



# Euronet<sup>®</sup>

2025 Global Policies  
& Statements

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### About the Flags

As part of the Euronet logo, the Euronet flag represents our global coverage in 200 countries and territories. In this report, we use the flag to symbolize the expansive geographic reach of our payments network.

# Euronet Standards

## Reporting Procedures

Any employee who believes he or she has experienced or witnessed any conduct that is in violation of this policy should report that concern to a supervisor, Human Resources representative, the Company's General Counsel or through the Global Ethics Hotline immediately. These are the individuals authorized by this policy to receive complaints on behalf of the Company. This policy does not require reporting harassment to any individual who is creating the harassment.

Complaints may be made orally or in writing. If a complaint is made orally, the employee may be asked for a written statement during the investigation. All complaints, to the extent possible, should include dates, times, location, details of the incident(s), names of the individuals involved and the names of witnesses to the incident(s). Any supervisor who is aware of conduct inconsistent with this policy or who receives or learns of a report of conduct inconsistent with this policy must report such conduct immediately to Human Resources.

## Responding to Complaints

All reports describing conduct that is inconsistent with this policy will be investigated promptly and thoroughly. Employees are required to cooperate in investigations. The Company is committed to maintaining confidentiality to the extent possible. The Company will take all reasonable measures to ensure that the situation is divulged only to those with a need to know.

## Corrective Action

We will not tolerate any harassment or discrimination in violation of this policy. If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, then the Company will take corrective action, including discipline, up to and including termination of employment, as is appropriate under the circumstances, regardless of the job positions of the parties involved. The Company may discipline an employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law. If the person who engaged in conduct in violation of this policy is not a Company employee, then we will take whatever corrective action is reasonable and appropriate under the circumstances.

## Retaliation Prohibited

Retaliatory treatment of any employee for reporting discrimination, harassment or other prohibited behavior or for cooperating in a harassment investigation is strictly forbidden. All employees who experience or witness any conduct they believe to be retaliatory should immediately report such conduct to a supervisor, Human Resources representative, the Company's General Counsel or through the Global Ethics Hotline.

# Anti-Bribery Policy

## Statement of Policy

Euronet Worldwide, Inc., its subsidiaries, and those affiliates over which Euronet Worldwide, Inc. has operational control (collectively, the “Company” or “EWI”) prohibit bribery of public officials and corporate representatives in the conduct of its business throughout the world. All Company employees are required to strictly comply with the United States Foreign Corrupt Practices Act (the “FCPA”), the U.K. Bribery Act and with anti-bribery laws in the countries in which they are operating (collectively “Anti-Bribery Laws”). Anti-Bribery Laws prohibit the bribery of government officials (including officials of designated public international organizations and employees of companies owned or controlled by foreign governments), compliance party candidates or officials, or political parties.

Some Anti-Bribery Laws, including the U.K. Bribery Act, prohibit the bribery of representatives of corporations and other business entities (“corporate representatives”). Bribery can take many forms, including the promise or payment of money or anything else of value (such as “in kind” items, services, lavish gifts or entertainment, or charitable donations, for example). The FCPA also requires that the Company’s books, records, and accounts be kept in reasonable detail to reflect the Company’s transactions and disposition of assets accurately and fairly.

## Bribes Prohibited

Bribes, kickbacks or otherwise giving or promising anything else of value to individual public official(s) or individual corporate representative(s) in an attempt to influence the action or inaction of those individuals for purposes of gaining an improper business advantage (or avoiding a business disadvantage), will not be tolerated and are strictly prohibited. This prohibition extends to payments to consultants, agents or any other intermediary when the employee knows or has reason to believe that some part of the payment or “fee” will be used to bribe or otherwise influence a public official or corporate representative. If any employee is confronted with a demand for a bribe from anyone,

that demand must be reported immediately to his or her supervisor and to the Company’s General Counsel or Compliance Officer.

## Administration of the Policy

The Policy will be administered by the Audit Committee of the EWI Board of Directors, the EWI General Counsel and Compliance Officer. Contact information for those individuals will be provided in the Anti-Bribery Program Compliance Manual (the “Manual”).

## Policy Manual

EWI management will prepare and maintain the Manual in order to provide specific guidance on the implementation and enforcement of this Policy. The Manual will be distributed to all employees and representatives who have control over any EWI funds or who have responsibility for recording transactions that impact EWI books and records

## Accurate Books & Records

The FCPA specifically requires that the Company’s books, records, and accounts be kept in reasonable detail to accurately and fairly reflect the Company’s transactions and asset dispositions. Therefore, the Company also prohibits:

- Subterfuge of any kind, e.g., the payment of “bonuses” or “success fees” to agents or other third parties for activities that would violate this, Policy.
- Activities intended to circumvent laws using payments to agents, consultants, or subcontractors.
- Mischaracterization or intentional vagueness in recording entries in the books and records of the Company.
- The recording of any false or artificial entries on the books and records of the Company; and
- Creation or maintenance of any assets or liabilities, which are not reflected in the books and records of the Company (so-called “hidden accounts,” “slush funds” or “hidden debts”).

# Anti-Bribery Policy

Exceptions will be made only with the prior written approval of the Company's General Counsel or Compliance Officer.

## Facilitating Payments

So-called "grease," "facilitating," or "expediting" payments, known as "Facilitating Payments," are usually modest amounts of money paid to low-ranking officials engaged in ministerial duties for routine governmental actions. These Facilitating Payments are not allowed unless the life, health or safety of an employee is threatened. If such a situation occurs, the person making the payment must contact the Company's General Counsel or Compliance Officer within 48 hours to provide all information requested. Any payment made under these circumstances must be accurately recorded in the Company's books and records.

