

Supplier Code of Conduct

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1 Preamble

Since 2009, Ratepay has become one of the leading providers of white-label buy-now-pay-later solutions in the DACH region.

As a company, we are aware of our social responsibility and want to make a positive contribution to the environment and the community. The Ratepay corporate culture and our self-image also developed from this aspiration. This goes beyond implementing legal requirements and avoiding penalties.

We want to inspire responsible business by exemplifying how to act ethically, socially, environmentally and sustainably in the highly regulated payment industry.

This is the promise and trust we want to convey to the outside world with this Supplier Code of Conduct.

2 Introduction

The companies, service providers and external forces (hereinafter referred to as "partners") that cooperate with us and provide goods, merchandise or services to Ratepay play an important role in our sustainable growth and overall success. Ratepay's top priority is to treat its partners with respect and in a spirit of partnership.

We encourage our partners to integrate and apply the principles of this Code of Conduct in their business in order to promote the development of a sustainable society and economy through responsible business conduct and continuous improvement. Ratepay's partners are required to inform their subcontractors and employees of the applicability of this Code of Conduct and to ensure compliance with it in every workplace where goods, merchandise or services are provided to Ratepay.

The following provisions are based on internationally applicable standards such as the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and applicable ILO conventions, as well as the legislation of the respective country.

3 Social & societal responsibility

We encourage our partners to take the necessary steps to ensure the safety and health of their employees. Ratepay's partners are required to set up mechanisms to identify hazards and counteract them immediately. Employees must be regularly instructed on applicable occupational health and safety standards and safety measures. The partners must document this and provide evidence to Ratepay upon request.



Our partners respect global principles and guidelines and, according to their resources and possibilities, consider participating in sustainable initiatives and projects in order to contribute to our society.

3.1 Protection of human rights

As our partners, you follow the principles of the Universal Declaration of Human Rights and exclude human rights violations.

3.2 Core labor standards

Ratepay is committed to complying with the core conventions of the International Labor Organization (ILO), which are designed to ensure decent working conditions and adequate protection. Ratepay's partners respect these and enforce them as a minimum requirement.

Working hours, wages, break times, vacations

Ratepay's partners offer their employees remuneration that in any case complies with the respective national legal standards on minimum wage. They ensure that the working hours and the need for rest in the form of adequate paid leave at least comply with the applicable local laws.

Freedom of association and collective bargaining - as provided for by the applicable national standards - are recognized and promoted rights of workers.

Exclusion of child labor - Ratepay's partners do not employ persons below the minimum working age permitted by law in the respective country or jurisdiction. The minimum age for employment must not be below the age at which compulsory schooling ends and in no case below 15 years of age. National standards for the protection of children and young people in employment must be complied with. The exceptions of the ILO shall apply. Children shall be protected against economic exploitation, the performance of work that is hazardous, that may interfere with the child's education, and that may endanger the child's health or physical, mental, spiritual, moral or social development. The promotion of future professionals, e.g. in the form of school internships, is expressly desired, while respecting national requirements.

Exclusion of forced labor - Ratepay does not tolerate any form of forced or compulsory labor. The employees of our partners may choose their employment relationship freely and without threat. All employees are free to leave the employment relationship in compliance with labor laws. Employees are to be treated with dignity and respect. No employee may be subjected to verbal, psychological, physical, sexual and/or physical violence, coercion or harassment.

3.3 Discrimination, bullying & sexual harassment

Ratepay condemns any form of discrimination and bullying towards colleagues, superiors and business partners. This includes any kind of sexism and sexual assault, racism, age and body discrimination, homophobia, violence and its threat as well as prejudice or discrimination based on social origin or social position. Ratepay's partners are also responsible for workers who are employed through agencies or other intermediaries.

3.4 Diversity, inclusion & equal opportunities

Ratepay regards diversity and variety as an indispensable basis and enrichment for successful cooperation. Diversity is what makes up Ratepay's corporate culture. We see ourselves as a community of our employees, who contribute to this diversity through their individual personalities, life situations and experiences. Ratepay values diversity and welcomes everyone to our team, regardless of ethnic or social origin, religious beliefs or world views, gender, physical or mental limitations, age, sexual orientation, skin color, marital status, educational background, nationality or other personal characteristics.

As our partners, you condemn all forms of discrimination and strive to establish a positive work environment in which all employees are treated with respect and dignity.

