



A Commitment to Leading with Integrity

*CODE OF BUSINESS CONDUCT & ETHICS for Directors, Officers and Employees
as adopted by The Board of Directors of Euronet Worldwide, Inc. on June 13,
2018.*

A message from Michael J. Brown, Chairman and Chief Executive Officer

At Euronet, we believe a great company can only be built on a solid ethical foundation. We want to lead in business, but we want to do so without compromising our commitment to our shared values of honesty, integrity and ethics.

This Code of Business Conduct and Ethics sets forth our core values as well as guidelines for ethical conduct in various situations and specific corporate policies governing the conduct of our business.

This Code of Conduct applies to every Euronet Employee worldwide and under certain circumstances will apply to agents and contractors. The Company expects that all Employees will familiarize themselves with the Code and act in accordance with it in the performance of their duties and responsibilities. This Code covers many situations and examples of ethical conduct, but is not exhaustive. Euronet's leadership team, and in particular our General Counsel, will be available to respond to any questions you may have concerning proper conduct in situations not covered here.

Euronet remains committed to leading with integrity in all aspects of our business—across the conference room, and across international borders where we provide electronic payment alternatives for customers in over 150 countries worldwide.



*Michael J. Brown
Chairman and Chief Executive Officer*

Who does this Code apply to?

This Code of Business Conduct and Ethics (the “Code” or “Code of Conduct”) sets out our core values and corporate policies that apply to the conduct of business by Euronet Worldwide, Inc. and each of its subsidiaries and offices worldwide (collectively “Euronet”, the “Company”, “we” or “us).” This Code also describes the ethical standards that each director, officer, and employee (collectively “Employees” or “you”) must follow when acting on behalf of the Company.

What does our Code of Conduct promote?

This Code of Conduct promotes:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, duties and responsibilities;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that Euronet files with, or submits to, the Securities and Exchange Commission (“SEC”) and other supervisory or regulatory bodies around the world, and in other public communications made by the Company;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting of violations of the Code; and
- Accountability for adherence to the Code.

Our Standards of Ethical Conduct

Our reputation is affected by the conduct of every Euronet Employee. You are expected to conduct yourself in accordance with the following standards:

- You must act ethically and with integrity, fairness and honesty in all of your business dealings. You should be willing to admit mistakes and learn from your experiences.
- You may not participate in any fraud or other illegal or improper activity whether or not it is intended to benefit the Company. Examples of “fraud” as the term is used here include violations of law such as theft and embezzlement, as well as

unauthorized handling or reporting of Company transactions, forgery or falsification of Company records or financial statements for personal or other reasons.

- You may not enter into any activity that is in conflict with, or would reasonably appear to be in conflict with, the interest of the Company or which would prejudice your ability to exercise independent judgment in carrying out their duties and responsibilities. Examples of such activities include, without limitation, investments in suppliers, customers or competing companies (except insubstantial securities investments in publicly traded companies), outside employment or consultancy that could affect working efficiency, and direct or indirect ownership of property or tangible items which may be sold or leased to the Company.
- We are committed to building and maintaining a diverse workplace, free from discrimination or harassment. We will not tolerate discrimination or harassment in the workplace on the basis of race, gender, religion, national origin, disability, sexual preference, or veteran status. You must treat everyone, your fellow Employees as well as our vendors, customers and competitors, with fairness and respect.
- When reporting the results of your work, you must reveal all material facts known to you that, if not revealed, could either distort reports of operations or conceal unlawful practices.
- We are committed to processing personal data lawfully, fairly and in a transparent manner and in compliance with applicable laws. We will not use personal data in a way which is inconsistent with the initial purpose for which it is collected. The personal data we collect will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are collected. We will take reasonable steps as required by applicable law to ensure that personal data that we collect is accurate and, where necessary, kept up to date. We will not retain personal data for longer than is necessary for the purpose it is collected, subject to any legal requirement to retain information. We will use appropriate technical and/or organizational measures to ensure appropriate security of personal data.
- You must safeguard confidential information and personal data from accidental loss or disclosure to unauthorized parties, unless you are legally obligated to disclose that information. You should contact the legal department before making any disclosure of this nature. Confidential information and personal data must not be used for personal advantage.
- When you leave the Company, you must return all confidential information and any assets of the Company in your possession or control to the Company, and remain obligated to use and protect the confidential information of the Company, and its suppliers and customers consistently with the principles set forth in this Code and applicable laws.

