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Declaration on Corporate Responsibility

Wirecard AG bears responsibility. As a financial infrastructure company for payment processing, the company ensures the reliability of cashless payment processes worldwide, thus contributing an important component to the development of the digitized society. Internationally, the importance of digital payment and online commerce is growing steadily among all social classes and is particularly noticeable in these times of restricted personal freedom of movement due to the corona virus. This would not be possible without the digital financial infrastructure behind it.

Wirecard defines its responsibility also in accordance with the requirements of the ESG categories. For Wirecard, environmental protection, social responsibility and responsibility in sustainable corporate management are the foundations of its corporate activities. Wirecard acknowledges the requirements of the EU Green Taxonomy and assures that its economic activity is ecologically sustainable, that damage to the environment is not part of its business activities and that the company sees itself as part of a circular economy. Wirecard employs around 5,500 people worldwide. The company complies with all local social standards and guarantees employee rights in the various nations and jurisdictions in which it has employees. Wirecard is committed to the upholding of human rights at all its locations. Wirecard's global presence extends to the regions of Europe, Asia-Pacific, Latin America, North America and Middle East/ Africa. The European core markets are Germany, France, Great Britain, Ireland, Austria and Romania. Wirecard's international presence is structured in five core locations, with a number of smaller country units assigned to each core location. In Europe, this is the group headquarters in Aschheim, in the Asia-Pacific region Singapore, in Latin America São Paulo, in North America Conshohocken (Philadelphia) and in the Middle East/ Africa region Dubai. Wirecard complies with the Corporate Governance Code and follows the rules for good corporate management. The company issues annual declarations of compliance in accordance with Section 161 of the German Stock Corporation Act.

The management of Wirecard AG acknowledges its responsibility to address these issues appropriately.

ESG

Society

2 billion people, around a quarter of the world's total population, currently have no access to financial services. In this regard, Wirecard makes a contribution to sustainable development. Some of its products

include prepaid card solutions for people who have no access to credit cards or traditional bank accounts. Our services also enable secure and simple handling via mobile terminals, easy access to mobile e-accounts and the avoidance of cash, including for hygiene reasons. Future growth in this business area will be supported by the global megatrend of digitization. With its risk management and anti-fraud systems, Wirecard AG helps business customers to cope with the challenges of global e-commerce and to minimize sales losses as a result.

Wirecard AG is currently establishing a sustainability management system that monitors non-financial issues and services along the entire value chain and advises the Management Board on sustainability issues. Wirecard AG has been conducting a materiality analysis since 2018 which is updated regularly. This involves evaluating and analyzing the expectations and requirements of relevant stakeholder groups. The aim is to identify those issues that are of particular importance to the company's business activities and have a significant impact on them. Furthermore, Wirecard will define qualitative and quantitative measurement figures (KPIs) and give regular progress updates.

Environmental protection

The Wirecard AG business model per se has only minor environmental impact and related risks. The cashless transactions of the more than 300,000 merchants connected worldwide are processed virtually paperless using the fully digital platform of Wirecard AG. The decentralized, global data centers of Wirecard AG are operated with electricity from renewable energies wherever possible. The business activities of Wirecard AG do not pollute groundwater or air. Moreover, the support of online trading reduces individual trips and reduces the load on traffic routes.

Climate protection

With regard to the business model, the Group Risk Management of Wirecard AG has not identified any climate-related, material risks at present, although constant monitoring is carried out within the framework of the internal "Wirecard Group Risk Policy".

New technologies enable Wirecard to create new sales potential with customers operating business models relevant to climate protection, for example in the areas of e-mobility and car sharing as well as smart grids. At the same time, Wirecard is developing an emissions management system to establish an emissions reduction strategy.

Today, for example, we are already involved in these areas:

- Use of green energy for all data centers worldwide
- Energy efficiency measures in the area of company-wide power supply

At our location in the U.S., Wirecard has been compensating for business trips through a carbon offsetting provider since 2019. In 2020, Wirecard AG will report on its emissions performance for the first time within the scope of the CDP (Carbon Disclosure Project). Further measures are currently in preparation.

