

# OUR CODE OF CONDUCT.

INTEGRITY COMES FIRST.

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# A message from our founders.

*At Wayfare, we believe in fostering a positive, inclusive, and respectful environment for everyone. Our Code of Conduct is a reflection of our shared values and commitment to upholding the highest standards of integrity and professionalism in all our interactions.*

*This Code establishes clear guidelines for behavior, ensuring everyone feels respected, supported, and secure. It applies to everyone in our community—employees, partners, trainees, volunteers, and anyone connected with Wayfare. By embracing these standards, we collectively contribute to a culture of mutual respect, collaboration, and trust.*

*We remain committed to ongoing learning and improvement, and we welcome open dialogue and feedback to better uphold our values.*

*Thank you, for being a valued member of our community and for helping us create a positive environment for all!*

*Anda & Wim*



# Introduction.

Our Code of Conduct outlines our unwavering dedication to ethical and honest business practices. It serves as a guide for our actions, ensuring that we maintain the highest standards in every aspect of our work.

## Who has to comply with our Code?

Our Code applies to everyone in our company, at every level, including employees, managers, collaborators and founders. We expect our third parties, including suppliers, customers and business partners, to act in a way that is consistent with the principles and values of our Code when conducting business with us. We expect employees working with our third parties to hold them accountable.

## What happens when our code is violated?

Employees who violate the law, our Code or our policies may be subject to disciplinary action, up to and including termination. Depending on how serious the incident is, there can be even civil or criminal consequences for the person involved or for Wayfare. We expect everyone to do their part to protect our reputation, our company and our customers.

### What does it mean to be accountable?

We are each personally responsible for operating with high performance and high integrity. We have accountability at a personal level.

- pro-actively contributing to the capability of the team, sharing responsibility and rewards and getting the work done in the most effective and efficient way
- supporting each other's work by being transparent, honest, fair, direct and respectful
- gaining the trust of our customers by proactively anticipating, meeting and exceeding their needs and expectations
- showing consistency in words and actions
- demonstrating a commitment towards continuous improvement and development
- behaving fairly, honestly, professionally and ethically, no matter the situation

## Raising concerns and speaking up

An essential part of performing with high integrity and delivering exceptional results is taking action when you believe the law, our Code, or our policies may have been violated or are about to be violated. When you suspect misconduct, it's important that you speak up about it.

## How to speak up

There are many ways to speak up:

- If you are comfortable in doing it, directly confront the situation with.
- Otherwise, share your concern with your manager, or any other manager in the company. Often, managers will be able to offer guidance and answer any questions.
- If you're not comfortable discussing the situation with your manager, you can go to HR or Upper Management.



# Our purpose & values.

## OUR PURPOSE

Delivering meaningful software and long-lasting partnerships. We create valuable solutions for our partners that drive their business forward and help them reach their significant goals.

## HOW DO WE WORK? OUR VALUES

Core values are the essence of a company: they are timeless, shape culture and reflect principles and beliefs. We embraced 4 values reflecting our desire to build something valuable and durable alongside our customers.

Our guiding principles, our values and beliefs, shaping how we work, collectively and individually are:



## Commitment to delivering exceptional customer experiences

We are willing to anticipate, meet and exceed the needs and expectations of our customers. It involves working together, building long-term relationships, focusing efforts to add value to the business of our customer and to Wayfare.

**We listen to our customers,** striving to understand their challenges, we invest time in finding the most innovative and relevant solution and we put effort into developing, implementing and maintaining it.

**We keep our promises.** We will never let them down because we have the willingness to bind ourselves with their goals and beliefs.

## Teamwork

We cherish the value of teamwork. **We know that we are more powerful together.**

We work together, cohesively, towards a common goal, creating a positive working atmosphere, and supporting each other to combine individual strengths to enhance team performance.

## Integrity

We aspire to behave **honestly, fairly and ethically**, showing consistency in words and actions, regardless of the situation. We commit to being open, taking time to understand others and to respect them.

