



Code of Conduct

unzer

Purpose and scope of this Code of Conduct

At Unzer, we believe that expressing our essential values and principles is crucial to running our business responsibly. This Code of Conduct applies to all employees, regardless of their position, function, or level of employment, as well as to our partners. As a company offering payment and commerce solutions, we operate in a highly regulated industry and adhere to detailed regulations issued by organizations such as the German Federal Financial Supervisory Authority and the Luxembourg Commission for the Supervision of the Financial Sector. We are committed to ensuring that all our business processes are ethical, lawful, socially, and environmentally sustainable and that we act responsibly across the entire value chain. We recognize that our partners are an important part of our business and expect them to adhere to the principles outlined in this Code of Conduct.

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A message from our CEO

Unzer has set itself the goal of simplifying retail by combining technology, service and payment. Today, employees from 67 nations are working towards this goal and I am proud to be part of this exciting journey ahead. Together, we are helping companies and organisations to process and simplify their payments so that they can focus entirely on their customers. At the same time, we are driving digitalisation in retail and contributing to a connected society.

Consistently pursuing our mission is important for our success. However, how we work together to fulfil this mission is just as important. Adherence to our values is essential for us as a team. They help us achieve our goals and bring the individual companies in the Unzer Group closer together. That is why strengthening our corporate culture is very important to us.

This Code of Conduct defines how we treat our environment - our retailers, our business partners, and society in general. It applies to everyone and is intended to help us carry out our daily work responsibly and make the right decisions. At the same time, the Code describes our expectations of our external partners.

As CEO of Unzer, I would like to encourage you to express your concerns, questions and worries clearly and respectfully. We are committed to a work environment based on inclusion, respect and honesty. I therefore appeal to you that we treat each other as partners and support each other. Let us treat each other and our environment with respect, because we are a community, and it is largely up to us to shape it.

With best wishes,

Robert Bueninck
Chief Executive Officer of Unzer

Upholding integrity and compliance at Unzer

As our Group's Chief Compliance and Governance Officer, it is my job to ensure that we adhere to the highest standards of integrity and compliance. I am pleased to introduce you to our Code of Conduct, which sets out the expectations and principles that should guide us as individuals and as a company.

It is the responsibility of all of us to comply with the regulations of our organisation. Only if we take our role as a reliable partner seriously will we earn the trust of our dealers and business partners. This is crucial for the long-term success of our company.

This Code of Conduct is therefore not a mere formality, but an important part of Unzer's corporate culture. It helps us to make the right decisions and adhere to our values - especially in difficult situations. In this sense, it is a guide for how we work together and interact with our environment.

I would encourage everyone to familiarise themselves with these standards. Please contact us if you have any questions or concerns or if anything is unclear. Let's work together to uphold our values and ensure that Unzer is a trustworthy partner for everyone involved.

I look forward to working with you in a spirit of mutual respect.
Thank you for your support!

Dr. Max Steiger
Chief Compliance and Governance Officer at Unzer



1.0 Who we are

Unzer offers payment and commerce solutions to European merchants. We believe that customers want to enjoy a seamless shopping experience, regardless of where they shop. And we are convinced that merchants want to delight their customers and not have to think about how to technically connect their online shop and their physical shop in one system. That's why we provide the software and hardware to ensure that all their systems communicate with each other in real time.

Our unified commerce platform allows companies to access and utilise customer, sales and product data in one place and in real time. Thanks to the reliable and transparent data source in the cloud-based backend, retailers better understand their customers' wishes and requirements, save time and money through more efficient processes and receive secure payment integration. At the same time, customers benefit from a consistent and personalised shopping experience where they have the flexibility to choose how, where and when they pay.

In this way, we support companies in offering their customers an even better service. And we accompany you in your transformation in an increasingly digital and connected world.



Our Mission

We provide an ecosystem enabling businesses digitalise by delivering simple and integrated payment and software solutions.



