



# Raisin Group Code of Conduct

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# Letter from the Managing Directors

Dear Raisineers,

Raisin's vision is simple: **savings and investments without barriers**. We aim to remove barriers for savings and investment products for our active users, while providing simple access to funding for our Deposit-taking Banks.

To fulfil this vision, our mission is **to make money perform better**. We strive to make the financial system better. We are transforming savings into a marketplace product, efficiently connecting active users with banks. Our marketplaces eliminate complexity in the industry and streamline the allocation of deposits across banks, while providing active users with a large variety of the best savings and investment products on the market. We also provide the infrastructure for innovative business models in financial services. For our platform partners, we combine state-of-the-art technology with extensive banking experience.

Raisin's purpose is, therefore, **to create financial peace of mind** to our active users, by allowing them to increase their wealth and save for retirement with our safe and secure platform; and to banks, by taking care of their value chain to source deposits, providing them access to different markets and being a reliable source of funding. Furthermore, together with our clients, we continuously improve and expand our products and services to enable strong and sustainable growth. All entities in Raisin Group share this vision together with individual goals based on our respective business models.



As a way to achieve that, Raisin has designed this Code of Conduct to define our behaviour standards that every Raisineer is expected to adhere to. Being a company with offices around Europe and the US, with Raisineers with different origins and backgrounds, it is not easy to have one Code to cover all possible specific situations but rather a set of rules and principles leading towards certain important areas. This Code aims to set the mindset of all Raisineers to use their better judgement in thriving as a business while handling an increasingly complex regulatory environment. Seeking advice and knowing how to escalate promptly and accordingly is also part of that goal.

We use this Code to welcome new people to our team, to design our products and to achieve our

mission – reinforcing the message that Raisin always strives to **do the right thing**. It is designed to establish an ethical perspective in our daily tasks, that includes following applicable regulations and internal policies and procedures while acting with integrity.

We are building an agile organization that entrusts all Raisineers with responsibilities and offers them a variety of growth opportunities. Our corporate culture is based on trust, integrity and feedback. Together, we strive for sustainable growth, resilience and diversity. We want to celebrate an open and diverse company where people feel free to express their opinions and to speak up. By doing so, we are creating a culture of ethical behaviour, and acting accordingly is key to Raisin success.

# 1. Introduction and Principles

## 1.1 Introduction, Purpose and Scope

Raisin is an open banking services provider in the savings and investments space within Europe and the USA, interacting with banks and financial services providers to help them source stable and secure deposit funding and also enable them to offer third-party products to their active users.

Raisin's image and reputation, as a company that operates in an ethically and legally appropriate manner, is inseparable from the conduct of each of us as we perform our work, everyday. We, the Raisineers (see explanation below), are expected to respect laws and regulations, avoid conflicts of interest, protect the Company's assets, and show consideration and appreciation for the local customs, traditions and social norms of the various countries and cultures in which Raisin conducts business.

As a Group, we see it as our responsibility to make a clear commitment to democracy, tolerance and equal opportunities across all borders. We fully support the protection of internationally proclaimed human rights and reaffirm our support for the fight against forced labour and child labour (including modern slavery and human trafficking). We act in accordance with our sustainability strategy by taking the economic, social and ecological impacts of our actions into account in our decisions. In doing so, we are guided by the [principles of the UN Global Compact](#).

In fulfilling our responsibilities within Raisin, we do not take ethical shortcuts. Improper conduct will never be in Raisin's interest. The success of our business depends on the trust of our active users, service partners, shareholders and investors, and our Raisineers. With this Code of Conduct (here referred also as the "Code" or "CoC"), we are creating the basis for maintaining and further expanding this trust. As Raisineers, we observe our Code of Conduct and never accept that others violate it.

### 1.1.1 Purpose

Our Code of Conduct contains a number of important guidelines of behaviour and is intended to guide all of us in our daily business but also in our strategic planning and our decision-making processes. The goal of the Code of Conduct is to be brought to life by applying it in our everyday operations, business or situations. Where appropriate, our Code of Conduct will be modified by local laws and standards. Furthermore, this Code is not intended to be a static instrument. It will be continuously developed and adapted to the ever-changing legal and economic environments that affect the ways that we conduct our business at Raisin.

The principles contained in here ensure a high level of integrity and professionalism in all our actions. The Code is the standard that all Raisineers, the Management Board and the Supervisory Board must follow. It is intended to create an open, predictable environment in which all Raisineers not only refrain from legally prohibited or dubious actions, but are also made aware

of ethically and morally questionable transactions and business practices.

