



Yalamanchili  
Solutions for  
Payments

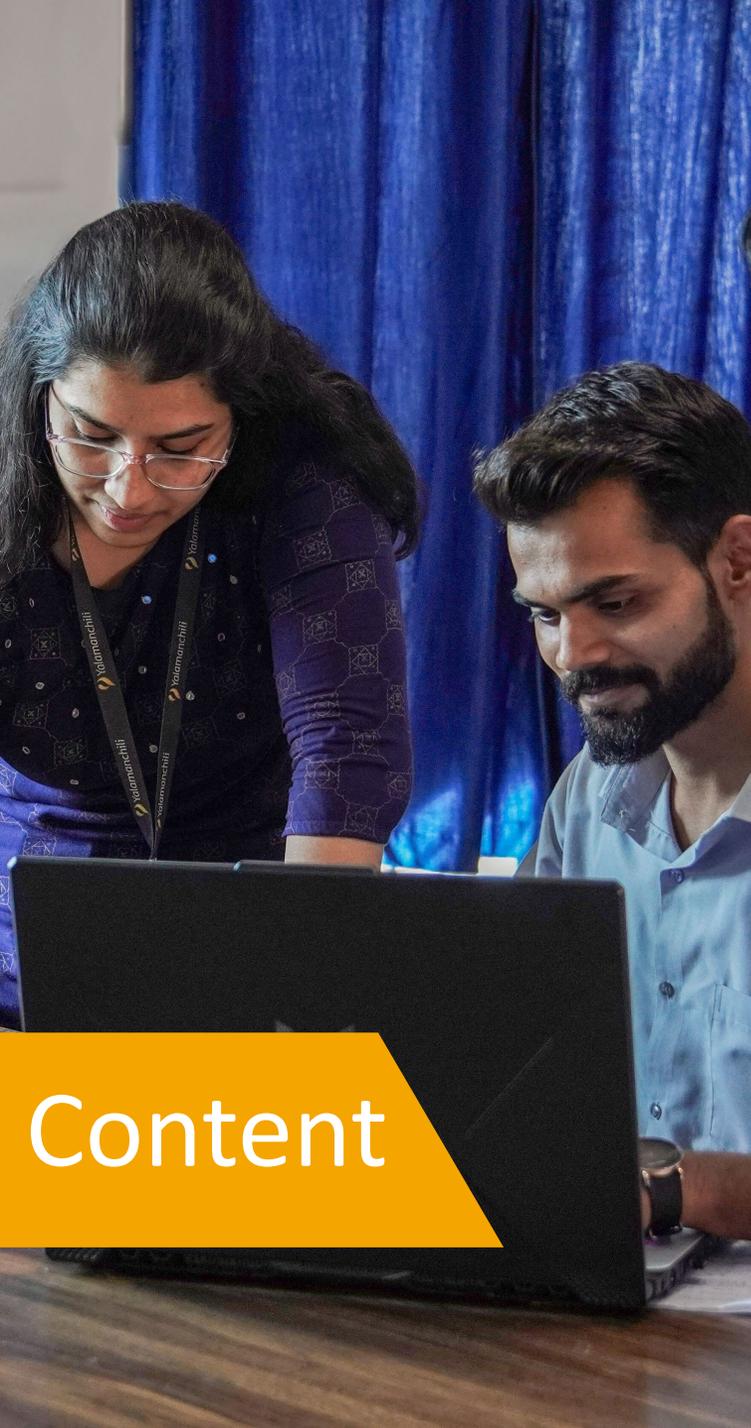


# The Yalamanchili Culture

Our Code of Business Conduct & Ethics

March 2025





# Content

- A Message From Ramki
- Our Purpose, Vision & Values

## 1. Introduction

---

- The Yalamanchili Culture - Our Code of Business Conduct & Ethics
- Assessing Challenges
- Conflicts With The Yalamanchili Culture

## 2. Speaking Up, It's Your Responsibility

---

- Your Responsibilities
- Leader Responsibilities
- Raising Concerns and Speaking-Up
- Non-Retaliation

## 3. Supporting Our Culture

---

- Diversity & Inclusion
- Prevention of Harassment & Discrimination
- Respecting Each Other
- Workplace Security & Safety
- Protecting Staff Privacy
- Conflicts of Interest
- Giving Back
- Environment

## 4. Protecting Our Business

---

- Protecting Our Assets
- Protecting Our Information Systems
- Confidential Business Information
- Client and Customer Confidentiality
- Intellectual Property
- Accuracy In Recordkeeping
- Records Information Management
- Social Media
- Public Speaking

# How We Do Business Is How We Build Our Reputation

## 5. Upholding The Law

---

- Complying With Laws & Regulations
- Anti-Money Laundering, Anti-Terrorist Financing and Sanctions
- Anti-Bribery & Anti-Corruption
- Competing In Business Fairly
- Gift Giving, Receiving & Entertainment
- Insider Trading
- Competing In Business Fairly
- Anti-Tax Evasion
- Modern Slavery

## 6. Resources & Help

---

- Questions, Concerns & Information
- Why This Is Important
- Thank You From Our Group Chief Ethics, Risk and Compliance Officer

# A Message From Ramki

Yalamanchili as an organization has its roots in its ideology of dedicated and self-less service to our clients and their customers, built on a foundation of morals, ethics and values. The strict adherence to our philosophy and our uncompromising stance towards our value system helped differentiate ourselves in the marketplace and led to carving a place and name for ourselves in the industry, and more importantly, our longevity.

The way we service our clients, and their customers, will define the character of our organization. Our character provides us an identity. Our identity defines our existence and ensures our sustainability and survivability.

The Yalamanchili Culture guides each one of us on how we need to conduct ourselves as individuals and as a group when we interact with others both within the organization and when we interact outside the organization, be it with our clients, our customers, our service providers or our competitors. This will only make each of us a better human being.

Over the years, as we went about building Yalamanchili, a sense of purpose evolved - of being useful to not only our clients we service but to society at large, where our objective is to make a difference through innovative products and solutions leveraging on technology.

Let us tread the path we have chosen based on our ideology and ideals; success will follow.



**Succeed by  
doing what is  
right**



## What We Believe

## Our Purpose

To empower businesses and individuals through seamless, convenient and innovative payment experiences that drive financial inclusion, enable growth and simplify transactions. We are committed to revolutionizing the payment experience by driving accessibility, security, reliability and efficiency for clients and consumers worldwide.

## Our Vision

To be the leading payment partner of choice for our clients by solving real life payment challenges and seizing new payment opportunities. We see a future where every transaction is streamlined, transparent and secure, empowering businesses to thrive and individuals to transact with confidence. We innovate to drive excellence in client and individual centric solutions that redefine the payments landscape and shape the future of digital finance.



## What We Believe

## Our Values

**Patience:** We believe in the power of patience to navigate challenges and achieve long-term success. We embrace patience as a virtue that allows us to make thoughtful decisions and build lasting relationships.

**Persistence:** We are committed to the pursuit of excellence through persistent effort. We understand that great achievements often require continuous dedication and resilience in the face of obstacles.

**Passion:** We are driven by passion for what we do and the impact we create. Our enthusiasm fuels innovation, fosters creativity, and inspires others to excel.

**Planning:** We prioritise strategic planning as the foundation for success. We proactively anticipate opportunities and challenges, meticulously craft our roadmaps, and adapt our strategies to achieve our goals effectively.

**Perfection:** We strive for perfection in everything we do, knowing that excellence is a journey of continuous improvement. We hold ourselves to the highest standards of quality, attention to detail, and accountability.

**Professionalism:** We uphold professionalism as the cornerstone of our interactions, both internally and externally. We conduct ourselves with integrity, respect, and ethical conduct, fostering trust and credibility in all our relationships.

