



Code of Conduct for Wise Group AB (publ) and the group


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1. Background

Wise Group has the ambition of long-term value creation, for shareholders, employees, and our surroundings. We do this by thinking and acting sustainably and for equality in every situation. This means that sustainability matters impact on day-to-day work as well as on business strategic decisions. Wise Group takes in account our essential impact on sustainability and how we are impacted by sustainability, as well as related risks and opportunities. This Code of Conduct serves to realize our ambition and guide our stakeholders.

Wise Group's Code of Conduct is based on accepted sustainability principles. The foundation for the Code of Conduct is the UN Global Compact, an international initiative supported by companies around the world, that emphasizes human rights, matters related to work environment and labor law, environmental management, and anti-corruption. These areas include what is also called ESG, i.e., environment, social, and governance.

Both internally and externally, Wise Group strives for brave and humane business and working life. Sustainability matters are closely connected to our core operations and values, making these matters particularly important to us. It is our firm conviction that when people can use their power and full potential, this creates stronger meetings, relationships, and more benefits for our clients, generating a driving force that can change the world.

2. Scope

Wise Group's Code of Conduct is aimed at employees, clients, suppliers, and other stakeholders. Everyone who represents or performs assignments for Wise Group must, in all contexts, strive to realize and protect Wise Group's values as described in this Code of Conduct.

We can find the ethical starting point in ourselves. We should ask the question – is this right and reasonable? Each action and decision should be possible to report openly and should stand up to critical review from our surroundings. One way to test this is to ask oneself questions like

- Could I tell my manager, colleague, or family this?
- Would this action stand up to scrutiny from the media?

If the answer to either of these questions is ambiguous, consult with someone else, such as a colleague or manager. If there is still any hesitancy, refrain from the action or decision.



Wise Group shall comply with all applicable laws and other legal regulations, everywhere that Wise Group conducts operations. This includes regulations on the matters mentioned in this policy.

3. Business ethics

Sound professional ethics shall be the basis of our work in each respective competence area, and our assignments shall be performed at a high level as regards both business outcomes and quality.

Wise Group shall adopt the best possible attitude, such as treating others with compassion and respect. This includes respect for private life and privacy and respectful processing of personal data.

Wise Group shall comply with rules on business ethics. Wise Group strives for transparency and sound business practices. We do not allow any form of abuse of confidence or power, such as taking or receiving bribes, embezzlement, or conflicts of interest. All relationships shall be non-discriminatory and fair.

Wise Group is cautious of getting involved in political lobbying and refrains from all political financing.

Wise Group strives to avoid any negative impact on end users and consumers from services or products. Therefore, the company works to identify, prevent, and manage any such impact.

Clients shall be met with respect and understanding. Wise Group shall always try to meet a client's needs in the best possible way, within the framework laid out by the Code of Conduct and the operations.

The key words in our quality efforts are:

- long-term client relationships,
- high competence,
- open and honest communication, and
- motivated employees who collaborate in a non-prestigious manner.

Wise Group strives to supply only services/products with an appropriate and even quality. The services/products shall match the client's stated expectations, needs, contractual specifications, and relevant legislation.

Wise Group has a separate procurement policy, and all suppliers are encompassed by this Code of Conduct.



4. Human rights

Wise Group shall respect and strive to protect human rights by avoiding any negative consequences for human rights caused by our operations and dealing with any situations that may arise. We also work to strengthen human rights.

This undertaking means not discriminating any individual due to their gender, faith, age, nationality, social or ethnic background, sexuality, marital status, politics, disabilities, trade union membership, or any other reason. Wise Group works actively to promote diversity and prevent discrimination and has separate guidelines for the matters that affect our internal work.

Further, Wise Group does not use child labor and does not allow trafficking or modern-day slavery.

5. Environment and climate

Wise Group strives to decrease its negative environmental and climate impact, including in the form of emissions, pollution, and water usage. We also strive to maintain and develop protection for the environment and climate, for instance through effective resource use and usage of renewable energy sources. Wise Group strives to adapt its operations based on climate change. Wise Group has a separate environment and climate policy that describes the company's guidelines in the area in greater detail.

6. Working conditions

Wise Group promotes sound working conditions for its employees and those of its partners. Wise Group shall behave with respect and integrity in both internal and external contacts.

Wise Group shall contribute to a workplace free from discrimination, bullying, threats, and harassment, including in external contacts. We strive for ensuring that all employees have the same possibilities and promote employee development and education, regardless of gender, age, ethnicity, and faith. Wise Group also creates opportunities for disenfranchised groups.

Wise Group guarantees the possibilities of social dialogue and union-related work.

Further, Wise Group shall strive to uphold and develop protection in the internal working environment, such as protection of life and health as well as product and service safety.

Wise Group has policies that more closely describe employees' work environment and conditions, promote diversity, and counteract discrimination.

7. Information, communication, and contacts with the media

All information from Wise Group shall be correct and truthful. It shall uphold a high factual and ethical standard. Communication with the media, the public, and the capital market shall take place in accordance with Wise Group's information policy. Wise Group shall not disclose



information of a confidential nature, whether this has been provided in a written, verbal, or electronic form.

8. Intellectual property and other rights

Intellectual property and other rights, such as methods, concepts, and ideas, are an important aspect of Wise Group's conditions for success on the market. Wise Group shall protect and safeguard such values, in the interest of Wise Group. Wise Group shall also respect the intellectual property and other rights of clients, suppliers, and other stakeholders.

9. Follow-up

It is the responsibility of each respective manager to ensure compliance with the contents of the policy and that it is enforced locally. Each manager must always serve as a role model. In the case of suppliers and other stakeholders, the management team is responsible.

Wise Group has a whistleblower policy and a [whistleblower function](#), to which anyone can turn with input on compliance with this Code of Conduct.