Our history

Unzer brings together the expertise of 13 companies under one brand, offering a unique, end-to-end payment solution. This broad portfolio makes it challenging to summarise our story in just a few sentences. Since launching the Unzer brand in 2020, our team, has been dedicated to providing seamless payment solutions and driving digital transformation for businesses across Europe.

Major milestones in our history are:

- 2025** Unzer continues to focus on small and medium-sized enterprises and introduces new payment methods such as direct bank transfer and Wero.
- 2024** BaFin recognises Unzer's improved compliance and governance by ending its special monitorship and lifting the onboarding ban. Unzer invested over 20 million euros in these enhancements.
- 2023** Unzer introduces its own Buy Now, Pay Later service and continues to invest in its technology, payment methods and features. New funding helps Unzer grow faster, lead key projects, and shape the industry's future.
- 2022** Unzer invests in its compliance and governance processes, expands its management team and launches its payment platform UnzerOne. The smart point-of-sale device POS Go simplifies payment.
- 2021** Unzer is evolving with a new management team leading the way. They are streamlining processes and improving structures. With the Clearhaus acquisition, Unzer is now an acquiring institution.
- 2020** The new Unzer brand is launched. Further companies are acquired to complete the portfolio.



” Our Code of Conduct describes how we work with each other and with others. Therefore, we also expect the highest level of ethical behaviour and transparency from our business partners.”

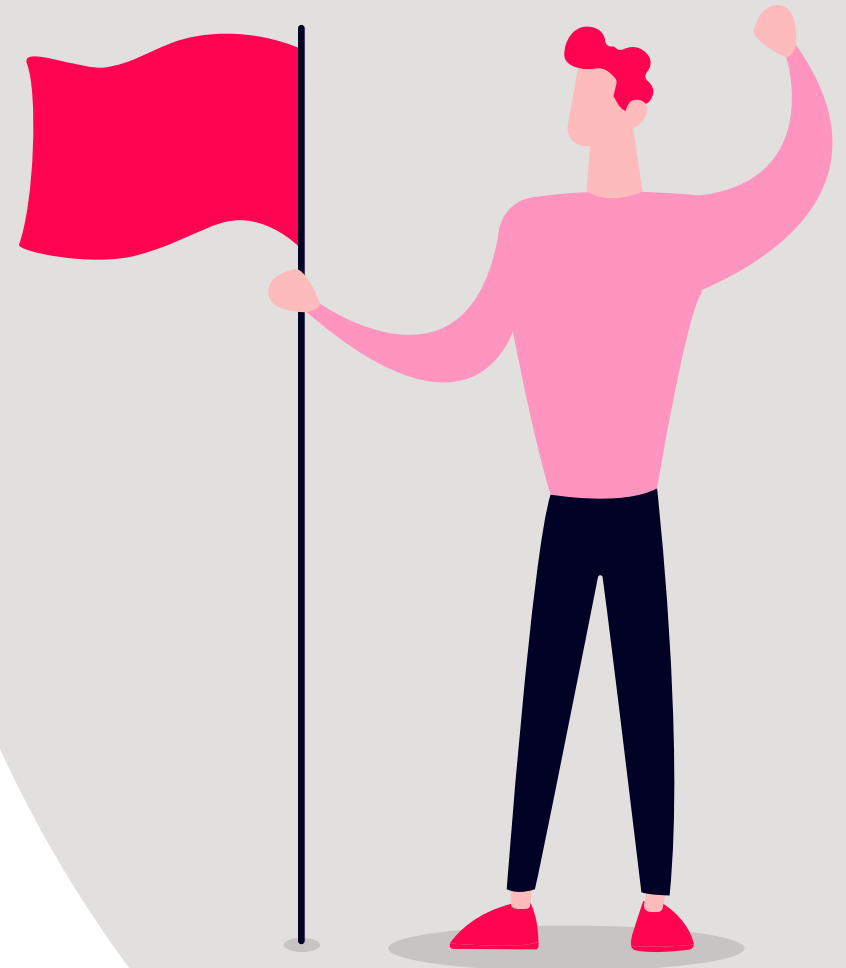
Pascal Beij, Chief Commercial Officer

2.0 What we know to be true

At Unzer, we are guided by our six values. They help us make decisions, shape our culture and bring the company closer together.