All Employees should be aware of conflicts of interest

You should not have any personal or professional interest that is incompatible with the loyalty and responsibility you owe to Euronet. You should perform your job duties based on what is in the best interests of Euronet rather than any personal considerations or relationships that you may have. Employees should have no relationships with anyone, including suppliers, vendors, contractors, customers, competitors, regulators, or other Employees of Euronet that create loyalties which compete with their loyalty to Euronet or create a conflict of interest which affects, or might appear to affect, their independent judgment on behalf of Euronet.

Information concerning corporate or business opportunities that comes to you as a result of your work for or with Euronet is confidential information and belongs to Euronet. To attempt to exploit such opportunities for your personal benefit or a competitor's benefit creates a conflict of interest. It may also result in legal consequences to you, as in the case of buying or selling stock on the basis of inside information (see below).

Examples of situations in which a conflict of interest will normally arise are listed below. This list is not intended to be comprehensive; in all cases, you should start by applying common sense and the general principles of the Code to your situation. If you need guidance or clarification, you may always contact the legal department. In some cases, merely disclosing a relationship or a situation will be sufficient to reduce or eliminate the potential conflict.

Gifts and Entertainment

Except for certain small ordinary or customary gifts or business entertainment, as described below, you may neither give nor solicit or accept any gift, loan, entertainment, travel benefits, or special treatment or privileges from a competitor, or anyone who conducts or seeks to conduct business (including a customer or supplier) with Euronet. Gifts of money, stocks, bonds, or other financial instruments are strictly forbidden. You may never accept any gift or entertainment on behalf of Euronet that would impair or influence your judgment. In no case may a vendor or other third party subsidize your business travel expenses. "You", for all purposes relating to this Section, includes your family and any person or entity you control.

Gifts: You may give or accept gifts of nominal value that are commonly accepted as promotional items or tokens of appreciation. You should consider whether the frequency and timing of gifts might create any appearance of impropriety. In certain circumstances, these gifts may be prohibited by the anti-corruption standards discussed on page 12 ("Improper Payments").

Where local custom or other exceptional circumstances call for an exchange of gifts having more than a nominal value as part of a business relationship, you may provide or accept such a gift on behalf of Euronet only with written approval from a Chief Executive Officer,

Chief Operating Officer, Chief Financial Officer or General Counsel (“C-Level Officers”). These gifts may be prohibited by anti-corruption standards discussed on page 12 (“Improper Payments”).

The giving or acceptance of gifts, or participation in entertainment, falling outside the above guidelines may be approved in exceptional circumstances by any C-Level Officer. C-Level Officers who wish to deviate from the above guidelines must obtain the approval of the Chief Executive Officer or General Counsel.

Meals and Entertainment: Business meals and entertainment should be infrequent, consistent with accepted business practice, not extravagant in nature and for the express purpose of furthering a business relationship. Whether you are hosting or receiving a business meal or entertainment, a representative from each company must be present.

Discounts

You may not accept discounts on personal purchases of a supplier's or customer's products or services unless such discounts are generally offered to Euronet Employees or others having a similar business relationship with the supplier or customer.

Outside Activities or Employment

All Euronet Employees are expected to devote full time and energy to Euronet during normal business hours. While the Company expects that you will, from time to time, need to attend to personal business during the workday, such distractions should be reasonable and kept to a minimum. The making or receiving of calls, participating in meetings, or handling correspondence related to significant outside activities, including a second job or operating a personal business, during Euronet business hours is strictly prohibited. Likewise, you may not use Euronet equipment or supplies to conduct such activities.

Any outside activity that competes with Euronet or provides services or assistance to a competitor is strictly forbidden unless approved in advance and in writing by the General Counsel.

