

# WEX Third Party Code of Business Conduct and Ethics

## INTRODUCTION

### General Principles

The reputation of WEX Inc. and its affiliates (collectively, **WEX**) depends on our ability to provide high-quality, value-added services to our customers. We rely on trusted business partners such as vendors, suppliers, consultants, and contract workers (**third parties**) who share our dedication to acting with integrity, honesty, and compliance with the law. This Third Party Code of Business Conduct and Ethics (or **Code**) outlines the principles and expectations for establishing and maintaining a business relationship with us.

We may conduct periodic risk-based assessments of your compliance with this Code. If we determine that you are not in compliance, we may decide to discontinue doing business with you.

This Code does not replace any specific contractual requirements between our organizations. If a contractual term is stricter than this Code, we expect you to meet the stricter contractual requirement.

### Speaking Up about Ethics and Compliance Concerns

If you become aware of an ethics or compliance concern related to your organization's business relationship with WEX, notify us through either of the following channels:

- Your designated WEX Contact
- WEX Integrity HelpLine, our global, confidential reporting system at [www.wexintegrityhelpline.com](http://www.wexintegrityhelpline.com)

We expect third parties with which we do business to provide confidential reporting mechanisms for their workers to report ethics or compliance concerns. We also expect you to protect those who report concerns and prohibit retaliation against them.

## ETHICAL CONDUCT AND INTEGRITY

### Conflicts of Interest

A conflict of interest exists when you face a choice between what is in the best interest of your organization (financial or otherwise) and what is in the best interest of WEX. We expect you to use good judgment and avoid situations that can lead to even the

appearance of a conflict, which can undermine the trust others place in us and damage our reputations.

We expect you to notify us immediately of any actual or potential conflicts of interest. Depending on the circumstances, we may ask you to take appropriate measures to manage any identified conflicts. Because describing every potential scenario or issue is impossible, you should consult us about potential conflicts when appropriate.

### **Gifts and Entertainment**

We do not directly or indirectly accept or provide gifts, favors, meals, travel, lodging, entertainment, charitable donations, or any form of hospitality that could create even the perception of improperly influencing a business decision. We expect you to uphold similar standards and to maintain well-defined internal policies to help ensure that your organization complies with all applicable laws and regulatory requirements.

You must obtain WEX's specific, written approval before directly or indirectly offering, promising, or providing any reasonable, customary and infrequent form of hospitality to any government official in connection with our business relationship.

### **Bribery and Corruption**

We do not pay or accept bribes or kickbacks at any time for any reason to or from any person or entity in the private or public sector, nor do we make expediting, facilitation, or "grease" payments to government officials. You must follow these standards as well, and we expect you to comply with all applicable anti-bribery and anti-corruption laws, including implementing related internal procedures and overseeing the conduct of any person or entity with which you do business.

### **Economic Crime and Money Laundering**

As a global commerce platform provider, we take seriously our obligation to help prevent money laundering and comply with all relevant laws and regulatory requirements. We expect our business partners to share this commitment. You must not engage in any activity that could facilitate or may constitute WEX being involved directly or indirectly in economic crime, including money laundering or other illegal activities such as terrorism financing, tax evasion, or fraud.

### **Insider Trading**

If you gain access to any material non-public information about WEX, our publicly traded customers or business partners, or any other publicly traded companies while working with WEX, you must not share that information with others, use it for trading purposes, or tip anyone else for their trading purposes. Material non-public information includes information that is not available to the general public and could influence a reasonable investor to buy, sell, or hold our or others' securities.

## **Cooperating with Investigations**

We expect your reasonable cooperation with regulatory authorities on any inquiries, audits, reviews, or investigations related to our business relationship. This includes taking prompt action to preserve any relevant documentation and retaining it as required by law.

## **RESPECT FOR PEOPLE AND THE WORKPLACE**

### **Inclusion, Respect, and Fair Treatment**

We are committed to fostering inclusion and preventing discrimination and/or harassment in all aspects of our business. We expect you to maintain a workplace free from discrimination, harassment, and retaliation and to comply with all applicable laws.

We also look to partner with third parties that actively promote inclusion within their organizations and supply chains where those opportunities exist.

### **Workplace Safety and Security**

We are dedicated to ensuring a safe and secure environment for workers and visitors at our facilities. We expect you to maintain the same standards while complying with all applicable workplace health and safety requirements.

### **Human Rights**

We are dedicated to respecting and protecting human rights and upholding the dignity and equality of every individual. We expect your organization to share this commitment by not engaging in or tolerating practices such as forced labor, child labor, human trafficking, or any modern slavery.

### **Fair Labor Practices**

We follow all applicable labor laws and expect you to do the same. This includes upholding fair labor standards by providing safe working conditions, reasonable working hours, and equitable compensation. We expect you to respect workers' rights to freely associate, join, or form trade unions or works councils and engage in collective bargaining. You must also ensure that your organization's workers are legally authorized to work in their respective jurisdictions.

## **RESPONSIBLE BUSINESS PRACTICES**

### **Safeguarding Confidential and Proprietary Information**

As a trusted partner, you may need to access our company, employee, or customer information to conduct business with us. We expect you to abide by all applicable data privacy laws and regulatory requirements and to take appropriate care when handling,

sharing, or transmitting our confidential or proprietary information. Report any unauthorized access, disclosure, loss, or theft of our information to us immediately.

You may not disclose our confidential or proprietary information to other parties without our consent, except as required by law or as necessary to perform the services outlined in any agreement we have with you. If you receive a request to delete, access, or otherwise impact our confidential or proprietary information, report this to us immediately, and do not act upon that request without our instructions. Do not publicly disclose WEX as a customer or use the WEX name, logo, or trademark unless we authorize you to do so.

## **Business Records**

Business partners, government officials, and the public need to be able to rely on the accuracy and completeness of our disclosures and business records. To support us with these obligations, we expect you to maintain accurate and complete business records on all matters related to your business with us. This includes your compliance with any applicable contractual obligations to us, such as audit or inspection rights.

## **Procurement and Third-Party Management**

We rely on trusted business partners to support our operations and our ability to serve our customers. We expect you to maintain ethical procurement practices by selecting your suppliers and other business partners based on objective criteria (such as price, quality, availability, terms, and service), conducting appropriate due diligence, and holding them to similar standards.

## **Competing Fairly**

We believe in free and open competition. We do not engage in unethical or illegal business practices that may reduce competition and restrict trade. We expect you to also conduct business in compliance with all applicable laws regarding fair competition and antitrust.

## **Trade Compliance**

As a global company, we are committed to complying with all applicable laws that govern international trade. We expect you to comply with economic sanctions and export control laws and regulatory requirements that could apply to the products, services, or technology related to the business you conduct with us and to avoid doing anything that could position your organization or WEX in violation of applicable economic sanctions and export controls.

## **Environmental Responsibility**

We recognize our responsibility to the environment and seek to operate as sustainably as possible. We expect you to also operate in an environmentally responsible manner and to strive to minimize environmental impacts.