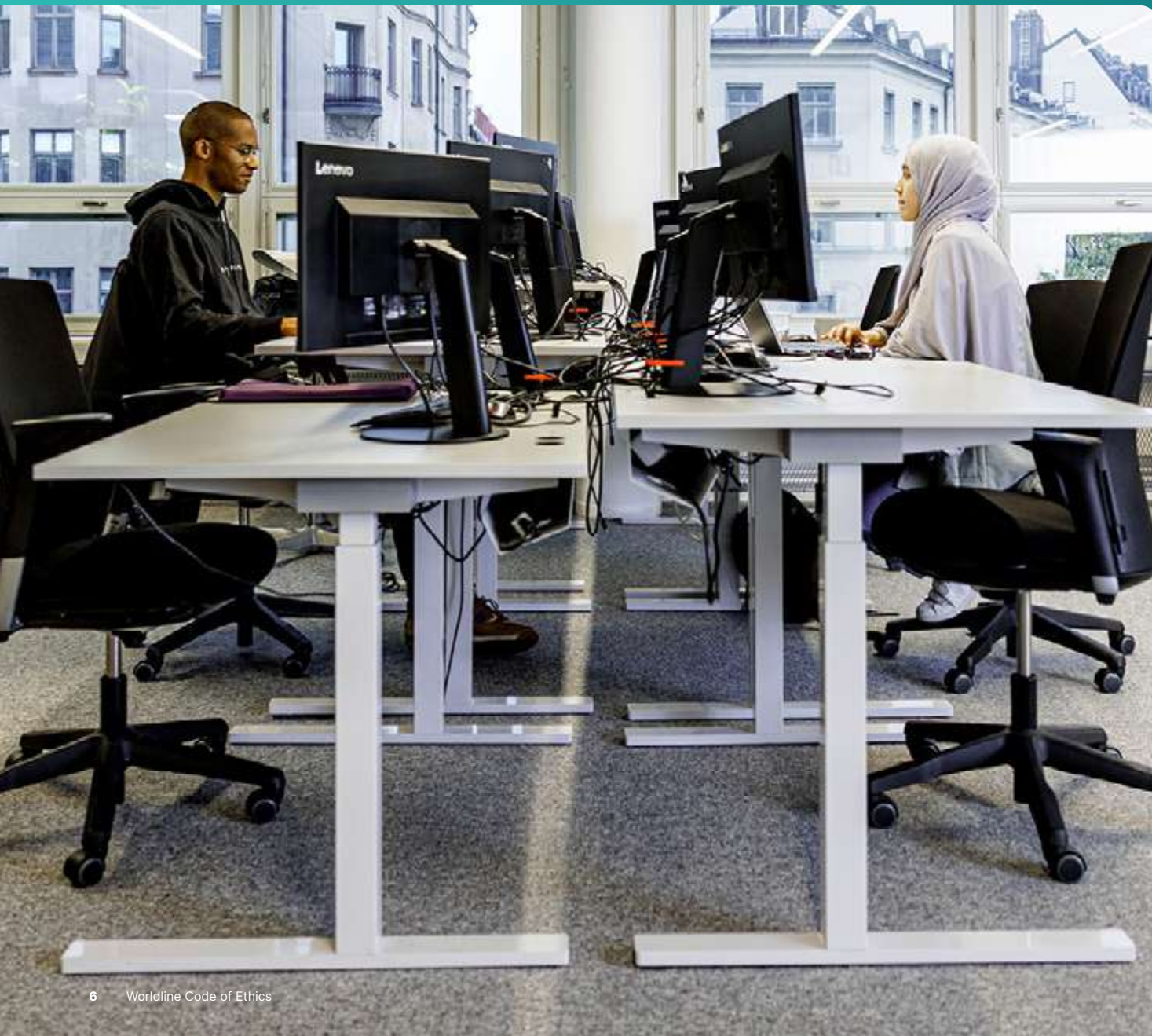
**Empowerment:** Empowerment is a two-way street. On the one hand, being trusted and supported by Worldline's leaders to realise our full potential; on the other hand, being accountable for our own journey and not hesitating to take action.

## Role of the code and applicability

The Code of Ethics applies to all employees of the Worldline Group and its controlled subsidiaries and joint ventures worldwide. The members of the Executive Committee, the top management, the corporate officers and the management committees of the Group and of the various entities, including the Worldline Foundation, must comply with the obligations of good conduct set out in this Code of Ethics. Worldline reserves the right to take necessary and proportionate measures (including disciplinary) to remedy any proven violations of the provisions of the Code of Ethics. It can go up to termination.

In addition, Worldline encourages its various commercial partners to share and comply with the ethical standards set out in this code in terms of business integrity, human rights, working conditions, sustainability and respect for the environment.

# Our commitment for ethics, integrity, anti-bribery and anti-corruption



## Anti-bribery, anti-corruption and influence peddling



Worldline has zero tolerance for bribery and corruption, regardless of whether it takes place in the public sector or in the private sector. We believe in a culture of integrity and transparency in all our actions, ensuring that our operations always comply with anti-corruption laws and regulations. We expect every employee to commit to rejecting any form of bribery, corruption, and to report any suspicious activity. Our commitment to anti-corruption is fundamental in maintaining the trust of our customers, business partners, and stakeholders, and in ensuring the sustainability of the company's business activities.



### Do

- Refuse any form of bribery, kickbacks, or inappropriate gifts from suppliers, clients, or business partners.
- Participate in training and awareness sessions on anti-corruption to better understand its implications and consequences.
- Promote transparency and integrity in all business transactions and interactions with third parties.



### Don't

- Show favouritism or bias in dealing with business partners by giving advantages to some at the expense of others.
- Pay money (facilitation payments) to expedite an administrative procedure.
- Use company resources for personal gain or for corrupt activities.
- Ignore or cover up suspicious behaviours of corruption within the company.
- Engage in corrupt practices.



## Questions and Answers

### What is a bribe?

A bribe refers to the act of giving, offering, receiving, or soliciting something of value, such as money, gifts, or favours, in exchange for influence or action in business or public affairs. It is typically aimed at gaining an unfair advantage or influencing a decision or action in one's favour. Bribes are considered illegal and unethical, and they can lead to severe legal and reputational consequences for individuals and organisations involved.

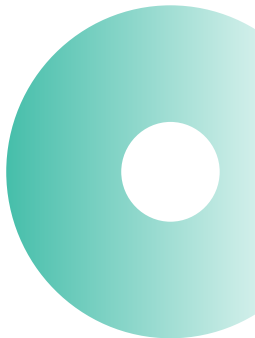
### Does using an intermediary to do bribes lower the risks of corruption?

No, in many cases utilizing intermediaries for bribery can actually increase the risks, as it may be viewed as an attempt to conceal or facilitate corrupt activities. Laws and regulations related to bribery and corruption focus as well on the use of intermediaries, and any involvement in corrupt activities at their side, carries legal and reputational consequences. Therefore, we should be vigilant when working with intermediaries and draw their attention on conducting business with integrity and transparency and refrain from engaging in any form of corrupt behaviour.





# Gifts and invitations



The exchange of gifts and invitations of reasonable value is a common practice in the business world. However, if these gestures are made with the intention of gaining an undue advantage in the context of the business relationship, they can be considered as forms of corruption. Several factors must be considered to assess the risk of corruption when exchanging gifts or invitations (see Q&A).