Board Memberships

By reason of Euronet’s reputation and industry position, it is expected that Employees will be presented with opportunities or invitations to serve on the Board of Directors or similar governing body of third parties, including customers, vendors and others with which Euronet has a commercial relationship. No Employee may serve on a board of directors or similar governing body of a for profit enterprise or a trade group without the prior written consent of Euronet’s Chief Executive Officer or General Counsel.

Investments and Other Financial Opportunities

Employees should not have a direct or indirect investment (including stock ownership in private or publicly traded companies) or other financial, commercial or operational interest in any third party, including a supplier, contractor, distributor, vendor or competitor of Euronet if it could create a conflict of interest on their part. A conflict of

interest may exist if a direct or indirect investment is of significant value or represents a significant percentage of your total investment portfolio or the investment portfolio of someone subject to your influence or control, for example, a spouse, child or parent. A 'direct or indirect investment' does not include any investment made by a mutual fund or pension plan for its portfolio and does not include any investments, such as stock or stock options, acquired as a result of employment with an entity prior to the date a person became a Euronet Employee.

If you are in a position to influence or evaluate purchasing or other procurement decisions at Euronet, you may not hold any position with or have a financial or other business relationship with any of Euronet's suppliers.

It may be a conflict of interest if an Employee acquires an interest in an asset, such as real estate, stock or some other type of property, when Euronet has or is reasonably likely to acquire an interest in that same asset. You must notify your supervisor in writing immediately if any of these potential conflict of interest situations occur. You must also notify your supervisor in writing if you acquire a profit or investment opportunity as a result of representing Euronet in the course of your relationship with Euronet.

Employment of Family Members

It may be a conflict of interest if a member of your immediate family, or an individual over whom you have control, is employed by a supplier, contractor or competitor of Euronet's. In some instances, it may also be a conflict of interest if Euronet employs both you and another member of your family, or an individual with whom you have a close personal relationship. Situations where one family member may be in a position to influence the compensation, benefits, or working conditions of another family member are prohibited. You must notify your supervisor in writing if you believe that your relationship with another Euronet Employee, or the Employee of a Euronet supplier, contractor, or competitor raises a potential conflict of interest.

Pre-Approval of Related Party Transactions

No transaction between Euronet and an executive of Euronet may be made without being approved by the Audit Committee. Specifically, no transaction that is considered a "related party transaction" and would require disclosure under the US securities laws (in particular Item 404(a) of Regulation S-K) may be consummated or may continue unless the transaction is approved or ratified by the Audit Committee. In determining whether to approve or ratify a related party transaction, the Audit Committee will take into account, among other factors it deems appropriate, whether the related party transaction is on terms no less favorable than terms generally available to an unaffiliated third-party under the same or similar circumstances and the extent of the related person's interest in the transaction.

All Employees share the responsibility for making full, fair, accurate, timely and understandable disclosures

The integrity of the Company's accounting and financial records is based on the validity, accuracy and completeness of basic information supporting entries to the Company's financial books of account.

All Employees involved in creating, processing or recording such information are held responsible for its integrity and are responsible for providing full, fair, accurate, timely and understandable disclosure concerning the Company and its business and financial performance in reports and documents that the Company files with, or submits to, the SEC as well as in other public communications by the Company, in each case in compliance with applicable law and US Generally Accepted Accounting Principles ("GAAP").

Internal Controls and Disclosure Controls and Procedures

Euronet maintains a system of internal controls over financial reporting to ensure reliability and adequacy of its books and records and proper recording of all transactions including dispositions of assets. Our internal controls are intended to prevent the Company's records from being misleading or concealing anything that is improper.

- You must strictly comply with our disclosure controls and procedures and internal controls over financial reporting and must be vigilant in ensuring that the Company's funds or assets are not used for any unlawful or improper purpose. You may only enter into transactions that are executed in accordance with the Company's specific authorization or established formalized policies and procedures.
- You must not allow any transaction to be recorded in the accounts of the Company unless it is within the scope of written policies and procedures or is specifically and formally approved by an Employee with proper authority. Such approval requires the determination that all transactions that have been accounted for in accordance with Company policy will be accumulated and processed in a manner that will permit preparation of financial statements, reports and data for purposes of internal, public and regulatory reporting. Such statements, reports and data must be in a form sufficient to reflect accurately and fairly the results of transactions entered into by the Company and to permit proper accountability for assets.

