## About this Code

#### Purpose

The purpose of the Wolt Global Seller Code of Conduct (hereinafter the "Code") is to establish uniform compliance standards for our sellers to adhere to, and forms part of our contractual relationship with them. This is in addition to the required compliance with applicable relevant laws and regulations. At Wolt, we are committed to operating with the highest degree of integrity and regulatory compliance, and we expect our sellers, as well as their personnel (people such as your employees, directors, officers, agents, representatives, and subcontractors) to share that commitment and follow this Code as well as the overall Code of Conduct, as applicable.

#### Scope

This Code applies to all of our sellers, their employees, subcontractors and affiliates. This means anyone involved in the production of goods or services for Wolt, including fleet account managers, in any location in the world, with the exception of: individual courier partners and merchant partners such as restaurants and retail businesses, which are required to follow the <u>Guidelines for Wolt Partners</u>.

#### Responsibilities

Our sellers are responsible for reading, understanding and acknowledging this Code, and for ensuring that it is followed by their employees, subcontractors and affiliates. From time to time, Wolt reserves the right to verify the compliance of our sellers with this Code and to take action on issues that are identified.

#### Document owner and amendments

This Code is owned and maintained by the Wolt Legal and Procurement Teams. From time to time, we may amend it to stay current and in line with evolving requirements. The latest version of the Code is available on the Wolt website.

## Delivering on sustainability together with our sellers

At Wolt, our mission is to make cities better places to live. Whether it's connecting small businesses like restaurants or retailers with their customers, or by creating local jobs for couriers, we understand that our success is linked to the sellers we choose to partner with. We believe that if we truly want to be a sustainable company, we need to work together with our entire value chain to continuously improve.

While some of the aspects included in this Code may be new or *development* areas for our sellers, all sellers are expected to read, understand, acknowledge and proactively work towards bettering themselves and their partners, as a condition of doing business with us.

## Reporting issues of non-compliance

Open and honest communication are the foundation of strong relationships. All of our sellers, their employees, partners and other stakeholders are encouraged to speak up if they witness anything that contravenes the information or expectations outlined in this Code, or compliance with national/local laws and Wolt policies. We reserve the right to follow up with each of our sellers to verify their compliance with this Code as a minimum condition of doing business together. In case we find any areas of non-compliance with this Code and depending on the severity of the breach, we will take the appropriate actions which may include a desk review, an in-depth investigation, suspension or termination of the relationship with that seller. To the extent that a seller's contract contradicts or supplements this Code, the contract shall govern as it applies to that contradicting or supplemental provision.

# Wolt

Issues of non-compliance should be reported directly to our confidential **third party hotline**, <u>Speak Up</u>, or to the Wolt compliance team directly at <u>compliance@wolt.com</u>. Additional details are available on our website.

## Labour and Working Conditions

#### Working hours and conditions

Your employees should always be present voluntarily and should never be put at risk of physical harm due to their work environment. Wolt will preference sellers that have a maximum work week of 48 hours, respecting the daily maximum working hours, plus an exceptional overtime of 12 hours per week, worked voluntarily, OR the maximum permissible amount of overtime stated in the applicable national/local law, whichever is less. You should allow employees at least one day off in seven days, or equivalent privileges.

Wolt encourages our sellers to monitor and support the positive mental health of their employees, especially during challenging periods such as global pandemics or times of political unrest. That includes making sure that the employees take breaks from their work and that they are properly instructed in their activities and protected from excessive physical or mental fatigue.

#### Child labour and the protection of young workers

You should not engage in any forms of child labour, which means employing anyone younger than 16 years of age (or higher as defined by the relevant national/local law) for unskilled work, and anyone younger than 18 years of age (or higher as defined by the relevant national/local law), for skilled work, in any of your facilities. If applicable and relevant, you should have special provisions for the protection of young workers such as for e.g. ensuring they don't operate heavy machinery, work night shifts or are engaged in any work that is likely to harm their mental, social, or physical health, or that is morally dangerous or harmful.

#### Forced or slave labour, modern slavery and human trafficking

You should not engage in any forms of forced or slave labour in any of your facilities. You should also take additional measures to ensure that you do not support (even indirectly) any forms of modern slavery or human trafficking through your business dealings with your supply chain partners.

#### **Disciplinary practices**

You should not use any forms of corporal punishment or mental or physical coercion to discipline your employees.

#### Wages and benefits

You must pay your employees the minimum wage, if existent, in the national jurisdiction, in the countries where you operate. We strongly encourage you to pay employees a <u>living wage</u>. Wages should always be paid directly to the individual workers, in legal tender and at regular intervals no longer than one month.

