



# Welcome to Ratepay's Code of Conduct



# Dear colleagues,

## How we<sup>1</sup> act responsibly and make the right decisions

Ratepay is a **success story**. We make life easier for people with our solutions and provide real added value in the market. We can be really **proud** of that. Of course, a first-class product alone is not decisive for success or failure. All this can only be successful when people **trust** us. And we have to re-earn this trust every day.

This Code of Conduct is **binding**. In it you will find the most important principles of how we do business.

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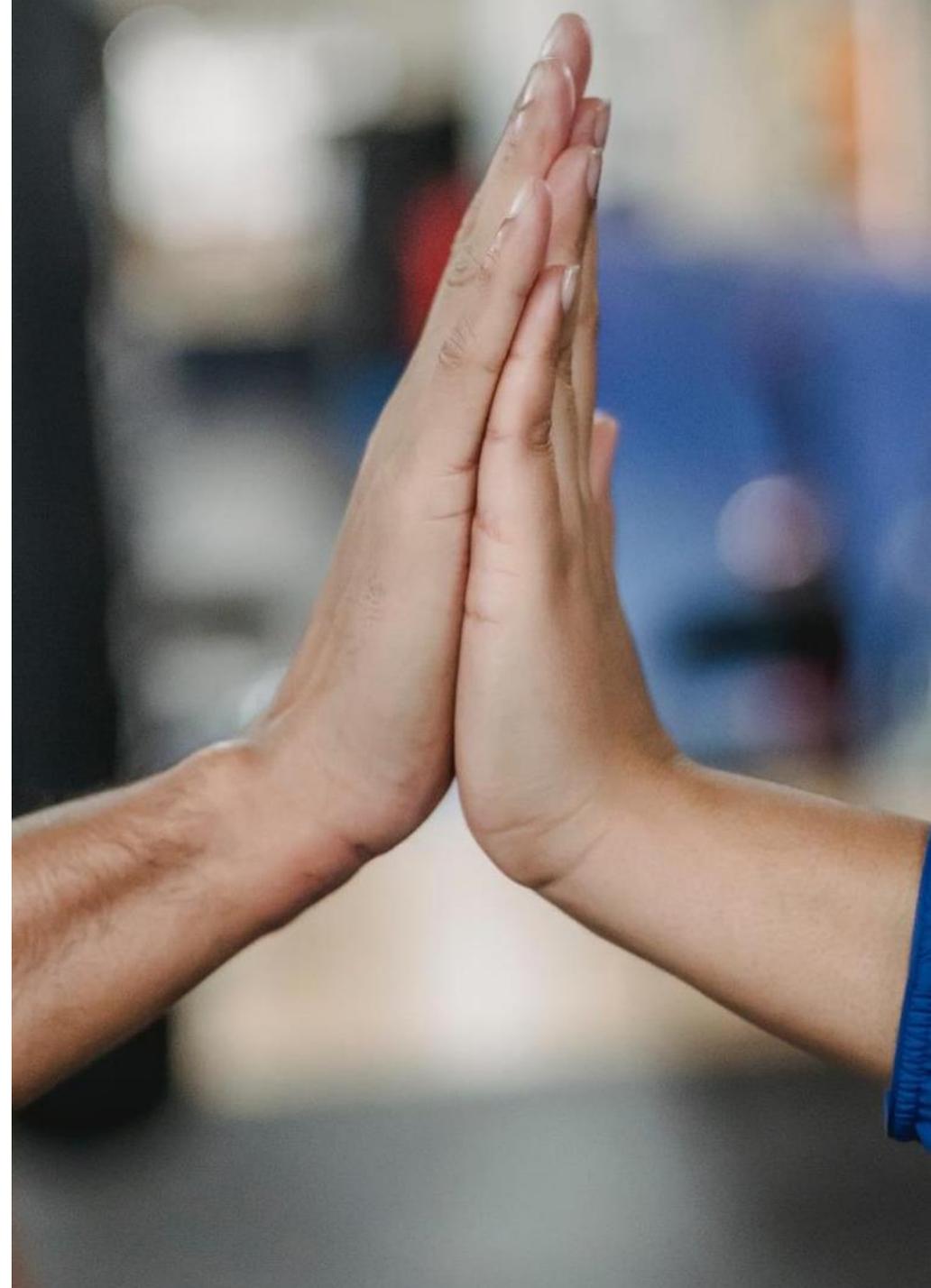
<sup>1</sup>We always mean in this Code of Conduct all employees, managers and top executives of Ratepay.