The risk is even higher when dealing with public officials.

On the overall, it is necessary to declare gifts and invitations and check Worldline's internal guidelines and policies to ensure full compliance.



## Do

- Refuse any gift or invitation that could inappropriately influence a business decision.
- Declare and record any gift or invitation given or received, in accordance with the company's policies and guidelines to ensure transparency.



## Don't

- Use gifts or invitations to favour certain business partners.
- Offer gifts to a client during a tendering period or contract negotiation, as well as receiving them from a supplier.

## Questions and Answers

### What questions you should ask yourself when you want to offer a gift to a partner/client or when you receive one?

- What is the value of the gift? It should be reasonable value (not excessive).
- What is the frequency of the exchange? Recurrent small exchanges can also be considered as a bribe.
- What is the context of the exchange? Is it during a tender? A contract renewal? The timing can be sensitive if close to a decision-making period for example.
- Could the gift have an influence on the continuation of the business relationship or a decision? If yes, it is a red flag, in case of any doubt do not hesitate to contact the Compliance function.



# Donations and philanthropic activities



We are committed to having a positive impact on the economic and social development of the regions in which we operate. Through our corporate philanthropy activities, we give priority to supporting causes linked to education and the environment, with a focus on young people and women. Our philanthropic objective is to have a positive long-term impact on today's social and environmental transformation. We can all volunteer within Worldline to propose initiatives and take part in them to help make the world a better place.



## Do

- Respect the rules governing donations and the Group's philanthropic policy.
- Carry out due diligence beforehand to ensure that our partners and projects meet the Group's standards and have a significant impact.
- Ask our partners to keep us regularly informed of developments, the use of funds or resources allocated and their impact.



## Don't

- Engage in actions or partnerships that do not reflect our ethical principles and philanthropic policy.
- Make a commitment before checking that we have the financial, human and technical resources to support the sponsorship project.
- Use philanthropic contributions as a means of influencing decisions in our favour.

## Questions and Answers

### How can I find out more about Worldline's philanthropic activities?

There are dedicated pages accessible via the intranet. You can consult our existing actions, our regional/local initiatives around our sites abroad, our communications and contacts by country.

### I know an association and would like Worldline to make a donation. Where do I start?

The first thing to do is to check that the project/structure is compatible with our philanthropic policy and therefore eligible for a donation. Then you need to contact the local or global contact points (philanthropic ambassadors) for more information on the feasibility of the partnership/project and the steps involved in submitting an application.

### What is philanthropy?

Philanthropy is a "feeling that moves people to help others" or as "love of humanity". Today, philanthropy covers all private donations to organisations working in the public interest. Donations are free and unrequited. Corporate practices and the notion of return on investment are providing a new framework for philanthropy. Increasing attention is being paid to impact: how to ensure that the donations made are useful and achieve their objectives.

# Conflicts of interests



A conflict of interest arises when an individual's personal or financial interests conflict with those of Worldline, compromising impartiality and objectivity. A conflict of interest may not be inherently problematic, but if it is not declared and managed appropriately, it can lead to unfavourable consequences for employees and the entire company.



### Do

- Report any potential or actual conflict of interest using the declaration form.
- Adhere to the recommendations to mitigate the risks related to an actual conflict of interest.
- Inform your manager if you realise that, within the scope of a project, tender, or business relationship, you have a conflict of interest with a supplier or client.



### Don't

- Use Worldline's resources for personal gain.
- Participate in the recruitment process of a close relative.
- Engage in a professional activity parallel to your work at Worldline that would compromise or interfere with your work as a Worldline employee.

## Questions and Answers

**An employee is working on several projects, one of his regular clients asks him if his son can do an internship within Worldline. What is the right behaviour?**

This is a potential conflict of interest, it should be declared and recorded. The recruitment process in Worldline is transparent and fair. All candidates are treated in the same way. In the end, the most competent one is hired. The employee must explain he is not in charge of the recruitment process and redirect the client to the official process.

**After joining the procurement department as an IT services buyer, an employee discovers Worldline does business with an IT company where his best friend works as a Head of sales, and it is within his supplier's portfolio.**

This is a potential conflict of interest, it should be declared and recorded. The buyer may prefer to select his friend's company rather than another one, and it might not be the best choice for Worldline. The buyer should step out and not take part in the selection process.

# Third party due diligence



We are committed to work with third parties who adhere to ethical, legal, and responsible business practices. This includes integrity, respecting human rights, promoting fair labour practices, preventing and mitigating environmental negative impacts thanks to sustainable procurement and complying with all relevant laws and regulations. We expect our third parties to apply these same standards to their own suppliers and subcontractors.

Our Business Partners Commitment to Integrity Charter outlines our expectations. If we find that a third party is not upholding these principles, we reserve the right to refuse to engage with them or to terminate an existing relationship.



### Do

- Encourage our partners to report any concerns about potential illegal, fraudulent, or unethical activities through the Worldline integrity line.
- Require our third parties to not only comply with the letter and spirit of our Code of Ethics and the Charter, but also to adhere to the laws of the countries in which they operate.
- Perform due diligence on a risk-based approach on the different third parties we deal with and select them based on objective criteria.



### Don't

- Lower Worldline standards of integrity to ease and accelerate business.
- Work with third parties that refuse to comply with our Business Partners integrity charter or refuse to provide us with equivalent commitments.



## Questions and Answers

**In the context of a specific project, we need to onboard a business partner (suppliers, clients...) very quickly. Can we start working with him with no prior checks, as we received positive feedback from other companies that worked with him before?**

Following our internal policies and procedures, before starting working with a business partner we should perform prior risk-based approach checks and due diligence to assess the risks. Otherwise, we expose Worldline to legal and reputational damage.





# Anti money laundering and counter terrorist financing



Financial sector businesses act as a front line against financial crime and are obliged to prevent and detect potential money laundering and terrorist financing risks to protect the integrity of the financial system, to prevent criminals benefiting from the proceeds of crimes and to prevent them from building significant economic influence and posing a threat to stability. Worldline made a commitment to fight money laundering and terrorist financing and counts on all of us to be part of this fight by applying zero tolerance policy.



### Do

- Be responsible for spotting suspicious situations including transactions or activity, both during onboarding and ongoing due diligence of the customers.
- Verify all information provided by clients prior to their onboarding.
- Conduct enhanced due diligence on high-risk customers (high-risk industries or geographic regions) and document the findings thoroughly.
- Report AML policy breaches and escalate suspicious findings to the AML Compliance officer.
- Collaborate with the AML compliance team to conduct periodic AML risk assessments, making necessary adjustments to AML policies and procedures.



### Don't

- Onboard any client prior to completing the due diligence.
- Neglect to verify the identity of customers or counterparties when required and ensure that information is accurate and up-to-date.
- Ignore suspicious activities or transactions.
- Attempt to handle AML-related issues or investigations on your own, collaborate with compliance team.
- Forget to maintain complete and accurate records of all transactions and customer interactions, as these are essential for audits and compliance checks.



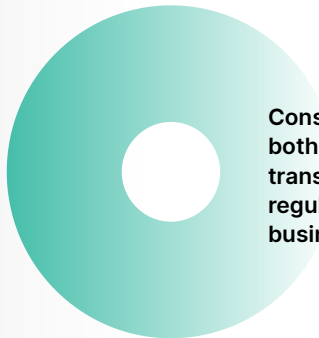
## Questions and Answers

**What has to be done if after conducting a standard due diligence you have doubts regarding the prospective customer?**

An enhanced customer due diligence must be conducted. The business relationship must not be opened.