### 1.1.2 Scope

This Code of Conduct applies to all locations of Raisin, including Raisin SE, Raisin Bank AG, Raisin Solutions LLC (Raisin US), Raisin Platforms Limited (Raisin UK) and any other subsidiaries, branches, representative offices and legal entities that together are part of the Group (together referred to as "Raisin" or "Company"), unless explicitly stated otherwise. It applies to all roles and seniority levels of Raisineers, which comprises all persons on a permanent, temporary or fixed term contract of employment basis (altogether referred to as "Raisineers"). The Code of Conduct also addresses all persons (such as consultants/vendors/contractors, freelancers, or ambassadors) that perform services and tasks for Raisin (altogether referred to as "Service Providers") to inform them about how Raisin conducts their business and what values and standards we adhere to.

## 1.2 Principles

### 1.2.1 Raisin Principles

We want to create a working environment in which we promote a culture of performance, constant development and innovation, reward openness and integrity, and focus on goal-oriented and responsible action. To achieve this, we are guided by the following principles, which act as the framework on which our Code of Conduct is built, and are applicable to all Raisineers:



#### Step up, challenge and commit

We respectfully challenge decisions, asking for and giving constructive feedback. Once a decision is determined, we commit to it.



#### Act entrepreneurially and manage risks

We all shape the growth and development of Raisin. We focus on simplicity and seize opportunities for growth and innovation. We operate responsibly, manage risks actively and use resources in a sustainable manner.



#### Assume responsibility for results

We focus on achieving our objectives and seeing things through to completion. We take pride in the ownership for our work and reliably deliver results according to set targets.



#### Inspire and be inspired

A positive attitude, team spirit, and integrity are at the core of every interaction. We believe in the power of diversity and aspire for the inclusion of all. We embrace challenges and actively participate in development opportunities to improve our own skills as well as those of our colleagues.



#### Focus on our active users

We create value for our active users. Earning and keeping their trust is key to our success.

## 1.2.2 Leadership Principles

Our leadership principles guide the actions of our managers when dealing with our Raisineers.



### Be a role model

We are role models for the Raisin principles and are known for our integrity. We ask for feedback and appreciate it as input for self-development.



### Lead with clarity and purpose

We prioritize our work within the context of Raisin's vision and strategy and reliably deliver strong results with our teams. We involve our teams in decision making and delegate ownership. We continuously measure the outcomes of the team without micro-managing.



### Build and develop a great team

We strategically organize our team and make tough decisions. We highlight growth opportunities and ensure development through coaching, mentoring, and training. We challenge our teams and help them achieve their full potential.



### Be fair and inclusive

We seek out and respect diverse perspectives, ensure equitable practices and the inclusion of everyone. We lead with empathy and hold ourselves accountable for creating a culture where every individual can thrive.

## 2. Assume responsibility for results

### 2.1 Observance of Laws, Company Policies and Social Norms

Raisin is, and will increasingly be, represented in various product markets and regions around the world and therefore operates in a variety of jurisdictions and will be subject to the laws and regulations of different legal systems.

Being a good corporate citizen means that we Raisineers comply with all applicable laws, rules and regulations in the communities in which we operate, while also respecting local traditions and other social norms. In short, it means to behave lawfully, honestly and ethically. Our reputation is largely determined by the conduct and actions of each individual, regardless of their position within Raisin. Therefore, any kind of inappropriate behavior and violation of these principles can have serious consequences for our active users and colleagues, damage Raisin's reputation and lead to other negative consequences. Our shared purpose, values and guiding principles help us all to decide what behaviour is most appropriate in a given situation. In doing so, we demonstrate personal integrity and a high sense of responsibility.

To clarify and uphold Raisin's commitment to compliance with laws and social norms, a suite of company policies has been developed to set out and articulate our internal rules, values and principles. These include (but are not limited to) this Code of Conduct as well as policies

and trainings in a variety of areas such as Data Protection, Information Security, Compliance, Communications, Travel & Expenses, Conflicts of Interest, Anti-Bribery and Anti-Corruption, Anti-Money Laundering, Anti-Financial Crime and Combating Terrorist Financing, Environmental, Social and Governance, Diversity, Equity and Inclusion, and Whistleblowing.