# Come on everyone.

## Let's take it to the next level together!

We are interested in much more than just implementing legal requirements or avoiding penalties. These principles express our self-conception. Both as an inner expectation and as a commitment to the outside world. We believe that acting in an authentic and honest way is a prerequisite for long-term success. For this reason, every one of us commits themselves to act in accordance with this Code in our day-to-day business and to comply with it. The ratepay Code is intended to be more than just written text. We wish for you to be convinced of it and therefore to consistently fill it with life and dedication.





## Why a code of conduct?

The Code of Conduct ensures the boundaries, including our values, which are very close to our hearts.

For example, we believe in an open and honest work environment where everyone feels comfortable and valued. This is how we want to be and this is how we want to be perceived internally and externally.

The Code of Conduct is the binding orientation for this. In addition, we are a BaFin-regulated company and subject to a number of different regulations.

Violations can lead to severe penalties.



## To whom does the code of conduct apply?

This Code of Conduct applies to the entire Ratepay team. No matter whether interns, students, employees, managers or top executives.

At ratepay, we want to create a safe and pleasant working atmosphere so that everyone can contribute and unfold their full potential. Violations of this Code of Conduct harm Ratepay and all of us. We therefore strive to avoid even the appearance of misconduct.

Therefore, it is important to ensure the compliance to the Code of Conduct in your work environment and to address violations openly.

If you are uncertain as to whether a certain behaviour complies with the code of conduct, feel free to ask.

# Our togetherness

## Appreciation

We give all our colleagues a voice and encourage them to get involved. Ideas and suggestions for improvement are welcome from everyone and help us to move forward.

Every opinion is important to us and is critically considered. We are therefore proud of our feedback culture, surveys and discussion rounds.

## Respect

We expect all employees to behave respectfully towards their colleagues, business partners and customers and we expect our managers to set an example.

Position, age or experience have no influence on our interactions.