# Sanctions, embargoes and export control regulations



Considering the significance of export control regulations, our company diligently complies with both national and international mandates. We rigorously evaluate all equipment and technology transfers, exports, re-exports, brokerages, and transportation to ensure adherence to these regulations. We also consider sanctions regimes in effect in specific countries, refraining from business dealings where prohibited.



### Do

- Review and verify export control requirements for all international shipments.
- Adhere to trade embargoes and restrictions related to specific countries, entities, or individuals.
- Seek guidance and approvals from the compliance team when dealing with potential high-risk transactions or unfamiliar parties.
- Report any potential export control violations or concerns to the compliance department for immediate action.



### Don't

- Engage in any business dealings with countries or entities that are under sanctions regimes or on restricted lists.
- Bypass export control regulations, even if pressured by external parties or for perceived business advantages.
- Delay the reporting of any potential export control violations. Timely reporting is crucial for addressing and resolving compliance issues.



## Questions and Answers

**What should I do if I come across a situation that raises concerns about potential violations of sanctions export controls?**

First, cease any further involvement in the activity in question. Second, report your concerns to the compliance team.



# Tax evasion



Non-compliance with Worldline's tax strategy can have negative consequences: application of penalties to a Worldline entity or its employees, criminal proceedings, deterioration in relations with tax and non-tax public authorities (for example: inability to respond to calls for tender).

This is why Worldline attaches particular importance to complying with the regulations in all the countries in which it operates and, in general, wishes to maintain and develop its reputation as a responsible corporate citizen: Worldline's profits are taxed where the economic activity takes place, as set out in the Group's transfer pricing policy, established in accordance with OECD guidelines.



## Do

- Comply with the letter and spirit of the laws in force in the countries in which we operate.
- Comply with reporting obligations.
- Be vigilant about international financial and commercial flows between Group companies.
- Establish a relationship of trust, cooperation and transparency with the tax authorities.



## Don't

- Implement aggressive tax policies that are disconnected from our actual operations.
- Set up entities in non-cooperative jurisdictions.
- Set up legal arrangements that are disconnected from any economic substance in order to avoid our normal tax obligations.



## Questions and Answers

### What does the tax function mean at Worldline?

Worldline's tax strategy is approved by the Group Finance Director, a member of the Executive Committee, who delegates his executive management (definition, monitoring and supervision) to the Group Tax Director. Local tax managers liaise with local finance and sales teams and external advisers to ensure that the tax strategy is properly implemented and that applicable national and international tax laws are complied with. The tax department is organised around a corporate team and local in-house and external specialists working closely with operations to support the company's development and ensure the Group's competitiveness. As such, it aims to minimise double taxation, ensure compliance with applicable tax laws and regulations, minimize tax exposure, benefit from available tax incentives, reliefs and exemptions in accordance with tax legislation and the Group's business.

### If we make a tax error, do we have to inform the tax authorities?

Worldline wishes to establish and maintain a relationship of trust, transparency and cooperation with tax authorities. If there is a suspected error in a tax declaration, it must be verified by the tax manager of the declaring entity. They will determine the appropriate course of action for rectifying the error, based on the applicable jurisdiction where the company is located.



# Fair competition



Fair competition stands as a cornerstone of ethical business conduct and economic health. It fosters innovation, ensures consumers have access to a variety of products and services at competitive prices, and maintains a level playing field for all market participants. Our company is committed to complying with all applicable competition laws, also known as antitrust laws, which are designed to prevent anti-competitive practices in the marketplace. As a listed company, we hold a significant responsibility to uphold these principles to contribute positively to the markets in which we operate.



## Do

- Engage in fair pricing practices by setting prices independently and based on market forces without collusion with competitors.
- Promote transparency by ensuring all marketing and advertising is truthful and not misleading.
- Encourage fair procurement by treating all suppliers and contractors with equity during the bidding process, ensuring no undue influence or anti-competitive agreements.
- Stay informed and compliant with all competition laws relevant to our business operations.



## Don't

- Engage in discussions, exchange of information or agreements with competitors to take unfair advantage, fix, control, or maintain prices or procurement terms and conditions, volumes market shares and clients.
- Conspire with other entities to manipulate the outcome of competitive bidding processes.
- Agree with competitors to divide or allocate markets or customers.
- Exploit a dominant market position to exclude competitors or exploit customers and suppliers.



## Questions and Answers

### I attended a trade conference where competitors discussed common industry challenges, including pricing strategies. Is this a cause for concern?

This can be concerning. While trade conferences are networking opportunities, any discussion regarding pricing strategies (price fixing) among competitors can lead to anti-competitive behaviour, which is illegal. You must avoid such discussions and immediately remove yourself from conversations that may lead to the sharing of sensitive information with competitors. If in doubt, seek guidance from our legal team.

### What should I do if I suspect that one of our business partners is involved in anti-competitive behaviour?

If you suspect any anti-competitive practices involving a business partner or even within our company, you should immediately report this to the legal or compliance teams. Do not attempt to investigate the matter alone. The company will treat it with the utmost seriousness and confidentiality, ensuring that it is investigated appropriately and that necessary actions are taken in line with legal and ethical standards.



# Responsible lobbying



Worldline is committed to apply high standards of transparency and integrity in its corporate political and business activities worldwide. Low and inconsistent assessment and monitoring of corporate political activities and other forms of corporate influence create risks for investors, customers and Worldline. Our company has a zero-tolerance to corruption, it is committed to act fairly and with integrity in all political relations. Compliance with laws and regulations is mandatory around lobbying. The Public and Regulatory Affairs (PRA) contributes to greater visibility, and aims to develop corporate political accountability as part of the ESG strategy, it has a direct report line to the CEO.



## Do

- Rely systematically on the positions established by the Group's PRA Department, which coordinates lobbying actions.
- As PRA employees, we declare our identity and the interests we represent when acting on behalf of Worldline.
- Indicate the institutional players and professional associations with which a relationship is established.
- Promote a culture of integrity and demonstrate loyalty and high moral standards.
- Register in lobbyist registers where they exist.
- Provide reliable information.
- Report any breaches of the code of ethics relating to lobbying activities to the Compliance Department.



## Don't

- Share confidential information
- Represent the company's interests without prior agreement from the PRA department
- Inappropriately obtain information.
- Put pressure on institutional officials.
- Offer gifts (directly or indirectly) or any form of unreasonable hospitality or create a relationship with a public official that could generate a sense of obligation.
- Engage in situations of conflict of interest, especially when holding an elected position.



## Questions and Answers

### Does Worldline have a specific function for lobbying?

Yes, this division reports directly to the CEO and is governed by the principles of Worldline's code of ethics.

### Can employees present their own view or opinion on regulations in progress on behalf of Worldline?

No. The positions that our company advocates are carefully crafted and validated by our management team, with the expert guidance of the PRA department. Our advocacy efforts must be consistent and aligned with Worldline values and goals.

### Is it possible to engage in discussions with officials and institutions without informing Worldline's PRA Department?