**At Wayfare, the value of trust that others have in us is far beyond anything that can be measured.**

## Innovation

In our understanding, innovation is a “significant positive change” of something, when our result is embraced and used by others who have experienced that problem. It’s a result, it’s an outcome, it’s something we work on, for solving an existent problem or an anticipated one.

**We are naturally curious about technology and about people.** We explore every day how technology can be used to mold our creative ideas into real solutions that will be perceived as valuable by our customers and by us.

We know the importance of questioning conventional approaches of identifying and exploring new ones to address existing technical, operational and commercial challenges. Innovative ideas will enable the company to move forward to develop new or improved processes, methods, solutions and to deliver better services.

OUR VALUES ARE IN THE HEART OF  
EVERYTHING WE DO



# Our people & culture.

At Wayfare we respect our people.

We are committed to fostering a work environment that promotes professional growth, inclusivity, wellbeing and dignity for all individuals. This section outlines our principles and expectations related to employment practices, professional development, wellbeing, diversity and inclusion, harassment prevention, and the reporting of issues to create a safe and positive workplace.

## Employment Practices and Professional Development

We are dedicated to fair and equitable hiring practices that provide equal opportunities for all candidates, based on what truly matters: skills, experience, behavior and potential.

Our hiring process is straightforward and inclusive, designed to attract talented individuals who share the company's values and are excited to contribute to the team's success.

Our commitment to professional development ensures that each employee has access to the resources and support needed to grow within our company. We believe in continuous learning and encourage our employees to seek out opportunities for skill enhancement and career development.

### Key commitments include

**Transparency:** we ensure clarity and openness throughout the recruitment process, so candidates always know where they stand and what is expected at each step.

**Equity:** we strive to eliminate biases and embrace diversity, ensuring that everyone has a fair chance.

**Merit-based selection:** hiring decisions are based on candidates' knowledge and abilities, ensuring a fair and thoughtful process.

**Confidentiality:** we respect the privacy of all applicants. Personal and sensitive information provided during hiring is kept confidential and used only for recruitment.

**Background checks:** as part of our commitment to maintaining a secure and trustworthy workplace, we conduct background checks on all potential hires. These checks may include verification of employment history, education, criminal records, and other relevant information. Candidates are informed about this process and checks are conducted in compliance with all applicable laws and regulations.

**Merit-based remuneration:** at Wayfare, we believe in rewarding employees based on merit. Our remuneration packages, including salaries, bonuses and other benefits are determined by the individual's performance, contributions and impact on the company. We regularly review our compensation practices to ensure they remain competitive and aligned with our dedication to recognizing and rewarding performance and commitment.

**Onboarding:** we provide comprehensive support and resources to help new hires integrate smoothly into the company culture from day one.



## Wellbeing

The wellbeing of our employees is one of our highest priorities. We strive to create a healthy work-life balance and encourage practices that promote overall wellbeing. We are fostering a work environment that is both productive and fulfilling.

## Safety work environment

Maintaining a safe and healthy work environment is also a high priority. All employees are expected to protect themselves and their colleagues by adhering to all health and safety regulations. This includes being aware of potential hazards in their work area, staying up to date with mandatory safety training and promptly reporting any incidents, injuries or unsafe conditions. The company provides comprehensive safety training at the start of employment and continues to offer periodic training, including essential emergency procedures and annual medical checks, to maintain a safe and healthy environment for everyone.

## Prohibition of human trafficking & slavery

Wayfare is committed to upholding the highest ethical standards, ensuring that all operations respect human rights and strictly prohibiting any form of modern slavery or human trafficking within our organization or supply chain. We maintain a zero-tolerance policy for practices such as forced labor, human trafficking or exploitation, applicable to all employees, contractors and third-party suppliers. Employment at Wayfare must be freely chosen, with all employees treated with dignity and respect and never subjected to involuntary servitude or coercion. We require our suppliers, clients and business partners to adhere to the same standards.

## Diversity and inclusion

We are committed to cultivating a diverse and inclusive workplace where everyone feels valued and respected. We are dedicated to creating a culture where all voices are heard and where everyone can contribute and succeed.