Our six core values are: (1) We put merchants first, (2) we act with integrity, and (3) we always deliver results. (4) We work together as a team, and (5) we own our tasks, taking responsibility for what we do. Finally, (6) we strive for the highest quality and always try to improve.

Adding to our values, we have agreed on six leadership principles that we use daily, whether discussing ideas for new projects or deciding on the best approach to solving a problem. We consider these principles when hiring new managers and rely on all leaders to follow them in their day-to-day work with their teams.



2.1 Our values

1

Putting merchants first

We always start with our merchants and work backwards. We keep our promises and work vigorously to earn and keep their trust. We solve merchants' problems and prioritise their interests. We anticipate future market needs and actively shape the future of payments by listening to our merchants and their customers.

2

We act with integrity

We are true to our word. We do what we say and say what we do. We speak up when something is wrong. We comply with all applicable laws and regulations, upholding the highest professional standards.

3

Delivering results

We focus on delivering our promises in high quality and on time. We never put off until tomorrow what we can do today, since results matter. We prioritise and invest in initiatives that will be most impactful.

4

Together, not alone

We act as one team and understand that our work affects others – even if they are not in our reporting line or team. We support one another on this basis and treat each other with respect as equals. We put the company's interests first and pitch in to support the greater whole.

5

Raising the bar

We aim for the highest standards and continually raise the bar to deliver high-quality products, services and processes. We see learning as an ongoing process and mistakes as an opportunity to improve. We begin each day with a determination to perform and be better – for our merchants, partners and the world at large.

6

Embracing accountability

We are responsible for our words, actions and results. We are always present, follow through and keep our commitments. We never sacrifice long-term value for short-term results. We demonstrate respect through transparent, timely and honest communication.

2.2 Our leadership principles

1

Lead the way

Leaders guide with empathy and inspire their team by setting an example with their actions. They work vigorously to earn and keep their employees' trust and remain true to their word. Leaders stay humble and self-critical and never blame others for their misjudgement. Leaders are also part of the team.

2

Be a guide, not a rulebook

Leaders mentor their teams and create opportunities for personal growth and success, fostering a culture of coaching and support. They raise the performance bar with every hire and promotion, recognise exceptional talent, and willingly move them throughout the organisation. Envy is beneath them.

3

Weave a carpet of diversity, united by respect

Leaders make equality a fundamental principle of all their actions. They truly value different backgrounds and ways of thinking and being. They ensure that people feel safe coming to the workplace and openly expressing their ideas, opinions, and concerns. Leaders ensure that all voices are heard and respected, regardless of hierarchy, origin, or identity.

4

Listen with intention, communicate with purpose

Leaders understand the value of listening and know when to remain silent. They effectively communicate across teams, ensuring everyone is on the same page and working towards the same goals. They know how to inspire and get everyone committed. Leaders speak candidly and directly address things, unambiguously but always respectfully.

5

Play chess, not poker

Leaders not only consider the immediate task at hand but also look ahead to the future and the long-term impact of their decisions. By constantly striving to understand the big picture and to consider the potential consequences, leaders make informed decisions that drive the organisation towards best serving its customers and reaching its ultimate goals and vision.

6

Roll up your sleeves

Leaders bring a hands-on mentality, fully engage with and actively participate in their team's work. They are willing to step in and take action to resolve issues and escalate when needed. They use their skills and expertise to guide their team towards achieving clear and defined goals.