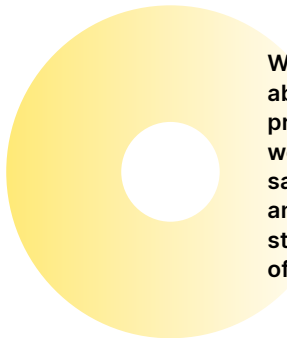
No. Worldline's PRA department is accountable for all lobbying activities towards the public authorities in each country. PRA advocates Worldline's policies and ensures transparency and integrity in its corporate political and business activities. Engaging in discussions with officials and institutions without informing the PRA department upfront is not in line with Worldline policies and procedures.

## Our work environment, our impact and our social responsibility





# Ensuring everyone's health and safety



Worldline recognises the importance of health and safety for all our employees on site, working abroad, business travellers and expatriates. We are committed to provide a workplace that prioritises the well-being of our team members. By adhering to strict health and safety protocols, we aim to ensure a safe and secure environment for all. Promoting a culture of health and safety safeguards the physical and mental well-being of our employees and fosters a sense of trust and reliability in our relationships with other stakeholders. We believe that upholding these standards is a moral imperative and a strategic necessity for the success and sustainability of our organisation.



**Do**

- Ensure that fire safety rules are implemented and complied with.
- Make sure the site is safe for employees.
- Ensure that all personnel, including managers are aware of and trained in safety measures.
- Ensure that all staff are familiar with the alert and report procedure.
- Make sure you know the evacuation plans and the personnel in charge of evacuation, as well as the first-aid workers.
- Report problematic situations or unsafe conditions when they occur, so they can be mitigated.



**Don't**

- Ignore all the rules listed above.
- Be under influence of alcohol or any other drugs, whether legal or not, that could impair judgment or reduce productivity when carrying out duties, whether on Worldline's premises or elsewhere. It may pose safety and health risks to yourself and those that work with you.
- Have illegal drugs in your possession when working or at work.



## Questions and Answers

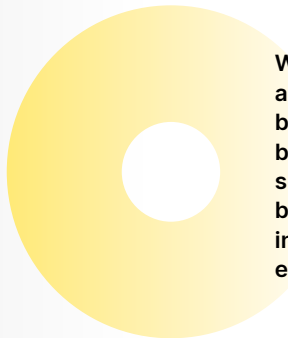
**What are my obligations as an employee for health and safety?**

Ask my human resources contact where I can find rules, plans and useful contact points to warn and train me on the topics related to health and safety in the workplace.

Respect the rules on those topics set up by Health and Safety department and Human Resources.



# Diversity and inclusion: Absence of discrimination and equal opportunities



Worldline fosters a diverse and inclusive environment, where all individuals are respected and valued. It is crucial for Worldline that its employees feel empowered and encouraged to bring their best to work. We are committed to provide equal opportunities for all employees based on skills, qualifications and experience and regardless of their race, ethnicity, gender, sexual orientation (LGBTQIA+), age, religion, disability, or any other characteristic protected by applicable law. Embracing diversity not only enriches our workplace but also fuels innovation and growth. We are dedicated to create a culture where everyone feels welcomed, empowered, and able to contribute to their fullest potential.



**Do**

- Encourage open and honest discussions about diversity and inclusion in the workplace.
- Implement and enforce policies that promote and support diversity and inclusion.
- Foster a work environment where everyone feels valued and respected, regardless of their background or identity.



**Don't**

- Ignore concerns raised by employees about diversity and inclusion.
- Allow discrimination or prejudice to go unchecked in the workplace.
- Make assumption about individuals based on their identity of background.



## Questions and Answers

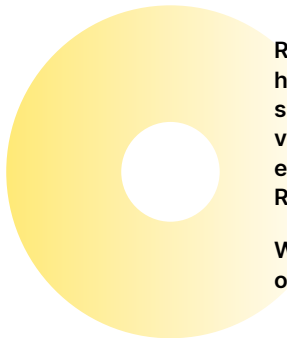
**How can I take part in promoting inclusion and diversity within Worldline?**

You can join the UNITE network. UNITE is our employee network that looks at equity, diversity and inclusion (EDI) in Worldline. With one simple objective: empowering all talented, ambitious and motivated Worldliners to have an equal chance at becoming leaders – if this is their professional ambition – whilst creating an inclusive workplace for us all and a culture of equality.





# Respectful work environment and fighting harassment



Recurring derogatory jokes, mobbing, gendered compliments, discriminatory decisions, harassment can take many forms. Within Worldline, there is no acceptance of employees being subjected to such offensive, abusive or other unwanted behaviour in the workplace which violates the personal dignity of the victim or creates an intimidating, hostile or humiliating environment (e.g. physical, sexual, psychological, verbal or any other form of harassment). Respect is fundamental in our relations.

We do not tolerate intimidation, bullying or harassment in any form, either between employees or with third parties, preserving thus physical and mental health and safety.



### Do

- Adopt the right reflexes to act and prevent harassment: Harassment is never okay. Speak up and report via the Integrity Line, or by reaching Human Resources department or your manager.
- Lead by example and demonstrate respectful behaviour towards everybody.
- Always be aware and adhere to Worldline's guidelines on harassment and respectful workplace.



### Don't

- Invade people's personal space: visualize their personal space "bubble" instead.
- Be the source of offensive and recurring jokes, mobbing, inappropriate behaviour.
- Ignore your colleagues' feelings.
- Tolerate or turn a blind eye to inappropriate or disrespectful behaviour in the workplace.
- Retaliate against employees who report incidents of harassment.

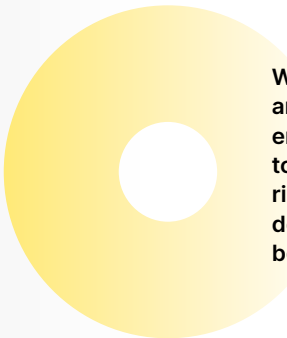
## Questions and Answers

**I hear inappropriate jokes at work (about gender, origins, sexual orientation...), I feel uncomfortable about it but I don't know how to react?**

Experiencing discomfort and uncertainty in such a situation is completely understandable. You have the right to work in a respectful and inclusive environment. One approach is to calmly and assertively let the person know that their comments are inappropriate and make you feel uncomfortable. If you're uncomfortable addressing it directly, consider discussing your concerns with your manager, Human Resources, to help you address the issue. You can also chose to speak up through the Integrity Line.



# Human rights



Worldline is a participant in the UN Global Compact and we embrace its principles of protecting and supporting Human Rights, promoting fair employment practices and protection of the environment, recognising the relationship that these have with each other. We are committed to the elimination of modern slavery; the effective abolition of child labour; and upholding the rights to freedom of association, collective bargaining and to strike. Our Human Rights Policy details the international conventions and standards which guide our approach. We strongly believe that all workers should not be subject to any form of exploitative employment practices.



### Do

- Promote respecting Human Rights in our facilities and premises worldwide through policy, training, and leading by example.
- Recognise the right of all workers to have lawful terms of employment agreed and understood, and adhered to by both sides.
- Ensure that all workers can take the breaks they are entitled to within the working day and between working days.
- Promote communication between management and employees to identify and address problems.
- Respect laws and regulations related to working conditions, fair remuneration (at least the minimum wage and benefits legally required).
- Report promptly any breaches of employment or human rights law, or Worldline policy, especially if the victim is vulnerable.



### Don't

- Withhold Identity Card, Passport or other personal documents to make it difficult for a worker to leave of their own free will or to work elsewhere.
- Force or coerce workers to work unpaid overtime to meet otherwise impossible deadlines.
- Compel workers to work excessive hours without end or push them to work through breaks.
- Prohibit collective bargaining or try to intimidate workers into not striking.
- Employ children overtly or covertly when they should still be in education.