Wolt sellers should provide their employees with access to adequate social, health and accident insurance when these are not available in the country of operation.

#### Freedom of association and collective bargaining

You should recognize and not interfere with your employees' right to self-organize, to defend their interests and to engage in collective bargaining, in accordance with applicable law and practice. Support such efforts by appropriate means.

#### Diversity, equality and inclusion

You should create an inclusive work environment that promotes mutual respect, gender equality and equal opportunity for all, including in how you hire, promote, remunerate and develop your employees and how you operate your business (e.g. purchasing from small sellers or women-owned businesses).



#### Discrimination

You should not discriminate against any person or persons on the grounds of race, color, gender, age, religion, marital status, sexual orientation, political opinion or national or ethnic origin, or other similar characteristics. You must ensure that appropriate measures are in place to mitigate discrimination and bias, including in how you hire, promote, remunerate and develop your employees and how you operate your business.

#### Health and safety

You should always create and maintain a safe and clean working environment for your employees by ensuring that risks to their health and safety (including accidents) are identified and mitigated. This includes, if relevant and appropriate, ensuring you provide them with adequate personal protective equipment and clothing, training and equipping your facilities with correct signage. Moreover, all sellers must comply with the occupational health and safety requirements of the respective country you are operating in. Your employees should always have access to clean drinking water and clean sanitary facilities.

### **Environmental sustainability**

#### Greenhouse gasses, energy, waste and water

You should proactively identify, understand, and improve your negative environmental impact. At a minimum, this includes properly measuring and reducing your greenhouse gas emissions across your value chain, energy consumption, creation of waste and your water consumption, and ensuring that all required environmental permits are valid and in good standing.

#### Hazardous waste and chemicals

If applicable and relevant, you must also have a proper system and valid permits in place for managing chemical and hazardous materials, waste water and solid waste. Wolt strongly encourages sellers to explore sustainable alternatives (processes, products, materials or solutions) that can be utilized and/or explored with us.

## Fair and ethical business practices

#### Communication

You should be open and honest and tell us when things go wrong. Wolt strongly encourages our sellers to publicly report on their progress for each of these areas. Sellers are forbidden from using the Wolt brand in any external or public facing communications without express written permission from Wolt.

#### Compliance with laws

You should operate with ethics and integrity. You must comply with the national/local laws and regulations of the country you operate in and which govern your business as well as holding the relevant permits, even if some of those laws are international or foreign in nature. This includes but is not limited to being in compliance with all anti-trust competition laws and regulations or any applicable tax obligations, and/or food safety and quality requirements (if applicable).

#### **Conflicts of interest**

You should regularly identify and disclose any actual, potential or perceived conflicts of interest to Wolt so that these can be addressed in the appropriate manner.

#### **Confidential information**

You should respect and safeguard Wolt secrets and proprietary information to the fullest extent possible by ensuring that robust systems are in place and that employees are held accountable for adhering to those systems.

#### Bribery, corruption and anti-money laundering



## Wolt Global Seller Code of Conduct

You should never engage in bribery, directly or indirectly, or other corrupt business practices including, but not limited to improper payments, gifts, hospitality or any other gift which may inappropriately influence business decisions, especially with Wolt employees. You should not make donations on behalf of Wolt or Wolt employees.

Wolt sellers should always have appropriate systems and processes in place to mitigate any potential for money laundering, or financing terrorist, military or criminal activities. This includes keeping appropriate books and records of financial transactions, and prohibiting insider trading or any other illegal or inappropriate use of insider information.

#### Sanctions

You should not be owned, controlled by, engaged with or otherwise affiliated to a sanctioned entity or party (including individuals, companies or countries). You should not be involved in the export, import, sale and supply of "controlled" goods, software, or technologies. We reserve the right to verify the ownership structure of your operations to ascertain no sanctions are breached and to block payments and/or suspend the activities on Wolt Services pending investigations regarding sanctions, anti-money laundering and anti-terrorist financing investigations.

#### Sub-sellers

You should identify and keep records of your own sellers and subcontractors and ensure that they are held accountable to the same expectations outlined in this Code.

## Acknowledgement

I acknowledge that I have received and read a copy of Wolt's Global Seller Code of Conduct, that I have understood the contents and that my company agrees to abide by this Code.

I acknowledge that this Code represents a key annex to any seller-buyer agreements between my company and Wolt or any of its subsidiaries.

To the best of my knowledge, my company is compliant with the Wolt Global Seller Code of Conduct.

I have the authority to bind the company named below.

Name:	 -
Title:	 -
Company:	
Signature:	
Date:	 (DD/MM/YYYY)

Please complete and return this page to your Wolt contact or buyer directly.