We recognize the importance of preventing improper influence on the conduct of auditors. Accordingly, the Company prohibits any Employee from taking any action, or failing to take any action, to fraudulently influence, coerce, manipulate, or mislead any of our internal or external auditors during their review or audit of our financial statements and related books and records for the purpose of rendering the financial statements false or materially misleading. Such conduct is prohibited even if it does not succeed in affecting the auditors' review or audit.

Accuracy of Records

We are committed to complying with the applicable securities laws, including reporting requirements, and to ensuring that information contained in our public communications, including financial statements, reports to investors and the SEC, fairly present in all material respects, the financial condition, results of operations and cash flows of the Company. It is essential that the business transactions of all of Euronet's subsidiaries and divisions are reported accurately and that accounts and records are properly maintained. The true nature and impact of business transactions must always be fully disclosed on Euronet's books in a timely fashion.

When making written records, make sure you are honest and accurate and that you comply with all applicable laws and Company policies.

Falsification or Alteration of Records

Falsifying or altering records, or knowingly approving false records, is prohibited and may be a criminal offense. Here are some rules you should keep in mind:

1. False or misleading entries or statements may never be made in any of our books, records, expense or incentive compensation reports or other documentation for any reason. Keep books, records and accounts in reasonable detail so they accurately reflect the underlying business transactions.
2. Expense reports must be filled out accurately and completely, showing the correct purpose and amount of each expense item. If reports relate to meals or entertainment, they must list all parties for whom the expense was incurred.
3. Permanent entries in Euronet's records may never be altered in any way.
4. No secret or unrecorded funds or assets may be created or maintained for any purpose.
5. You may never make a payment or approve a receipt with the understanding that it will be used for a purpose other than what is described in the record of the transaction.

Retention of Records & Personal Data

The Company has adopted a formal "Document & Data Retention Policy" that all Employees are required to follow. An Employees' obligation to retain or destroy documents and personal data is clearly defined within the policy and the schedules that are part of that policy. Company records include internal and external documents prepared in the ordinary course of our business. There are laws governing the retention of Company records and personal data, depending on the Euronet location to which you are assigned. Records and personal data must always be retained and destroyed in accordance with such laws and our Document & Data Retention Policy. No records relating to a pending or threatened litigation, audit, or government investigation may be destroyed.

Complaints or Reporting of Violations or Questionable Accounting Practices

Euronet is strongly committed to ensuring that it properly reports financial transactions. Euronet requires compliance with GAAP and internal accounting and auditing controls. We

encourage any Employee who believes the Company or anyone in the Company has acted improperly in connection with the financial reporting of, or accounting for, any transaction, to report this to the Ethics Hotline.

Our Audit Committee maintains an "open door" approach to receive, retain and handle complaints and notifications regarding the Company's accounting, internal accounting controls or auditing matters. We encourage the prompt reporting of such complaints or concerns so that rapid and constructive action can be taken. Any such complaints or concerns may be submitted to the Audit Committee on an anonymous basis by calling the Ethics Hotline described on page 15 of this Code.

SEC and Other Public Disclosure

The Company is dedicated to ensuring that information contained in its public communications and its publicly filed financial statements and periodic reports is accurate, complete, fair, timely and understandable in compliance with applicable law and GAAP. You are required to promote accurate, complete, fair, timely, and understandable disclosure in the periodic reports required to be filed by us and in all public communications and you must strictly comply with the Company's disclosure controls and procedures, in each case in compliance with applicable law and GAAP.

Euronet considers your health and safety a top priority

Euronet is committed to providing a safe and healthy workplace for its Employees and for visitors to our premises. In an effort to further this commitment, Euronet has designated all of its facilities as free from drugs and smoke. For more information, refer to any applicable Employee Handbook or office guidelines for your office.

You should not violate your obligations as a Euronet employee in using social media.

Employees' use of social media can pose risks to Euronet's confidential information and reputation, expose Euronet to discrimination and harassment claims and jeopardize Euronet's compliance with securities laws and other applicable laws.