## Legitimate Expenses and Legal Practices Outside the United States

Anti-Bribery Laws contain certain exceptions for conduct which would be illegal regarding an official of the United States but may be permitted under certain circumstances by other governments regarding their officials. For example, in the United States, you may not buy a meal for an official of the United States government, but in other countries such a practice may be lawful, normal, and customary. However, and prior to promising or making any payment or giving anything of value (whether in-kind or otherwise) to a public official or corporate representative in any country, or in the event that questions arise with regard to the proper maintenance of Company books and records, employees must seek the advice of the Company's General Counsel or Compliance Officer ahead of the event or anticipated payment and act accordingly.

Reasonable, bona fide expenditures, such as travel and lodging expenses that are associated with the promotion of a product or service or with the performance of a contract are generally an exception to Anti Bribery Laws. However, prior to promising or making any payment or giving anything of value

(whether in-kind or otherwise) to a public official or corporate representative in any country, or in the event that questions arise with regard to the propriety of the expenses, employees must seek the advice of the Company's General Counsel or Compliance Officer ahead of the event or anticipated payment and act accordingly.

You are not required to contact the Company's General Counsel or Compliance Officer in advance if you are hosting reasonable and infrequent meals or entertainment for corporate representatives. Likewise, nominal gifts to corporate representatives, which bear the Company's logo, do not require this step.

## Third Party Agents, Consultants and Representatives

Employees must obtain the prior written approval of the Company's General Counsel or Compliance Officer prior to the engagement of attorneys, (excluding Ria or epay agents that are part of their product distribution networks, whose selection in the ordinary course shall be subject to their standard compliance procedures), consultants and other representatives who are outside of the United States or represent the interests of the Company outside of the United States and who have the potential to represent the company before public officials or corporate customers. Prior to approval, all such agents and third parties must be subjected to appropriate due diligence. Any approval is contingent on:

- Positive results from due diligence.
- Having the agent or third party contractually obligated to comply with Anti-Bribery Laws; and
- Presenting documented communications in which Company employees have positively informed the agent or third party of the Company's commitment to comply with Anti-Bribery Laws.

**Donations** — It is never permissible to provide a donation to improperly influence a government official, or in exchange for any improper favor or benefit. It may, however, be permissible to make donations directly to a government agency (rather than to an individual

# Anti-Bribery Policy

government official) as part of a charitable effort. Prior approval from the Company's General Counsel is required before making such a donation.

## **Promoting, Demonstrating, or Explaining Products —**

It is never permissible to direct promotional expenses or activities to a government official to improperly influence him or her, or in exchange for any improper favor or benefit. In some cases, however, it may be appropriate to direct such expenses to a government official or entity in order to promote, demonstrate, or explain the Company's products and services. Before doing so, Company associates must seek prior approval from the Company's General Counsel.

**Hiring or Engaging Government Officials —** It is never permissible to hire or engage a government official, or his or her immediate family members, to improperly influence the official, or in exchange for any improper favor or benefit. Note that before hiring a government official (or relative thereof) Company associates must first receive legal approval from the Company's General Counsel.

**Political Contributions —** It is never permissible to provide a political contribution to improperly influence a government official, or in exchange for any improper favor or benefit. For additional information and consultation on political contributions, employees should contact the Company's General Counsel.

## **Discipline and Prosecution**

Any person found violating this Policy and its accompanying Manual may be subject to employee discipline, up to and including termination. In addition, any person who violates the FCPA, the U.K. Bribery Act or local anti-bribery laws may find themselves subject to criminal prosecution by U.S., U.K. or local authorities.

Please see [ANTI-BRIBERY PROGRAM COMPLIANCE MANUAL](#) for more information.

# Anti-Corruption Policy

Euronet is known for its honesty and conscientious behavior. It is the foundation of our business and the reason for our success. Euronet should adhere to all relevant rules and regulations when conducting business. Every relationship our business has is greatly impacted by our reputation. It affects how investors view us as an investment, how consumers view our services, and how our staff, consultants, and agents interact with one another. Every one of us must abide by the Euronet Anti-Corruption, Economic Sanctions, and Export Controls Policy while conducting business globally and with consideration for local situations.

## Enforcement

Regardless of where we work, this policy is applicable to all of us, including directors, officers, employees, consultants, and agents. It is our collective responsibility to uphold Euronet's reputation and to act morally.

All individuals connected to Euronet are required to comprehend and abide by all relevant laws and regulations in the nations where we conduct business, in addition to this policy and any other Euronet rules and guidelines.

In addition to economic sanctions on transactions with sanctioned nations and individuals, the United States and other nations in which Euronet conducts business, including the UK and member states of the European Union, maintain controls on the export, reexport, or transfer of goods, software, technology, and services (collectively, "export controls"). Serious civil and criminal fines, denial of participation in government contracts, and other administrative and civil penalties are all possible outcomes of breaking these laws. It is imperative that everyone connected to Euronet take reasonable steps to prevent potential violations when circumstances imply that a customer or a transaction might be in violation of these laws.

The Foreign Corrupt Practices Act ("FCPA") of the United States, which went into effect in 1977, prohibits offering or supplying cash or anything of value to representatives of foreign political parties or governments with the aim to win over or hold onto business. Euronet, like all of its employees, is subject to this law. Canada established the Foreign Public Corruption Act in 1999. This act prohibits offering or providing any form of favor or benefit to a foreign official for the foreign official's advantage. The UK approved the UK Bribery Act in 2011, which prohibits the bribery of public officials and significantly increased the implementation of anti-corruption laws government representatives, including both direct and indirect commercial bribery.