## Questions and Answers

**What are the sources of Human Rights applicable to Worldline employees?**

We have international standards and laws. We comply with the UN Global Compact, declarations such as the ILO Declaration on Fundamental Principles and Rights at Work, and guidance issued by the UN and the OECD on responsible and ethical business conduct. Laws such as France's *Devoir de Vigilance* and the Modern Slavery Acts of the UK and Australia help shape how we operate. National laws on employment rights, whistleblowing, or equality also play an important part.

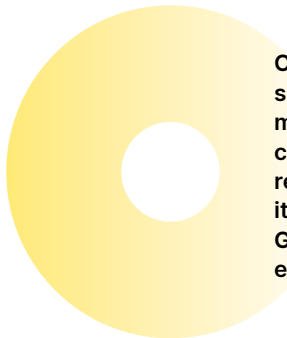
**How do we ensure that our Business Partners understand what we expect of them?**

Our *Business Partner's Commitment to Integrity Charter* outlines the principles they should agree to adhere, including Human Rights.

**I think that someone is a victim of modern slavery: what should I do?**

If you have reason to believe that someone working for either Worldline, one of its customers, suppliers or partners is a victim of modern slavery, you should report it via Worldline Integrity Line and to the appropriate local authorities if you think they are in danger.

# Environmental and CSR approach



CSR (Corporate Social Responsibility) encompasses sustainable business practices, integrating social, environmental, and economic considerations. It aims to maximise positive impacts while minimising negative aspects, contributing to a more sustainable and ethical world. Worldline created a CSR program, incorporating extra-financial challenges into its corporate strategy, reflecting compliance, transparency and a high engagement. Worldline intends to maintain its CSR leadership in the sector for the years to come, by applying ESG (Environment, Social, Governance) best practices, and involving stakeholders to create a positive impact on its ecosystem, society and the planet.



## Do

- Evaluate suppliers against CSR criteria before collaborating with them, as part of its sustainable procurement commitment.
- Developing Green IT solutions to reduce the carbon footprint of our services.
- Use digital documentation and opt for paperless alternatives to reduce paper consumption.
- Choose local and sustainably sourced products for office supplies to support eco-friendly vendors and reduce the carbon footprint.



## Don't

- Take the plane for a business trip when a train alternative of less than 4 hours is available.
- Throw your waste in any bin, you should use the bins dedicated to each type of waste (company restaurants, shared areas).
- Print unnecessary documentation.



## Questions and Answers

### I don't see how we are impacted by CSR topics, we just provide immaterial services?

Worldline is a B2B and not a B2C company but it doesn't mean that its CSR impact is zero. It is crucial to recognize the environmental impact of digital technologies. Furthermore, in view of current and future regulations, more importance is given to the value chain as a whole. Thus, even if Worldline doesn't have the most polluting activity, it is possible that some of its suppliers are more polluting. So it is the company's moral responsibility to act to reduce its impact across its entire value chain.

### What are the main pillars Worldline focuses to have a CSR impact?

Worldline focuses on 4 main pillars for impactful contributions:

- **Develop customer trust:** business continuity and services availability
- **Be a responsible employer:** trainings, wellbeing and diversity & inclusion
- **Guarantee business ethics:** monitor the number of alerts investigated and associate action plans
- **Reduce the environmental footprint:** sustainable procurement and emission reduction targets

### As an employee what can I do to take part in sustainable actions?

Every action is important. Therefore, when you are at the office or working remotely, you can keep in mind that your behaviour can make a difference: sort your waste, reduce your meat consumption, switch off the lights and devices, take the train instead of the plane...).

## Protection of our data and assets





# Protection of personal data



Protecting the privacy of our customers, our Worldline employees, our business partners and suppliers is vital to earn and maintain their trust. Personal data is defined as any information relating to an identified or identifiable individual. We should handle personal data in the appropriate way at Worldline. Therefore, we are committed to protecting the privacy of individuals and complying with applicable personal data protection laws, particularly the European Union General Data Protection Regulation (GDPR).



## Do

- Collect personal data only if it is strictly necessary to fulfil a lawful or legitimate purpose and ensure it is securely processed.
- Seek advice from your Data Protection Officer before transferring personal data outside the European Union.
- Immediately report any personal data breach.
- Follow the mandatory training, know and understand data protection obligations
- Shred everything once it is no longer needed.
- Follow privacy by design principles in new projects.



## Don't

- Consider that personal data collected for one purpose can be used for another.
- Collect sensitive data if not required by law or agreed to by data subject.
- Ignore your daily security updates.
- Send your email before you verify the recipient email address.
- Keep data for longer than necessary.
- Make decisions based solely on automated processing when this can significantly impact the people concerned.

## Questions and Answers

### What are personal data?

It is any information relating to a natural person who can be identified, directly or indirectly. e.g.: name, photo, fingerprint, email, phone number, social security number, IP address, computer login identifier, voice recording, etc. It does not matter whether this information is confidential or public. Note: for these data to no longer be considered personal, they must be made anonymous to make it impossible to identify the person concerned: blurred faces, etc. However, if data can be cross-referenced to identify an individual, it's still considered personal.

### What are sensitive data?

Sensitive data is a special category of personal data. It includes information that reveals alleged racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

### What are the pillars to implement a rigorous data protection strategy in Worldline?

Defined policies and procedures, organised data protection community, accurate management tools and records, targeted training and awareness, comprehensive governance with measurable indicators and metrics.

# Security of data and commercial information



Information security at Worldline is a priority as we evolve in a complex threat landscape. Implementing an Information Security Management System ensures constant and lasting improvement of service security for us and our customers. Our security standards allow us to build customer loyalty, win business in critical security scenarios, and control data security risks while offering our services. Our rules applies to all our staff and to digital, paper and verbal information, belonging to Worldline or entrusted by customers. It covers the global implementation of security for the provision of IT services, including development, support, production, and monitoring functions across all solutions.



## Do

- Perform regular security and privacy risk assessments and internal controls.
- Conduct trainings and awareness programs on security issues to increase the information security maturity of Worldline.
- Ensure that all sensitive, personal and business information of Worldline or its customers is processed, maintained, or used in a secure manner, and that the legal and regulatory provisions of each country and contractual security commitments are managed.
- Report any suspected security incident promptly to ensure action and mitigation.



## Don't

- Allow the transfer of client information or Worldline information to personal devices of employees or unauthorized people (internal or external in accordance with the information classification associated).
- Click on suspicious links or provide sensitive information in response to unsolicited emails (or others communication channels like WhatsApp) to prevent falling victim to phishing attacks or "CEO fraud".

## Questions and Answers

### I have a business trip and work from a public place what can I do to protect the information?

#### To protect information while working from public places:

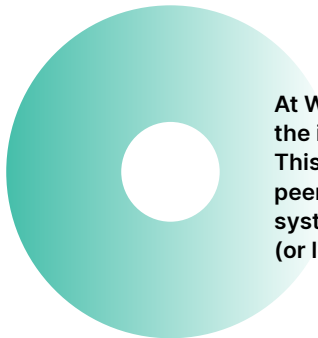
- Be discreet when using the phone and avoid spreading out documents.
- Ensure documents and screens are not visible to other people.
- Keep documents with you when leaving your seat and avoid leaving them unattended.
- Use privacy filters on laptops and report any suspected security incident immediately.
- Always keep your laptop with you and lock/shutdown when you are not in front of it. If your laptop, smart card or phone is stolen/lost, report it immediately so that access can be blocked.



