



CODE OF CONDUCT

October 2026

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GENERAL PROVISIONS

1. About this document

This Code of Conduct applies to everyone who works at and with SurePay: temporary and permanent staff members, freelancers, directors and, where applicable, suppliers and vendors. Alongside this Code of Conduct, specific codes, principles, policies and procedures may apply.

SurePay is on a mission to make payments easier, more personal and even more secure by offering financial technology solutions to banks, corporates and institutions all over the world.

This Code of Conduct translates our core identity into action:

We Care:

We are a supportive employer and understand that health, family and safety are truly important.

Think Forward:

By continuously anticipating the needs of tomorrow, we lead the way with solutions that secure the future today.

Build Together:

We believe in teamwork and strive for the best results together.

Be Responsible:

We all contribute to achieving our mission of reducing fraud and improper payments, leading to a positive impact on society.

By making our DNA and values tangible, it provides the clarity needed to ensure our daily intentions and behaviors consistently align with who we are as an organization.

2. Our Values in Practice

This is what you can expect from us, whether you are a partner or a colleague. In return, we expect nothing less from you.

2.1 We Care

- We foster an inclusive environment where everyone feels safe to bring their authentic selves to work; we are collectively responsible for maintaining a culture of openness and respect.
- We prioritize transparency by involving our team in significant organizational changes and committing to honest communication regarding decisions that impact our people.
- We empower one another to speak up, address difficult issues head-on, and intervene proactively whenever necessary.
- We are dedicated to excellence in service, going the extra mile to fulfill our mission of preventing fraud and misdirected payments.
- We recognize that every customer is unique; we listen actively to their specific needs to provide tailored, effective solutions.
- Our business is purpose-driven; while we pursue growth, our primary focus is creating a positive impact on security and efficiency for the end-user.
- We maintain a zero-tolerance policy toward misconduct and hold our employees, customers, and third-party stakeholders to the same high ethical standards.

2.2 Think Forward

- We maintain a proactive, problem-solving mindset and remain adaptable in the face of evolving challenges.
- In times of conflict, we move beyond the friction of the details to focus our energy on constructive resolution and forward momentum.
- We practice forward-thinking by considering how our decisions and changes affect others, ensuring our actions are thoughtful and well-integrated.
- We strive for excellence in our respective fields, fueling both our individual professional growth and the overall performance of the company.
- We embrace innovation and seek strategic partnerships that strengthen our products, our company, and the broader market in which we operate.
- We stay agile and responsive to external trends, customer feedback, and the evolving needs of society.
- We aim to lead the industry in developing secure, efficient solutions that provide essential value to our customers.

2.3 Build Together

- We foster a “no-blame” culture, focusing on respectful feedback and collaborating toward effective solutions rather than dwelling on mistakes.
- We prioritize open, honest, and transparent communication in everything we do.
- We keep one another informed and aligned, striving for a healthy balance of information that provides clarity without being overwhelming.
- We celebrate our successes and actively empower a culture where achievements are recognized and shared.
- We treat everyone as equals, regardless of role or title.
- We support one another during challenges, offering collaborative thinking and practical help to find the best way forward.
- We listen to and act on customer feedback to drive the continuous improvement of our products, our services, and our own professional growth.

2.4 Be Responsible

- We take full ownership and accountability for our work; when mistakes occur, we focus on taking responsibility and finding solutions rather than dwelling on the error.
- We make principled, honest decisions and uphold the highest standards of integrity in all our actions.
- We are committed to ethical conduct and actively report any suspected misconduct or unethical behavior.
- We strictly adhere to all governmental regulations and internal policies to ensure the highest levels of data security and professionalism.
- We handle all information with extreme care, ensuring the privacy and confidentiality of our customers, colleagues, and partners.
- We conduct our daily business with a conscious awareness of our broader social and environmental impact.
- We refuse to engage in business with any parties involved in corruption, or economic and financial crime.

3. Fair Business Conduct

3.1 Treating stakeholders fairly

A stakeholder is any individual who has a vested interest in the services provided by or to SurePay, including colleagues, coworkers, clients, vendors, suppliers, and investors.

We expect everyone to treat one another with respect and dignity, acting fairly, reliably, and in the best interests of our team and partners. No one shall seek an unfair advantage through manipulation, discrimination, inappropriate behavior, or the concealment and abuse of privileged information. We strictly prohibit the misrepresentation of material facts or any other unethical practices that compromise our commitment to integrity.

3.2 Respecting Confidentiality of Entrusted Information

All individuals who have been entrusted with confidential information have a duty to maintain the confidentiality of all information regarding SurePay and its clients. This obligation remains in force and continues to apply even after the termination of one's employment, secondment, or service agreement. Above all, every employee is responsible for securing all information and communication tools against unauthorized access, which includes proactively preventing the loss or any inappropriate use of company and client data.

3.3 Protecting Personal Data

We respect the privacy of all employees, clients, and stakeholders, and we hold a collective responsibility to treat all entrusted personal data with the highest level of care. Personal information must always be shielded from unauthorized access or misuse. We adhere to applicable laws and our internal privacy frameworks to ensure that personal data is retained only for legitimate business purposes and that we remain transparent about how we collect, use, and share it. Any data processing must be fair, accurate, transparent, and never excessive. We expect everyone to respect the integrity of personal information and strictly follow all data protection regulations.

3.4 Dealing with third parties

We seek to deal with third parties who share our values. We expect any third party to comply with this SurePay Code of Conduct or equivalent values and ethical standards. A third party is anyone who does business with SurePay, including: suppliers, vendors, consultants, independent contractors, contract workers, clients and any other stakeholder involved with SurePay.

3.5 Avoiding Conflicts of Interest

Conflicts of interest arise when personal, financial, or outside obligations interfere—or even appear to interfere—with the ability to perform duties in a fair, honest, and transparent manner. Because our relationships with clients and partners must be built on integrity, any situation that could reasonably be perceived as a conflict must be avoided. This includes holding outside positions or material interests in vendors and clients that might impair unbiased decision-making, as well as using confidential.

Furthermore, the exchange of gifts or hospitality must never influence, or appear to influence, the objectivity of a business decision, regardless of value. A gift or invitation may only be given or received after informing the relevant manager in advance and after receiving explicit permission to proceed.

All SurePay employees must report an outside interest before accepting the outside interest or before starting a job at SurePay via the SurePay C.A.F.E. (Compliance Automated Forms Employees) registration tool.

4. Bankers' Oath

By joining SurePay, employees sign the Bankers' Oath and choose to live by the values in this Code. We are all personally responsible for acting with care and being able to explain the “why” behind our decisions.

This also means we do not look the other way or encourage anyone else to break these rules. We do not make excuses for unacceptable behavior, and failing to follow this Code can lead to serious consequences or disciplinary action.

Furthermore, for our team in the Netherlands, by taking this oath, supervisory directors, directors, and employees based in the Netherlands are held accountable under external disciplinary rules, ensuring our professional conduct remains subject to the highest level of regulatory oversight.

5. Staying Up to Date

We want this Code of Conduct to remain relevant as we grow, so it may be updated from time to time to reflect new developments. To stay updated, please make sure to check in or request the latest version regularly so you are always up to speed on our current standards.

Last update: October 2026