Please contact the General Counsel right away if you have any queries about adhering to this policy. It is our collective responsibility to uphold Euronet's reputation and to be in compliance with these laws and regulations.

# Harassment & Sexual Harassment Policy

Euronet is a harassment- and discrimination-free environment.

Euronet does not accept illegal harassment or discrimination in any form, whether verbal, physical, or visual. The HR team at Euronet is dedicated to looking into any instances of harassment or discrimination, including sexual harassment as that term is defined in this policy.

Bullying is one of the numerous forms of discrimination and harassment that can happen based on a range of qualities, in a range of settings, and towards one or more individuals. You do not have to be the target of harassment; it can also happen if you see someone else being harassed. When someone is subjected to unwelcome behavior that violates their dignity or creates an environment that is threatening, hostile, demeaning, embarrassing, or insulting to them, it is considered harassment.

Regarding race, religion, creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, military status, veteran status, or any other basis protected by federal, state, or local law, ordinance, or regulation, Euronet forbids discrimination or harassment of any employee. This anti-discrimination and harassment policy is applicable to all individuals involved in the operation of Euronet and forbids managers, supervisors, coworkers, and outside parties from engaging in unlawful discrimination or harassment against Euronet employees.

To ensure that we all follow this policy, it is crucial that you understand it. We anticipate that you will notify Euronet of any harassment or discrimination, as Euronet may be held accountable even in cases where management is unaware of the harassment or discrimination. The harasser may also be held personally accountable for any damages, as may any management representative who was aware of the harassment and approved or tolerated it.

At Euronet, sexual harassment is not condoned nor allowed. Unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or bodily acts that are sexual in nature—including sexual assault—are all considered forms of sexual harassment. This term covers a wide range of objectionable behavior, including harassment of a person of the same sex by another person on the basis of their gender. A partial list of actions that qualify as harassment is as follows:

- Unwanted sexual advances or propositions.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons, or posters.
- Verbal conduct: making or using derogatory comments, epithets, slurs, and jokes.
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes, or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.

No matter how severe the harassment is, you must report it right away to your supervisor or the HR team at Euronet if you witness harassment or experience it firsthand from a coworker, manager, or outside vendor. It is your responsibility to report someone whose actions make you feel uncomfortable or insulted, even if they are not meant for you. Please include the name(s) of any witnesses, the specifics of the incident(s), and the circumstances surrounding the harassment. Any occurrence of harassment or discrimination must be reported by all supervisors to the Ethics & Conduct team so that it can be investigated. Euronet will investigate the claims in-depth, promptly, and impartially starting right now.

## Harassment & Sexual Harassment Policy

If it is found that harassing behavior has taken place, appropriate corrective measures in line with the seriousness of the infraction shall be implemented. Any worker that Euronet finds to have engaged in harassment or discrimination will face appropriate disciplinary action, which may include termination. The investigation's findings will be shared with all parties involved by a Euronet representative. Euronet will not take any negative action against the employee who reported the harassment or discrimination for making a good faith complaint, and Euronet will not allow or condone employee retaliation. Additionally, Euronet will not accept or condone retaliation against any worker who takes part in a harassment or discrimination investigation.

It is prohibited to use this policy to file harmful or baseless complaints against managers or staff members. If a complaint is brought in bad faith, the individual making it will face disciplinary action, which may include termination.

Euronet's legal obligations to ensure resolution will apply to all complaints and processes including allegations of discrimination or harassment, and all information will be kept confidential to the greatest extent feasible. Euronet will always try to keep the identities of all parties concerned private, apart from what is required to conduct a complete investigation.

## Diversity, Equity & Inclusion Policy

Euronet is committed to advancing the diversity of our workforce across all geographies and levels of management, inclusive of ethnicity, and gender diversity.

Euronet adheres to the Equal Opportunity Employer (EOE) guidelines specifically prohibiting from considering race, ethnicity, or gender in its hiring and promotion activities. These anti-discrimination policies are also applicable to the selection of members of our Board of Directors. Additionally, our Board believes that its membership should continue to reflect a diversity of gender, ethnicity, age, sexual orientation, and gender identity.

### ADA & ADAAA

Americans with Disabilities Act (ADA) and American with Disabilities Act Amendments Act (ADAAA) are U.S. federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities and that, when needed, provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of Euronet to comply with global and national laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, our policy is not to discriminate against qualified individuals with disabilities regarding application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions, and privileges of employment.

The company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to the company.

### Genetic Nondiscrimination

The Genetic Information Nondiscrimination Act (GINA) of 2008 is designed to prohibit the use of genetic information in health insurance and employment. The company does not conduct any genetic testing on any applicant or employee under any circumstance and does not discriminate against any applicant or employee because of the individual's genetic information (including information from genetic tests, the genetic tests of family members, the manifestation of a disease or disorder in a family member, family medical history, or information about any employee's, applicants, or family member's request for or receipt of genetic services). Nor does the company request, require, purchase, or intentionally acquire any genetic information.

To the extent the company receives information about an applicant's or employee's family medical history or other genetic information inadvertently (e.g., in the administration of a leave request or accommodation request), that information will not be used except as required for any legitimate purpose (e.g., to consider an employee's leave request relating to a family member's medical condition), and will be treated and maintained as a confidential medical record and will not be disclosed except as allowed or required by applicable law.