# Introduction



- The Yalamanchili Culture - Our Code of Business Conduct & Ethics
- Assessing Challenges
- Conflicts With The Yalamanchili Culture

# The Yalamanchili Culture - Our Code



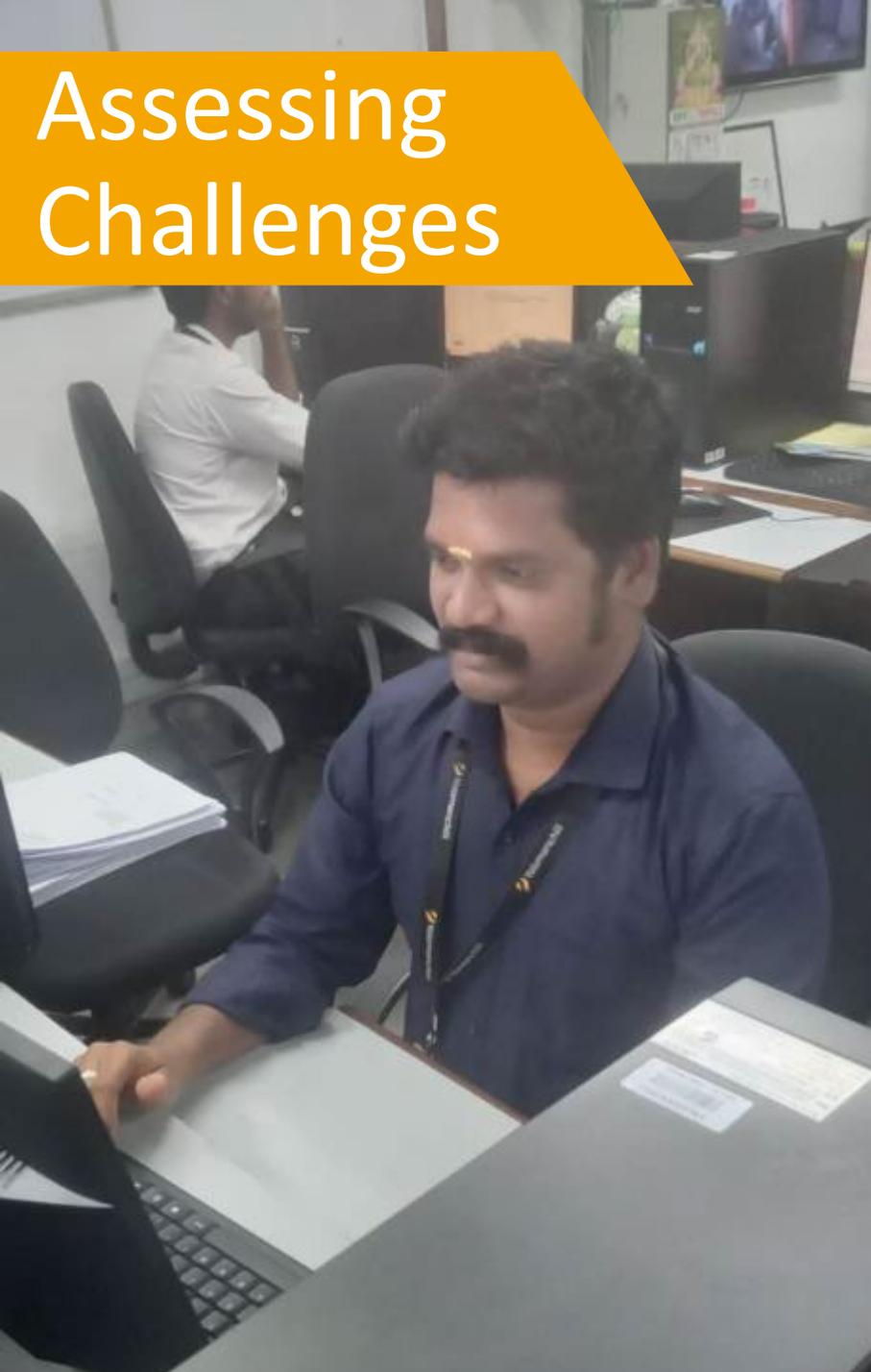
**At Yalamanchili, we believe in doing business ethically and responsibly.** The Yalamanchili Culture is our Code of Business Conduct and Ethics, and guides every decision we make, ensuring we uphold integrity at all levels. This applies to everyone associated with Yalamanchili, including employees, contractors, executives, and the Board of Directors. Our commitment is to conduct business with the upmost ethics and integrity, which drives our success.

**We are all responsible for ethics and compliance.** It's what we value. It's how we work. Read The Yalamanchili Culture. Apply it in your everyday interactions and work. Use The Yalamanchili Culture as a compass to help you make the best decisions, even in challenging situations. Our policies and procedures will not give you every answer to every challenge you encounter, but The Yalamanchili Culture will guide you on how to make the best possible decisions.

**What happens if we don't follow The Yalamanchili Culture?** Trust of our clients, consumers, vendors and regulators may be damaged, and our brand may be negatively impacted. That's why violations of The Yalamanchili Culture, our company policies or the law, can result in disciplinary action up to and including termination of employment. Depending on how serious the incident is, there might also be civil or criminal consequences for the person involved, and for Yalamanchili.

## Everything You Do Makes Our Culture

# Assessing Challenges

A photograph of a man with a mustache, wearing a blue button-down shirt and a lanyard, sitting at a desk in an office. He is looking down at a laptop. In the background, another person is visible at a desk, and there are computer monitors and office equipment.

## The Yalamanchili Culture Is Your Guide

It doesn't matter what your role at Yalamanchili is, each of us may face situations where we are unsure, or situations where making decisions can sometimes be difficult and it is important that we all make the best decisions in the situation we might face.

The Yalamanchili Culture provides you with easy-to-use information and references that will guide you in making the right decisions in difficult or questionable situations.

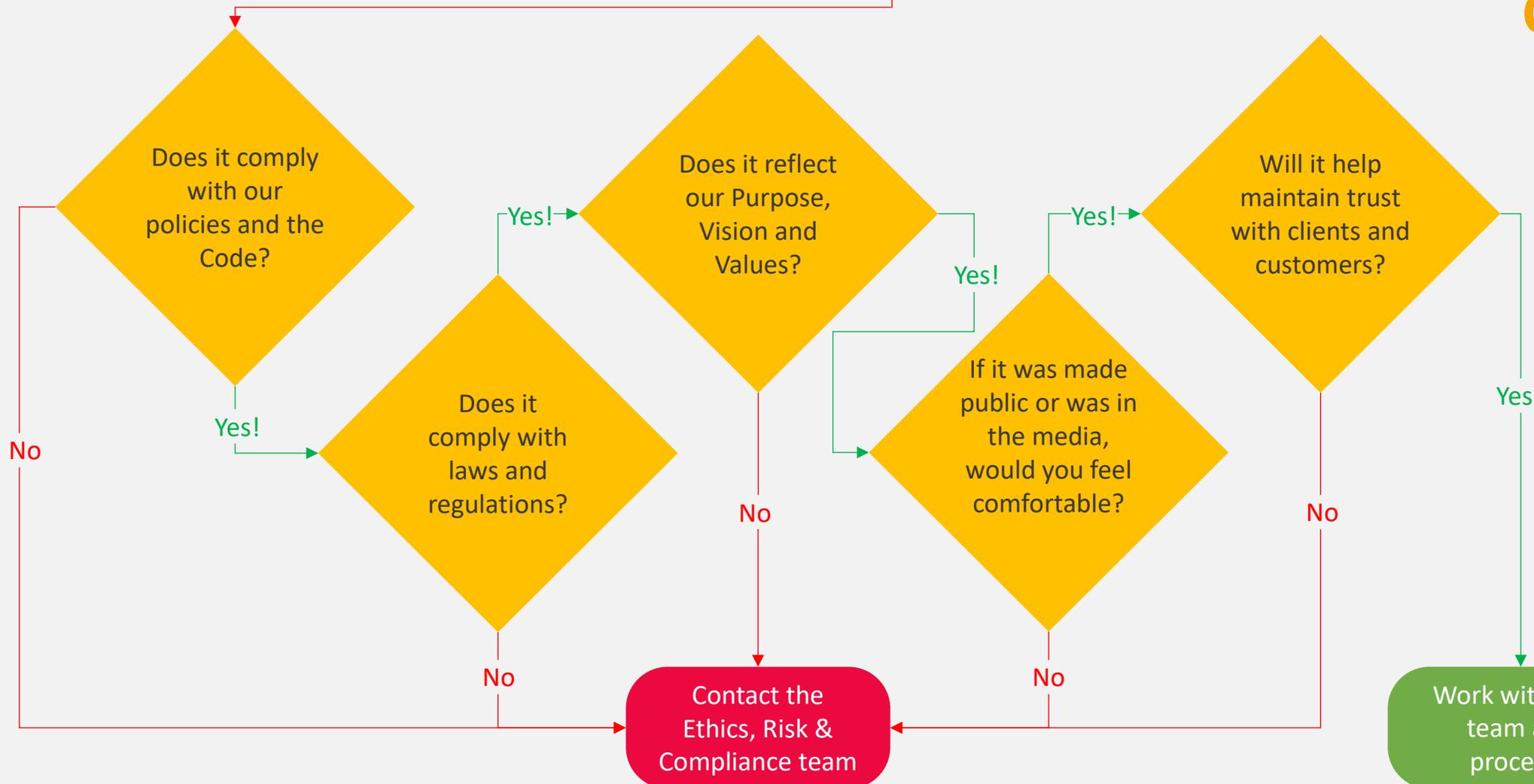
If you are unsure, always seek help from your Manager, Human Resources or the Ethics, Risk and Compliance team.