You may not speak on behalf of Euronet on social media or post any information about Euronet on social media that can be attributed to the Company unless you are required to use social media as part of your job duties, such as marketing, public relations, recruitment, corporate communications, investor relations or other business purposes. Any communications on social media on behalf of the Company must be authorized by the investor relations department or the legal department in advance.

Employees are prohibited from disclosing on social media any non-public information about the Company regarding business opportunities, financial results or any confidential or proprietary information.

For more information on the proper use of social media, please consult the “[Social Media Policy](#)”.

All Employees have a responsibility to protect Euronet assets

Preventing the loss, damage, misuse or theft of Euronet property is a part of each Employee's job. All Euronet assets should be used only for the benefit of Euronet and not for personal gain. Euronet assets include not only physical assets, such as our buildings, equipment, computers, or other office fixtures and supplies, but Euronet's intellectual property rights in its trademarks, software, technologies, know-how, trade secrets, business concepts and strategies, financial data and other information.

Intellectual property is very valuable to Euronet and can be protected by patents, copyrights, trademarks and trade secrets. You may not take any action, such as unauthorized disclosure, that could affect Euronet's ability to protect these intellectual property assets. Euronet requires that Employees execute non-disclosure agreements that outline each individual's responsibility for safeguarding Euronet's proprietary information.

You should take every precaution to protect Euronet's confidential information and trade secrets

Confidential information and trade secrets include non-public information about Euronet (such as business strategies, pending contracts, unannounced services, computer source and object code, financial projections and customer lists) and internal documents and communication that might be useful to competitors or harmful to Euronet or its customers, if disclosed.

In the conduct of our business, Employees have occasion to receive and use proprietary information of customers, vendors, distributors, and other organizations with which Euronet does business. We must use this information only in accordance with the agreements under which we have received it. Euronet equally respects the property of its competitors and other third parties. Employees must take steps to safeguard all sensitive and proprietary information by keeping information secure and limiting access to such information. This includes and is not limited to financial information of cardholders, merchants and other third parties. You may not engage in unauthorized copying or reveal or use any trade secrets of a former employer, customer, or other business contact in connection with your Euronet employment, including competitor information such as customer lists, technical developments or operational data.

If you have any questions or concerns about information being requested by a distributor or supplier regarding another distributor or supplier, you should contact your supervisor or the legal department for guidance and clarification.

All Employees have a responsibility to maintain privacy and security of personal data

Euronet receives and processes personal data of employees and other third parties, such as customers, agents and merchants, in the ordinary course of our business. Every Employee must respect and protect the privacy and security of that information. Our security procedures strictly limit access to and use of personal data, and require that all Employees take measures to protect personal data from unauthorized access. You should know your responsibilities under these procedures, and collect, use, access and retain personal data only as authorized by Euronet's "[Data Protection Policy](#)", "[Data Security Policy](#)", "[Document and Data Retention Policy](#)" and applicable data protection laws. Please consult the legal department with any questions regarding your obligations under these policies or applicable laws.

Euronet is committed to workplace privacy and safeguarding personal data of Employees

Euronet treats Employee personal data in Employee records as confidential and in accordance with applicable laws. Generally, Employees' personal data will only be released:

1. To the Employee, or a third party, upon written request of the Employee;
2. In response to a subpoena for records or request for production of documents issued by a court or government agency; or
3. To Employees who senior management of Euronet or Human Resources has authorized to request the information and who have a legitimate need to know.

Euronet will comply with all laws relating to protection of personal data. You should be aware that your communications utilizing Euronet facilities, whether telephone, facsimile, electronic mail, or otherwise, are considered the property of Euronet and may be monitored for security or other reasons in the sole discretion of Euronet. For more information, consult the Employee Handbook or other legal guidelines applicable at your place of work.

All agreements entered into by the Company must be properly authorized by management and all litigation or regulatory matters must be notified to management.