We make all of these policies and training freely available for all Raisineers to read and review in a variety of formats and all Raisineers acknowledge that we should familiarise ourselves with the values we are expected to uphold, as outlined in these policies. These policies protect ourselves, our partners and investors, our active users and the culture we seek to uphold as a business, based on fairness and trust. It is for this reason that it is clear that deliberate breaches of these policies could lead to disciplinary action as governed by local employment laws.

#### 2.1.1 Reporting Violations, Enforcement and Sanctions

The provisions of this Code of Conduct represent the fundamental components of Raisin's corporate culture. We, the Raisineers, acknowledge that Raisineers who violate any laws, regardless of whether they are subject matters of our Code of Conduct, other Group policies or a Company policy that applies to us, may be disciplined up to and including termination of employment. Raisin's supervisors may also be disciplined for failing to detect a violation in their area if, in the reasonable

judgement of the employing Raisin Group entity, the failure resulted from inadequate supervision of Raisineers.

Violations of the law, the Raisin Code of Conduct or other policies of Raisin Group entities can be raised with relevant supervisor(s), the legal department (via [legal@raisin.com](mailto:legal@raisin.com) or [legal@raisin.bank](mailto:legal@raisin.bank) as appropriate), a Whistleblowing report, or, where applicable, via the relevant workers council. Any reports must be in line with the law. Anyone who consciously makes false statements regarding another person is acting contrary to this Code and may additionally be committing a criminal offence.

#### 2.1.2 Advice and Reprisals

Raisin strives to provide its Raisineers with the information and training needed to assist them in avoiding situations that might violate the law, our Code of Conduct or other Company policies. However, in case of doubt, Raisineers may obtain advice from their line managers or legal department.

Raisin will not discharge, demote, suspend, threaten, harass, or in any other manner, discriminate against a Raisineer who reports a violation in good faith. Raisin will also not tolerate any attempts whatsoever to prevent Raisineers from reporting such matters.

### 2.2 Anti-Financial Crime Measures

Maintaining the highest standards with regard to the prevention of money-laundering, fraud,

the financing of terrorism and compliance with international sanctions is a key factor of success for the products and services provided by Raisin. In addition, our Raisin entities are subject to strict statutory and contractual anti-money-laundering obligations either directly (as a regulated entity) or indirectly (as a provider of services to regulated entities). Entities in the Raisin Group have therefore developed detailed anti-money-laundering concepts that must be complied with by all relevant Raisineers of those entities. More broadly, the Group maintains an Anti-Money Laundering Concept which must be adhered to by all in the Group.

In addition, we acknowledge that no Raisineer shall, either alone or in concert with others, perform any activities that contravene domestic or foreign regulations governing money laundering, or linked to prohibited activities such as tax avoidance, fraud or the financing of terrorism.

In the event of doubts as to the propriety of transactions that involve the transfer of cash or other payment methods, we will consult the relevant legal department at an early stage. Raisin has processes to prevent any acts that could endanger the integrity of the market, its assets or its active users and business partners.

When performing transactions, we Raisineers pay close attention to avoid the financing of terrorism and make all reasonable efforts to ensure we do not under any circumstances violate financial sanctions or embargoes. In the event of any suspicion or lack of understanding



on the part of the Raisineer, we will seek help from the legal or compliance departments of the relevant Raisin entity. In the context of international activities Raisin is conscious of the applicable sanctions regimes. These may include international sanctions when engaging with entities from other jurisdictions (international sanctions compliance).

Annual refresher training is provided to all Raisineers on these and other critical topics and it is an expectation that all Raisineers (if not on long-term leave) complete this training.

### 3. Act entrepreneurially and manage risks

#### 3.1 Market and Competitive Behaviour

We are unconditionally committed to the principles of fair competition and comply with the antitrust and fair competition laws of the countries in which Raisin conducts business.

As accurate legal assessment depends on the complexities of the laws concerned and the individual circumstances of each situation, the legal department should be consulted whenever doubt arises. Nevertheless, there are forms of conduct that typically constitute a violation of competition laws and which we Raisineers will neither engage in nor tolerate:

##### 3.1.1 Relationships and Interactions with Competitors

Formal agreements with competitors and coordinated behaviour aimed at or causing a restraint or limitation on competition are forbidden. These include agreements to fix or set prices, quotations, terms and conditions of sale, production or sales quotas, and also the apportionment or allocation of active users, territories, markets or product portfolios. Coordinated behaviour arising from, for example, informal talks or non-binding agreements aimed at or giving rise to such a restraint on competition are also forbidden.