### What are the cybercrime threats that may affect Worldline?

Cybercrime threats that may affect Worldline include phishing, scams, social engineering, ransomware and many other forms. It is critical to be vigilant and proactive in protecting against these threats to ensure the information security of Worldline and its customers. Regular training and awareness programs on security issues increase our maturity on this topic.

# Use of illegal or hacking software



At Worldline, we strictly prohibit the use of illegal or unlicensed copies of software, as well as the installation of hacking type tools on Worldline's or customers' networks and/or workstations. This includes, but is not limited to, products such as password crackers, port scanners, peer-to-peer tools, file sharing tools. We have policies in place to ensure the integrity and security of our systems and to uphold ethical business conduct. The restriction of access to hacking software (or legitimate software used by hackers) aims also to protect our information system.



### Do

- Use only licensed and authorized software for work, ensuring compliance with legal and ethical standards.
- Adhere to company policies and industry regulations and standards when installing or using software on Worldline's or customers' networks and workstations.
- Document any business justification and get prior approval in accordance with our policy for the use of potentially sensitive software.



### Don't

- Use, exchange, or store illegal software on Worldline's systems. Illegal software (keygen,...) are often used as backdoor to compromise a system.
- Install hacking type tools as mentioned above. Any unauthorised use of such software poses a significant risk to the security and integrity of our systems and is not tolerated.

## Questions and Answers

### What are the implications of using illegal or hacking software at Worldline?

The use of illegal or hacking software poses severe risks to the security and integrity of our systems, potentially leading to data breaches, unauthorised access, and legal repercussions. Employees must understand that such actions not only violate company policies but also breach ethical and legal standards. It is crucial to report any potential security vulnerabilities or concerns related to software usage to the appropriate channels for investigation and resolution. The restriction of access to hacking software or legitimate software used by hackers is also in order to protect our information system, as hackers attempt to compromise our systems using such software.



# Internal fraud and accurate records



Misappropriation of resources, manipulation of data or assets, intentional omissions or changes in financial reporting, just to name some, may constitute fraud. We must not engage in any form of fraud, it can lead to major risks for the company. Worldline seeks to be transparent and ethical in its management and governance, and to retain the confidence and trust of all its internal and external stakeholders. We have a zero tolerance on fraud. We have an internal control framework in place over the group to provide assurance on accurate records, reporting and accounting. Fraudulent acts or suspicion of such acts must be reported immediately via the Integrity Line.



### Do

- Respect internal control processes and policies
- In case of doubt or suspicion of internal fraud inform directly your manager or the compliance team via the Integrity Line, or other channels available.
- Ensure that we pay according to our payment terms and the right price for the deliverables agreed with our suppliers.



### Don't

- Conceal or ignore errors in the financial records to avoid visibility on a possible issue.
- Validate transactions, or payments if you don't have the appropriate authorisation or clearance, or if you are not sure of the accuracy of the fund's recipient.
- Give incorrect information to a client to secure a contract as it could constitute a fraudulent act and as such, lead to the imposition of penalties on Worldline, as well as civil or criminal proceedings.

## Questions and Answers

### What are red flags for Fraud?

Special attention is needed when 3 criteria converge: the financial need (debt, greed...), the opportunity (weak controls...) and the rationalisation (justifying actions with excuses like "no one will notice" or "I'll give it back later"). There are various forms of fraud, among them we have theft, unauthorised disclosure or manipulation of sensitive information...

### Whose responsibility it is to prevent fraud?

Worldline expects high ethical standards from its different stakeholders, so it is every employee's responsibility to be vigilant to prevent fraud. We are all encouraged to contribute to the prevention and detection of fraud, and in case of doubt or allegations report any suspicion promptly to enable proper investigation and if needed the definition of appropriate measures.





# Use of social medias



Worldline encourages its employees to seize the opportunities available by showcasing how we create value for stakeholders and humanize our business. Our behaviour online impacts both ourselves and the business. Therefore, there are certain things to keep in mind to ensure data security and compliance.