Testing for drug or alcohol use is not considered "genetic testing," and may be required by the company in appropriate circumstances. Consistent with the general prohibition against genetic testing of any applicant or employee, any specimen(s) gathered for drug and alcohol testing will not be tested for any genetic information.

We will not retaliate against any individual because the individual honestly and in good faith makes a complaint of discrimination based on genetic information.

## Energy Transition Plan

Recently businesses were under increased pressure to be genuine, trustworthy, truthful, and transparent in the current climate. Being the one of the top providers in the world for financial, regulatory, and environmental, social, and governance ("ESG") reporting, these expectations are the core of Euronet's philosophy.

Euronet is dedicated to providing our customers with unwavering services and goods while lessening our environmental effect. We are currently assessing and striving to lower the environmental impact of our own operations and reduce our carbon footprint both locally and worldwide, in addition to supporting the ESG-focused activities of our customers.

### Prospective Remarks / Exclusions

This Environmental and Climate Change Statement contains certain statements that are covered by the safe harbor established by Sections 21E of the Securities Exchange Act of 1934, as amended, and 27A of the Securities Act of 1933. These statements are therefore considered "forward-looking statements." Words like "may," "will," "could," "would," "should," "expect," "plan," "anticipate," "believe," "target," or other words of a similar kind can occasionally be used to identify aspirational, future events or condition statements. This paper may contain forward-looking statements about our climate-related programs, aims, plans, aspirations, commitments, and strategies, among other things.

By definition, they are predicated on present plans, projections, and expectations that are rife with assumptions, risks, and uncertainties. Therefore, there are no promises or assurances that they will materialize or be carried out effectively. Euronet disclaims any intention or duty to update or alter any forward-looking statements, whether as a result of new information, future events, or otherwise. Any forward-looking statements are given only as of the date hereof, and unless otherwise required under applicable legislation.

The term "material" or "materiality" used in this Environmental and Climate Change Statement and in all other Environmental documents refers to Euronet's evaluation of ESG priorities to represent the ESG concerns that are significant to us and our stakeholders. When used in this context, these phrases should not be confused with the terms "material" and "materiality," which are defined differently by securities legislation and should not be used in relation to financial statements and reporting.

# Anti-Slavery & Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, including slavery, servitude, forced and compulsory labor, and human trafficking, all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Euronet Worldwide, Inc. takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships, as well as implementing and enforcing effective systems and controls to ensure modern slavery does not exist anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chains, in accordance with our disclosure obligations under the Modern Slavery Act. We expect the same high standards from all of our business partners; we will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labor, as well as anyone held in slavery or servitude, whether adults or children, in our contracting processes, and we expect our business partners to hold their own business partners to the same high standards.

This policy applies to all individuals who work for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy is not part of any employee's employment contract, and we reserve the right to change it at any time.

## Policy Responsibilities

This policy sets forth our legal and ethical commitments, as well as that all people under our control abide by it. Euronet Worldwide, Inc. is in charge of implementing this policy on a daily basis, monitoring its usage and effectiveness, dealing with any questions about it, and reviewing internal control systems and processes to ensure they are successful in combating modern slavery.

Management at all levels is responsible for ensuring that people reporting to them understand and comply with this policy, as well as that they get proper and ongoing training on it and the subject of modern slavery in supply chains. Feedback and suggestions for the improvement of this policy are welcomed.

Any comments, suggestions or queries are encouraged and should be addressed to HR Department.

## Policy Compliance

You must read, understand, and enforce this policy. The prevention, identification, and reporting of modern slavery in any element of our company or supply chains is the duty of everyone who works for us or is under our authority. Refrain from engaging in any action that might lead to or imply a violation of this policy.

If you have reason to believe that a conflict with this policy has occurred, is happening, or may occur in the future, please contact your line manager or a business director as soon as possible. You are urged to express concerns about any issue or suspicion of modern slavery in any aspect of our business or any business partners tier's supply chain as soon as possible.

Note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our business partners to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

# Anti-Slavery & Human Trafficking Policy

If you have any doubts about whether a specific act, the treatment of employees in general, or their working circumstances inside any tier of our supply chains represents any of the numerous types of modern slavery, please contact your line manager or a company director.

We want to promote transparency and will assist anybody who expresses serious concerns in good faith under this policy, even if those worries turn out to be incorrect. We are dedicated to ensuring that no one experiences any adverse treatment as a result of reporting in good faith their concern that modern slavery in any form is or may be occurring in any section of our own business or in any of our supplier networks.

Dismissal, disciplinary action, threats, or other unfavorable treatment as a result of voicing a concern is considered detrimental treatment. If you suspect you have been subjected to such treatment, you should immediately notify your line manager. If the problem is not resolved, and you are an employee, you should file a formal complaint.

## Communication & Awareness

Training on this policy, as well as the threat our company faces from modern slavery in its supply chains, is part of the induction process for all new employees, and updates will be offered through established channels of communication between the company and you.

Our zero-tolerance stance to modern slavery must be conveyed to all suppliers, contractors, and business partners from the beginning of our commercial engagement with them and reinforced as needed subsequently.

## Policy Breaches

Any employee who violates this policy may face disciplinary action, which might result in dismissal for misconduct. If other persons or organisations working on our behalf violate this policy, we reserve the right to terminate our relationship with them with immediate effect.

# Health & Safety Policy

It is the joint obligation of Euronet and all of its workers to create and maintain a safe work environment. Euronet makes an effort to guarantee a secure workplace and adherence to all occupational health and safety regulations that are relevant for each jurisdiction in which Euronet conducts business.