3.5 Community engagement

Ratepay takes responsibility and contributes to the local and global development of people and society. Our goal is to have a positive and motivating effect on our partners to take up local or regional commitment for social and economic development.

4 Bribery and corruption

Ratepay does not tolerate any form of bribery or corruption. All partners and their employees must behave in such a way that no personal dependence, obligation or influence arises. The basis of the cooperation is a business conduct based on fairness and compliance with the applicable national and international standards. Partners carefully monitor compliance with this principle.

Employees may not offer or accept benefits or gifts in the performance of their business duties. At no time may extraneous considerations influence business decisions.

Anti-bribery and anti-corruption regulations must be followed in all business areas. Upon request, partners must provide Ratepay with proof that their employees have been instructed accordingly.

Under no circumstances may binding dependencies arise in business relationships. Applicable national standards must be complied with. Any indications of corrupt behavior must be reported immediately to Ratepay via the whistleblower system ("Whistleblowing"), which is freely accessible on the homepage www.ratepay.com.

5 Money laundering

Partners are required to ensure that Ratepay services are never misused for illegal purposes such as money laundering. Money laundering is defined as financial or economic transactions by which illegally acquired liquid funds are introduced into the legal financial system. Express reference is made to the provisions on the punishability of money laundering under the Criminal Code.

In particular, before entering into a major business transaction, partners are obliged to inform themselves sufficiently about the business environment of the contracting partner, the contracting partner itself and the purpose of the intended business transaction.

Indications for the existence of money laundering are:

- unusual cash payments
- payments in currencies not specified on the corresponding invoice
- payments made by a third party and not by the actual contracting party, unless agreed otherwise
- Payment settlements which do not correspond to the ordinary bookkeeping
- Attempts to proceed as aforementioned or inquiries as to whether such an approach would be possible

Employees of the partners must inform their supervisor or the Compliance Officer immediately in cases of doubt or suspected irregularities.

Partners must provide evidence of existing processes to prevent money laundering upon request.

6 Ecological responsibility

Ratepay strives to limit the environmental impact of our direct or indirect actions as a payment service provider. Ratepay strives to identify and minimize the environmental footprint created by its business activities. Ratepay would like to encourage partners* to make an active contribution themselves and to join a sustainable business management with transparent ecological and economic goals.

6.1 Energy consumption and emissions

Partners shall comply with the applicable environmental standards.

Our partners should draw up an annual CO₂ balance. It is recommended to draw up the balance on the basis of the Green House Gas Protocol (GHGP). The aim must be to constantly reduce the emissions generated by suitable measures.

6.2 Resource observation and waste

The business activities of the partners are to be oriented towards the careful use of raw materials and natural resources. Partners shall continuously work on the avoidance and reduction of environmental pollution. Applicable procedures and standards for waste management, the handling of chemicals and other hazardous substances and their disposal must be complied with. The protection and preservation of the natural basis of life is to be promoted to a particular extent.

6.3 Objective setting and investment in environmental protection measures

The introduction of a sustainability management system is to be aimed for. For this purpose, reduction targets for energy, CO2 emissions and the reduction of resources can be defined. The UN Sustainable Development Goals (SDG) can be used as a basis as overarching guiding goals for the implementation of the company's own sustainability goals.

Investments to protect the environment (e.g. energy reduction measures, compensation payments) must be internalized in the cost structure. It is advisable to plan an appropriate budget for this purpose at the beginning of the year.

7 Laws and guidelines

Compliance with the law is a self-evident maxim of our daily actions and a basic prerequisite for trusting and cooperative collaboration.

We only cooperate with partners who provide us with proper business conduct based on compliance with all relevant national laws, guidelines and regulations.

7.1 Complaint procedure - Whistleblowing

As our partners, we encourage you to provide clear policies and procedures that make it anonymous and easy for employees to report irregularities, violations of laws and policies, or the contents of this Code of Conduct without fear of repercussions.

Employees of our business partners can also submit information about misconduct or wrongdoing in connection with business activities via the Ratepay whistleblower system, which is freely accessible at www.ratepay.com ("Whistleblower Site").

8 Postamble

We welcome a constant commitment to comply with this Code of Conduct and to continuously improve our own standards.

Ratepay may reserve the right to impose sanctions in the event of serious violations of the elimination of the violation within a reasonable period of time, to terminate the business relationship and also to decide on the exclusion of possible future business relationships.

9 Decision of the management

This directive came into force on Oct. 1st 2022.

Nina Pütz

Chief Executive Officer (CEO)

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