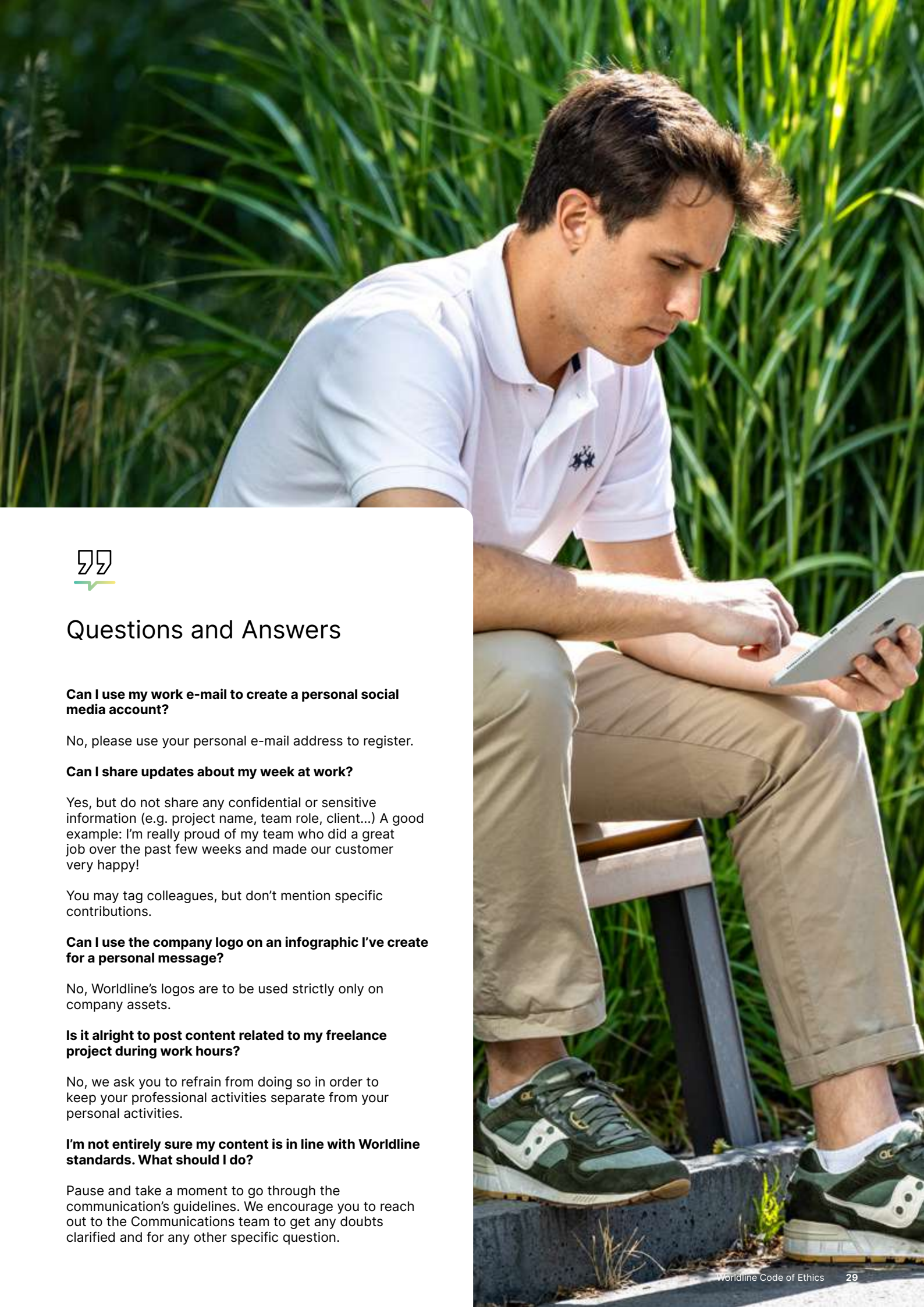
## Do

- Use a secure password, update it regularly and keep password details to yourself.
- Ensure third party content is free or already purchased before sharing.
- Use (appropriate) photos to depict your life at Worldline keeping the current state of affairs in mind (inappropriate content includes themes of obscenity, racism, sexuality, pornography, sexism, discrimination, threats, harassment, personal offense, defamation, illegality, etc.).
- Convey your words and opinions as your own and not that of the company.
- Consult your local or the global public relations manager if you are contacted by the media and remember any statements you make.
- Use hashtags or mentions (e.g., #Worldline) for visibility.



## Don't

- Share information about business if not public already (including customers' personal information, sales leads, etc.).
- Share personal information of colleagues (e.g. their photos/personal contributions to a project) without their permission.
- Post pictures of your computer, business badge or any other security-sensitive items on social networks.
- Criticise competitors or one of Worldline's products for the benefit of another.
- Respond independently to negative comments about the business.
- Edit the logo or use it to represent your own accounts (the LinkedIn banner provided can be used).
- Create an account based totally or partially on the name 'Worldline' without prior permission of the Communications team.



## Questions and Answers

### Can I use my work e-mail to create a personal social media account?

No, please use your personal e-mail address to register.

### Can I share updates about my week at work?

Yes, but do not share any confidential or sensitive information (e.g. project name, team role, client...) A good example: I'm really proud of my team who did a great job over the past few weeks and made our customer very happy!

You may tag colleagues, but don't mention specific contributions.

### Can I use the company logo on an infographic I've create for a personal message?

No, Worldline's logos are to be used strictly only on company assets.

### Is it alright to post content related to my freelance project during work hours?

No, we ask you to refrain from doing so in order to keep your professional activities separate from your personal activities.

### I'm not entirely sure my content is in line with Worldline standards. What should I do?

Pause and take a moment to go through the communication's guidelines. We encourage you to reach out to the Communications team to get any doubts clarified and for any other specific question.



# Protection of the company's assets (IP IT)

Intellectual Property (IP) are valuable intangible assets for Worldline (e.g. inventions, original works of authorship, designs, brand elements, or know-how). Intellectual Property Rights (IPR) are the protection granted by law to IP assets (e.g. patents, copyrights, trademarks, industrial designs or trade secrets). Ensuring the protection of our IP assets, by group policies, secure disclosure process and adequate IPR, is fundamental for maintaining competitive advantage, promoting innovation, reducing risks of counterfeiting, improving our freedom to operate, and safeguarding our reputation on the market. It's a legal obligation for us, and a strategic business practice allowing us to fulfil our responsibilities to shareholders and customers and to promote a sustained corporate growth.



## Do

- Promptly report any inventions, designs, software or other works you create during the course of your employment to your management and the Worldline IP Team for proper assessment and action.
- Handle Worldline and our customers confidential and proprietary information with utmost caution by ensuring it is securely stored and access-controlled and only shared with authorised parties subject to proper confidentiality undertakings.
- Use our company's IP strictly for professional purposes, as intended and authorised by Worldline. When using third-party IP, always ensure to obtain the necessary permissions and observe strict compliance with the applicable licensing terms and conditions.
- Involve the legal department when negotiating contracts that grant rights to our IP to customers or third parties to ensure appropriate safeguards.
- If you notice or suspect that our company's IP is being used without authorisation, report it to the legal department immediately.



## Don't

- Share confidential or proprietary information with unauthorized persons, either deliberately or inadvertently. It includes sharing sensitive information about software, methodologies or other technical know-how with third parties, family, friends or even internally with other Worldline employees who are not entitled to access such information.
- Disseminate unreleased works such as new inventions to third parties or publicly on Internet, social media, forums, or by any other means or media before reporting it to the Worldline IP Team. It will prevent Worldline to be granted patent protection and can damage our competitive advantage.
- Download, duplicate or reverse engineering Worldline IP (software or other digital assets...) without proper authorisation.
- Use Worldline's IP for personal gain such as creating personal projects or contributing to open-source communities.
- Use, link or embed open-source elements with Worldline proprietary software without conducting a proper due diligence to ensure our compliance to the open-source license terms, the compatibility of the licenses and to prevent potential legal and operational risks.



## Questions and Answers

### What are copyrights and does it apply to software?

Copyrights protect artistic or literary works of any kind from the simple act of creation subject to originality. Software is considered a literary work under IP law and some of its constituent elements, such as the programming lines, codes, flowcharts and preparatory design material, can benefit from copyright protection, provided they are original. Any code you write as part of your employment duties at Worldline is typically considered as a "work-made-for-hire" and is the Intellectual Property of the company.

### I'm working on developing a new and innovative solution for Worldline, and I believe it could be patented. What are the steps I should take to ensure the Worldline's IPR are secured?

First, document your development process (version history, change logs, date of creation, details of the innovation, and unique features of the software). Next, maintain your work confidential, do not share any details with individuals outside Worldline. Finally, submit your invention to the Worldline IP Team who will review your submission, determine the patentability, and guide you through the potential next steps.

### What should I do if I find another company using a brand very similar to our registered trademark "Worldline" in its tradename, logo or in the URL of its corporate website?

Document any evidence of the potential infringement, including the company name, the brand in question, and where/how such brand is being used. Do not engage directly with the company on this potential issue and notify the legal department which will investigate the infringement and decide on appropriate course of action.

### A public source code repository has published some of Worldline proprietary software code. What should I do?

Inform immediately your manager and the legal department for advices on actions to be taken, which may include issuing a takedown notice to the website, conducting an internal investigation to determine the source of the leak, and possibly taking legal action for any damages resulting from the reproduction and distribution of the code without Worldline's consent.

### I received a formal letter claiming that one of our software infringes on someone else's patent. What should I do?

Immediately forward the letter to the legal department. Do not respond to the claim or modify the software in any way until the legal department has reviewed the situation and provided advice on the necessary steps.



## In focus: Open Source Data & AI

### What are the risks of using open-source software in Worldline proprietary solutions?

Depending on the terms of the associated license, using open-source software can expose Worldline to risks such as having to disclose proprietary source code or being restricted on how the software can be commercialized. Before integrating any open source component in a Worldline solution, you must review the component's license in coordination with the legal department to ensure compatibility with your project and compliance with our IP policies.

### What precautions should I take before using AI tools at work?

Before using any AI tool for your work tasks, the following precautions shall be taken to safeguard Worldline IP:

- Verify that Worldline is granted the appropriate licenses for the AI tool you plan to use, and that your intended use falls within the scope of the licensing agreement or the terms of use for public tools;
- When training AI models or using AI tools, be careful not to inject any Worldline IP, confidential, secret or sensitive information such as financial data, legal information covered by NDA, full Worldline solution code, code covered by IP and avoid using personal data. Ensure that all data used by you and the AI model comply with privacy laws and Worldline data governance policies.
- Do not reuse the result as is, or as our own/Worldline's content, and consult the legal department to understand who owns the IPR to the data generated by the AI tool.