Following The Yalamanchili Culture will help you assess situations and support you in making good judgements.

# Assessing Challenges

## Know How To Effectively Assess A Challenging Situation

Assess the situation and the actions you want to take



If you answer “yes” to all these questions, it’s probably OK to proceed. But if you answer “no” or “I’m not sure” at any point, stop and reconsider. Keep in mind, it’s always a good idea to ask for help if you are not certain.



## Conflicts With The Yalamanchili Culture

# We Always Follow The Laws and Regulations Of The Countries In Which We Do Business

Yalamanchili does business in many countries, and sometimes local traditions, cultural norms, customs and expected business practices may differ.

### How do we deal with a situation that conflicts with The Yalamanchili Culture?

If you feel there is a conflict between The Yalamanchili Culture and the way we do something in your country, a country you are doing business in, your office, or your department, you should seek advice. Generally, if a local custom or typical business practice conflicts with The Yalamanchili Culture, **we must always follow the principles set out in The Yalamanchili Culture**. However, if a local law conflicts with The Yalamanchili Culture, **we must always follow the law**.

If you are unsure, seek guidance from your Manager or the Ethics, Risk & Compliance team.

# Speaking Up - It's Your Responsibility



- Your Responsibilities
- Leader Responsibilities
- Raising Concerns and Speaking-Up
- Non-Retaliation



## Your Responsibilities

# Show How You Live Our Code Every Day

It is the responsibility of all of us to follow The Yalamanchili Culture and to demonstrate our values in everything we do.

Each of us are expected to:

- Lead by example, work and act in the spirit of our Purpose, our Vision and our Values
- Inspire others by using good judgment and act with integrity and honesty. We cannot – and will not – emphasize performance at the expense of our integrity
- Demonstrate our inclusive behaviors. Appreciate that we are a team of diverse and unique individuals, that is a key strength driving our success – every employee’s voice matters
- Be honest in business, do not let the pressure to succeed make you do things you know are wrong, no one has the authority to make you do something that violates The Yalamanchili Culture
- Follow all policies and laws that apply to your job, complete all training assigned to you, ask if you are unsure – that’s the best way to learn
- Speak up if you see, or suspect, misconduct or unethical behaviors, it’s always the right thing to do
- Do not tolerate retaliation against anyone who raises a concern or ask questions, protect employees from any retaliation



## Leader Responsibilities

Every leader at Yalamanchili has an obligation not to just follow and demonstrate The Yalamanchili Culture, but to actively support and promote it. Our leaders must act with purpose and authentically demonstrate our values as well as practice inclusive behaviors with their teams. Our leaders must foster an environment that embodies the values of Yalamanchili within their teams.

Demonstrate inclusive leadership behaviors:

- **Vulnerability** - Show a willingness to acknowledge your own areas of weakness, with a message of learning and becoming stronger in the future
- **Empathy** – Be curious and focus on truly understanding the unique experience of everyone on your team and around you
- **Courage** - Empower everyone to speak-up and act for what is right, escalate concerns raised
- **Encouragement** - Create an environment that supports taking calculated risks and learning from mistakes

When leaders demonstrate inclusive behaviors, staff feel like they truly belong, allowing them to invest in our purpose and bring their best, most authentic selves, which drives success.

# Everyone has a Responsibility To Uphold The Yalamanchili Culture





# Leader Responsibilities

## Be A Leader People Remember - For The Right Reasons!

Leaders at Yalamanchili must invest time and effort in supporting their team. We want all staff to recognize and benefit from excellent leadership.

How can you demonstrate ethical leadership?

- **Talk about integrity** - Talk with your team frequently about the importance of doing business with integrity
- **Be available and open** – Foster an environment in which staff feel comfortable coming to you with questions and concerns
- **Recognize concerns** - Document and escalate concerns raised to you through the correct channels. Don't put the burden back on the staff member to solve the issue
- **Don't retaliate** - Don't retaliate against employees who raise a concern in good faith
- **Give attention** - Be present when talking to your team or in one-to-one meetings with staff, be curious and open to their observations, ideas and feelings

# Raising Concerns & Speaking Up



If you have any concerns, if you think something just doesn't feel right, or if you see something that may harm our reputation, it's important that you speak up.

If you see or experience conduct that is inconsistent with our standards, have the courage to speak up. Yalamanchili takes all reported concerns seriously and investigates them confidentially. There are many ways to share your concerns.

## We Have Courage To Speak Up For What's Right



# Non-Retaliation



## We Have Courage To Speak Up For What's Right

**Raise concerns in good faith.** Sharing a concern in good faith means that you honestly believe that there may be a violation of The Yalamanchili Culture, our policies or the law.

**What happens when you raise a concern?** As the reporter of the concern, no matter who you contact to raise it, the matter will be promptly reviewed and, if necessary, investigated by the Business Conduct team, who have the appropriate expertise. Information you provide will be shared only with people who need to know, to resolve the issue. If the concern is substantiated, Human Resources will make a recommendation to the individual's Manager regarding what, if any, disciplinary action is needed. The reporter will be notified when the matter is resolved and whether the claim was substantiated or not. Additional details of the outcome will likely not be shared, so we can protect the confidentiality of the investigation.

**We do not tolerate retaliation.** Yalamanchili does not allow any form of retaliation against anyone who reports a concern in good faith or cooperates in an investigation. If you believe you have been retaliated against, reach out to Human Resources or the Ethics, Risk & Compliance team.

# Supporting Our Culture



- Diversity & Inclusion
- Prevention of Harassment & Discrimination
- Respecting Each Other
- Workplace Security & Safety
- Protecting Staff Privacy
- Conflicts of Interest
- Giving Back
- Environment

# Diversity & Inclusion



## We Foster A Culture Of Respect

**We value differences.** Although our roots are proudly Indian, we are a multinational organization. Anyone of any background, gender, age, caste, community, language, religion or race has an equal opportunity to excel at Yalamanchili. We believe in building an environment where the unique talents of each individual are welcomed, regardless of who they are or where they come from. Our differences in our backgrounds and life experiences bring valued viewpoints, creativity and experience that contributes to our success as a company. Our leaders are driven to continually consider and support diversity in hiring and in allocating the projects we work on.

**We are inclusive.** An inclusive culture creates an environment in which individual differences, experiences and capabilities contribute to our business success.

**We support diversity.** We support diversity of thought, ideas, culture and background, we drive equity and actively work to eliminate unconscious biases that hold us all back.

# Prevention of Harassment & Discrimination



**We do not tolerate any kind of harassment or discrimination.** We are dedicated to building an environment where everyone can do their best work without fear of harassment or discrimination.

We value the individual differences, experiences and capabilities of each employee. Our combined strength is enhanced by the diverse backgrounds and perspectives of our team. It makes Yalamanchili a better place to work and a better business partner for our clients.