We apply strict controls in order to ensure that we do not pass on or receive any information that would allow conclusions to be drawn about the current or future market behaviour of the competitors. The relevant legal department within the Raisin Group should always be consulted prior to engaging in a joint activity that involves communications with competitors. Current or future information regarding price, margins, costs, market share, internal proprietary practices, sales terms and specific active user or vendor information should not be obtained from or exchanged with a competitor.

##### 3.1.2 Trade and Professional Association Meetings

While attendance at and participation in such meetings, on behalf of Raisin, may be important to further corporate objectives, it is also recognized that attendance at such meetings can present a potential antitrust/fair competition risk. We Raisineers shall only attend meetings from legitimate trade and professional associations that include meeting minutes being taken and made available to ensure a record is kept. Any benchmarking or comparative information supplied must be in full compliance with applicable laws and regulations. When in doubt, the relevant legal department must be consulted.

#### 3.2 Avoidance of Contractual Risk

We take our responsibility to contractual partners seriously. To avoid misunderstandings and unintended consequences, all Raisineers

who bear responsibility for the conclusion of agreements and contracts shall, prior to such conclusion, perform a careful assessment of the contractual duties and terms and of the risks that could arise from such agreement. Due to the complexity and legal implications associated with commercial agreements, as well as the potential for conflicts with other corporate relationships, the legal department must be involved in the preparation and review of all material contracts as defined by the relevant Group entity.

## 4. Step up, challenge and commit

### 4.1 Conflicts of Interest

We demand of all Raisineers, and those with whom the Company is associated, the highest ethical standards. Private interests and the interests of Raisin must be kept strictly separate. Consequently, we Raisineers will avoid situations that may lead to a conflict between our personal interests and those of Raisin, including any paid secondary employment or donations. Raisineers, during contacts with existing or prospective active users, suppliers, clients and competitors, will act in the best interests of Raisin to the exclusion of any personal advantage.

Transactions between Raisin Group entities and individual Raisineers are an important topic and need to be handled appropriately and carefully. This means any instances in which we Raisineers are users of the Raisin Group or undertake transactions or agreements with Raisin outside our role as Raisineers. A variety of compliance regulations<sup>1</sup> govern these contracts and Raisin ensures that any such transaction is handled carefully and impartially by appropriate senior staff. In any event, these transactions should not conflict with the interests of active users or Raisin's interests. If a Conflict of Interest is nevertheless unavoidable, the interests of the active users and Raisin's interests shall take precedence.

The receipt of gifts and expenses by Raisineers is not necessarily a Conflict of Interest requiring reporting. However, we acknowledge that the giving or receipt of gifts and entertainment expenses may be seen as inducements under certain circumstances and should be treated carefully and in accordance with our relevant Group policies.

We Raisineers acknowledge the guidance and information in our Raisin Conflict of Interest Policy, and the Anti-Bribery and Corruption and Gifts Policy which provide further details.

### 4.2 Third Party Management

We expect our suppliers, business partners and service providers to respect our ethical standards, and to act accordingly considering the Raisin Statement of Principles for Vendors.

Within the marketplace, Raisin enhances its standing through the quality and value of its innovative products and services. We make decisions on the basis of known economic criteria, within the bounds of relevant laws, standards and norms.

We are honest in our dealings with others, obeying all applicable laws and corresponding regulations governing fraud, bribery and corruption, and avoiding even the appearance of a conflict of interest.

Any activity of the Company in connection with

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<sup>1</sup> such as WpHG, US Foreign Corrupt Practices Act, or the UK Bribery Act.