” Delivering results is more than just achieving targets; it is about building trust, credibility and reputation by consistently delivering on our commitments, and doing so with the utmost integrity and adherence to our Code of Conduct.“

Niv Liran, Chief Technology and Product Officer

3.0 How we work together

Respecting and protecting human rights are fundamental to building a responsible and sustainable business. This is why we are committed to conducting our activities in line with the UN Guiding Principles on Business and Human Rights and internationally recognised human rights standards. We seek to prevent and address adverse human rights impacts in our operations and business relationships and ensure that everyone is treated with dignity, fairness, and respect, with no tolerance for discrimination.

Policies and procedures help everyone at Unzer to work with clarity and confidence. By putting things in writing, we make sure expectations are transparent, responsibilities are clear, and decisions are based on a single source of truth.

These guidelines are here to support us in our daily work and in challenging situations, pointing us to the right people to contact if we have questions along the way. All policies and procedures created under our Group Policy and Procedure Framework are mandatory and apply to everyone in scope. Employees always find the latest versions and further details on the Unzer intranet.

” We value the uniqueness of every individual – every perspective, every experience, every story. We witness daily how diversity inspires our creativity, strengthens our solutions, and drives our collective success.“

Stefanie Hohenstatt, Vice President People & Culture

3.1 Our commitment to diversity, inclusion and equality

We feel certain that building a culture of diversity, inclusion, and equality helps us progress and improve. This is why we have made creating a diverse and inclusive workplace one of our leadership principles. We also ensure that all employees are given equal opportunities and that there is no room for discrimination.

Our commitment to diversity, inclusion and equal treatment is based on internationally recognised human rights standards, including the International Bill of Human Rights and the fundamental conventions of the International Labour Organization (ILO).

A respectful and appreciative workplace for everyone

Our goal is to create an environment in which everyone feels respected and appreciated, helping them deliver their best possible performance. All employees must comply with the principles of the General Equal Treatment Act. We welcome and support people from all backgrounds and celebrate diversity in many respects, including ways of thinking and being, lifestyle, age, religion, economic and social status, and gender identity. Under no circumstances do we ever tolerate any form of harassment, including sexual harassment, discrimination, bullying, or victimising, at our company.

Equal opportunity and equal treatment

Being an equal opportunity employer means that we are committed to providing equal opportunities to everyone in all aspects of employment without any discrimination on the grounds of age, skin colour, disability, origin, ethnicity/nationality, religion, race, gender, medical history, sexual orientation or similar.

Health and Safety at work

We are committed to creating and maintaining a healthy, safe, and stable working environment for our employees. All employees must ensure safety in the workplace to the best of their knowledge and belief to protect themselves, colleagues, dealers, and third parties. Accidents and potential hazards in the workplace must be reported to the HR department. If external persons at Unzer become aware of a potential health or safety hazard, we encourage them to contact us immediately so that we can eliminate the risks.

Labour relations

For us, being a responsible employer means engaging in constructive dialogue with all employees. We live a dialogue based on two-way communication, trust and appreciation. We respect the right of our employees to decide who should represent them in dealings with the company.

Zero tolerance for offenses

Do not remain silent if you witness behavioural violations or are yourself a victim of discrimination, (sexual) harassment or bullying. We take every complaint seriously and assure you that we will treat it with strict confidentiality and sensitivity. We maintain absolute confidentiality about personal information, incidents and conversations with uninvolved third parties. A complaint will never lead to a disadvantage for employees or partners.

If individuals ever violate this policy, whether through dishonesty or through discriminatory, harassing or bullying behaviour towards individuals or groups, they will be subject to disciplinary action. The consequences will depend on the severity of the offence.



3.2 Our commitment to business ethics and compliance

We are committed to the highest standards of openness, integrity and responsibility. We therefore endeavour to avoid any misconduct that could have negative consequences for the Unzer Group and its affiliated companies, its employees and third parties. Every one of us must act responsibly in order to strengthen and maintain the integrity of Unzer and our public reputation. All our actions must also comply with applicable laws, regulations, internal policies and our values.