**We are committed to equal opportunity in all employment decisions.** We promote a culture where everyone is treated with dignity and respect. We do not tolerate any form of harassment or discrimination.

Discrimination or harassment can be in writing, verbally, physically, or visually, such as photos or videos. We do not tolerate discrimination based on:

- Caste, race or skin color
- Gender, sexual orientation and gender identity or marital status
- Religion
- Age
- National origin, ancestry or citizenship
- Marriage or marriage potential
- Pregnancy
- Medical condition
- Physical or mental disability
- Personal favoritism and preferences through association

## We Value Individual Differences As Strengths

# Respecting Each Other



## Show Your Care To Bring Out Our Best Work

### **We promote a positive working environment.**

Conduct, including speech, that is disrespectful of any member of our staff, our clients, our suppliers and vendors, or our customers, could lead to corrective action, up to and including termination.

**We respect opinions and contributions.** Respectful conduct shows that we care, and that we value everyone's contributions. When we support and respect our abilities and identities, we bring out the best in each other and our teams.

We conduct ourselves respectfully when we:

- Think carefully about our words and actions and how they might be perceived
- Never say or do anything others may find offensive
- Speak up when we see disrespectful behavior
- Always treat others with kindness and acceptance

Disrespectful behavior is not tolerated. Offensive, threatening, or degrading words or actions harm our teams and our business.



# Workplace Security & Safety

## Ensuring Safe Environments Lets Us Do Our Best

**Workplace safety is the responsibility of all of us.** We are committed to providing a safe and secure working environment. Any threatening or violent behavior has no place at Yalamanchili. The security and safety of our staff is paramount.

**We follow all safety requirements, and we address safety issues when observed.** This applies to both our work processes and workplace security. If you need to report a safety issue, injury or work-related illness, please contact your Manager, your Site Leader, Human Resources or a member of the Ethics, Risk and Compliance Team.

**We do not tolerate inappropriate or illegal activities.** Alcohol and drug use impairs our ability to perform at our best, and it can place others at risk. We do not use, sell or possess drugs or alcohol at work, and we never work under their influence. Prescription and over-the-counter medicines are permitted if taken according to a doctor's instructions and you can safely perform your job. Alcohol may be provided at some company events on Yalamanchili premises, with advance approval from an Executive Committee member. At these events, we are still acting as representatives of Yalamanchili; use good judgment.



# Protecting Staff Privacy

## We Respect Confidentiality of Staff

**The information of our staff is confidential, and we protect that.** We respect the confidentiality of staff information. We never disclose this information inappropriately, and we follow all laws governing staff privacy.

Your trust of Yalamanchili and your colleagues is essential to our business. That trust begins with each other. For business purposes, we may need to collect private information from our staff. We must handle this information according to our high ethical standards.

**We all take responsibility to protect confidential staff information.** Just as we do with consumer and client information, we take measures to protect our staff personal records and information:

- Only those with appropriate authorization may access staff records
- We only collect and access records for legitimate business purposes
- Outside of business operations, we never share staff information without explicit permission

If you mistakenly receive the personal information of other staff, contact Human Resources or the Ethics, Risk and Compliance team. Do not access or use the data.



## Conflicts of Interest

# Honesty Integrity Transparency

**We do business in the right way.** By being transparent, avoiding conflicts of interest and disclosing potential areas of conflict, we demonstrate our commitment to and support our ethical culture. We never put our personal interests in conflict with those of Yalamanchili. We all play a role in protecting our company.

**We are transparent in our business dealings.** By avoiding conflicts of interest and disclosing potential areas of conflict, we demonstrate our commitment to and support our strong ethical culture. We never put our personal interests in conflict with those of Yalamanchili, or the clients who trust us with their business. We all play a role in protecting our company and our reputation.

All staff must follow our Conflict-of-Interest Policy.





## Conflicts of Interest

Conflicts may be present in many different situations. We must use good judgement, but here are some common areas where conflicts may need to be disclosed to the company and assessed:

- **Engagements in outside employment including self-employment**, in consulting activities - even if they are not in the payments space - or involvement in any start-up ventures or engaging Yalamanchili staff in such a venture
- **Holding an advisory board, Board of Directors or equivalent fiduciary roles** for a residential, charitable, not-for profit, religious, or social organization, as part of your official job duties, or if you wish to serve on a Board for any entity owned or controlled by you or your family
- **Unpaid professional activities for any payment service or related entity** that has a relationship with Yalamanchili
- **A close relative who works for any organization that has a relationship or competes with Yalamanchili in any way.** Yalamanchili recognizes that there will be times when the employment of relatives may occur in the workplace. Such relationships may result in conflicts of interest, potential bias or favoritism or adversely affect the ability of Yalamanchili to operate effectively.
- **Previous employment with a Yalamanchili business partner** where you are now involved in decisions regarding that organization

**Honesty**  
**Integrity**  
**Transparency**



# Honesty Integrity Transparency

- **Engaging in romantic relationships with colleagues, a supplier contact, a vendor or a client staff member**, these relationships can introduce bias, favoritism, and compromised judgment, staff in these situations may be inclined to offer preferential treatment or opportunities, which can undermine fairness and equality within the organization and can negatively impact team morale and productivity
- **Engaging in political activities that may result in personal biases or affiliations to influence professional decisions**, this can lead to partiality in decision-making processes, compromising the integrity and impartiality expected in the workplace, they may inadvertently create tensions among colleagues who hold opposing views, potentially disrupting team dynamics and productivity, it is important that organizational objectives and professional duties remain unaffected by personal political leanings
- **Investing in or purchase stock of a business client, vendor, or other business partner**, such investments may lead to divided loyalties and compromised decision-making, they may prioritize personal financial gain over the best interests of Yalamanchili, potentially undermining the integrity of business transactions and relationships and they may inadvertently favor the interests of the company in which they have invested, leading to unfair advantages or biased treatment in negotiations or dealings.

## Conflicts of Interest

# Conflicts of Interest

## Honesty Integrity Transparency

- **Hold a significant financial interest or investment** as owner, partner or stockholder, of 10% or greater of the total outstanding shares of any publicly traded company
- **Hold a financial interest or investment, either directly or through an investment/venture fund where you have influence over investment decisions, in a private company/startup in a payment service, a vendor, other business partner or related entity** that has a relationship with Yalamanchili
- **Have a relationship with a Government Official** that has, or may have, influence over matters that could affect Yalamanchili business
- Have had **prior Government employment**
- **Hold a seat on any commercial entity board**

Additional requirements exist for serving on an advisory board, Board of Directors or equivalent role for organization types not covered under the Conflict-of-Interest Policy (e.g., most for-profit entities). In these situations, staff at Manager job levels or higher may seek such roles if certain eligibility and approval requirements are met.

If you need guidance, please contact Ethics, Risk and Compliance team.



## Giving Back

# We Show That We Care

**We give back to our communities.** Giving back is part of how we do business. It enables individuals, businesses and economies to thrive. We strive to make a positive impact with the highest ethical standards. We provide employment, career opportunities, build and develop school and college facilities promote micro agricultural business opportunities for farmers, as well as driving the digitization of finance and financial inclusion. Giving back is how we live our beliefs. It also builds trust in our brand, which can drive business opportunities.

We give back responsibly when we:

- Contribute to causes that we care about
- Never allow charitable work to create a conflict or harm our company
- Get approval from Human Resources before giving or acting on behalf of the company
- Keep our Manager and colleagues aware of our volunteering

# Environment



## We Are Leaving A Legacy For The Next Generation

**We protect the environment in which we do business.** We are committed to creating a thriving business while doing our part to protecting the planet, conserving natural resources and preventing pollution. We do this through reducing our carbon footprint and operating our offices in a way that reduces pollution.

We do this by:

- Reducing use of electricity to be comfortable but not wasteful
- Reducing paper-based documents, printing and other paper-based information, which also reduces risk of data loss events
- Ensuring we manage and dispose of our e-waste effectively
- Minimizing waste we generate personally and ensuring we reduce, reuse and recycle as much as possible



## Protecting Our Business

- Protecting Our Assets
- Protecting Our Information Systems
- Confidential Business Information
- Client and Customer Confidentiality
- Intellectual Property
- Accuracy In Recordkeeping
- Records Information Management
- Social Media
- Public Speaking

# Protecting Our Assets



## Our Assets Enable Our Success

**Data and information is our business, all of us must protect it.** Our assets are all the tools and information we use to do our work each day. They allow us to operate effectively as a company and help us continue to be successful.