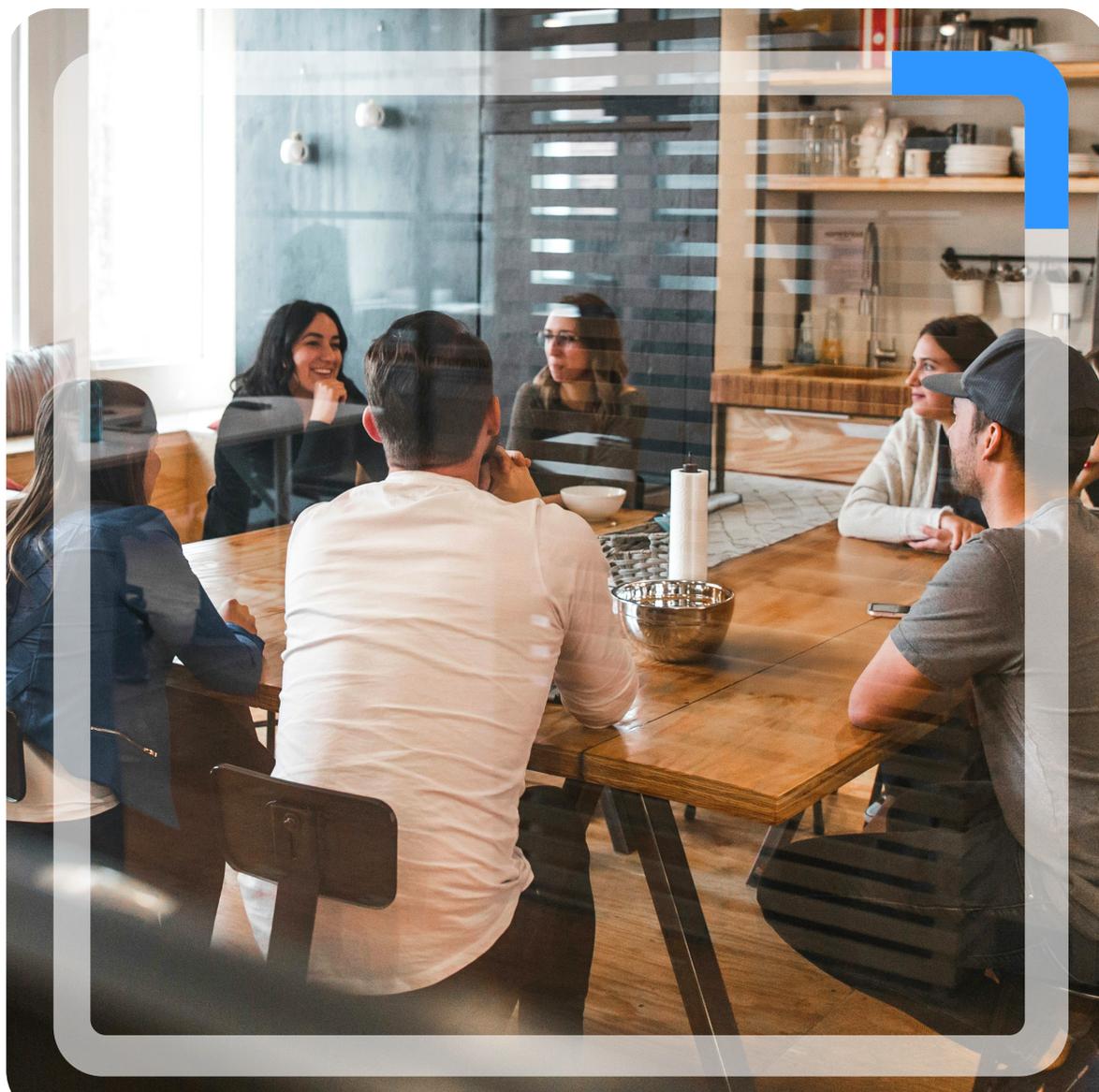
Politically Exposed Persons (PEPs) or persons associated with PEPs may have both additional reputational risks and increased risk of non-compliance with applicable Anti-Bribery and Corruption Laws and Regulations. As a general rule, an escalation to the relevant compliance function is needed. We will refer to relevant Raisin Group Anti-Bribery and anti-Corruption Policies for further details.

### 4.3 Handling Internal Grievances and Complaints

Raisin provides Raisineers with a convenient and reliable method for reporting incidents of alleged harassment, including sexual harassment, discrimination, unwanted and/or inappropriate behaviors.

If a Raisineer feels uncomfortable or mistreated, Raisin encourages them to first try to communicate directly with the person involved, letting them know that their behaviour is unwelcome. However, we understand that this isn't always easy or possible. If a Raisineer doesn't feel comfortable addressing the issue directly, or if the conversation doesn't resolve the problem, it is advised to reach out as soon as possible to the manager, a member of the Workers' Council (if applicable), or someone from the People and Culture team.

We treat all reports with sensitivity and respect and make all efforts to resolve matters for Raisineers making a report. We rely on Raisineers to make such reports, as we cannot assist where we are not aware that such activities may be happening. The report should



include all facts available regarding the alleged harassment, sexual harassment or unfair treatment.

