



CODE OF BUSINESS CONDUCT AND ETHICS

Current Version: 1.0

Non-legalese, Simple English Summary

1. This policy specifies that the highest ethical and professional conduct is expected in all dealings with Wingify.
2. All applicable laws must be complied with, a safe and healthy work environment must be maintained, and any violent or threatening behaviour should not be engaged in for any dealings with Wingify.
3. Any kind of discrimination, bribery in any form, intolerance of any religious, political or cultural sentiments are unacceptable.
4. Retaliating against any person/s who report or raise complaints in respect of any business conduct or ethics shortcomings is not tolerated.

At Wingify, we ensure that we maintain the highest professional standards in all our dealings. Ethical conduct, Professionalism, Integrity, honesty, transparency, fairness, sustainable work practices, non-discrimination, equal employment opportunities, safe harassment free workplace, ensuring human rights, dignity, respect and, compliance with all rules, regulations, laws are the cornerstones of our business. All Wingify Customers, Vendors, Partners, Resellers, Partner Referrals etc. (Hereinafter together referred to as “Business Partners”) are expected to adhere to and maintain the same standards in all their professional dealings with Wingify. The required standards that our business partners are expected to adhere to are listed below:

1. Compliance with all applicable Laws, Rules, Regulations, Ordinances etc., including but not limited to Anti-bribery laws, FCPA, Laws against sexual harassment, laws against slavery / modern slavery, laws preventing child labor, Privacy laws including GDPR compliance.
2. Ethical conduct and Professionalism – We believe that our employees, as well as our Business Partners, must always ensure they conduct themselves professionally, keeping in line with Industry practices and conventions. This promotes a respectful workplace where business flourishes. Any form of verbal or physical abuse, threatening remarks, profanity, disrespectful communication, lewd comments, aggressive behavior etc., will not be tolerated. As we are a global organization, we expect everyone to keep cultural requirements in mind to ensure we are tolerant and do not hurt any religious, political or cultural sentiments.
3. We do not tolerate any discrimination on any grounds and afford equal opportunity to one and all. We expect fairness, honesty, transparency, and integrity in all dealings.
4. We provide a clean, safe, and healthy work environment for our employees and expect the same is maintained by our Business Partners. A safe and healthy workplace not only includes safety and health rules and practices, but also reporting accidents, injuries and unsafe conditions, procedures, or behaviors and having freedom of expression. We are very strict to action against complaints of Violent and threatening behavior and have set processes in places to ensure such complaints are addressed, verified, resolved and disciplinary action taken against employees for the same. For business partners, it may lead to a termination of our business engagement with them.
5. Bribery and dealings with Government personnel- We are intolerant of any form of bribery and are compliant with anti-bribery laws including the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, and similar legislations in other countries prohibiting any form of bribery. Any dealings with Government personnel are



strictly regulated and employees are guided by our Legal Department for ensuring legal regulations governing payments and gifts to governmental officials are met.

6. Finance record keeping- Wingify supports full, fair, accurate and timely maintenance of all financial transactions while adhering to all applicable laws and any internal organization controls and measures set up. We audit our internal processes and procedures annually and expect to be able to do the same for our Business Partners as regulated by the contractual arrangements with them.
7. Conflict of Interest- Please report any conflicts of interest you may have that will result in you having competing loyalties that may impact VWO or its users in any manner. We encourage avoidance of any behavior that may cause or be perceived to cause a conflict of interest and /or create a benefit for you, your friends, your family, or Business associates, or any of your other Business dealings.
8. Retaliation is not tolerated- Employees and Business Partners are encouraged to raise any questions, concerns or to report violations of this Code of Conduct with Executive Management or by dropping an email to Legal@vwo.com. We do not tolerate any form of retaliation against any person who raises a complaint or concern for an alleged violation of our Code of Conduct. The subject of the complaint, whether an employee or a Business Partner, is expected to cooperate with Wingify during the investigation of potential or alleged misconduct.