## Harassment and discrimination prevention

We have a zero-tolerance policy towards harassment and discrimination in any form. We are committed to ensuring that our workplace is free from behaviors that are threatening, intimidating or discriminatory.

This includes, but is not limited to:

**Bullying:** Using words or actions to intimidate, threaten or humiliate another person.

**Sexual harassment:** Any sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature.

**Discrimination:** Treating someone differently based on their race, color, religion, sex, sexual orientation, gender identity, national origin or disability.

We expect all employees to treat one another, our customers, business partners and suppliers, with dignity and respect at all times.





# Responsible business conduct.

## Compliance with tax laws

Wayfare is committed to full compliance with all applicable tax laws and regulations.

- **Accuracy:** We ensure that all tax-related documentation is accurate and truthful, reflecting our financial activities in a precise manner.
- **Timeliness:** All tax obligations must be met within the prescribed deadlines.
- **Transparency:** We maintain transparency in our tax practices and work diligently to avoid any actions that could be construed as tax evasion or avoidance.
- **Responsibility:** It is the responsibility of every employee and collaborator involved in tax-related processes to stay informed of current laws and regulations, and to seek guidance when needed.

Adhering to tax laws is crucial for maintaining our reputation and upholding our ethical standards.

## Avoid conflicts of interest

We prioritize Wayfare's best interests and ensure that personal interests do not interfere with our professional responsibilities.

- **Undivided Loyalty:** We make decisions that are solely in the best interest of Wayfare, free from any personal gain or outside influence.
- **Gifts and Financial Interests:** We refrain from accepting gifts, payments, or engaging in financial activities that could compromise or appear to compromise our loyalty to Wayfare.
- **Transparency:** To avoid any potential conflicts, we proactively disclose any personal relationships, investments, or external activities that might influence our work to our manager for review and guidance.
- **Good Judgment:** By exercising sound judgment, we maintain the integrity of our actions and protect Wayfare from any conflicts of interest.

Avoiding conflicts of interest helps us maintain trust, integrity, and a strong commitment to our company's success.

## Anti-bribery and corruption

We have a zero-tolerance policy for bribery and corruption in any form. Our people and business partners must not offer, give, solicit or accept any form of bribe or inducement, whether in cash, gifts, or other benefits, to gain or retain business or any other advantage. All business dealings must be conducted with the highest ethical standards and in full compliance with applicable laws.

## Accurate records and reports

We prioritize accuracy, honesty and timeliness in all records and reports. Whether internal or external, all information must fairly represent the facts, including financial data, operational records, and other business-related information.

- **Responsibility:** Every employee is accountable for the accuracy and integrity of their work. Any discrepancies should be promptly corrected.
- **Compliance:** Adhere to all relevant laws, regulations, and company policies.

Accurate records are essential for maintaining our integrity and trustworthiness.

- **Timeliness:** Prepare and submit records promptly to support informed decision-making.
- **Integrity:** Records should always reflect true circumstances without omissions or distortions.

## Create and protect intellectual property

At Wayfare, we highly value innovation and the development of intellectual property (IP).

We encourage all employees to contribute to the creation of new ideas, technologies, and improvements. However, it is crucial to ensure the protection of the company's intellectual property.

This includes securing any inventions, trademarks, copyrights, and trade secrets developed during employment with Wayfare, avoiding unauthorized disclosure and ensuring that all IP-related work is properly documented and managed in accordance with company policies.

## Use technology responsibly

Employees are expected to use company technology resources in a responsible and ethical manner.

This includes adhering to all relevant policies, avoiding misuse of systems or networks, and ensuring that technology is used in ways that support the company's goals and do not harm others.



## Fair competition

We compete vigorously but always within the bounds of fairness, integrity, and the law.

- **Commitment to fair play:** At Wayfare, we believe in competing honestly and ethically. We avoid any practices that could be considered deceptive, unfair or anti-competitive.
- **Compliance with laws:** We adhere strictly to all applicable antitrust and competition laws.
- **Respect for competitors:** We respect our competitors and do not engage in practices such as spreading false information, theft of trade secrets or other unethical behaviors.
- **Ethical conduct:** Our approach to competition is rooted in the values of transparency and integrity. We win and retain business based on the quality of our services, innovation, and excellent customer experience, not through improper conduct.