Raisin has a confidential [Equal Opportunities Officer](#) ('EOO') who is the single point of contact on all issues relating to gender equality for every department. The EOO is involved in all personnel, organisational, and social measures for every department concerning:

- equality between genders
- the compatibility of family and work
- protection against sexual harassment at the workplace

It also provides protection against discrimination, including related to:

- ethnic or racial origin
- sex/gender
- religion or belief
- disability
- age
- sexual identity

#### 4.4 Whistleblowing System

Where an internal grievance or complaint process can't be followed, we maintain Whistleblowing

processes within the Raisin Group for the protection of whistleblowers. A whistleblower is a person who exposes any kind of information or activity that is deemed illegal, dishonest, in violation of the Code of Conduct, other rules of Raisin, local or international law. The information of alleged wrongdoing can be classified in many ways: violation of company policy/rules, laws and regulation, or threat to public interest/national security, as well as fraud, money laundering, terrorist financing and corruption. Raisineers may use the process, as can any person or party with relevant knowledge about Raisin.

Raisin is committed to using all means to mitigate legal, fraud and other risks and has developed a process so that Raisineers wishing to make a whistleblowing report can do so on a confidential basis in line with the relevant law. As Raisin is headquartered in Germany, our processes are based on the requirements of German law and the process can be used by any Raisineer. How this is applied for each subsidiary is outlined in detail in the respective Whistleblowing procedures of the subsidiaries. Nevertheless, there are some essential components applicable to the group. We at Raisin acknowledge that retaliation directed against whistleblowers or other persons providing information is prohibited under any and all circumstances. This shall also apply to any threats of retaliation and the attempt to exercise reprisals.

If, following a report or disclosure, a whistleblower suffers a disadvantage in connection with their professional activity, it shall be presumed that

this disadvantage is a retaliation. In this case, the person who has disadvantaged the whistleblower shall prove that the disadvantage was based on sufficiently justified reasons or that it was not based on the report or disclosure.

The Management Board and the People & Culture function take all allegations of retaliation extremely seriously and will treat all proven instances as a disciplinary matter, and treat such violations in accordance with the requirements of local employment law(s).

## 5. Inspire and be inspired

### 5.1 Respect for others

Raisin's continued success depends upon our commitment to develop and utilise the diverse talents and energies of all Raisineers. Raisineers and prospective Raisineers are assessed based upon principles of equality and fairness. We strive to create an environment of mutual respect, encouragement and teamwork. We value a sharing environment that provides the opportunity for open communication, continuous learning and diversity. Our goal is to provide a workplace environment that attracts, engages and retains highly talented and motivated people, while helping them to achieve their full potential, regardless of their differences or similarities.

Each of us is responsible for creating a workplace environment that rewards high performance and a commitment to excellence, as well as an atmosphere of trust and respect, to enable us to maintain a productive work environment.

We protect the rights, diversity and circumstances of all Raisineers. Raisin commits to uphold its policies, principles and the defence of legal rights under all relevant laws and any other applicable legislation. What this means is that there will be zero tolerance for behaviour, words or use of company tools in a manner which is or could be perceived as threatening, harassing or bullying or would otherwise be a breach of our policies, rules or laws to which we are subject.

### 5.2 Professionalism and Integrity

The success of our Company depends largely on our Raisineers. Qualified and motivated Raisineers make a decisive contribution to economic performance and are therefore an important success factor. We assess our Raisineers based on their performance and skills and give them honest and fair feedback. Our Raisineers always carry out their professional responsibilities with the greatest possible professionalism and integrity. This means not only respecting the rights of others, but avoiding anything that harms other Raisineers or Raisin. Since an Employee's behaviour also reflects on Raisin, it is a special requirement to avoid behaviour that has harmful effects for the Company, active users, other Raisineers or the public.

Publications on the Internet or on social media sites that can be linked to Raisin, its activities, active users or Raisineers can affect not only us personally, but also the Company. Our activities on social media, the Internet and the use of new technologies can result in violations of data protection laws, the misuse of confidential information or other guidelines. We therefore always exercise good judgement when using social media and other online activities, even in private.

Based on this Code of Conduct and our commitment, we always strive to resolve any conflicts in a way that respects the people involved and, as far as possible, takes their interests and needs into account.

### 5.3 Safety and Health

Raisin and each of its Raisineers play an active role in making the locations in which we operate a good place to live and work.

