WEX INC.
2020
INAUGURAL ESG REPORT

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LETTER FROM OUR CEO

Over the past 35+ years, WEX has grown from a payment processing provider to a global leader in financial technology solutions. Our company vision is bringing the future of commerce to the present. We have consistently introduced products and services with one goal in mind: responsibly and sustainably enabling payments for millions of customers, partners, and end-users around the world and we do this through a culture that values: Integrity; Execution; Innovation; Relationships; and, Community.

As a result of our products and services, approximately 16 million vehicles across the globe have access to exceptional payment security and control, purchase volume in travel and corporate solutions was $20.9 billion in 2020, and our health division, which provides consumer-directed healthcare technology and services, reached an estimated 33.4 million U.S. consumers as of March 31, 2021.

With this responsibility in mind, we are pleased to share our inaugural Environmental, Social and Governance (ESG) Report, which utilizes the Sustainability Accounting Standards Board (SASB) framework to discuss our efforts and performance for fiscal year 2020. I am particularly proud of our longstanding efforts to champion diversity and inclusion, encapsulated in our motto, "Be You at WEX." Our volunteerism and philanthropic endeavors, such as the WEX Compassion Fund and our "Month of Caring" initiative, illustrate our support of the local communities in which we operate. While our business has always been aligned with corporate and social responsibility, our ESG Report reflects WEX's commitment to continuous improvement as we strive to become an even more sustainable and resilient business.

We have great efforts and initiatives underway, and we have a lot of important work ahead of us. As with everything we do at WEX, our core values of integrity, execution, innovation, relationships, and community will guide us. This inaugural report will be followed with periodic updates. We will establish clear and appropriate targets and goals that reflect our focus, and our commitment to transparency and enhanced disclosure. Though we are in the early stages of developing and articulating our ESG program, we are proud of the heritage and culture of WEX and the progress we have made. We welcome your input, collaboration, and support on the journey ahead.

Melissa D. Smith

Chair and Chief Executive Officer • May 26, 2021

ABOUT US AND OUR APPROACH TO ESG

WEX is a leading financial technology service provider that simplifies the complexities of payment systems across continents and industries. We operate in three segments: Fleet Solutions, Travel and Corporate Solutions, and Health and Employee Benefit Solutions.

Acting as stewards of our communities, our company has a long history of and focus on Corporate Social Responsibility (CSR). In 2019 we began to expand our energies beyond CSR and formalized our focus on environmental, social, and governance matters (ESG) including the establishment of board oversight and participation. We anticipate continuously evolving and improving our ESG capabilities over time. In 2020 our primary focus was on assessing our current competencies and enhancing our public disclosures as a foundation for greater transparency as part of our ESG strategy and execution in 2021 and beyond.

ABOUT THIS REPORT

For this inaugural ESG Report, we leveraged the Sustainability Accounting Standards Board (SASB) framework to understand and communicate what is of most relevance to our U.S. investors. We also referred to the Global Reporting Initiative (GRI) and industry best practices to identify areas of interest to a broader group of stakeholders, including our employees, customers, partners, and the communities in which we operate. We drew upon the knowledge of our colleagues throughout WEX to collect and organize content relative to the subject matter we identified as relevant. Lastly, we have compared our activities to the United Nations Sustainable Development Goals (SDGs) to assess how we may be contributing to these worthwhile objectives. We align our activities with five of these global goals, referenced on page 24.

Inquiries about or suggestions for our ESG practices and policies can be directed to investors@wexinc.com

ESG GOVERNANCE AND LEADERSHIP

The Corporate Governance Committee has responsibility for board oversight of ESG programs as a part of the committee's core stewardship focus.

Board of Directors

Corporate Governance Committee

ESG Management Committee

We have also established a cross-functional ESG Management Committee whose role is to expand our ESG efforts in practice. The functions represented include:

- **Corporate Communications**
- **Finance**
- **Human Resources**
- **IT**
- **Legal**
- **Risk and Compliance**
- **Operations**
- **Strategy**
- **Commercial Business and Products**

The ESG Management Committee works collectively to advance our ESG risk management capabilities and also to identify additional ESG-related opportunities. It reports out to the Corporate Governance Committee, which, in turn, reports to the entire board as appropriate.

Our commitment to the environment is demonstrated through the products and services we provide and also by how we operate.

We take our environmental impacts into account when developing new facilities. Our new corporate headquarters was designed to utilize natural light, reduce energy consumption, and enhance the quality of the workplace environment—all with the goal of fostering a positive place to work while minimizing environmental impact.

In addition, a significant focus of our business is to improve the fuel economy of our customers by giving them access to controls, business insights, and data. We provide tools for our customers to optimize their vehicle fleet fuel consumption such as freight management, route optimization, and idle time monitoring.

ENERGY AND WASTE MANAGEMENT

The bulk of our operations consists of office space where energy use is limited to lighting, heating, and cooling that space. Where our business expends the most energy is through our data centers.