# Inside information and insider trading



Worldline is listed on the Euronext Paris market, so trading in its securities is regulated. During your daily work, you may have access to “Inside Information”. It is about important and confidential data that have not been made public and which, if made public, can have a significant impact on the price of Worldline securities. Inside Information can include knowledge of the financial statements, revenue forecasts, pending litigation or major M&A confidential projects. Trading on Worldline shares while knowing Inside Information for your own benefit or for the benefit of a third party is Insider Trading. It is a criminal offence which could lead to imprisonment, reputational damage and heavy fines.



## Do

- Refrain from any direct or indirect transaction involving Worldline’s securities as long as the Inside Information is not made public through a press release.
- Always preserve the confidentiality of privileged information to which you may have access by taking all necessary actions to this effect, within and outside the context of your work.
- If you believe that Inside Information may have been inadvertently disclosed immediately inform your manager or compliance department.
- Comply with internal policies preventing insider trading, Worldline has a Guide to prevent insider trading, which sets out the measures taken and the obligations incumbent on all persons who may have access to Inside Information.



## Don’t

- Engage (or attempt to engage) in insider dealing, i.e. using Inside Information by acquiring or disposing of, for your benefit or for the benefit of a third party, directly or indirectly, Worldline’s securities.
- Recommend that another person engage in insider dealing, by recommending, on the basis of Inside Information you have, that another person acquire or dispose of Worldline’s securities even if you make no financial gain yourself.
- Disclose Inside Information, including inadvertently, to any person inside or outside Worldline Group. (close relative, friend, acquaintance etc.)

## Questions and Answers

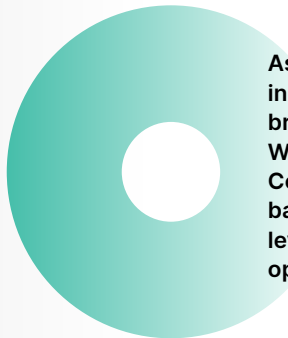
**I learned that Worldline will acquire a big company. It is not public yet, can I suggest to some relatives that they take advantage of this opportunity and acquire Worldline shares?**

No. You have precise, confidential and non-public information which, if known to the public, can affect the price of Worldline shares. You mustn’t buy or sell Worldline shares until this information is public. Also you mustn’t give this information to anyone inside or outside Worldline. Doing so may result in criminal penalties.

**I am aware of Worldline Q1 financial results before the public disclosure, am I allowed to purchase or sale Worldline shares prior to the publication? Can I recommend buying shares to someone else external to Worldline?**

No. As this information is deemed to be Inside Information, such transactions would be considered as insider trading. Using Inside Information to your benefit or for any other person is considered as insider trading and would be punished by law.

# Resilience and business continuity



As a systemic player in numerous countries, an important service provider and a large employer in the global market, Worldline holds a key role in the Payment ecosystem. This vital position brings along a considerable responsibility seamless business continuity for all involved parties. Worldline ensures that sufficient resources are allocated to enable key Resilience and Business Continuity activities to take place and will ensure that key personnel have the knowledge and background to perform their roles. All employees regardless of their role receive a minimum level of information to ensure embedding Resilience and Business Continuity into day-to-day operations and management processes.



## Do

- Regularly assess organisation’s vulnerabilities and risks.
- Develop a proactive, comprehensive plan for dealing with potential disruptive events.
- Conduct regular testing of plans and make adjustments as needed
- Provide training to all employees on operational resilience and business continuity plans.
- Maintain a robust communication strategy that keeps all stakeholders informed during a disruption.
- Collaborate with all departments to ensure everyone understands their roles during a disruption.



## Don’t

- Assume that a disruption won’t happen to your organisation.
- Underestimate the potential impact of even small disruptions.
- Overlook the importance of regularly testing and updating your plans.
- Underestimate the importance of communication during a disruption.
- Restrict planning efforts to only certain areas of business.

## Questions and Answers

**In the event of disruption affecting our abilities to deliver services to our client? What can I do as an employee?**

If you are part of a team impacted by the incident, ensure that you have a strategic plan in place that covers the risk and the disruption.

**Does Worldline have a crisis management plan?**

Yes, Worldline has several crisis management plan to address various critical situations that may impact our service delivery or overall business operations.

**What is the difference between resilience and business continuity? And how does it impact Worldline?**

Both operational resilience and business continuity planning aim to protect an organisation and ensure it can survive unexpected events, operational resilience focuses more on adaptability and flexibility, while business continuity is more about response and maintaining operations during and after a disruptive event. Both are crucial for the success and survival of Worldline.



# Encouraging people to speak up

**It is important for Worldline to commit to the highest possible standards of openness, honesty, integrity, accountability and business Ethics. In line with that commitment, Worldline expects employees and any other third party or partner to come forward and speak up if they have concerns about or are aware of:**

- A breach of our ethical principles and policies
- A breach of any applicable law or regulation
- A wrongdoing

**The Integrity Line has been set up to enable the reporting of concerns, malpractice, wrongdoing or issues freely.**

## **Who can raise an alert?**

All Worldline employees and stakeholders can raise an alert, including interns, subcontractors, suppliers, clients, partners, shareholders...

## **When can I raise an alert?**

You are encouraged to raise an alert when you have serious concerns or suspicion of unethical or inappropriate behaviour causing a breach of our internal policies and procedures or infringing our ethical standards. The report must be done in good faith and include information obtained lawfully.

## **How can I raise an alert?**

We highly recommend using the Worldline Integrity Line to raise your alerts, it is available 24/7. It allows anonymous reporting, if not prohibited by local laws. The platform guarantees confidentiality of the exchange and proper recording.

You can also reach directly, in person, your manager, the human resources or the compliance department if you want to have a conversation about a concern.

## **What happens when I raise an alert?**

When you submit an alert you receive an acknowledgement receipt. Then your alert is sent to Compliance for a preliminary review to analyse if it is admissible or not, based on objective criteria, and the Compliance function informs you.

If the alert is admissible further investigation and analysis is performed. Based on the outcome, measures will be taken, which can go from improvement of internal processes over mediation up to disciplinary measures and dismissal (in line with local legislation and Worldline policies). As a submitter you will be informed of the outcome and conclusions.

## **What are the risks I expose myself to when I raise an alert?**

Worldline doesn't tolerate any form of retaliation including threats of relation and attempts of retaliation against a person who reports an alert in good faith or cooperates in the investigation. The reporter is protected and invited to disclose to the compliance function if he believes he is targeted by any form of retaliation.



## **Do**

**You should send a Compliance Alert when you believe that applicable laws or the principles of our Code of Ethics are violated:**

- When you feel you are being treated unfairly by managers or colleagues.
- When you know bribes are paid to win a contract.
- When you know about falsified invoices.
- When your teammate is being harassed or bullied by a manager.



## **Don't**

**You should *not* use the Compliance Alert report channels, when it is an emergency or a purely private life matter:**

- When a light bulb in the office kitchen is broken.
- When the colleague sitting next to you talks too much.







For further information, please visit [worldline.com](https://worldline.com).