

COMMITMENT TO INTEGRITY

Guideline for Business Partners of SONET, společnost s.r.o.

Introduction

As a service provider for leading banking and financial institutions in Card acquiring area SONET commits to conduct its global business in compliance with all applicable laws and regulations, act upon the highest ethical standards and treat others with respect and integrity, according to the principles laid down in this Commitment to Integrity (hereinafter referred also to as “**Guideline**”).

Integrity, honesty, fair dealing and credibility is highly valued in SONET because it is the right thing to do and because our reputation is one of our most important assets.

We must bear in mind that in business, as well as in other areas of our lives, ethical behaviour does not just happen. It needs to be built and continuously maintained throughout the organization. At SONET, acting with integrity is a priority and is applied throughout our company. Maintaining the highest standards of integrity involves meeting our commitments to all our constituents – business partners, end customers, employees, shareholders - and to ourselves.

This Guideline will be provided to all our Business Partners, and we reserve our right to select our Business Partners according to their adherence to Corporate Social Responsibility (**CSR**) attitude and the principles set out in this document.

The rules set out in this document must be followed by all individuals or legal entities acting as SONET’s suppliers, subcontractors, customers, consultants or partners whatsoever (“**Business Partners**”).

Any Business Partner will be provided with this Guideline.

Content of the Commitment to Integrity

Our Business Partners through their cooperation with us become an integral part of a complex ecosystem “behind the payment card” and therefore this Guideline comprises the requirements for responsible business operations with which our Business Partners must comply to support our global CSR attitude and to build our successful long-term relationship.

This Guideline explains what SONET expects from you as our Business Partner with regards to business ethics, human rights, business practices, employee relations, health and safety and other topics related to sustainable and responsible business practices and on the other hand what you as our Business Partner can expect from SONET. It refers to international standards and defines specific SONET’s requirements. This Guideline may be supplemented from time-to-time by other documents containing additional requirements.

We would like to point out that the principles set out in this Guideline are in addition to and not intended to contravene any laws or regulations that Business Partners should comply with. If the law provides for a more stringent rule than this Guideline or, conversely, if this Guideline is more stringent in its regulation than the statutory provisions, the Business Partner must always comply with the more stringent rule.

All actions of SONET staff members are based upon our fundamental values expressed in this Guideline. We live these values in our day-to-day dealings with each other as well as in cooperating with our Business Partners. We expect them to accept these with regard to their employees as well as to third parties as their own values – only then can we ensure sustainability. Therefore, this Guideline is a crucial requirement for ensuring the continuity of the relationship between SONET and its Business Partners.

Business Partners hereby acknowledge that:

- They have read and understood the terms and conditions as provided in this Guideline and comply with them.
- They adhere and commit themselves to the utmost respect of the principles set forth in this Guideline, and that their non-compliance can be a breach of their contractual obligations, which depending on its severity, can lead to the termination of the contract.
- They will treat their employees in accordance with the rules set out in this Guideline and will inform all their own direct partners and will encourage them to follow these principles or at least equivalent ones. Thus, they will ensure that their own partners and subcontractors comply with the same requirements or at least equivalent ones.
- They understand that SONET may require each of its Business Partners to provide evidence of compliance with its obligations under this Guideline in the form of an evaluation report (extra-financial evaluation) prepared by an independent third party.

Human Rights

SONET's Business Partners must support and respect the protection of Human Rights and take appropriate measures to ensure they are not committing or participating (directly or indirectly) in Human Rights abuses and/or degrading practices within its organization such as moral and sexual harassment, threat, corporal punishment, or other practices that are not in line with Human or Fundamental Rights.

Each Business Partner must comply with the principles of the UN Universal Declaration of Human Rights dated 10th December 1948 and with the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (18th June 1998 as revised on 15th June 2010).