Euronet considers itself to be an honest and ethical contractor with high expectations of itself and its Employees. All agreements or other commitments of Euronet must be in written form, reviewed by legal counsel and signed by a duly authorized representative of Euronet. Only certain Officers of Euronet are authorized to enter into agreements on behalf of Euronet. No Employee may engage outside counsel, make any commitments or enter into agreements of any kind on behalf of the Company without proper authorization by

Euronet. The legal department must be notified promptly of all litigation or regulatory actions against the Company. Requirements regarding the review of contracts are set forth in Euronet's "[Policy Regarding the Legal Review of Commercial and Operating Agreements and Notice to the Legal Department of Certain Events.](#)"

You should be aware of the specific rules relating to antitrust and competition

Agreements between or among competitors that limit competition are a violation of the antitrust or competition laws of most jurisdictions in which Euronet operates, including the United States and the European Union, and in any event, are prohibited by this Code. Oral discussions and informal arrangements may be considered "agreements" so you should be careful whenever you meet with competitors or customers, including contacts at trade associations or shows, or professional gatherings.

You may never discuss with competitors, or even listen to a discussion of, present or future prices, profit margins or costs, bids or intended bids, terms or conditions of sale, allocation or distribution of market shares, allocation or limitations of sales territories, distribution practices or other competitive information. If such a discussion is initiated, you must refuse to participate and leave if the discussion does not stop. You must then report the incident to a lawyer in our legal department.

Anti-competitive behavior prohibited by this Code includes agreements or discussions with competitors regarding:

1. Fixing or controlling prices or terms of sale
2. Allocation or apportionment of products, markets, territories or customers
3. Boycott of certain customers or suppliers

In addition, it may be anti-competitive to engage in certain activities with customers. You may not, except with the prior concurrence and advice of our legal department:

1. Solicit from a customer information about a competitor's confidential bid proposal
2. Require a customer, as a condition to doing business, to buy from Euronet before we will agree to buy from them
3. Require a customer to take a product or service they do not want in order to get from us a product or service they do want
4. Agree with a customer to establish or fix the customer's resale prices or other terms or conditions of sale

For full information concerning our policy concerning competition matters, please see Euronet's "[Antitrust Law and Policy Compliance Program.](#)" Any questions regarding antitrust and competition matters should be directed to our legal department.

All Euronet Employees should familiarize themselves with the definition and rules relating to “inside information”

Employees may learn information about Euronet, its shareholders, or a third party that is not generally known to the public and that could affect someone's decision to buy, sell or hold the securities of Euronet, its shareholders or such third party. Such “inside information” would include, but not be limited to, trade secrets, business plans, marketing and sales programs, audits, dividend changes, financial results, earnings estimates, litigation or other actual or contingent liabilities or other confidential or proprietary information.

The rules in the United States and other jurisdictions in which Euronet operates governing trading on the basis of inside information are very complex and, if breached, could result in civil and criminal penalties for Employees and Euronet itself. As a general rule, and subject to more specific procedures for a given transaction involving Euronet, you must hold inside information in strictest confidence and must not buy or sell securities of Euronet or any other company while in possession of this information until it has been publicly and legally disclosed and a reasonable waiting period has elapsed following such disclosure. You also must not disclose or tell others about the information so that they may trade in the stock of Euronet or another company. In addition to potential civil or criminal penalties, Employees are also subject to disciplinary actions up to and including termination of employment or contract assignment for a violation of this policy.

Employees are prohibited from trading in the Company's securities while in possession of material nonpublic information concerning the Company, or making selective disclosure of such information, in violation of the Securities Exchange Act of 1934, as amended, and the rules and regulations of the SEC.

For more information concerning insider-trading rules, please see Euronet's “[Insider Trading Policy](#).”

Euronet conducts business internationally, and Employees must abide by country-specific laws and customs as a result

You are expected to obey the laws and respect the customs of all the countries in which we transact business, provided that such laws or customs do not result in a violation of this Code or the laws to which Euronet is subject, some of which are summarized below. The U.S. Foreign Corrupt Practices Act prohibits any payment or gift to government officials outside of the US for the purpose of obtaining or retaining business. Some non U.S. Anti-Bribery Laws, including the U.K. Bribery Act, prohibit the bribery of the representatives of corporations and other business entities (“corporate representatives”). If you find yourself in a jurisdiction in which local laws do not address a particular situation or they are unclear or conflict with this Code, consult our legal department.