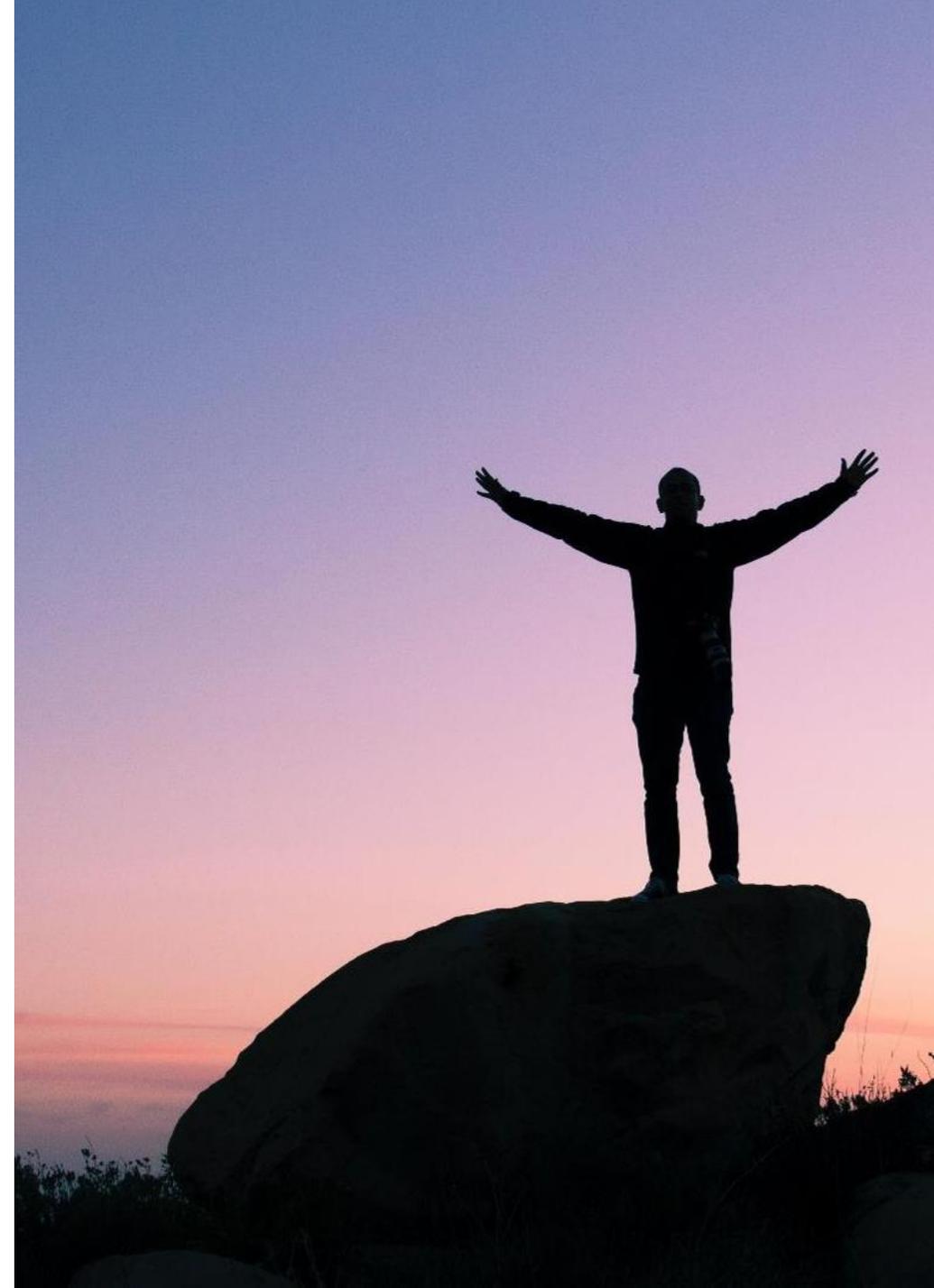
## **Integration and diversity**

We combine a colorful mix of different courses of life and experiences. This diversity is what defines us and is the perfect basis for growing together, both personally and entrepreneurially.

We value our diversity and welcome everyone to our team, regardless of ethnic or social background, religious or philosophical beliefs, gender, physical or mental limitations, age, sexual orientation, skin color, marital status, educational background or citizenship.

## **Freedom of expression**

We live an open feedback culture and respect the views of our colleagues. We respect the fundamental right to freedom of association and recognize collective bargaining.



## **Zero tolerance for discrimination and harassment**

We condemn all forms of discrimination and harassment. We take an active stance against this and stand united behind every person affected by such an act.

These include, among others, all forms of sexism and sexual assault, racism, age and body discrimination, homophobia, disrespectful behaviour, violence and threats thereof, and prejudice or discrimination based on social background or position.

## **Development**

Your ideas and your passion for new things are the basis of Ratepay. We support each other in unfolding our personal potential, continuously developing it further and using it for the good of Ratepay. We create formats to promote a dialogue between employees and managers. We want to grow beyond ourselves together, both personally and as a company.



## Responsibility

We take responsibility for our actions and see each task as our own project. Ratepay is committed to respect the UN human rights and complies with internal and external guidelines and regulations. Safe working conditions are an obligation for us. Only when we take responsibility and accountability do we jointly advance Ratepay.

## Sustainability

The focus is on sustainable management in all three dimensions (social, environmental, and business & governance). The center of our efforts is our sustainability mission. Here, the focus of our actions is on the continuous provision of health-preserving care for our employees, as well as a more socially just society, a cleaner environment and a competitive business model. We believe that by balancing all dimensions, we can achieve long-term business success.



# Our Brand mission.

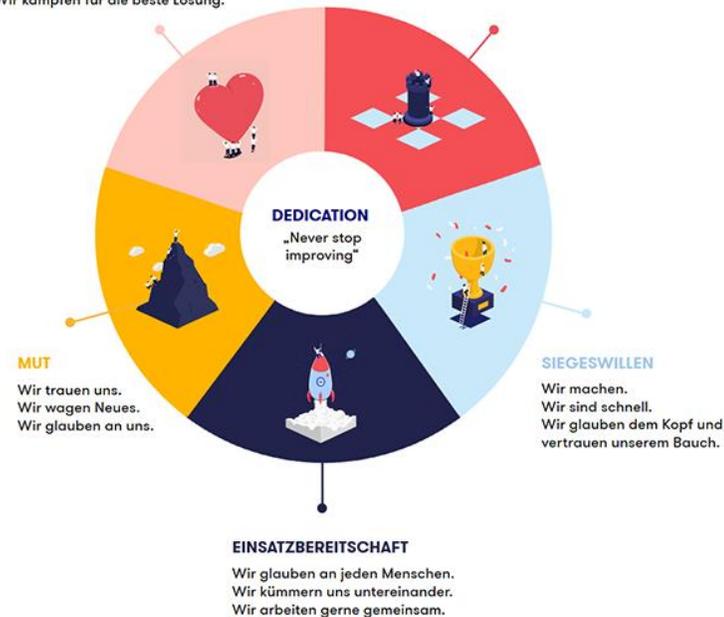
Ratepay means for us: always go a step further. This applies to both our internal and external actions. No matter whether we give feedback to colleagues, talks to customers or develop a product. We call this **Dedication**. It is our brand core and complemented by the brand values of warmth, decisiveness, will to win, willingness and courage. The brand core and brand values form our brand mission statement, our corporate compass so to speak, which sets us and our products apart from the competition.

