# GW SOLUTIONS Ltd.

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# CODE OF CONDUCT

*Standards of Ethical Behaviour for All Personnel*

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| **Document Title** | Code of Conduct |
| **Company** | GW SOLUTIONS Ltd. |
| **Registration / VAT** | BG201793517 |
| **Registered Address** | Asen Zlatarov 16, Plovdiv 4000, Bulgaria |
| **Website / Service** | www.iban.com |
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| **Document Owner** | Senior Management |

> *At GW SOLUTIONS Ltd., our reputation is built on trust. We provide financial infrastructure services — IBAN validation — that clients rely on for accuracy, integrity, and security. Everything we do must reflect those same qualities internally. This Code of Conduct is not a box-ticking exercise; it is the practical expression of the values we expect every person associated with our company to uphold.*
>
> **— Senior Management, GW SOLUTIONS Ltd.**

## 1. Purpose and Scope

This Code of Conduct (the "Code") establishes the ethical standards and behavioural expectations that apply to everyone who works for or on behalf of GW SOLUTIONS Ltd., including:

- Directors and senior management
- Employees (full-time, part-time, and fixed-term)
- Contractors, consultants, and freelancers
- Agents and authorised representatives

This Code operates alongside other Company policies, including the Anti-Bribery & Corruption (ABC) Policy, Data Protection Policy, and any applicable employment agreements. In the event of conflict, the stricter standard applies.

## 2. Our Core Values

GW SOLUTIONS Ltd. is guided by six core values that underpin all of our decisions and conduct:

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| **1** | **Integrity** | We do what we say and say what we do. We act honestly in all circumstances, even when no one is watching. |
| **2** | **Accountability** | We take responsibility for our actions and decisions. Mistakes are acknowledged and corrected, not concealed. |
| **3** | **Respect** | We treat every person — colleagues, clients, partners, and public officials — with dignity and professionalism. |
| **4** | **Reliability** | Our clients trust our services for critical financial processes. We uphold the highest standards of accuracy, availability, and security. |
| **5** | **Transparency** | We communicate openly, record transactions accurately, and do not pursue hidden agendas. |
| **6** | **Compliance** | We follow the law and our internal policies. We do not take shortcuts that expose the Company or individuals to legal or reputational risk. |

## 3. Honest and Ethical Business Conduct

### 3.1 General Standard

All personnel must conduct Company business honestly, fairly, and in good faith. Deception, misrepresentation, and manipulation are prohibited in all forms — whether directed at clients, colleagues, partners, or regulatory authorities.

### 3.2 Conflicts of Interest

A conflict of interest arises when personal interests could — or could be perceived to — compromise professional judgement. Personnel must:

- Disclose any actual or potential conflict of interest to management promptly
- Refrain from participating in decisions where a conflict exists
- Not use their position or access to Company information for personal financial gain
- Seek written approval before taking on external employment or business interests that could conflict with the Company's activities

### 3.3 Confidentiality

Personnel have access to sensitive information about the Company, its clients, and its technical systems. All such information must be treated as confidential and must not be disclosed to unauthorised parties during or after engagement with the Company. This obligation survives the termination of any employment or contract.

## 4. Anti-Bribery and Anti-Corruption

GW SOLUTIONS Ltd. operates a strict zero-tolerance policy on bribery and corruption. All personnel are required to read and comply with the Company's Anti-Bribery & Corruption (ABC) Policy. Key obligations include:

- Never offer, give, request, or accept a bribe or corrupt advantage in any form
- Never make facilitation payments, regardless of local custom or expectation
- Ensure that any gifts or hospitality given or received are reasonable, transparent, and properly recorded
- Report any request for, or offer of, a bribe immediately to management

Any breach of anti-bribery obligations will be treated as gross misconduct and may result in immediate termination and criminal referral.

## 5. Data Protection and Information Security

### 5.1 Data Protection

The Company processes personal data in accordance with the General Data Protection Regulation (GDPR) (EU 2016/679) and applicable Bulgarian data protection law. All personnel who handle personal data must:

- Process personal data only for lawful, specified purposes
- Ensure data is accurate, adequate, and not retained longer than necessary
- Report any actual or suspected data breach to management without delay
- Not transfer personal data outside the EEA without appropriate safeguards

### 5.2 Information Security

Given the nature of the Company's services — financial data validation — information security is critical. Personnel must:

- Use strong, unique passwords and multi-factor authentication where available
- Not share login credentials or access rights with other individuals
- Report any suspicious activity, phishing attempt, or security incident immediately
- Use Company systems and data only for authorised business purposes
- Not install unauthorised software on Company devices or systems

## 6. Respect and Inclusion in the Workplace

GW SOLUTIONS Ltd. is committed to maintaining a working environment characterised by dignity, respect, and equal opportunity. Discrimination, harassment, and bullying in any form are prohibited.