You must follow safety procedures and use caution when performing any task at work. You have an obligation to notify your manager or another management person right away if you see something unsafe. Euronet will investigate the situation and, if necessary, take appropriate action.

Euronet is dedicated to giving staff members a space where they may come forward with concerns about unsafe working circumstances of any kind.

Notify management right away if you ever come across a strange person at your workspace. When leaving personal belongings unattended, especially in or on desks overnight, proceed with caution.

Weapons are not permitted in any way on Euronet property.

## Introduction

Euronet Workplace Health and Safety Policy, hereinafter the "policy," outlines the duties and obligations of various company stakeholders regarding a safe working environment.

This Workplace Health and Safety Policy is put in place to ensure the safety of all the employees, contractors, and any authorized visitors on the company premises. The company fully accepts any rules and regulations enacted by the legislature. The company's Chief Executive will conduct an annual follow-up on the policy and report on its effectiveness.

## Obligations

The company is fully committed to ensuring a safe and healthy environment on its premises. To do so, the company will take all necessary and possible measures to remove any hazards or risks. Further, the company will ensure that all its operations are carried out safely and do not pose any danger to either the workers who are authorized visitors.

## Company Responsibilities

The company will ensure the following to provide a safe and healthy environment:

- Ensure a safe work environment by putting signs like escape routes clear at all times.
- All its equipment's are up to date.
- Provision of safety facilities for workers
- The company will provide periodic training and safety drills.
- Provide information and instruction regarding health and safety.
- Listen to employees' complaints about health and safety and co-operate with them.

## Employee Responsibilities

The employees have the following responsibilities:

- The employee, to their maximum capacity, will adhere to the safety practices.
- They will ensure reasonable care of themselves and co-workers.
- Participate in training and safety drills.
- Wear protective equipment while working.
- Report any safety issue immediately to the company.
- Read and comply with the instructions provided on the company premises.

## General

- It is everyone's responsibility to keep exits, hallways, and corridors clear at all times.
- Vehicles should be parked at the designated place and must not be parked at random places.
- Any suspected hazard or violation of safety measures must be reported immediately to the health and safety officer.

## Reference

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Anti-Bribery Program

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# Appendix A

## Anti-Bribery Program Compliance Manual

### 1. INTRODUCTION

The purpose of this Manual is to provide all employees, officers, directors and representatives of Euronet Worldwide, Inc. and its subsidiaries ("EWI" or the "Company") with the tools and resources necessary to enable, monitor and enforce the Company's full compliance with the United States Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act, and applicable anti-bribery laws in the countries in which the Company conducts business ("Anti-Bribery Laws").

### 2. CORPORATE POLICIES

#### 2.1 Anti-Bribery Policy Statement

EWI has adopted a policy on compliance with Anti-Bribery Laws (the "Policy"). The Policy, which is attached as Annex A to this Manual, applies to the Company and all employees, officers, directors and representatives of the Company.

#### 2.2 Code of Business Conduct and Ethics

The Policy and this Manual supplement the EWI Code of Business Conduct & Ethics ("Code of Conduct") adopted by the Board of Directors on September 14, 2011, as amended through the date of this Manual. All provisions of the Code of Conduct remain fully effective.

#### 2.3 Anti-Bribery Compliance Program and Manual

The Anti-Bribery Compliance Program described in this Manual ("Compliance Program") is intended to facilitate implementation of the Policy and provide detailed guidance and procedures which will allow all Company employees, officers, directors and representatives to efficiently and effectively carry out the Policy's requirements and objectives. The Manual will be periodically reviewed by the General Counsel and/or the Board and appropriate amendments will be issued as often as necessary.

### 3. ADMINISTRATION OF COMPLIANCE PROGRAM

#### 3.1 Board of Directors

The Board of Directors of EWI (the "Board") has ultimate responsibility for ensuring that the Company meets its obligations under Anti-Bribery Laws. The Board will evaluate and adopt possible amendments to the Policy and the Manual and other aspects of the Compliance Program. The Board has delegated certain responsibilities to its Audit Committee ("Audit Committee") and to certain officers of the Company as specified in the Manual and the Audit Committee Charter.

#### 3.2 Audit Committee

The Audit Committee has responsibility for:

- (a) overseeing administration of the Compliance Program;
- (b) reviewing the findings of the General Counsel and/or the Compliance Officer regarding possible violations of the Policy or the Compliance Program and reviewing the findings of internal audits regarding possible bribery; and
- (c) where the circumstances warrant, undertaking an independent investigation of possible violations of the Policy or the Compliance Program.

#### 3.3 General Counsel

The General Counsel has responsibility for:

- (a) assisting the Compliance Officer, as needed, in respect of the Policy and the Compliance Program;
- (b) advising Company personnel (as EWI's legal counsel) on any legal issues related to compliance with the Policy;
- (c) referring to Compliance Officer questions, reports and/or complaints the General Counsel receives regarding adherence to the Policy and the Compliance Program;
- (d) immediately reporting to the Compliance Officer and the Audit Committee any material violations of the Policy or the Compliance Program that appear to have occurred; and

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# Anti-Bribery Program Compliance Manual

(e) assisting the Compliance Officer in investigating possible violations of the Policy and the Compliance Program unless the Audit Committee determines that an independent investigation is warranted.

In carrying out the foregoing responsibilities, the General Counsel may utilize the assistance of qualified staff members, investigators, forensic accountants and outside legal counsel.