Fair Labour

SONET expects its Business Partners will treat their employees and all persons acting on their behalf with the highest ethical standards. Business Partners must adhere to international and national conventions and laws

dealing with Fundamental Rights, including, but not limited to, non-discrimination, freedom of association, the right to collective bargaining, protection of children and mothers and the right to form works' councils. Furthermore, SONET's Business Partners are not allowed to use or threaten to use corporal punishment or other forms of abuse.

If required by local law, all employees of SONET's Business Partners must have an employment contract. Business Partners' working hours shall comply with national laws and local industry standards, and wages and other benefits provided by a Business Partner must be fair and at least equal to the minimum relevant legal and industry standards.

- **Child labour**

All SONET's Business Partners must not use or support the use of child labour. Child labour is any work that is done by a person under the age of 15 unless local law provides for a higher minimum age for workers or a longer duration of compulsory education, in which case the higher age shall prevail. If, however there are laid down exceptions for developing countries in the ILO Convention and the legal age is lower than the lower age will prevail. Business Partners must comply with the minimum age defined in the legislation of each country.

- **Forced Labour**

Forced labour is any work or service which is exacted from other persons under the menace of a penalty for which those persons do not make themselves available voluntarily.

SONET's Business Partners shall take measures to ensure they do not engage in or support the use of forced, bonded or compulsory labour. This also includes all forms of human trafficking and working against one's own will or choice. All the above prohibited forms of labour have in common the deprivation of individuals' liberty in order to exploit them for personal or commercial gain.

Employees must have the right and the ability to leave employment when they choose. No employee shall be required to lodge deposits or identity papers when commencing employment, unless strictly and mandatorily required by local law. If a Business Partner uses a staffing recruiter or agency, in no event shall workers be charged fees or expenses related to their recruitment.

SONET's Business Partners shall act ethically and with integrity in all their business dealings and relationship and to implement and enforce effective controls to ensure the above-described forms of prohibited labour are not practiced in their businesses and supply chains.

- **Harassment and discrimination**

SONET expect its Business Partners to be aware of their responsibility towards their staff, their customers and business partners as well as towards society and its underlying principles. Thus, we expect our Business Partners to observe the personal dignity of every individual and to adopt and enforce policies which effectively prohibit harassment or discrimination of any type, especially on the grounds of gender, marital or parental status, ethnic

or national origin, sexual orientation, religious belief, political affiliation, age, disability, or membership in a trade union or employee organization. This is also because SONET commits to ensuring collective fairness, equality of treatment between genders and balanced access to managerial positions.

- **Working hours and remuneration**

SONET's Business Partners must comply with all applicable labour laws and regulations dealing with remuneration of the employees and permitted working hours including work brakes.

Employees must not be required to work more than the legally permitted maximum number of hours a week, except in extraordinary business circumstances that must be clearly defined and communicated, and with the consent of the employee.

SONET's Business Partners must provide fair remuneration and guarantee the applicable statutory national minimum wage.

- **Occupational health and safety**

SONET's Business Partners must take the necessary steps to ensure a safe and healthy working environment for all their employees. SONET's Business Partners must strive to implement appropriate management systems to meet the local legal requirements.

Business Integrity

SONET's Business Partners are expected to always conduct their business in a professional manner and in accordance with standards set forth in all applicable international and national laws and regulations. At minimum, SONET's Business Partners and all persons acting on their behalf must act with integrity, honesty and fairness in all aspects of their business.

- **Anti-Corruption and bribery**

SONET's Business Partners and all persons acting on their behalf shall comply with all applicable anti-corruption laws. Bribery and any other form of corrupt business practice are strictly prohibited. The direct or indirect offer, granting or acceptance of illegitimate benefits to generate, maintain or accelerate business is unacceptable. Business Partners must ensure that no such benefits are exchanged in the course of their and their sub-contractors' businesses. Business Partners shall conduct appropriate risk-based due diligence prior to engaging any sub-contractors to ensure that such third parties comply with all applicable laws.