For more information about our anti-bribery policies, please see Euronet's Anti-Bribery Program Compliance Manual.

Improper Payments

Bribes, kickbacks, payoffs or other unusual or improper payments to government officials or corporate representatives to obtain or keep business or obtain a business advantage are strictly forbidden. You are not permitted to make or authorize any offer, payment, promise or gift that is intended or appears to influence a business relationship with Euronet. In particular, you may not give or offer anything of value to a government official or corporate representative to obtain any improper advantage. Even payments to government officials or corporate representatives to expedite routine administrative actions may be prohibited and you must consult the legal department before making any such payments. Any payments or gifts which might be given (which are permitted only with proper authorization) must be properly recorded in Euronet's books and records.

Prohibited "payments" may be in the form of a cash payment, funded travel or entertainment that is not associated with a legitimate business purpose, or other items of value. Keep in mind that that Anti-Bribery Laws apply to corporate representatives and anyone who works for a company that is owned or controlled by a government may be considered a government official, even if the company just looks like a commercial business. If a foreign official of an agency with whom Euronet is doing business, or any corporate representative customer, supplier, agent or distributor, suggests such a payment, you must immediately report that request to the legal department.

Euronet requires compliance with the above policies by all of its consultants or contractors, through contractual restrictions on making such payments and representations that any fees paid by Euronet to those consultants will not be paid on to any third party.

If you receive any offer, payment, promise or gift from a third party, you must report it to your supervisor immediately.

Anti-Boycott Rules

Certain member countries of the League of Arab States have enforced a boycott of Israel. These states typically enforce their boycotts by imposing certain requirements on companies that do business with them or their nationals to ensure that goods or services originating in Israel or with certain "blacklisted" companies do not enter their countries. The requirements may appear in documents such as invitations to bid, certifications, letters of credit, or purchase orders.

Not only will Euronet not participate in this type of unsanctioned boycott or restrictive trade practice, but Euronet is also obligated to report to the U.S. government any requests that it receives to participate in this kind of a boycott. If you are asked to participate in such an activity or requested to provide information, you must notify a member of the legal department.

Export Controls

It is Euronet's policy to comply with all applicable export regulations governing its business. In particular, some governments regulate the export and re-export of goods produced domestically, including equipment, software or technology, outside their country as well as the export of foreign-produced goods transiting their country. The export of many of Euronet's products and services do not require prior written authorization. However, in some cases written authorization specific to a particular transaction may be required because of the nature of the item to be exported or because of the status of the destination country or end-user.

US law restricts the exportation of certain types of products, including various types of software, to foreign countries. As a US company, it is illegal for Euronet to do business with any company established in certain restricted countries (which currently include among others Cuba, Iran, Liberia, North Korea, Northern Sudan and Syria). In addition, the US government has established a list of specific individuals and entities that it considers to support or have supported terrorism, and with which it is illegal for all US companies to do business. Before traveling to any of the restricted countries, or dealing with any person or entity that you have reason to believe may be associated in any way with any terrorist organization, you must consult with the legal department. Additionally, you are required to provide the legal department with the identities of all customers and potential customers sufficient to allow the legal department to determine whether such parties are on the US government's restricted lists.

Money Laundering Prevention

People who are involved in criminal activity may try to "launder" the proceeds of their crimes to hide them or make those proceeds appear legitimate. Many countries now have laws against money laundering which prohibit the acceptance of processing of the proceeds of criminal activities. Euronet is committed to fully complying with these rules and will only conduct business with reputable customers whose funds are derived from legitimate sources. If you have any reason to suspect that a customer is not reputable, or does not meet Euronet's standards for business conduct, you must contact the legal department so that full due diligence concerning the background of that customer can be conducted. In addition, you should be sensitive to any indication that the form of any payment being offered to Euronet for its services could suggest money laundering, including in particular payment from unknown third parties or any large payment in cash.

Your political contributions and activities are your personal choice

The political activities and contributions of money, time, or services by any Employee of Euronet are personal choices to be made only in the name of the individual Employee. When expressing a personal political opinion, you should be careful not to create the impression that you are speaking or acting on behalf of Euronet. You may not use Euronet's name, funds, property or services to support any political party, candidate, or

cause without the prior written authorization of the Chief Executive Officer or the General Counsel.