#### 5.3.1 Safety

Each of us must conduct work and maintain the workplace in a safe manner and immediately report to the relevant internal departments any accidents, operational malfunctions, dangerous conditions, or other hazardous conditions that are detected so that appropriate measures can be promptly taken to minimise damage and correct the problem.

Raisin has been and remains committed to sustainable and socially responsible development; the promotion of safe and healthful working conditions; and striving for sustained progress in the fields of safety and health.

#### 5.3.2 Personal conduct

Our commitment to safe workplace practices also extends to personal conduct, in particular use of consumables including alcohol, tobacco and other substances. Raisin encourages responsible consumption of lawful substances in a safe manner which does not adversely affect our performance and does not impede or impact the enjoyment or safety of others. The Group does not permit or tolerate the consumption of unlawful substances in the workplace or at company events.



We consider drug and alcohol abuse a serious matter that will not be tolerated. It is Company policy that our performance and judgement at work or while interfacing with active users and clients should never be impaired by alcohol, drugs or other substances.

A violation of this policy will result in disciplinary action, up to and including termination of employment. Raisin may assist individual Raisineers in seeking treatment or rehabilitation for drug or alcohol dependency. In such cases, Raisin may consider continued employment as long as concerns regarding safety, health, production, communication, or other work-related matters are adequately addressed.

#### **5.4 Environment**

Raisin recognizes its responsibility to minimize its negative impact on the environment. This includes specifically, but not exclusively, emissions of greenhouse gases, usage of water and electricity, waste production, pollution of air, water and soil, and adverse impacts on biodiversity.

In that regard, Raisin and its Raisineers commit to the responsible use of resources in its own operations as well as along its value chain, including suppliers and business partners. More specifically, Raisin is committed to:

- Comply with environmental regulations.
- Minimize air pollution and water usage where feasible, and compensate and reduce its carbon footprint.

- Prioritise the use of renewable energy, energy-efficient technologies, and implement practices that reduce energy consumption.
- Adhere to responsible waste management practices, including recycling and proper disposal, refurbishment, or donation of IT equipment. Besides, promote a paperless office environment and reduce unnecessary printing or use of physical resources.
- Encourage biodiversity-friendly office locations where feasible.
- Select suppliers and business partners who comply with environmental regulations and promote the safe and environmentally-sound development, manufacturing, transport, use, and disposal of products.

For more information about our environmental guidelines, targets, measures, and responsibilities, please refer to our relevant CSR and ESG policies.

## 6. Focus on our active users

### 6.1 Protection of Data, Assets and Sensitive Information

All Raisineers bear our share of responsibility for the protection of the tangible and intangible assets of Raisin.

Physical or tangible assets include but are not limited to property such as Company products, equipment, facilities, vehicles, computers and software, bank accounts, stocks, credit or debit cards, files and other records.

Intangible assets include informational assets, such as software or information developed by Raisineers or agents of Raisin that is not generally known to the public (i.e. business secrets and/or know-how), industrial proprietary rights, technologies, and other items of information that are of value, important and thus needful of protection.

#### 6.1.1 Data Protection and Information Security

We strive to maintain the highest sensitivity and standards of trust and security with regard to data protection, including the protection of personal data of active users, Raisineers and third parties. Full compliance with data protection laws and regulations is, therefore, a key factor of success for Raisin. Raisin has developed a Data Privacy and Protection concept which includes training, policies and practices designed to safeguard the rights of ourselves and others.

Mandatory data protection workshops and training are offered, on a regular basis to all Raisineers and, to the extent applicable, service providers. In case of any actual or potential violation of data protection principles the responsible data protection team must be contacted.

We also recognize our obligation to respect personal dignity and guard the privacy rights of all of our Raisineers, service providers and suppliers. Any behaviours or actions which go against our policies, especially the deliberate breach of the rights of others, will not be tolerated.

Raisin is dedicated to the protection of information assets and the implementation of effective information security policies and practices. This includes Information provided by suppliers, DtBs and other business partners that require special protection. To achieve this Raisin provides the necessary resources for the implementation and maintenance of an effective information security management system (ISMS) that is integrated into Raisins overall business conduct. We recognise the importance of information security to achieve the organization's business and risk management goals and are committed to the achievement of its objectives and the ongoing improvement of the ISMS.

All Raisineers and the Management Board are aware of their responsibilities when handling information and assets in an ethical, legal and courteous manner. They support Information Security to the best of their abilities. For this purpose, they are regularly informed, sensitised and trained.

