



THEPAY CODE OF ETHICS

Preamble

The Code of Ethics is the foundation of ThePay culture. It governs the basic rules and principles of ethical behaviour of ThePay employees, members of the statutory bodies and all persons authorised to act on behalf of ThePay in any way.

ThePay wants to continuously improve and avoid mistakes. It believes that compliance with the Code of Ethics can be a suitable stepping stone. ThePay does not mindlessly chase the highest profits but seeks to grow stably and sustainably so as not to jeopardise established values and workplace relationships.

Core pillars



Partnership

A satisfied client is the number one priority for ThePay.



Security

ThePay is committed to the security of its systems so that no sensitive data can be leaked.



Innovation

ThePay is constantly innovating. This is ingrained in its DNA and forms its business foundation.



Supervision

ThePay controls its systems and processes so that any errors can be detected and immediately corrected.

Rules of conduct towards the client

Client first

The employee always takes care of clients in the same way and in the same professional manner. It doesn't matter how big the client is from a business perspective. The employee provides the client with complete,

truthful and accurately worded information. The information must be easy for the client to understand, so they must not be given false, misleading or non-transparent information.

A professional employee whatever the circumstances

The employee is a specialist in their field. They always communicate politely and seriously and do not get flustered in difficult situations. They do their job with integrity. They never pressure the client and leave him room to consider their options. They assume that the client is also a business professional.

Prompt but correct reactions

The client needs fast and complete information. The employee never leaves them in the lurch and responds immediately where possible. The employee answers all client questions and explains the issue thoroughly. If the employee does not know what to do, he or she first consults with other employees at ThePay and then informs the client. As a rule of thumb, a slightly slower response that is correct is better than a hasty and incorrect response.

ThePay is transparent

ThePay maintains transparency towards its clients and business partners. It acts with integrity and strives to build trust.

ThePay does not accept or offer bribes

ThePay never bribes anyone in any way. This is a violation of the law and ThePay abides by the law. ThePay is forbidden to offer any quid pro quo. Particular emphasis is placed on cases where ThePay participates in a tender.

ThePay considers anything a bribe that could gain an advantage, e.g. for one client over another, or one business partner over another. If someone at ThePay receives a small gift in the form of traditional promotional items worth up to 500 CZK as a consideration for good work, this is not considered a bribe. The same applies when ThePay donates to its client or business partner a promotional item with a value of up to 500 CZK.

ThePay does not violate laws and contracts

What is stipulated by legal regulations or in contracts for ThePay is a given. At ThePay, no one will ever knowingly violate any obligations that could harm clients, business partners or ThePay itself.

Rules of conduct in the workplace

Collegiality

Relations between employees should always be fair. Employees should be friendly towards each other and try to help each other. There is no competitive atmosphere in the workplace. Under no circumstances are people judged by age or gender; sexual orientation; religious belief; skin colour; nationality, etc. No form of discrimination is tolerated.

Prudence

All employees shall exercise prudence concerning their health and life; and concerning property entrusted to them for use. No one shall knowingly damage anything. When damage is by accident; it must be reported to the appropriate person so; so that the level does not increase further, and any consequences can be effectively eliminated.

Work from home

If it allows; or even required by the situation; it is possible to occasionally work from home under certain

conditions. Primarily, everyone at ThePay tries to be close to each other, but employees are used to working effectively remotely and using current trends in communication to do so.

Dress code

If an employee has a business meeting they dress appropriately for the occasion. In other cases, they may dress casually in the workplace. It is important to feel comfortable in the workplace.

Right of complaint

An employee, if he/she feels; that he/she is being wronged; that he/she is not being treated according to the law or is being harmed; can make a complaint to the Compliance Manager and he/she will ideally make it anonymously to the Managing Director. The complaint is then investigated and, if appropriate, a position is taken, if justified. Of course, the employee is also entitled to submit any suggestion to improve the functioning of ThePay. Such a suggestion can also be made informally.

Data protection and confidentiality

Personal data protection

The personal data of clients and their customers are confidential. When handling personal data, we proceed with extra care and consideration is given; that personal data includes practically everything that ThePay knows about clients and their customers. It is forbidden to disclose the personal data of clients and their customers to unauthorised persons. The employee shall always follow the relevant internal regulation governing the handling of personal data.

IT security

ThePay uses means of communication with encrypted protocols. ThePay IT systems are continuously reviewed and checked for security.

General confidentiality

Employees are required to maintain the confidentiality of confidential information. Confidential information means, regardless of the form and method of its communication or interception and until the time of its publication; all facts; which come to the attention of the ThePay employee; and/or which are disclosed to them by a third-party during interaction with ThePay; as well as the very existence of these facts and interactions with third parties.

The clean desk rule

Employees shall properly secure their computers. When they leave the computer, they log out of the application/system and lock the computer. They must not copy files or transfer company data. They securely store carriers with confidential or business data when they are not at the workplace (e.g. USB drive). They never leave anything loose on their desk.

Conflict of Interest Rules

Avoiding conflicts of interest

All employees working for, acting on behalf of or in the interest of ThePay shall endeavour to avoid situations that could contribute to a conflict of interest. Private interest must not influence business or professional decisions. ThePay has effective procedures in place to identify potential conflicts of interest. Internal systems, control mechanisms and procedures are in place to identify and resolve conflicts of interest.

Any relationships with competitors; by clients or business partners, which could cause a conflict of interest, must be reported to the Compliance Manager and acted upon in accordance with the relevant internal

regulations.

If an employee obtains information; which is not publicly available; and the disclosure of which may materially affect business decisions, he/she must not treat such information in such a way that it results in conduct; which could cause harm and may result in unjust enrichment or advantage to himself/herself or another.

Employees must conduct business or transactions; in which they have a direct or indirect personal interest; and which could thus lead to a conflict of interest. Employees are obliged to refuse any interference; coercion; influence; wish or request; which could compromise the impartiality of decision-making in matters of clients or business partners. Employees must not provide clients with preferential rates or benefits other than those that are in accordance with the applicable conditions and internal regulations. It is unacceptable to compromise personal independence by accepting loans from clients or business partners.