We have built up key business assets over the course of our history. Without these assets, we cannot serve our customers and business partners. These assets are also essential to our strategic vision. We are all responsible for our assets, including:

- Tangible assets: offices, furniture, funds, supplies and facilities
- Electronic assets: our technology resources, including hardware, applications, software and licenses, mobile devices and tablets, network infrastructure
- Intangible assets: reputation, customer loyalty, trademarks, copyrights, trade secrets, patents, customer information including contracts and databases
- Financial assets: customer funds, revenues, investments

We protect our assets when we:

- Ensure that assets are not damaged, lost or stolen
- Report immediately when assets are defective or in need of repair
- Use all assets appropriately and with good judgment
- Follow all procedures to keep assets secure, both in the office and while traveling
- Never allow unauthorized individuals to use our assets

# Protecting Our Information Systems



## Information Is Our Raw Material

**Our information systems are our most valuable asset.** We must safeguard them from viruses, data breaches and other risks.

Information drives our business, and our information systems allow us to connect people globally. We use our information systems to process data that is both sensitive and valuable. Protecting that data is done by protecting the systems that transmit and store it.

To protect our information systems, we:

- Always use our Yalamanchili e-mail address when conducting business, not your personal account
- Always handle Yalamanchili information according to our Information Classifications
- Never install unapproved software or hardware
- Never use unauthorized devices on our network
- Never access unauthorized websites, including sites that may be a risk to our systems e.g. Google Forms
- Never share passwords, ID badges or access codes
- Never open suspicious or unsolicited email
- Never forward, share or upload confidential using personal messaging apps, social media or other online accounts such as personal email

# Confidential Business Information



**Our business information is valuable and confidential.** Confidential and proprietary business information is key to our success as a company. We always take appropriate measures to preserve such information.

## We Protect Our Success

Our solutions drive our business and are trusted by our clients and their customers. We continually develop and improve our solutions. Protecting our confidential and proprietary information is essential to being competitive and trusted.

To protect our confidential business information, we:

- Never leave confidential information where others can see or access it
- Access and store such information only on approved devices
- Never discuss confidential matters in public
- Ensure confidential information is always secure, even at your office desk
- Dispose of all confidential information according to company appropriately
- Always get permission from the Ethics, Risk and Compliance team before sharing confidential information

Your responsibility to protect our confidential business information does not end when you leave our company. You are still legally obligated to protect confidential information. Do not share it with any current, former or future employers. We depend on you to do what is right and take appropriate measures to preserve our confidential business information.

Always mark the confidentiality level of information or data you circulate.



# Client and Customer Confidentiality

We recognize the importance of maintaining the confidentiality of client and customer information as a cornerstone of our business ethics and professionalism.

## We Drive Client Trust

We understand that our clients and customers entrust us with sensitive data, commercial agreements, strategic plans, and valuable opportunities, and we are committed to upholding their trust by ensuring the highest standards of confidentiality and data security.

We maintain client and customer trust by:

- Maintaining robust systems and procedures to safeguard client and customer data against unauthorized access, disclosure, or misuse
- Respect the confidentiality of commercial agreements, contracts, and negotiations with clients and business partners
- Not disclosing confidential business strategies, pricing information, or competitive intelligence to third parties without proper authorization
- Exercising discretion and judgment when handling sensitive information and adhere to the principles of confidentiality in all business interactions
- Cultivating an open relationship of trust and transparency by respecting privacy, honoring confidentiality and non-disclosure agreements
- Reporting any breaches of confidentiality, data security incidents, suspicious activities, or policy violations to [SIRT@yalamanchili.in](mailto:SIRT@yalamanchili.in)

By adhering to these principles, we demonstrate our commitment to upholding the highest ethical standards, building trust-based relationships, and safeguarding the interests of our clients, customers, and stakeholders.

# Intellectual Property



**We create cool stuff that drives our business.** We provide innovative solutions and register patents and trademarks. These are our company's Intellectual Property (IP). To protect our IP, never disclose it to a third party without approval. Also, remember that anything you create, design or develop within the scope of your work for Yalamanchili is the sole property of our company.

**We respect the IP rights of others.** We take care not to infringe patents, trademarks or other rights. IP is a critical component of our business and the business of others. We respect others' IP just as we expect them to respect ours.

Remember that our responsibility to protect IP and other confidential information does not end with our employment. Wherever we may take our talents, we must always ensure that we do not disclose Yalamanchili IP.

**We protect our assets.** Some staff may have access to sensitive information, including non-public cardholder and payment account information. This information, along with our information systems and IP, can be especially vulnerable. Help us protect our intangible assets. If you know or suspect that any of our assets have been lost or stolen, report it immediately to the Ethics, Risk and Compliance team. Report any lost or stolen equipment or devices to the Corporate Information Technology team who will promptly investigate and take appropriate action to protect us.

## We Protect Our Competitive Advantage

# Accuracy In Recordkeeping



**We record and report our business with transparently and honestly.** We maintain accurate records that appropriately support business transactions in our financial statements. By following our internal controls, finance policies and procedures and recordkeeping policies, we achieve this goal. Even internal business records and communications may become public. This is why we must always avoid exaggerated information, inappropriate language and guesswork in our recordkeeping

Accurate financial records are essential to making sound business decisions and complying with the law. We must maintain the trust that investors, customers and business partners place in us. Even internal records may become public, so we never exaggerate or guess when it comes to recordkeeping.

To ensure accurate recordkeeping, we:

- Always keep detailed books, records and accounting statements
- Comply with generally accepted accounting principles, laws and regulations
- Follow all internal controls and policies
- Accurately record all our transactions, without exaggeration
- Submit all records to internal and external auditors promptly
- Report any records that appear false or misleading

# Accuracy In Reporting & Audit



# Accuracy In Recordkeeping



**We make sure accounting is accurate.** Each of us is responsible for detecting and reporting potential or actual fraud. Any activity that you believe reasonably constitutes potential or actual fraud should be reported immediately.

Fraudulent activity may include any of the following:

- Forgery
- Extortion
- Theft
- Misappropriation of assets
- Misrepresenting our company's financial condition
- Embezzlement
- Omissions of material information
- Errors in the audit or evaluation of financial statements or in maintaining financial records
- Noncompliance with our internal accounting policies or controls

To the extent possible under law, we protect those who report concerns regarding questionable accounting matters and violations of laws. If you have a question or concern regarding questionable accounting matters, contact the Ethics, Risk and Compliance team.

## We Maintain Accurate Records

# Records Information Management



Organized records ensure compliance with laws, facilitate good audits, protect information and ensure transparency. We handle our records and information with care.

The integrity of our recordkeeping is core to our business.

We optimize performance and reduce risk when we maintain records according to the law and our policies. We generate records in the course of doing business, and some must be retained for specific periods of time.

To manage records effectively, we:

- Keep and dispose of information according to our policies and internal controls
- Record financial transactions accurately
- Ensure records are easy to access, organized and secure
- Report any suspected fraud or misrepresentation in our records
- Keep any records that are subject to a legal hold as notified by the Ethics, Risk and Compliance team
- Provide any records requested in connection with an audit or investigation
- Ensure that our accounting matters include travel and expenses, accounting, internal accounting controls and financial auditing matters

## We Maintain Our Records & Information Effectively

# Social Media



**We protect our company by using social media appropriately.** We recognize the importance of social media as a valuable tool for communication, networking, and engagement. Social media platforms serve as extensions of our brand, reflecting our company culture and our purpose, vision and values.