## HERZLICHKEIT

Wir hören zu.  
Wir setzen uns  
füreinander und unsere Kund\*innen ein.  
Wir kämpfen für die beste Lösung.

## ENTSCHEIDUNGSFREUDE

Wir sind entschlossen.  
Wir fordern Leistung.  
Wir feiern Erfolge.



## Our public image

Of course, our brand mission statement and the ideas we have about working together apply not only to ourselves, but also to our interactions with customers, business partners and everyone else we deal with. We treat them with the same respect and appreciation that we show each other.

This applies to, for example:

- contact with customers and business partners, whether in sales talks or in case of different opinions
- interviews with applicants, their supervision during a trial day or when carrying out recruiting events
- participation in conferences, fairs, events, sporting events and other activities of this kind



## How we treat Ratepay assets

We protect both our own data and that of our customers and business partners from unauthorised access. We strictly adhere to the laws and guidelines governing the protection and security of personal data. We take measures to ensure the secure collection, use, storage, retrieval and transfer of this data and information. Even among colleagues, we only share information with authorized people.

We also protect Ratepay's assets. This includes our material and intellectual property as well as the data and information we process. We do not misuse this data for illegal or private purposes. We do not disclose company data to third parties without authorization.



# Laws and regulations

Compliance with laws and regulations is a self-evident creed of our daily actions and decisions. We are aware that, as a licensed payment institution, ratepay is subject to BaFin supervision in accordance with ZAG.

We especially ensure the compliance with:

- The General Equal Treatment Act (AGG)
- German labor law and the Occupational Health and Safety Act (ArbSchG)
- The Payment Services Supervision Act (Zahlungsdiensteaufsichtsgesetz - ZAG)
- The Act on the Tracing of Profits from Serious Offences (Money Laundering Act - AMLA)
- The General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG)
- The circulars of the BaFin



# Integrity

We take a firm stand against fraud and any other form of criminal behavior. We continuously develop procedures and processes to prevent and report corruption, bribery and extortion.



## **How do I ensure that I am acting legally and ethically correct?**

This Code of Conduct is intended to make our daily work easier, but it cannot address all the legal and ethical issues we face. In practice, we rely on our common sense.



# In case of doubt, a few simple questions will help:

1.

Do I act in accordance with our values and the brand mission statement?

2.

Do I act in accordance with our Code of Conduct and other guidelines?

3.

Do I act in accordance with all current laws and regulations?

4.

Have I analysed and understood all possible risks in advance and taken countermeasures if necessary?

5.

Is my behavior in the interest of Ratepay or is it driven by a personal interest?

6.

Do my actions reinforce the positive impression of Ratepay in the public eye?

7.

Is this the right decision and am I setting a good example? Would I also be able to represent this view in front of an audience?

If we can answer these questions with „yes“, we will most likely make the right decision.

If you are unsure, feel free to contact us. The managers, people & organization as well as the compliance, information security and legal management are there for you.



## Contact persons

We try to detect errors in time so that small problems do not become big problems.

Violating our Code of Conduct can damage the reputation of our company and have serious consequences.

Therefore, we ask you to ensure compliance with it and address violations openly.



## Important

There are no disadvantages for anyone who reports a presumed violation in good faith. Not even if the report turns out to be unfounded.

In the same way, we treat employees fairly who are accused of misconduct.

We therefore encourage you to also report your own misconduct as early as possible.



## Where can I report concerns?

Of course, various confidential persons are available to advise :

- your manager,
- People & Organisation,
- Compliance,
- Information Security,
- and Legal.

In addition, it is possible to ask questions or provide information anonymously via our whistleblower center on the Ratepay 1st page. The electronic whistleblower system is managed by the Compliance Team.



**Stand: February 2022**