You noticed something suspicious?

Any employees that suspect cases of financial crime should submit an internal suspicious activity report. External parties may get in contact via email (speak.up@unzer.com) or use our whistleblowing channels. Further Details can be found in section 5.

Our principles of business ethics and compliance include, but are not limited to:

1. Legal obligations & compliance



Anti-money laundering and countering the financing of terrorism

Unzer is firmly committed to the fight against financial crime, including the fight against money laundering and terrorist financing. Unzer will never knowingly conduct business with individuals or entities that present an unacceptably high risk of money laundering, terrorist financing or other financial crimes.



Financial sanctions

Unzer complies with all relevant sanction regulations and performs sanction screening to prevent any funds, financial assets or economic resources from becoming available, whether directly or indirectly, to a sanctioned person or entity.



Bribery and corruption

Unzer operates a zero-tolerance policy in terms of bribery and corruption. We do not bribe anyone for any reason at any time. This applies to all business dealings and transactions in all the countries in which we operate.



Protection of personal data

Unzer considers it vital to respect everyone's privacy and handle personal data lawfully and ethically. This concerns the personal data of our employees, customers, business partners, and all parties involved with Unzer. We demonstrate our commitment to privacy and data protection by embracing the following principles: (1) only lawful use of personal data in a fair, ethical, and transparent way; (2) no collection of unnecessary personal data and only for a legitimate purpose; (3) no unnecessary retention of data and storage only for as long as needed; (4) protection of personal data with appropriate security measures; and (5) use of adequate measures to prevent cross-border transfer where necessary.



Fair competition

Antitrust and competition laws are designed to promote and protect free and open competition, which is of utmost interest to Unzer, our retailers, partners and competitors. Unzer is committed to fair competition and strictly refuses to engage in any business actions or agreements that could harm or restrict competition. All Unzer employees must ensure that we conduct our business accordingly.



Mandatory employee training

To ensure that we are compliant with regulatory requirements, all Unzer employees must complete mandatory training on anti-money laundering and counter-terrorist financing, financial sanctions, fraud prevention, information security, data protection and health and safety. Any failure to do so may lead to disciplinary actions.

2. Principles & values

! Gifts and entertainment

Unzer employees are prohibited from offering or granting remuneration or benefits to public officials, employees of supervisory bodies, employees of tax authorities or auditors.

Hospitality is only permitted if it is clearly work-related (e.g. a business meal) and meets the accepted standards of local business culture.

! Avoiding conflict of interest

Fair play means avoiding conflict of interest. A conflict of interest can occur when the personal interests of an employee compete or conflict with the interests of Unzer. This could potentially lead to situations in which the employee, either knowingly or unknowingly, might not act in the best interest of Unzer. Therefore, we instruct our employees to avoid any actual or potential situation that could put their integrity at risk.

! Information security

Information security is of fundamental importance to our company and our international payment platform. It forms the basis for ensuring the trust of our customers, employees, regulators, and society. The leakage of confidential data could have severe financial consequences and lead to intangible damage to our reputation. Breaches of confidentiality about sensitive information must, therefore, be systematically prevented. Particularly sensitive or vulnerable information, such as transaction-related or person-related information, must be protected from manipulation. In addition, the authenticity of the parties with whom information is exchanged must be ensured. This applies equally to all applications and IT systems that process critical data, as well as to external and internal parties of Unzer.



What should I do if I notice or become aware of non-compliant internal behaviour?

We encourage employees, external partners and merchants to speak up and use Unzer's internal and external channels without fear of retaliation.

We ensure absolute confidentiality.

Find contact details in section 5.

3.3 Our commitment to the environment

As a company providing payment and commerce solutions, our environmental impact is different from that of manufacturers or large retailers. However, we take our responsibility seriously and are committed to reducing our footprint and protecting natural resources.