Employees

For an international service-oriented company, employees are the most valuable asset. In order to bind them to the company in the long term and provide them with additional qualifications, Wirecard regularly invests in the training and continuing education of its staff.

Wirecard does not tolerate any discrimination or disadvantages at its operating units. All executives of Wirecard AG worldwide are required to immediately and consistently stop any kind of discrimination. Wirecard also counters all forms of harassment with a zero tolerance strategy.

By treating everyone with trust and respect, Wirecard creates the necessary foundation that enables each individual employee to optimally develop his or her potential and to experience appreciation. Wirecard hires employees solely on the basis of their abilities and fosters them purposefully.

Wirecard aims to be perceived globally as an attractive employer and to inspire the best talents for the company.

Since diversity and equal opportunities are also to be ensured at the management and monitoring level, a diversity concept was developed for the composition of the Group's Management Board and Supervisory Board.

The company complies with all local, social and legal standards and guarantees employee rights and equal opportunities in the various nations and jurisdictions in which it employs people. Wirecard is committed to the upholding of human rights at all its locations and opposes wage dumping.

Governance

The Wirecard AG is committed to corporate responsibility and respects the recommendations of the Corporate Governance Code for good corporate management. The company issues annual declarations of conformity in accordance with Section 161 of the German Stock Corporation Act.

In June 2019, the Supervisory Board of Wirecard AG formed the following committees to improve its control functions:

- Audit Committee
- Compensation Committee
- Personnel and Nomination Committee.

In the Code of Conduct, the Board of Management has defined the values that determine the Group's social and ethical self-image and provide the essential framework for guiding our actions. It is based on three principles:

- Integrity and reliability
- Communication, privacy and transparency
- Respect and responsibility

As a result of the company's growth and the avoidance of concentrations of power, the Executive Board is to be expanded by an anticipated two positions from four to six members.

Compliance

The definition of corporate values in a Code of Conduct and the specification of these values in internal guidelines are part of the compliance management system of Wirecard AG. In particular, this includes training all employees with regard to compliance-relevant topics and the possibility of anonymously submitting information via a whistleblowing system. The compliance requirements are also imposed on business partners and are regulated by contract in our IT purchasing conditions as part of the process of integration of compliance clauses.

In 2019, the Group Compliance Office, which is responsible for the entire Group, was established as an independent department within the Wirecard AG as parent company of the Group. The department is responsible for developing a Group-wide compliance strategy and for processes and systems for implementing compliance requirements, particularly with regard to the non-financial issues of anti-

corruption and data protection, and monitors their Group-wide implementation as well as their operational execution.

A standardized Group-wide training concept was implemented and, for the purpose of realizing this concept, an online training course was purchased from an internationally renowned training provider, which includes anti-corruption training as well as other compliance-relevant training topics.

Data protection and information security

As a technology company, we are aware of the data protection and data security risks associated with the digitization of payment processes. The use as well as the protection of personal data are integral components of the business model of Wirecard and its subsidiaries.

There is regular coordination between the Group Compliance Office and the external data protection officer as well as the IT departments involved in order to be able to map data protection regulations in terms of procedures and systems.

Group-wide risk analysis is a central control element in the Group-wide prevention of money laundering and terrorist financing. In addition, the Group AML Office department provides support and advice to local anti-money laundering officers and product managers in the development of new products, the opening up of new markets or the exploitation of new sales opportunities.

Perspective

As a stock exchange-listed company, Wirecard AG sees transparency as a key aspect of effective market and capital market communication. To this end, the company has created a separate transparency section on its homepage in 2020, where it reports on significant business developments. This also includes the full publication of a special review report, which is intended to disprove accusations made against Wirecard. In the first half of 2020, Wirecard also intends to provide information on the subject of sustainability and to present its achievements on its website. The non-financial statement to be published in April 2020 contains additional information.