## We Represent Our Company In The Best Way

To ensure that our online presence remains positive, professional, and aligned with our organizational goals, when posting to social media we:

- Ensure official company posts are made using the corporate social media account and contact the Communications team to arrange posting
- Conduct ourselves professionally and respectfully, engaging in constructive and meaningful conversations, fostering dialogue, collaboration, and mutual understanding, while being cautious on issues that may be controversial, sensitive or may reflect poorly on the company or offend our audience
- Treat others with courtesy, empathy, and consideration, regardless of their backgrounds, opinions, or affiliations
- Ensure information you share is accurate, truthful, based on reliable sources and avoid spreading rumors, misinformation, or unsubstantiated claims that could harm the credibility of the company or mislead our audience
- Do not disclose confidential or proprietary information
- Adhere to all applicable laws including copyright laws, intellectual property rights, privacy regulations, and advertising guidelines
- Report any concerns, violations, or to the Ethics, Risk and Compliance team

# Public Speaking



## We Represent Our Company With Integrity

**We represent the company positively and honestly.** We are all responsible for protecting the Yalamanchili brand. We always strive to protect our brand and our reputation.

**We represent the company positively and honestly.** Everything we say on behalf of Yalamanchili affects our reputation. We must always speak positively and accurately. Our clients deserve clear communication from one, consistent voice. This is why we ensure that only those who are authorized speak publicly on behalf of the company do so.

We best represent our company when we:

- Obtain Executive Committee member approval to speak on behalf of Yalamanchili
- Refer media and external industry inquiries or requests for statements to the Corporate Communications team
- Protect our confidential business information
- Are respectful on social media
- Never disclose anything that could violate employee, client or business privacy
- Get approval to use outside social media to conduct business
- Always distinguish our views from those of the company

# Upholding The Law



- Complying With Laws & Regulations
- Anti-Money Laundering, Anti-Terrorist Financing and Sanctions
- Anti-Bribery & Anti-Corruption
- Competing In Business Fairly
- Gift Giving, Receiving & Entertainment
- Insider Trading
- Competing In Business Fairly
- Anti-Tax Evasion
- Modern Slavery

# Complying With Laws & Regulations

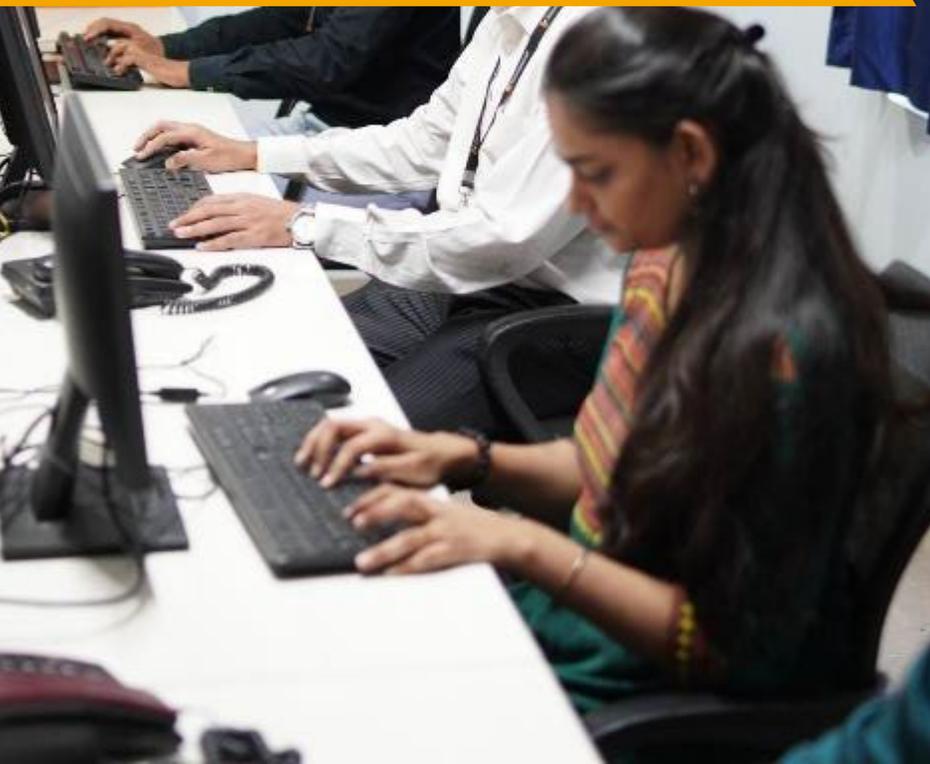


## We Follow The Law

**We are compliant with the legal and regulatory obligations that apply to our business in each of the countries in which we do business.** Our processes, procedures and controls exist not just to protect our business, but also to ensure we comply with both the word and spirit of the laws and regulations, including license obligations, in each of the jurisdictions in which we do business.

We recognize that adherence to legal requirements is not only a legal obligation but also a fundamental principle of ethical business conduct. By upholding the word and spirit of laws and regulations, we demonstrate our commitment to integrity, transparency, and accountability in all aspects of our operation.

# Anti-Money Laundering, Anti-Terrorist Financing & Sanctions



**We contribute to protecting our communities and the financial ecosystem.** We do not do business with criminals, terrorists or sanctioned governments, individuals or entities. Our business and our reputation depends on us working only with ethical partners.

## We Don't Do Business With The Bad Guys

We decide to do business with various partners based on our commitment to following the law and protecting our payment system and reputation. Our customers and business partners trust us to protect their payments from illegal activity and groups.

We adhere to all anti-money laundering, anti-terrorist and sanctions laws when we:

- Follow all controls, policies and protocols in place regarding these laws
- Notify the AML and Sanctions Compliance team with any concerns or questions, or if we notice suspicious activity
- Conduct risk-based due diligence on clients, customers, vendors and employees that
- Conduct business with reputable partners
- Follow all requirements related to sanctioned governments, entities and individuals

Money laundering is the process of hiding the proceeds of crime or making the source appear legitimate. Terrorist financing is the solicitation, collection or provision of funds from both legal and illicit sources to support terrorist acts or organizations. Sanctions restrict our business dealings with specific governments, individuals and entities.

# Anti-Bribery & Anti-Corruption



## We Protect Our Society By Doing Business The Right Way

**We believe the honest way to do business is the right way to do business.** We never offer or accept anything improper to secure business.

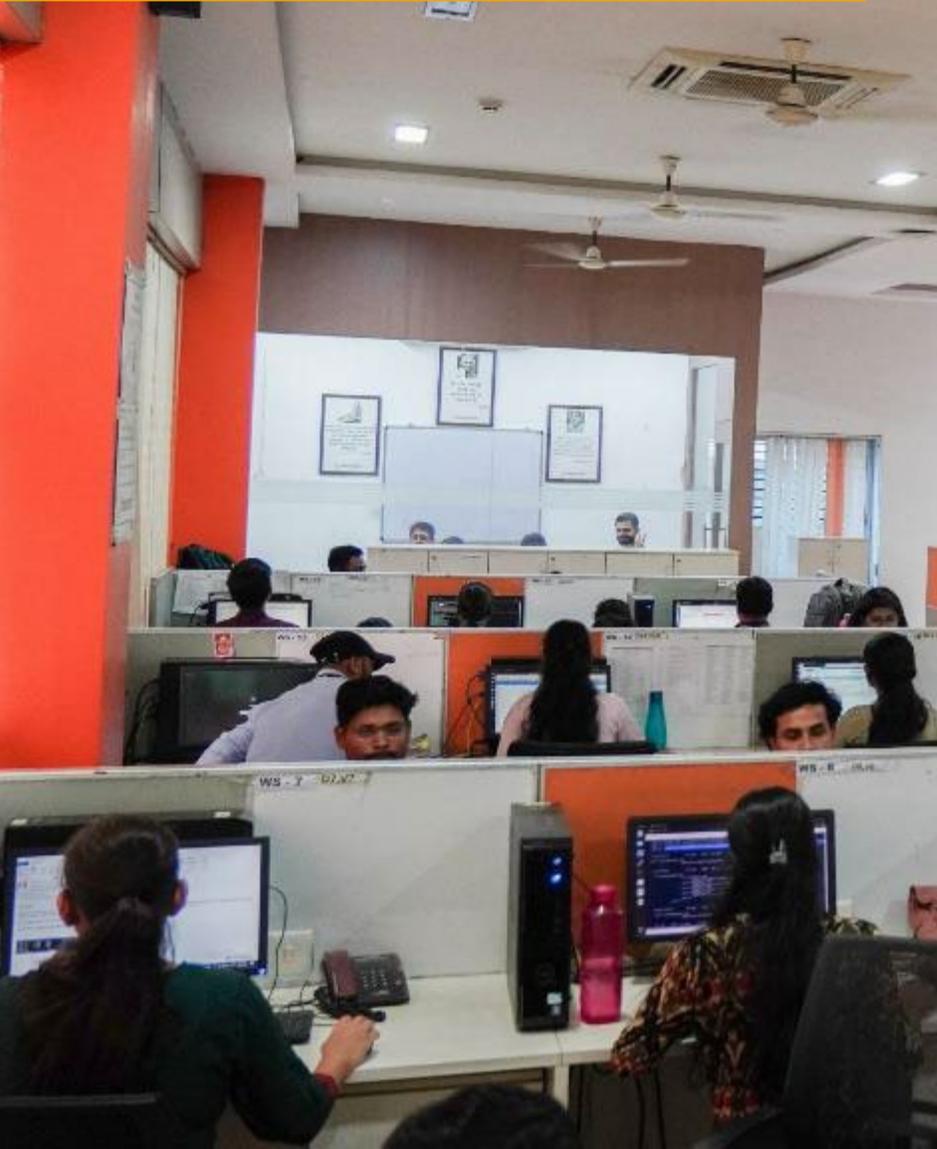
**We win business by competing fairly.** We never offer or accept anything of value to influence a business decision. The consequences for giving or accepting a bribe can be severe for the company and for you as an individual.