At Unzer, we strive to operate in an environmentally responsible way. This means continuously improving our sustainability efforts and finding ways to reduce environmental risks. In order to make an active contribution to tackling climate change on the path to climate neutrality in line with the Paris Climate Agreement, we have set ourselves ambitious targets to achieve significant reductions in our Scope 1 and 2 emissions by the end of 2027. To achieve this, we are constantly improving our operations to use resources more efficiently and lower our carbon footprint.

We are focused on cutting energy use and reducing emissions across our business. We work to make our rented offices spaces more energy-efficient and increase our reliance on renewable energy wherever possible. When travel is necessary, we prioritise public rail transport. In procurement, we choose sustainable products whenever we can and encourage the use of electric vehicles in our fleet. In 2025 we voluntarily started to report annually on our ESG efforts under the European Sustainability Reporting Standards (ESRS) to ensure transparency and accountability. This reinforces our commitment to tracking our progress and continually improving our sustainability initiatives.

Looking ahead, we are dedicated to significantly reducing our carbon footprint, helping to combat climate change, and contributing to a more sustainable economy for the future.

” We recognise our environmental responsibility and are constantly looking for ways to operate more sustainably and preserve natural resources for future generations.“

Jacob von Ingelheim, Chief Transformation and Risk Officer

“Integrity is the foundation upon which we build our reputation. It is the commitment of every member of the Unzer Group to uphold the highest standards of openness, responsibility and ethical conduct as a way of strengthening the integrity of our company and protecting the interests of all stakeholders.”

Dr. Max Steiger,
Chief Compliance and Governance Officer

3.4 Being a fair and reliable business partner

We are committed to professional and respectful behaviour towards all our stakeholders – whether merchants, business partners, suppliers, or any other person. We act with honesty, integrity, and transparency in our dealings with one another and with our merchants and business partners. This also requires us to act professionally at all times. If we need to disagree, we do so in a respectful way.



Confidentiality

It is vital to protect the confidentiality of proprietary information of merchants, end customers, colleagues and others to which we have access and with which we are entrusted. This includes only disclosing data within the limits of data protection law.



Consideration

We all rely on each other to do the best possible work as a company. Our decisions impact dealers and colleagues, so we always consider the consequences our actions can have on others. Part of this is our contracts with retailers and partners, which must meet our ethical standards and are reflected in our terms and conditions.



Fairness

Creating a respectful workplace where everyone can thrive starts with how we treat and support each other. That means all of us must always treat each other with dignity. Insults, harassment, or any similar behaviour are not acceptable. This includes, but is not limited to:

- Threats of violence
- Discriminatory jokes
- Personal insults, especially those using racist or sexist terms
- Unwanted sexual attention
- Sharing sexually explicit or violent material via electronic devices or other means

3.5 We take concerns seriously

Unzer strives to create a culture where anyone can speak up, knowing they will not face any negative consequences. For this reason, we have established a group-wide opportunity for reporting compliance concerns. This [whistleblowing system](#) ensures data protection, anonymity (if desired) and confidentiality.

Employees and any other stakeholders are kindly asked to submit a report if they suspect a potential violation of laws, regulations, or rules or a breach of internal policies, procedures, or the Code of Conduct that could pose a risk to our business. The following are just a few examples of issues for which a report can be filed:

- Bribery or corruption
- Internal fraud
- Unethical or unprofessional business conduct
- Harassment, mobbing and discrimination
- Finance and accounting
- Data protection and IT security

”Adhering to our Code of Conduct is not just a commitment to rules; it’s a pledge to uphold shared values. It guides us in making responsible and ethical decisions, fostering a positive work environment and enhancing our relationships with stakeholders.

Robert Bueninck
CEO



4.0 What we expect of our partners

We at Unzer value trust and ethical standards in all of our business dealings. That's why we also expect our suppliers and partners to comply with all applicable laws and regulations.