Maintaining a fair competitive environment not only reflects our values but also fosters trust and long-term success.



## Safeguard and respect confidential information

Confidential information is vital to Wayfare's success and reputation. All our people are required to handle sensitive information—whether related to the company, colleagues, candidates, clients, business partners or any other stakeholders—with the highest level of care and integrity. This obligation is not only a professional responsibility, but also a legal requirement as per the confidentiality clause outlined in our employment contracts and collaboration contracts.

Confidential information includes, but is not limited to, the following:

- Internal or external projects, concepts, analyses and technical or functional documentation.
- Sales and marketing strategies and proprietary knowledge related to Wayfare's products and services.
- Business plans, pricing strategies, offers, contracts, client lists and targeted companies for collaboration.
- Salary levels, contact details, team compositions and any other data that could harm Wayfare's interests or provide a competitive advantage if disclosed.

Confidential information may include, but are not limited to:

- **During the recruitment process**, we collect personal information such as full name, phone number, email address and mailing address. We also gather professional details including resumes or CVs, cover letters, references, certifications, qualifications, employment and education history, as well as skills and competencies. Personal data might include date of birth, nationality and gender if voluntarily provided. Additionally, application materials like forms, interview notes and background check information are collected to assess candidates. Recruitment tracking includes application status, interview schedules and feedback.
- **During the employment process**, we maintain updated contact details. We record employment specifics such as employee ID, job title, department, job description, employment start date and work schedule. Compensation and benefits data are collected, including salary details, tax information, banking details for salary payments, and benefits enrollment information. Performance and development records, including performance reviews and training details, are kept. Health information related to work is also recorded. Compliance records include employment contracts and disciplinary records.
- **In the sales process**, we gather contact details of customers and potential customers, including names, phone numbers, email addresses and mailing addresses. For business interactions, we collect company names, job titles and roles of key contacts. Sales transactions data, including the service purchase history, contract details and payment information, are maintained. Communication records, such as emails, message logs, and meeting notes, are also tracked. Marketing preferences, customer interests and consent for communications are recorded, as well as support requests, resolutions and feedback from customer interactions.





## Key responsibilities for our team members

- **Confidentiality obligation:** Our people must maintain the confidentiality of all data, information and documents encountered during the execution of their duties. This obligation extends beyond the contract's duration and remains in effect even after the relationship is terminated.
- **Restricted disclosure:** Under no circumstances should confidential information be disclosed to unauthorized individuals or the public, whether during or after the contractual period. This includes any information related to Wayfare's clients, people, projects, processes and policies.
- **Protection and precautions:** Our people must take all necessary precautions to prevent accidental or unauthorized disclosure of confidential information. This includes proper storage, controlled access and secure transmission of sensitive data.
- **Prohibition of copying:** Our people are prohibited from making copies of confidential documents or reproducing confidential information for personal use or for third parties.
- **Return of materials:** Upon termination of contract, when no longer needed for work purposes, our people are required to return all documents, regardless of format, that contain confidential information provided by Wayfare.

## Cybersecurity

Protecting our digital assets and online environments is critical for our company. All employees are required to adhere to cybersecurity protocols to safeguard our systems, networks and data from cyber threats. This includes, but not limited to, **the use of strong, unique passwords, multi-factor authentication, usage of licensed and approved applications, antivirus and antimalware solutions, VPNs, encrypted connections, regular applications and operating system updates and vigilance against phishing and other cyberattacks.** Employees must report any suspicious activity or potential security breaches immediately.

Compliance with cybersecurity practices is essential to protect the company and our clients from risks such as data breaches, unauthorized access and other forms of cybercrime. We are committed to maintaining a secure digital environment to ensure the continued trust and reliability of our services.

## Respect for personal information

At Wayfare, we value and respect the privacy and confidentiality of personal information.