Euronet expects all Employees to ask questions and report violations of the Euronet Code of Conduct

Not every situation is clear as to whether it violates this Code and Euronet's other policies. You should seek guidance when you see, or are in, a situation that might cross the line. If you need guidance on this Code or Euronet's policies, you should contact your supervisor, your human resources representative, the legal department or the confidential Ethics Hotline.

If you observe a violation or anticipated violation of this Code or applicable law, you must report it to your supervisor, the human resources department, the legal department or the confidential Ethics Hotline at **+1-972-708-5030**. ***This hotline will permit you to report violations on an anonymous basis.*** You may also do so by sending an anonymous email (such as one generated from yahoo, hotmail or gmail accounts) to the following address: hotline@eef.com. Additionally, actual or anticipated illegal or unethical behavior also can be reported directly to the Audit Committee.

In reporting a violation, you should provide as much detail as possible about the suspected violation including the individuals involved, the nature of the violation or anticipated violation and documentation of the violation or anticipated violation if available. Your report will be sent first to only three people: the General Counsel, Compliance Officer and the Director of Internal Audit. They will decide, based on the circumstances or your report, how best to investigate the situation and what action may be appropriate in response to your report. All calls to the hotline are reported to Euronet's Audit Committee. Because of this procedure, you can be assured that all calls are taken very seriously and will trigger an investigation and response that are monitored by the Company's Audit Committee.

No retaliation

We are committed to providing an environment which is receptive to receiving and effectively dealing with complaints regarding violation of this Code or our accounting, internal accounting controls, or auditing matters and maintaining the confidentiality of Employees who submit such concerns. You should be aware that no one at Euronet, including in particular your manager, is permitted to take any action against you for reporting a violation of this Code in good faith: ***Euronet strictly prohibits retaliation against any person who provides a report made in good faith concerning a possible violation of any law or this Code.*** Anyone who commits retaliation may be subject to civil, criminal and administrative penalties, as well as disciplinary action, up to and including termination of employment.

You should respond openly and willingly to requests for information related to governmental and internal investigations

It is our policy to respond appropriately to reasonable requests for information from governmental agencies, including in connection with investigations of the Company's activities. You must not mislead any government investigator or other government official or otherwise attempt to obstruct the collection of information requested by properly authorized government investigators or government officials. In order for Euronet to protect its rights in connection with any government investigation or inquiry, Employees are required to contact the General Counsel or the Audit Committee before responding on behalf of the Company to any non-routine governmental inquiry, inspection, subpoena or request. Responses on behalf of the Company to all requests for information shall be made under the direction of the General Counsel or the Audit Committee.

Whenever there is an authorized internal investigation, including any investigation of possible violations of this Code, each Employee is obligated to fully cooperate with the investigation and to promptly, completely, and truthfully comply with all requests for information, interviews or documents. Any Employee who has information relevant to such an investigation must not discuss or disclose such information to any other Employee except to the extent such disclosure is necessary for the investigation. Only the General Counsel, the Audit Committee or Board of Directors may authorize internal investigations.

In some situations, Euronet will address specific waivers pertaining to the Code of Conduct

The Company will waive application of the policies set forth in this Code only where circumstances warrant granting a waiver as determined by the Company. Other than for Directors and Executive Officers, any waiver must be approved by the General Counsel or the Chief Executive Officer. Waivers of the Code for Directors and Executive Officers may be made only by the Audit Committee or by those members of the Board of Directors not involved in the matter and must be promptly disclosed as required by law and the rules of the Nasdaq Global Select Market.

Euronet is committed to our Code of Conduct which includes enforcement of the Code to maintain the integrity of our business

Subject to applicable law, any Employee who violates the Code and/or other Company policies and procedures may be subject to disciplinary action, including termination of employment, and, if warranted, civil legal action or referral for criminal prosecution. In addition, subject to applicable law, disciplinary action, including termination of employment and other legal action may be taken against anyone who directs or approves violations or anticipated violations or has knowledge of them and does not promptly report them in accordance with the Company's policies.