We follow anti-corruption laws in all places we do business, around the world. To avoid bribery and corruption, we:

- Never offer or accept anything of value to influence a business decision
- Follow all policies when we give or receive gifts and entertainment
- Take extra care when interacting with Government officials
- Know the limits on gifts and any type of value when we do business
- Contact the Ethics, Risk and Compliance team with any doubts or concerns
- Follow all policies in assessing any third parties working on our behalf
- Keep accurate, detailed records



# Anti-Bribery & Anti-Corruption



## Transparency Gets Us Good Business

**Use extra care when interacting with public officials.** We never offer or accept anything improper to secure business. This includes employees of state-owned enterprises. Many countries, states and local jurisdictions have limits on what gifts and other things of value can be offered to these parties. Know these limits, wherever you operate. What may be legal in one jurisdiction may be illegal in another.

Yalamanchili is subject to the U.S. Foreign Corrupt Practices Act (FCPA), the Indian Prevention of Corruption Act, 1988, as well as applicable anti-corruption laws of other countries in which we operate. If you are ever in doubt, contact the Ethics, Risk and Compliance team. Remember that this also applies to third parties. Third parties cannot be used to make offers that Yalamanchili cannot lawfully make itself.

Never offer something of value to a third party if you think it may be passed along to a public official in a pending business deal. Follow our procurement procedures to vet the use of third parties. If you suspect a third party is misusing Yalamanchili or any other funds, report it to the Ethics, Risk and Compliance team.

Enforcement Consequences for violating anti-bribery laws are increasingly harsh. This is as true for individuals as it is for businesses. Criminal and civil enforcement actions are increasing. These often carry harsh sentences and large fines.



# Gift Giving, Receiving & Entertainment

**We acknowledge important relationships with our partners, but we never give or receive gifts, entertainment or any other benefit that may influence, or be perceived to influence a business decisions, or impact our ability to make objective business decisions.**

## We Get Business The Right Way

Our reputation and continued success rely on making impartial business decisions. In many cases, small gifts and entertainment do not affect business judgment. They can even create goodwill between business partners, but some gifts can violate the law. We never allow even the appearance of improper influence.

We comply with rules on gifts and entertainment when we:

- Never allow gifts or entertainment to affect our business decisions
- Never accept gifts or entertainment that might appear to affect our business decisions
- Never ask for gifts
- Never accept cash or gift cards
- Never seek personal gain through our position at Yalamanchili

Sometimes we might give gifts or offer entertainment. Such offers must be:

- For a proper business purpose only
- Legal and documented
- In accordance with company policy
- Nominal in value (i.e., not cash or cash equivalent)

At times you may not be sure whether to accept a gift. In such cases, seek help from your Manager or the Ethics, Risk and Compliance team.

# Insider Trading



We never share non-public information for the purpose of buying or selling securities, nor do we use such information to tip others. Insider trading is not just unethical; it is illegal.

## We Won't Abuse Our Position Or Our Confidentiality

In the course of our jobs, we may have access to material, non-public information about Yalamanchili or our client's business, strategy or other competitive advantage. We may learn such information from our clients, vendors or partners. We never share this. Our reputation as a trustworthy company relies on it.

We prevent insider trading when we:

- Never buy or sell shares in any publicly traded company, when we have inside information
- Never share inside information outside the company
- Only share inside information within the company on a “need-to-know” basis
- Never “tip” or pass along inside information to someone who may act on it

Some information may be considered “material.” This is when an investor would likely find the information useful in deciding to trade in a company’s public securities. Examples of material, non-public information may include mergers or acquisitions, expected or actual financial performance, significant changes in executive management , new products or services or cybersecurity breaches “Insider trading” is when someone buys or sells stock while having inside information. This is illegal. Doing so could lead to serious penalties. We must avoid even the appearance of an improper transaction.

# Competing In Business Fairly



## We Win Business In A Fair Way

We compete fairly because we want to win on the merits of our products and services, not unfair business practices.

Strong competition is good for business. It makes us better at what we do, and it strengthens our partnerships. We follow all laws that protect competition in all places we do business. Our work means more and has more impact in a fair marketplace.

To ensure fair competition, we:

- Use public sources to research competitors
- Never use proprietary information without authorization
- Never gain information through improper means (e.g., through a client or contractor)
- Never set prices or divide territories, markets or clients with competitors
- Never work with a competitor to restrict sales or alter a competitive bidding process
- Never restrict clients or suppliers in ways that affect their ability to compete
- Never forward or distribute competitive information we receive to others

Sometimes we need to gather information about our competitors. We must always do so legally and ethically. Use public sources. Use good judgment. Avoid even the appearance of anything inappropriate. You may receive information that you believe is confidential or obtained unethically. If so, speak up and contact the Ethics, Risk and Compliance team. Do not share the information with others.

# Anti-Tax Evasion



## We Do Not Tolerate Tax Evasion

**Tax evasion is against the law, as is assisting or facilitating the tax evasion of others.**

Yalamanchili will be held criminally liable if any of its employees facilitate tax evasion. We do not tolerate tax evasion in any form.

We must all ensure that activities and processes are never used to assist in tax evasion.

If you have any concerns or questions on our Anti-Tax Evasion measures, contact the Ethics, Risk and Compliance team.

# Modern Slavery



## We Honour Human Rights

We are committed to complying with all applicable **Modern Slavery laws** and maintaining policies that support ethical trading principles.

There are modern slavery risks in all sectors and industries. Our exposure to modern slavery risk may come from our business operations or our supply chain. We will not tolerate any forms of slavery, servitude, exploitation or human trafficking in our business.