### 3.4 Compliance Officer

The Compliance Officer has responsibility for:

- (a) day-to-day administration of the Policy and the Compliance Program;
- (b) coordination of anti-bribery education and training programs as required by the Compliance Program;
- (c) providing any pre-approval required for payments or incurrence of expenses when such pre-approval is required under the Compliance Program;
- (d) receiving and responding to questions, reports and/or complaints regarding adherence to the Policy and the Compliance Program, after consultation with the General Counsel and/or the Audit Committee where required by this Manual or otherwise appropriate;
- (e) annual review of published international anti-bribery risk indices (such as Transparency International's CPI) and based on them, making recommendations and administering any additional compliance measures considered appropriate in high risk countries;
- (f) providing information and recommendations to the Company's internal audit department regarding auditing of Anti-Bribery Policy compliance;
- (g) administration of the hotline maintained for reporting anti-bribery violations;
- (i) immediately reporting to the General Counsel the Audit Committee any material violations of the Policy or the Compliance Program that appear to have occurred; and
- (j) reporting to the General Counsel at least annually on the status of the Company's compliance with the Policy

and the Compliance Program and any practical issues that have arisen in connection with administration of the Policy or the Compliance Program.

The Compliance Officer is authorized to communicate directly with the Audit Committee at any time.

### 3.5 Internal Auditors

The Internal Audit Department will assist with enforcement of the Policy and the Compliance Program by routinely and regularly including in the internal audit process questions and reviews designed to test and verify compliance with the Policy and the Compliance Program and by otherwise assisting the Compliance Officer with administration of the Compliance Program as required from time to time. Each Internal Auditor will immediately notify the Compliance Officer, the General Counsel or the Audit Committee, as appropriate, when any credible indication of a failure to comply with the Policy or the Compliance Program comes to his or her attention.

### 3.6 Hot Line Programs

The Company will maintain telephone and electronic mail and postal mail hotlines dedicated to direct communication with the Compliance Officer regarding compliance with the Policy and the Compliance Program. These hotlines may be the same as that maintained under the Company's Code of Conduct. All Company personnel will be made aware of the existence and availability of the hotlines. All Company personnel are encouraged to report any potential violation of the Policy or the Compliance Program via one of the hotlines. Reports may be made anonymously if so desired. The Company's Non-Retaliation Policy covers anyone submitting information about a potential violation of the Policy, the Compliance Program, laws, regulations, or the Code of Conduct. There will be no reprisal for the submission of any information or report that is submitted in good faith.

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The Compliance Officer will be appointed from time to time and identified to all personnel.

The current Compliance Program hotline is:

Telephone: + 1-972-708-5030

Email: hotline@eefit.com

Postal: Compliance Officer

Euronet Worldwide, Inc.

3500 College Boulevard

Leawood, Kansas 66211 USA

### 3.7 Management's Responsibility

A list of key managers with responsibility for the management of principal business units or functions will be maintained by the Compliance Officer, the General Counsel and/or the CFO, and such management will:

- (a) ensure that their business units or functions disclose to the Compliance Officer any business partners (including customers, suppliers and other contracting parties) in which a government has a 30% or greater shareholding or may otherwise be considered a "government enterprise" as described in Section 9.1 so that appropriate measures can be taken with respect to those partners to ensure compliance with the Policy.
- (b) ensure that any pre-approval required under Section 9.1 of this Manual is obtained prior to the incurrence of the expense, payment or gift that is subject to pre-approval.

Any violation of the Policy or this Manual by any employee may be grounds for discipline, up to and including dismissal of the employee.

## 4. EDUCATION AND TRAINING

The Compliance Officer will either conduct or arrange anti-bribery training sessions for Company personnel as frequently as he deems appropriate to ensure proper awareness of and compliance with Anti-Bribery Laws and this Manual. Completion of such training shall be required at least once every two years for key Company management and accounting personnel, as well as any other personnel identified by the Compliance Officer as having responsibilities that require particular focus on Anti-Bribery Laws. The form and scope of such training shall be determined by the Compliance Officer.

## 5. DUE DILIGENCE PROCEDURES

### 5.1 Acquisitions

Whenever the Company pursues the acquisition of any business entity, the due diligence process associated with the proposed acquisition shall include an investigation of the acquisition target's compliance with the Anti-Bribery Laws. The specific information to be obtained in connection with such investigation shall be determined by, and the results of such investigation shall be reviewed and approved by, the Compliance Officer and the General Counsel.

### 5.2 Joint Ventures

Whenever the Company enters into any joint venture outside the United States, a review shall be conducted of the prospective joint venture partner or partners in order to determine the reputation, beneficial ownership, professional capability and experience, financial standing and credibility of the prospective joint venture partner or partners and, to the extent reasonably available, the history of such prospective joint venture partner's or partners' compliance with applicable provisions of Anti-Bribery Laws. The specific information to be obtained in connection with such investigation shall be specified by, and the written results of such investigation shall be reviewed and approved by, the Compliance Officer and the General Counsel.

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### 5.3 Consultants, Agents, Sponsors and Other Representatives

Before any agreement is signed with a consultant, agent (excluding Ria or epay agents that are part of their product distribution networks, whose selection in the ordinary course shall be subject to their standard compliance procedures), sponsor or other independent third party representative in connection with any business being sought or transacted outside the United States, an investigation shall be conducted of the prospective representative in order to determine the reputation, beneficial ownership, professional capability and experience, financial standing and credibility of the prospective representative and, to the extent reasonably available, the history of such prospective representative's compliance with applicable provisions of Anti Bribery Laws. The specific information to be obtained in connection with such investigation shall be determined by, and the results of such investigation shall be reviewed and approved by, the Compliance Officer or the General Counsel. When the Compliance Officer or the General Counsel deems it appropriate or necessary, the investigation shall include a personal interview of the prospective representative by a designee of the Compliance Officer or a designee of the General Counsel.