- **Confidentiality**

Even prior to completing a confidentiality agreement, SONET treats data and information from its Business Partners as confidential under applicable laws and complying with legal or regulatory disclosure obligations. In return, SONET expects the same level of care from its Business Partners. In particular, the respective applicable

legal and internal regulations for the protection of personal data and for data and information security must be observed already in the pre-contractual phase.

SONET's Business Partners are expected to bear in mind that protection of any information, commercial data, asset, hardware, software, and any kind of intellectual property rights belonging to SONET is of essence. Therefore, each Business Partner shall ensure that, in any case, it will provide the adequate level of protection of any information, commercial data, asset, hardware, software, and any kind of intellectual property rights belonging to SONET. In this regard each Business Partner must implement appropriate measures against the violation of the SONET's intellectual property rights or the theft of any information, commercial data, asset or hardware provided to the Business Partner by SONET.

- **Conflicts of interest**

SONET's Business Partners are expected to make decisions with respect to mutual business activities based on objective criteria.

Conflicts of interest arise when Business Partners, Business Partners' employees (or their relatives) can potentially benefit (materially or immaterially) personally from their role in the Business Partners' relationship with SONET. Business Partners must inform SONET about conflicts of interest as soon as they become aware of it. Business Partners shall also inform SONET if any SONET's employee has an interest in the Business Partner's business which might cause a conflict of interest.

In general, situations that may appear as an actual or potential conflict of interest are to be avoided from the beginning inclusive preventing the occurrence of such risk.

- **Data protection**

SONET's Business Partners shall comply with all applicable data protection laws in collecting, processing, storing or otherwise handling personal data of any individuals, including, without limitation, their own employees and employees of their customers, suppliers and business partners.

Business Partners are expected to inform SONET if they have any doubts or questions about the way to treat SONET related personal data and must always act in compliance with SONET's instructions.

- **Prohibited countries of origin**

SONET's Business Partners must not use minerals (including but not limited to tantalum, tin, gold, and tungsten) from conflict regions (e.g. Democratic Republic of Congo, Rwanda, Tanzania, Uganda, Zambia). Business Partners must take all appropriate steps to determine if their products contain minerals from conflict regions, and if so, develop due diligence processes to ensure that all products are responsibly manufactured.

- **Respect for the environment**

SONET believes that environmental responsibility and implementation of an appropriate environmental policy represents our contribution to the society. Taking into consideration the environmental impact on its business activities, we ensure that our operations are environmentally friendly by implementing appropriate technologies and actively promoting recycling, low energy consumption, and minimum environmental impact.

In return, SONET expects the same from its Business Partners. At all times, SONET's Business Partners are expected to act in an environmentally responsible manner, and to respect applicable legislation. SONET requires its Business Partners to make continuous improvements in environmental protection and to minimize the environmental impact of and pollution generated by their activities.

- **Fair competition**

SONET's Business Partners and all persons acting on their behalf shall comply with national and international antitrust and competition laws. They shall not enter directly or indirectly into any illegal agreements with their competitors nor exchange sensitive information, e.g. regarding markets, customers, strategies, prices and the like. SONET's Business Partners and all persons acting on their behalf shall participate in public tenders and private sector bidding procedures by strictly following the applicable laws and regulations.

- **Prohibited Export Countries**

SONET's Business Partners should always comply with all applicable sanction programs and export control laws and regulations. Therefore, Business Partners must agree to inform SONET about any product, software or service's classification number.

- **Respectful behaviour**

SONET encourages Business Partners to be a positive influence within and act with respect for the communities in which they operate.

SONET's Business Partners do their best efforts to act appropriately towards clients. Business Partners shall not disrespect SONET or other clients. SONET's Business Partners further notice and agree that SONET does not tolerate disparaging or unprofessional usage of social and/or digital media and that they must also refrain themselves from making malicious, obscene, discriminatory or derogatory statements (whether orally, in writing or in whatsoever other means) on its employees or on SONET's partners/clients and their employees.