### 6.1 Prohibited Conduct

- Discrimination on the basis of sex, age, race, ethnicity, national origin, religion, disability, sexual orientation, or any other protected characteristic
- Verbal, written, or physical harassment or intimidation
- Bullying or abusive behaviour towards colleagues, clients, or third parties
- Creating a hostile or uncomfortable working environment

### 6.2 Reporting

Any person who experiences or witnesses behaviour that violates these standards should report it to management. All reports will be handled with sensitivity and confidentiality. The Company will investigate promptly and take appropriate action.

## 7. Use of Company Resources

Company resources — including systems, equipment, software, data, and working time — must be used responsibly and primarily for legitimate business purposes. Incidental personal use is acceptable where it does not interfere with business activities and does not violate any other provision of this Code.

Specifically prohibited:

- Using Company systems to access, store, or distribute illegal, offensive, or pornographic material
- Using Company resources to conduct competing business activities
- Sharing or misappropriating Company intellectual property
- Misrepresenting one's identity or authority when acting on behalf of the Company

## 8. Regulatory and Legal Compliance

GW SOLUTIONS Ltd. operates in a regulated environment with obligations under Bulgarian, EU, and international law. All personnel must:

- Comply with all applicable laws, regulations, and regulatory requirements relevant to their role
- Complete all required regulatory training and certifications
- Not assist clients or third parties in circumventing legal or regulatory obligations
- Maintain accurate, complete, and timely records as required by law and Company policy

Where personnel are uncertain about whether an action is legally compliant, they must seek guidance from management before proceeding.

## 9. External Communications and Social Media

When communicating publicly — whether in person, in writing, or via social media — personnel must:

- Not make statements that could be construed as representing the official views of GW SOLUTIONS Ltd. without authorisation
- Not disclose confidential or commercially sensitive information
- Not make derogatory or defamatory remarks about the Company, its clients, competitors, or colleagues
- Act professionally and in a manner consistent with this Code

Any authorised external communications about the Company, its products, or its performance must be factual, fair, and approved by management.

## 10. Raising Concerns and Whistleblowing

GW SOLUTIONS Ltd. encourages an open culture in which concerns can be raised without fear of retaliation. If you become aware of, or suspect, a violation of this Code or any applicable law or policy, you are expected to report it.

Reports may be made to:

- Senior management of GW SOLUTIONS Ltd. (in person or in writing)
- By post to the registered address: Asen Zlatarov 16, Plovdiv 4000, Bulgaria

The Company will:

- Treat all reports seriously and investigate them promptly and fairly
- Maintain confidentiality to the greatest extent possible
- Protect any person who raises a concern in good faith from retaliation, victimisation, or disadvantage

Malicious, vexatious, or knowingly false reports are themselves a breach of this Code and will be dealt with accordingly.

## 11. Consequences of Breach

Breaches of this Code will be taken seriously. The Company will investigate alleged violations and respond proportionately, which may include:

- Formal warning or written reprimand
- Mandatory re-training or remedial action
- Demotion, suspension, or reassignment
- Termination of employment or contract
- Referral to regulatory authorities or law enforcement, where legally required or appropriate

The severity of the response will reflect the nature, extent, and impact of the breach, as well as any prior conduct.

## 12. Review and Updates

This Code will be reviewed at least annually by senior management, or sooner where material changes in law, regulation, or business practice make a review necessary. Personnel will be notified of any material updates and may be required to acknowledge revised versions.

## 13. Acknowledgement of the Code

All personnel are required to confirm that they have read, understood, and agree to comply with this Code of Conduct. New starters will be asked to sign an acknowledgement form upon joining. Existing personnel will be asked to re-confirm compliance on any material revision.

| **Approved by:** | **Date of Issue:** |
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| Senior Management<br>GW SOLUTIONS Ltd. | April 2026<br>Next Review: April 2027 |

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