### 5.4 Red Flags

One of the key aspects of due diligence investigations related to compliance with Anti-Bribery Laws is the identification of "red flags" which may indicate the existence of a potential bribery problem. The FCPA "red flags" identified by the U.S. Justice Department are described in Annex B hereto. Any due diligence investigations conducted by the Company will include an analysis of potential "red flag" issues.

## 6. CONTRACT PROCEDURES

### 6.1 Standard Forms and Provisions

The Legal Department has developed forms for many types of contracts and transactions. Where any such form exists, all Company personnel will use such forms unless otherwise agreed by a member of the Legal Department. As part of the Legal Department's review of contracts in accordance with the Company's Policy on Legal Review of Contracts, the Legal Department will determine whether the business relationship covered by a contract includes appropriate provisions to ensure compliance with Anti-Bribery Laws.

The Company shall attempt to include in any consultancy or agent agreement of the type referred to in Section 5.3 provisions substantially similar to those specified in Annex C in respect of the following matters:

- (a) Application of and Compliance with Anti-Bribery Laws
- (b) Restriction on Government and Political Activities
- (c) Accuracy of Documents
- (d) Cooperation with Audit Activities
- (e) Remedies for Default
- (f) Payment Mechanisms

In addition, all contracts which provide for the disbursement of funds by the Company to another contract party for business development services related to business transactions outside the United States shall be in writing and shall require the other party to submit a written invoice. Contracts requiring the disbursement of funds by the Company for such services shall also require that funds shall be transferred only to a bank account owned by the designated recipient and that such account shall be located in the jurisdiction where the relevant business services are to be performed unless the General Counsel determines that payment in another jurisdiction does not violate local law and that a valid business reason for payment in another jurisdiction exists.

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### 6.2 Approval Requirements

In addition to any other approvals required by other Company policies, any contract to which the second or third paragraphs of Section 6.1 above applies shall require the specific approval of the General Counsel or the Compliance Officer.

## 7. THIRD PARTY ISSUES

Anti-Bribery Laws prohibit corrupt payments through intermediaries. Persons and entities covered by Anti-Bribery Laws are liable for indirect payments or promises prohibited by Anti Bribery Laws if such payments or promises are made through a consultant, agent, sponsor, job, venture partner or other third party with the knowledge that the ultimate beneficiary is a prohibited recipient. Knowledge includes conscious disregard and deliberate ignorance of facts which indicate a high probability that the relevant payment will occur.

If any Company personnel knows or reasonably believes that a payment or promise of payment prohibited by Anti-Bribery Laws has been, is being or may be made by a joint venture partner, representative or other third party intermediary for or on the Company's behalf or for the benefit of the Company, the relevant individual shall immediately advise the Compliance Officer or the General Counsel and shall use all reasonable efforts to prevent the payment or promise of payment from occurring.

## 8. AUDITING

### 8.1 Regular Auditing

Testing and analysis of Company transactions for possible violation of Anti-Bribery Laws, the Policy or the Compliance Program shall be a regular part of the Company's routine audit process and all Company personnel shall cooperate fully with the Company's audit staff in that regard.

### 8.2 Anti-Bribery Spot Auditing

The Director of Internal Audit and the Compliance Officer shall select at least two Company operating locations outside the United States each year for a special audit of their disbursement and anti-bribery compliance practices. The Audit Department shall maintain a list of procedures that will be applied in such special audits.

### 8.3 Anti-Bribery Audit Reporting to Audit Committee

The results of all anti-bribery auditing activities shall be communicated to the Audit Committee promptly after completion of the relevant audit.

## 9. ACCOUNTING ISSUES

### 9.1 Certain Expenses Subject to Pre-Approval

The following payments or expenses shall not be made or incurred without the specific preapproval of the Chief Financial Officer, the Compliance Officer, the General Counsel or any other officer designated by one of them:

- (a) Any payment to any government official or any employee of a government enterprise or a commercial enterprise;
- (b) The incurrence of any expense (especially for travel or entertainment) on behalf of a government official or an employee of any government enterprise;
- (c) Except as provided in the next sentence, the incurrence of any expense (especially for travel or entertainment) on behalf of an employee of a commercial enterprise. Customary travel and entertainment expenses incurred for the purpose of promoting Euronet's products or services, administering contracts or other proper business purposes that are reasonable in amount shall not be subject to pre-approval.
- (d) Any gift to any government official or any employee of a government or commercial enterprise with a value exceeding \$100 or any lesser amount established in a local Euronet Gift Policy.

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For purposes of the Policy and this Manual, a “government enterprise” means an enterprise in which a government owns 30% or more of the voting capital or which might otherwise be considered to be controlled by a government, for example, though the power to appoint directors to the governing board of that enterprise. In the event there is any doubt concerning whether an entity is a “government enterprise,” you should consult the Compliance Officer or the General Counsel before making any payment or gift or incurring any expense.

### 9.2 Materiality Issues

The books and record keeping provisions of the FCPA require that books, records and accounts, including documentation of expenses, are made and kept in reasonable detail and that they accurately and fairly reflect the transactions and disposition of assets of the Company. This standard requires a level of detail and degree of assurance that would satisfy prudent officials in the conduct of their own affairs. That standard is generally thought to be more exacting than the materiality standard which typically applies in accounting and disclosure to investors. Accordingly, even relatively small payments or gifts may have to be accurately recorded in order to satisfy the books and records requirements of the FCPA and other Anti-Bribery Laws.

