

# Worldline Anti-Corruption Statement



## Introduction

In accordance with the Worldline's Code of Ethics, its Business Partner's commitment to integrity and the principle 10 of the United Nations Global Compact, the company is committed to conduct its business fairly, honestly and lawfully with whomever and wherever doing business, to work against Corruption in all its forms, including bribery, solicitation and extortion.

As part of this commitment:

- Worldline has a zero-tolerance policy towards Bribery, Corruption and Fraud of any kind.
- Worldline complies with all applicable laws on Bribery, Corruption and Fraud, such as the French SAPIN II, UK Bribery Act 2010, the U.S. Foreign Corrupt Practices Act (FCPA) which all have a transnational impact. Yet also the corresponding laws in the countries where Worldline is doing business must be complied with.
- Worldline's Senior Management are promoting a culture of compliance to inspire Managers and Employees to reinforce the standards articulated in this Anti-Corruption Statement.
- Worldline's Board of Directors and Executive Committee are committed to implementing and enforcing effective systems throughout Worldline.

# Gifts and hospitality

## Acceptable gifts and hospitality

Worldline permits normal and appropriate corporate entertainment, gifts, hospitality and promotional expenditure (given and received) to or from third parties if:

- they are reasonable and modest (country specific thresholds defined - about 70 euros in most European countries.)
- are offered unfrequently, openly, transparently
- it is seen as a commonly accepted business practice, and would be considered as being appropriate by an independent observer in all the circumstances
- it would not cause the Group embarrassment if it became publicly known
- or became known to competitors or other actors in the market.

Invitations to receptions or events must be offered or received in the context of a promotional campaign or public relations initiative. Travel costs to the reception or event may not be offered/accepted.

Seminars or conferences with a business nature are subject to specific conditions, where the compliance team needs to be consulted. Details are defined in internal guidelines.

For transparency, gifts and hospitality are subject to specific thresholds of acceptability, need approval and, accepted or refused, are logged in the gifts register. Further internal details are defined in the internal gifts and hospitality guidelines and best practices.

## Unacceptable gifts and hospitality

Worldline prohibits directly or indirectly receiving or offering the following types of gifts or hospitality:

- cash, payments, loans or advances, or cash equivalents such as gift certificates;
- personal discounts, gift vouchers, store cards;
- equities or shares;
- commissions or other types of reward;
- free services such as insurance, school fees, repair or improvement works or preferential treatment;
- holiday or leisure packages;
- sex-related activities or any activities in breach of the fair treatment of human beings;
- gambling activities;
- any prohibited goods or illegal items;
- invitation to events which are not principally of a business nature.

Offering or receiving whatever is also prohibited:

- in relation to third parties that notified their no-gift policy;
- during a bid process from a bidder or during a tender to involved stakeholders;
- directly or indirectly offer or receive gifts or hospitality to or from any public official, in the broadest meaning of the concept.

Under no circumstances are spouses, relatives, friends or any other intermediaries permitted to accept or receive gifts and/or hospitality in place of or on behalf Worldline Employees to whom this Statement applies.





## Facilitation payments

Facilitation payments are typically payments, often of a small amount to a government official intended to hasten or secure the performance of a routine governmental action or procedure. This may include for example, the clearance of goods, the issuance of work permits or visas, immigration services or obtaining a license.

In some countries, facilitation payments are common, and may be instrumental in securing an agreement or official document.

Worldline strictly prohibits facilitation payments, which are forbidden and severely punishable under applicable anti-corruption laws of most countries.

## Conflict of interest

A conflict of interest is a situation where the private interests of an Employee interfere with those of Worldline. In a conflict of interest, the private interests of the Employee may influence or appear to influence the impartial and objective performance of the Employee's duties or judgement.

Employees private interests include their financial, professional, family and personal interests.

Identifying and declaring situations of conflict of interest, actual or potential, is essential to preventing corruption.

More details are shared in the internal Global Conflict of Interest Policy.

## Dealing with third parties

As part of its activities, Worldline Group regularly deals with third parties (e.g. resellers, business introducer, agents, distributors, suppliers, subcontractors, partners in the framework of strategic alliances), including in countries where the risk of corruption is potentially high.

The actions of suppliers, subcontractors and intermediaries may expose Worldline to liability and damage its reputation. A prudent approach must therefore be adopted to anticipate, control and mitigate the risks associated with the choice of a supplier or an intermediary.

As such, each Employee undertakes to be diligent in selecting suppliers and intermediaries to ensure that they share the values and commitments, and to comply with applicable policies such as the Business Partner's commitment to integrity.

# Sponsorship and donation

## Charitable donations and contributions

Worldline can make Charitable Donations, fundraising and other Contributions yet, care is taken to ensure that the recipient is a bona fide charity and that there is no reason to believe the charity itself may be operated directly or indirectly for the private benefit of a Public Official or a family member of or a person known to be a close associate of a government or Public Official.

However, no Charitable Donation or other Contribution may be made to recipients, either individuals or organisations if

- their goals are incompatible with Worldline's corporate values or principles;
- they would damage Worldline's reputation;
- it is for political purposes (Donations to politicians, political parties, political organisations);
- it is for religious purposes (activities of churches and religious institutions that promote a belief in a specific faith or are operated exclusively for the benefit of organization members).

## Sponsorship

All Sponsorships

- require a written sponsoring agreement specifying the recipient (the platform owner or its duly authorised representative), its banking details, the exact amount of the sponsoring, the event for which the funds are destined and the consideration Worldline will receive in return;
- must be justified by a legitimate and plausible business purpose;
- may only be undertaken if the sponsoring offered by Worldline is proportionate to the consideration it receives in return.

# Raising a concern

Worldline encourages any Employees and Business Partners to raise their concern freely and report any violations of this Statement.

Concerns can be raised in different ways:

- to the line manager,
- to the Compliance Function or the Chief Compliance Officer via the alerts-line [ComplianceWorldline@worldline.com](mailto:ComplianceWorldline@worldline.com) or [worldline.integrityline.org](http://worldline.integrityline.org).

Concerns will be treated and acted upon according to the Compliance Alert Policy and Process.

# Sanction

Any violations of this Statement may result in disciplinary sanctions, up to and including termination of employment in accordance with local regulation.

# Monitoring and controls

To ensure that this Statement and the Compliance Programme is being effectively implemented, controls have been set up within key functions such as Finance, Human Resources, Purchasing or Sales, among others.

When any gaps are being revealed, Worldline commits to revise and improve its Compliance Programme.



# About Worldline

About WorldlineWorldline [Euronext: WLN] is a global leader in the payments industry and the technology partner of choice for merchants, banks and acquirers. Powered by 20,000 employees in more than 50 countries, Worldline provides its clients with sustainable, trusted and innovative solutions fostering their growth. Services offered by Worldline include instore and online commercial acquiring, highly secure payment transaction processing and numerous digital services. In 2021 Worldline generated a proforma revenue close to 4 billion euros.

[worldline.com](https://worldline.com)



**For further information**  
[infoWL@worldline.com](mailto:infoWL@worldline.com)



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The quest for  
responsible forestry