## 6.1.2 Treatment of Confidential Information and Transparency

Raisineers are obliged to treat as confidential all internal matters relating to Raisin that have not been expressly approved for release into the public domain. The communication of confidential internal information (for example, business strategies, research results or contents of internal reports) to unauthorised persons, either inside or outside Raisin, is not permitted. This also applies to third party confidential information that Raisineers have received. Any requirement to disclose confidential information to third parties requires specific supervisor approval. It should be considered if there is a need for a confidentiality agreement, approved by the relevant legal department and signed by the third party that will receive the confidential information.

Any Raisineers who, on the basis of their association with Raisin, learn of confidential information not approved for release into the public domain will not use this information for our personal benefit nor for the benefit of any other person.

Within the limits set by law, authorities and internally, we communicate openly with one another and exchange information within an appropriate framework, taking into account the need-to-know principle. In order to ensure that information shared with the public and the press is always transparent and consistent, all members of Raisin have a special responsibility to comply with applicable communications guidelines and legal requirements regarding false or misleading information.

## 6.2 Interactions with active users

Part of Raisin's success is through creating value to our clients by the solutions we provide and services we offer. It is therefore critical to communicate with clients in an honest, fair and professional manner and in accordance with their best interests. It means that Raisineers may not take unfair advantage of anyone or disadvantage them through manipulation, concealment, abuse of confidential information, misrepresentation of facts or any other unfair practices.

Client-facing Raisineers should understand clients' needs, expectations and interests in order to provide them with appropriate solutions that lead to the right outcomes. It is important when dealing with our clients that the communication is fair, clear and accurate. Statements that can be viewed as financial advice, or misleading, can violate applicable law.

We acknowledge that dealing with active user complaints is a key priority, because the success of Raisin depends on our active users. All complaints are treated as a high priority and an opportunity for feedback. It means any expression of dissatisfaction or objection, regardless of whether we believe it to be justified, about Raisin's provision of, or failure to provide, its services. All complaints must be referred to the Customer Service department. Complaints that could result in a client dispute must be referred to the Legal team. We strive to address all errors and complaints as soon as practicable and in any event within applicable regulatory timeframes.

## 6.3 Communications Guidance

Raisin has a clear commitment to professionalism, integrity and respect for our Raisineers and others, including active users, clients, commercial partners, regulators and all third parties we interact with. This is reflected in our rules on how we communicate both internally and externally and is outlined in our relevant Communications Policies. While this sets out detailed guidance for communications conduct, the following should be borne in mind at all times:

### 6.3.1 Internal Communications

At Raisin, all interactions should be conducted with professionalism and integrity. Raisineers are expected to use communications thoughtfully to convey important messages. If the tone of a conversation is unacceptable, Raisineers should feel empowered to provide constructive feedback. If tensions rise, participants can be requested to calm down or, if needed, interrupt the meeting to address inappropriate behaviour. Whether by letter, email or using platforms such as Slack and Jira, all messages constitute company records and Raisineers should consider how our messages will be understood by recipients. Particular care should be taken with communications which for legal reasons might need to be delivered in a particular format, for example offers of employment or confirmations of pay reviews etc.

### 6.3.2 External Communications

As a general rule, all Raisineers should be aware

of their role as Ambassadors for the Group and engage respectfully and appropriately with all persons outside the business when acting in our capacity as Raisineers of Raisin. In some cases, it is appropriate that certain types of communication are undertaken by our specialists, particularly dealing with regulators, journalists or legal representatives. In any event, individual Raisineers should consider if they are the right person to provide an answer to a question put by a third party, especially if that answer is to be made public.

### **6.3.3 Use of Social Media**

Raisineers are encouraged to act as ambassadors for Raisin and this extends also to the use of social media including but not limited to social media websites such as LinkedIn, Xing, Facebook, X, Threads and others. Raisineers are reminded, especially when we identify ourselves as Raisineers in the public domain, that information, messages, photos, blog posts, links or other types of communications which they share publicly or even privately with others is liable to be shared with a wider audience and, therefore, to act accordingly with care. Raisineers are also reminded that when speaking out on social media without a job assignment, it is important that we always make it clear that a personal opinion is being issued.

## **7. Contact and Monitoring**

The Compliance leads for Raisin Group entities may be contacted by Raisineers for any queries.

This Policy must be reviewed at least annually by all the Compliance teams of Raisin Group and the document owner.