The following chapter outlines these expectations regarding human rights, business ethics, and the environment. The following chapter outlines these expectations in relation to human rights, business ethics and the environment. Although the principles are not exhaustive, they form the basis for our cooperation. We are convinced that we need a common understanding of how we act as a company in order to build strong and lasting relationships with our suppliers, dealers and partners that are based on trust, transparency and mutual respect.

! **Respect for human rights**

We are convinced that entrepreneurial success can only be guaranteed in the long term if human can only be guaranteed in the long term if human rights are respected, recognized and protected. That is why we are guided by the United Nations Guiding Principles on Business and Human Rights, the labour and social standards of the International Labour Organization (ILO core labour standards) and the United Nations principles of responsible and sustainable corporate governance, as set out in the Global Compact, the Diversity Charter and the Principles for Responsible Banking, among others. These conventions are the guidelines that determine our daily actions, which we supplement with internal guidelines. They also define the standards by which we assess our suppliers, dealers and partners.

! **A non-discriminatory working environment**

At Unzer, we value mutual trust and respect and believe in treating all people with dignity and respect, regardless of their ethnicity, gender, religion, sexual orientation or other personal characteristics. We therefore also expect our partners, suppliers and dealers to refrain from any form of discrimination or harassment and to comply with international standards for working conditions, health and safety. No one may be physically, sexually, psychologically or verbally threatened in the workplace.

! **Ethical standards in the supply chain**

We expect our partners, suppliers and dealers to maintain the highest level of integrity, transparency and compliance. In addition, we require all partners, suppliers and distributors to comply with relevant laws and regulations on good corporate governance and business ethics as minimum standards. We do not tolerate any form of bribery or corruption or co-operation with groups involved in money laundering or terrorist financing. Our partners, suppliers

and distributors must also comply with European and national data protection standards and have appropriate security measures in place. We only work with organizations that share our commitment to protecting personal data and handling it with care.

! **Minimising the environmental footprint**

Unzer is driving environmental and climate protection measures at all its sites. It is essential for us that our partners, suppliers and distributors comply with all applicable environmental laws and regulations and continuously endeavour to reduce their impact on the environment. We encourage our partners, suppliers and dealers to take sustainability seriously and implement measures to reduce waste and greenhouse gas emissions, save energy and conserve resources.

! **Compliance with the Code of Conduct as the basis for good cooperation**

We call on our partners, suppliers and dealers to comply with the principles and obligations set out here. In this way, we work together to create a fair and responsible business environment. If a supplier, partner or vendor does not fulfil our ethical standards, we first ask them to correct the processes or structures within a reasonable period of time in order to remedy the violation and avoid similar incidents in the future. If it is a critical deviation, the measures must be implemented without delay. We are authorized to inspect the records of our partners, suppliers and distributors to ensure that they comply with our principles and values.

If someone violates our Code of Conduct, we consider this to be a serious breach of contract. We reserve the right to terminate the collaboration and cancel the contract. We believe that is important to maintain transparency and integrity in our supply chain.

5.0 Seeking guidance

If you have any questions or concerns about how our Code of Conduct may impact your business interactions with us, or if you have any other questions about Unzer, please get in touch with our Communications team (communications@unzer.com).

If you want to report any misconduct, use our anonymous whistle-blowing channels, which you may find on the right. These channels include a designated hotline, an e-mail address, and a website to report your concerns.

Thank you for being so committed to upholding Unzer's values and standards



Get in touch!

For general questions:

[Communications@unzer.com](mailto:communications@unzer.com)

To report a concern:

Speak.up@unzer.com

+49 69 9999 8839

Report anonymously: [Whistle Report](#)



Unzer Group GmbH

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The Unzer logo is displayed in white, bold, lowercase letters. The 'u' is stylized with a horizontal bar that extends to the left and then curves back to the right, forming a continuous shape with the rest of the letter. The background of the entire page is a vibrant red with a 3D effect of overlapping, semi-transparent circular discs that create a sense of depth and movement, receding towards the right side of the frame.