### 9.3 Reporting

Any perceived failure of the Company's books and records to meet the requirements of applicable Anti-Bribery Laws must be reported to the Compliance Officer, who shall consult with the Chief Financial Officer, the General Counsel, the Company's internal and external auditors and/or the Audit Committee in order to determine whether a possible violation exists and, if so, the appropriate actions required.

### RED FLAGS

1. The contracting party has a history of improper payment practices.
2. The transaction or the contracting party is in a country where there is widespread corruption.
3. The transaction or the contracting party is in a country that has a history of bribes and kickbacks.
4. The transaction or the contracting party is involved in or with an industry that has a history of violations of Anti-Bribery Laws.
5. The contracting party refuses to agree in writing to comply with applicable Anti-Bribery Laws.
6. The contracting party has a family or business relationship with a government official.
7. The contracting party has a poor business reputation.
8. The contracting party insists that its identity remain confidential or refuses to divulge the identity of its owners.
9. A government customer recommends or insists on use of a particular intermediary or consultant.
10. The contracting party does not have offices or a staff.
11. The contracting party does not have significant experience.
12. The contracting party insists on unusual or suspicious contracting procedures.
13. The fee or commission to be paid to the contracting party is unusually high, stated in round amounts, single one-time payments.
14. The payment mechanism to be utilized is secretive or unusual.
15. The contracting party submits inflated or inaccurate invoices.
16. The contracting party requests cash or bearer instrument payments.

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17. The contracting party requests payment in a jurisdiction outside its home country that has no relationship to the transaction, or the entities involved in the transaction.
18. The contracting party asks that a new customer be granted an excessive credit line.
19. The contracting party requests unusual bonus or special payments.
20. The contracting party requests an unusual advance payment.

### STANDARD CLAUSES FOR AGENT AGREEMENTS

(a) **Agent** warrants and represents to the Company that neither **Agent** nor any of its officers, directors, employees, agents or other representatives has or will make any payments of money, or anything of value, nor will such be offered, promised or paid, directly or indirectly, to any foreign officials, political parties, party officials, candidates for public or political party office or representatives of business organizations, to influence the acts of such officials, political parties, party officials, candidates or representatives in their official or representative capacity, to induce them to do any of the following on behalf of the Company:

- (i) use their influence with a government to obtain or retain business or gain an improper advantage in connection with any business activities of the Company; or
- (ii) improperly perform a function that is public in nature or connected with a business and results in an improper advantage for the Company.

(b) If **Agent** breaches any of the covenants set forth in clause (a), above,

- (i) this Agreement shall become void;
- (ii) the Company shall have a right of action against **Agent** for the amount of any monetary payment or thing of value made or given by **Agent** in breach of any of such covenants;

(iii) all obligations by the Company to pay any Fee or other compensation to **Agent** shall cease immediately;

(iv) **Agent** agrees to indemnify Company for all liability, costs and fees (including but not limited to attorneys' fees and costs of any investigation) arising from **Agent's** breach of the covenants set forth in clause (a), above, and (iv) the Company may at its sole discretion, rescind this Agreement and **Agent** shall immediately return to the Company any Fee paid to **Agent** arising from any transaction in violation of clause (a) above.

(c) Further, **Agent** agrees to the following:

(i) **Agent** will fully cooperate in any investigation regarding alleged violations of the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act or any applicable anti-bribery or anti-corruption law in connection with performance of this Agreement;

(ii) **Agent** will not employ any subcontractors, sub-agents or consultants in performance of this Agreement without the express, advance written approval of the Company;

(iii) Company may audit all of the **Agent's** books and records of all transactions related to the **Agent's** performance under this Agreement;

(iv) **Agent** acknowledges that the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act apply to this Agreement and all actions taken in performance of this Agreement;

(v) If deemed appropriate by the Company,

(A) **Agent** agrees to have all of its senior level management take the Anti Bribery training provided by the Company;

(B) **Agent** will sign an annual certification stated that the **Agent** has not engaged in any actions on behalf of the Company that has violated the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act or any applicable anti-bribery or anticorruption law; and

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(vi) **Agent** has disclosed to Company in writing the names of all persons and entities who have a beneficial ownership in the **Agent**. **Agent** will immediately notify Company in writing in the event any change in the **Agent's** beneficial ownership occurs or is expected to occur. Company will have thirty days from receiving written notice in which to conduct its own due diligence on the new beneficial owner and determine whether it will continue to do business with **Agent**.

(vii) Neither **Agent** nor any beneficial owner, nor any person or entity acting on **Agent's** behalf is or will become a government entity, government official, a political party, a political candidate or a public international organization without first obtaining the express, written approval of the Company.

(d) In the event that **Agent** fails to perform or breaches any of its agreements in clause (c) or Company does not accept a new beneficial owner as discussed in clause (c)(vii), the Company may, at its sole discretion, rescind this Agreement and **Agent** will pay Company any prepaid fees for products or services that were undelivered at the time of the rescission.



Leawood, Kansas, USA  
euronetworldwide.com

### About Euronet

A global leader in payments processing and cross-border transactions, Euronet moves money in all the ways consumers and businesses depend upon. This includes money transfers, credit/debit processing, ATMs, point-of-sale services, branded payments, currency exchange and more. With products and services in approximately 200 countries and territories provided through its own brand and branded business segments, Euronet and its financial technologies and networks make participation in the global economy easier, faster and more secure for everyone.