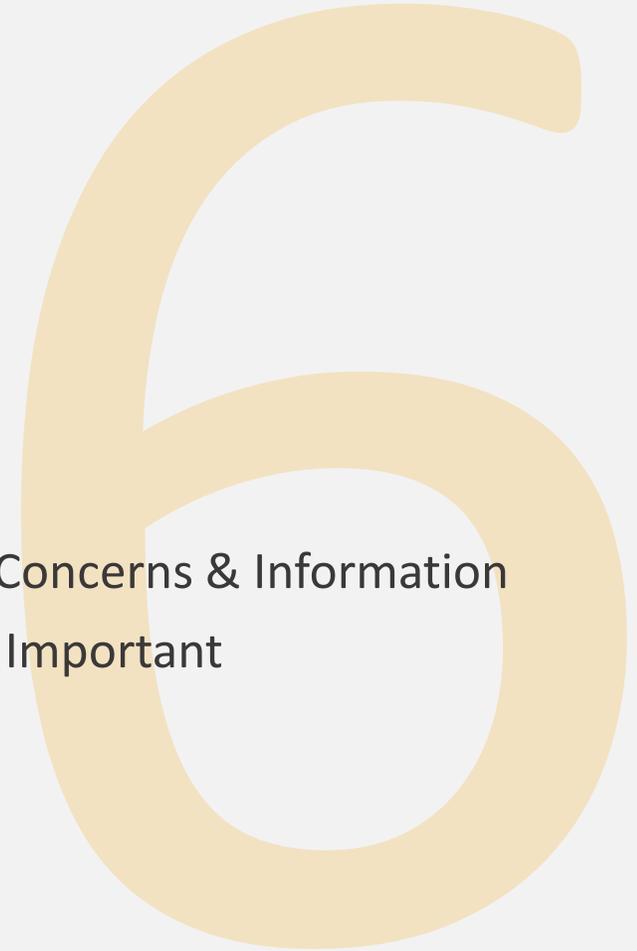
We expect businesses, companies, and other entities that provide, or seek to provide, any kind of good or service to Yalamanchili, including our suppliers, vendors and contractors (“suppliers”) to respect human rights and promote similar principles in their own supply chains.

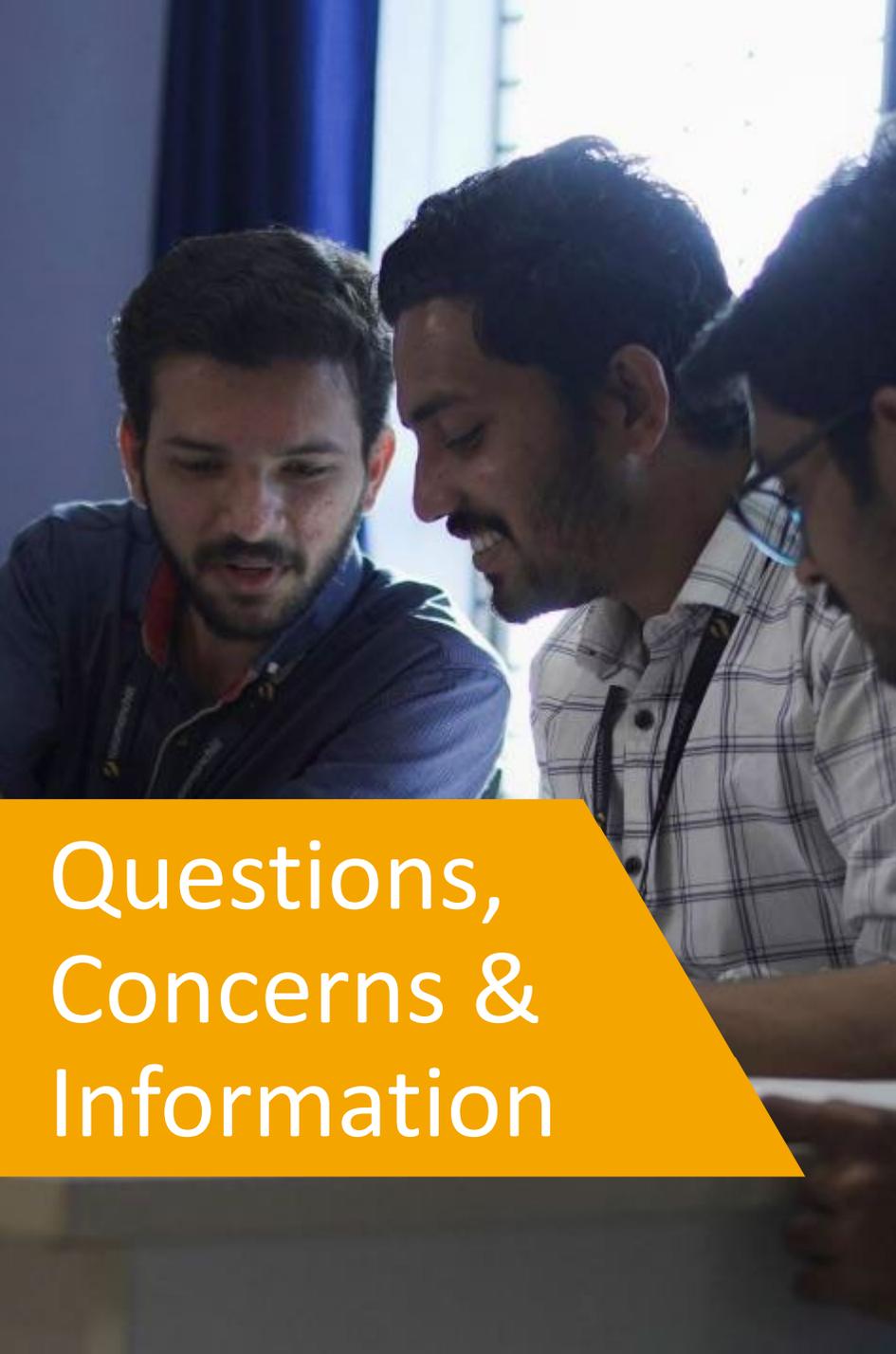
It is important to note that Yalamanchili does not manufacture goods or handle raw materials or commodities. Nonetheless, we recognize the risks in our business and within the payment ecosystem. As a global technology company, our suppliers are concentrated around areas such as coding and development, marketing, consulting and operational procurement (e.g., office supplies, computers, software). In some cases, our supply chains are global, with suppliers selected to service the entire Yalamanchili enterprise. In other cases, our suppliers are local or regional, fulfilling the specific needs of our offices around the world.

# Resources & Help



- Questions, Concerns & Information
- Why This Is Important





# Questions, Concerns & Information

## Know Where To Get Help

**The Yalamanchili Culture doesn't cover all situations you might face in your work at Yalamanchili, but we have many resources available to help you do the right thing.**

If you are unsure, you can contact:

- Your Manager
- The Ethics, Risk and Compliance team, you can e-mail [ERCOfficer@yalamanchili.in](mailto:ERCOfficer@yalamanchili.in)

You can also email our Business Conduct team confidentially, off Yalamanchili systems using [ymcbusinessconduct@gmail.com](mailto:ymcbusinessconduct@gmail.com)

- Any member of the Executive Committee
- The Business Conduct Office
- If need be, contact us confidentially, off Yalamanchili systems, using [ymcbusinessconduct@gmail.com](mailto:ymcbusinessconduct@gmail.com)

You can also go to the Ethics, Risk and Compliance intranet site.

Waivers to The Yalamanchili Culture must be submitted to the Ethics, Risk and Compliance team and can only be approved by the Organization Compliance Executive Committee.

# Why This Is Important



## You Make Our Culture

**It is you that makes the culture of Yalamanchili.** Your actions, your interactions and your attitude can make a difference. When we come together, we make a this one of the best places to work, learn, collaborate and deliver great solutions.

Yalamanchili success contributes to the success of our staff in their career and growth, our clients and their customers, our communities in which we live and work and the success of India as a whole.

**Do your bit, do the right thing. Be a champion of doing business the right way.**

# Thank You

The Yalamanchili Culture is your guide. As you apply it, I encourage you to reflect on the power of possibilities and that each and every one of us has in every decision, action and interaction we have. Every day we make hundreds of decisions. The right decisions – the ones that reflect our Purpose, Vision and Values – help us better serve our clients and customers. They build confidence in our solutions, services and the trust in Yalamanchili. Never underestimate the ability you have to make a difference. Every decision you make affects who we are and our future success. Your decisions, actions and interactions drive our future reputation.

Use the Yalamanchili Culture to help you make the right decisions. The Ethics, Risk and Compliance team are here to help you whenever you need guidance or have questions.

As we continue to work on growing our business and unleashing the possibilities for our future, I am grateful for your commitment to make Yalamanchili the best place to work and grow.

Paul Makaruś

Group Chief Ethics, Risk & Compliance Officer (Interim)



Our Culture, Our Success



[www.ysppayments.com](http://www.ysppayments.com)

2025