- **Data Privacy:** We are committed to protecting the personal information of our employees, clients, and partners. This includes any data that can identify an individual, such as contact details, employment records, or financial information.
- **Confidentiality:** Personal information is collected, used, and stored only for legitimate business purposes and in compliance with applicable laws and regulations. Access to personal data is restricted to authorized personnel who need it to perform their job responsibilities.
- **Informed consent:** We ensure that individuals are informed about the purposes for which their personal information is collected and obtain their consent when required by law. We strive to be transparent in how we use and protect this information.
- **Security measures:** We implement appropriate technical and organizational measures to safeguard personal information against unauthorized access, alteration, disclosure or destruction. This includes, but is not limited to, multi-factor authentication (MFA), data and devices encryption, regular backups of data, role-based access controls, network traffic control, regular security trainings and audits.
- **Responsibility:** All our people are responsible for handling personal information with care and integrity. Any breach or suspected breach of personal data should be reported immediately.
- **Compliance:** We comply with the General Data Protection Regulation (GDPR) and other local laws regarding data protection, ensuring that personal information is processed lawfully, fairly and transparently.

By maintaining a strong commitment to data privacy, Wayfare ensures that personal information is treated with the utmost respect and protected from misuse or unauthorized access.



# Environmental Commitment & Social Responsibility.

At Wayfare, we believe in giving back to the community. Our commitment to environmental sustainability and social responsibility is central to who we are. We strive to make a positive impact not just within our company, but also in the broader community through various initiatives and partnerships.

## Environmental Commitment

We are dedicated to minimizing our environmental footprint and promoting sustainable practices. We actively encourage recycling within our offices and take responsibility for reducing waste wherever possible. By implementing eco-friendly practices in our daily operations, we aim to contribute to a healthier planet for future generations.

Key environmental initiatives include:

### Sustainable Practices

We are continuously seeking ways to reduce our environmental impact, from energy efficiency to minimizing waste and using sustainable materials.

### Recycling Programs

Wayfare promotes recycling throughout our offices and ensures that waste is managed responsibly.





## Social Responsibility

Wayfare is committed to supporting and uplifting our communities through a variety of social responsibility initiatives. We believe in making a difference by supporting causes that matter, from helping local businesses to nurturing young talent and assisting those in need.

Our social responsibility efforts include:

- **Fundraising Events:** We organize internal events to raise funds for various causes, bringing employees together to make a difference. This includes Cooking for Charity, where we raise funds to support different social causes that need our help.
- **Supporting Local Businesses:** We prioritize partnerships with local businesses, helping to strengthen our community's economy.
- **Empowering Young Talent:** We actively support and mentor young, talented individuals, providing them with opportunities to grow and succeed. One of our key initiatives is the Apatronic Robotics Team – a group of young, talented people with a passion for robotics.
- **Shoebox Campaign:** We proudly support the Shoebox campaign, contributing to the well-being of those in need, particularly during the holiday season.
- **Oncology Hospital for Children:** Wayfare is committed to supporting the Pediatric Oncology Hospital from Cluj-Napoca, helping to provide care and resources for young patients and their families.

Through these initiatives, we show our commitment and dedication to positively impacting the world around us.





# Review & Update.

To maintain the integrity and effectiveness of our Code of Conduct, Wayfare is committed to reviewing and updating its contents whenever it is needed. This ongoing process ensures that our policies remain relevant, comprehensive and aligned with both internal and external standards.

The review and update process will include the following elements:

## Periodic reviews

Conducting periodic assessments to identify any necessary changes or updates.

## Alignment with evolving standards

Ensuring the code of conduct remains aligned with industry best practices, legal requirements and ethical standards.

## Input from our people

Soliciting feedback from team members to gather insights and address concerns.

## Prohibition of copying

Our people are prohibited from making copies of confidential documents or reproducing confidential information for personal use or for third parties.

## Management oversight

Regularly reviewing the code of conduct with management to ensure it reflects the company's values and goals.

Where technology meets community.

**OUR JOURNEY TOGETHER!**

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