We are consolidating our data centers and migrating our computer workloads to public cloud service providers to realize a number of benefits, which include reduced energy usage. While there is still energy usage with a cloud infrastructure, there is also increased efficiency and the need for redundant capacity is significantly reduced.

We have a Cloud First strategy with a goal of reducing our in-house managed data center facilities whenever practical. This strategy has many benefits including improved data security, infrastructure resiliency, system availability, and operational effectiveness while significantly reducing the amount of power we consume. We anticipate reducing data centers from 28 to seven locations by the end of 2022. From 2018 through 2021 we have closed 12 data centers and are approximately 58% complete on our target goal of closing 21 locations. For our seven remaining data centers, we have condensed the platforms on hyperconverged infrastructure that sit with minimal rack space, so power and cooling consumption has been reduced by over 90%.

<div align="center">

28
Data Center Locations

7
Data Center Locations

</div>
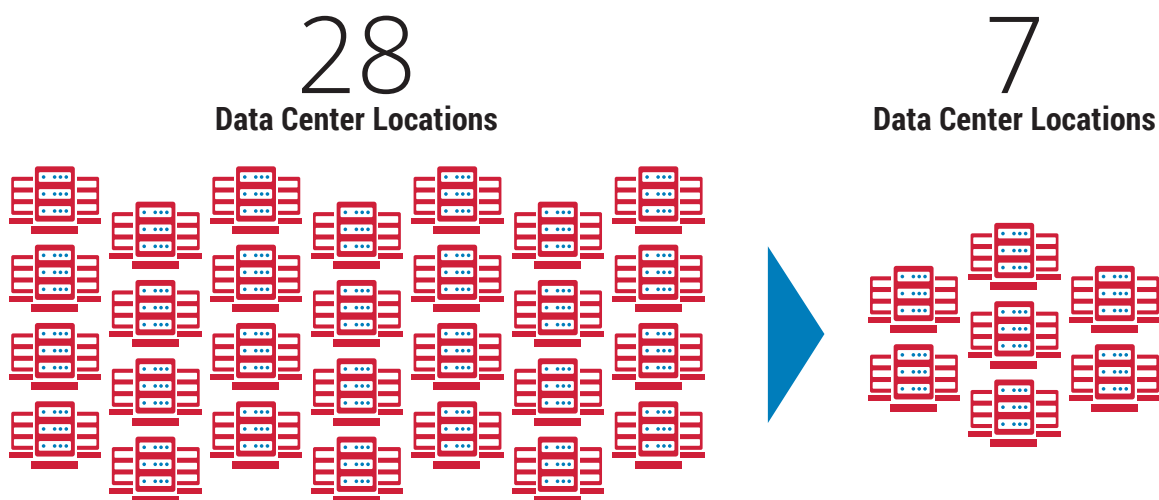
Our main offices have LED lighting throughout, and we are using best practices to minimize our energy use. All of our facilities participate in office waste recycling programs using single-stream recycling. We contract with a third party for e-waste recycling.

We encourage low-impact / low-carbon commuting for our staff by providing bike rooms and bike racks, carpooling programs, and a system for remote parking and shuttle buses. In Maine, where public transportation is an option, we offer our employees an annual $1,000 incentive to participate in low-impact commuting.

At the core of our culture is an understanding that our workforce is critical to our success in delivering financial technology solutions and innovations to thousands of customers around the world. Maintaining our continued growth and position as a leading provider of fintech solutions requires a strategy focused on attracting, developing, and retaining exceptional talent. We foster a culture that supports innovation and collaboration globally to attract and retain the very best talent. The growth of our people has always been and will always be one of our top priorities.

VALUES

We believe our core values of Community, Execution, Innovation, Integrity, and Relationships differentiate us from our competitors and meaningfully contribute to our growth and business success. Operating with transparency and authenticity internally and externally is paramount to us. Collaboration is essential to doing business, encouraged, and rewarded, as is our culture of curiosity, and respectful questioning and direct dialogue. These are essential ingredients to an environment that attracts superior talent and provides the space for innovation that creates business growth.

Along with being a growth-focused company, we take pride in prioritizing and maintaining a positive work environment where our employees enjoy their work, respect and support their colleagues, and are encouraged to innovate and collaborate. We foster a culture in which employees are motivated to recognize the value of their contributions—and of our business—to support the growth and development of the communities in which we operate.

COMMUNITY

We are a positive force in our world and our actions open possibilities for others.

TALENT MANAGEMENT AND DEVELOPMENT

Attracting, developing, and retaining employees and members of our management team is vital to the success of our organization, including meeting or exceeding our business and growth goals. The skills, experience, and institutional and industry knowledge of our employees significantly benefit our operations and performance. Therefore, we aim to develop a workforce that is exceptional at seeing around corners and adapting to rapid change. To ensure our leaders, teams, and contributors are set up for success, we know we have to maintain our strong commitment to talent development.

We are committed to a core set of shared beliefs and desired behaviors to drive consistency across our organization. Through our Great Leader Behaviors Program, employees are provided a baseline of behaviors and qualities to embody in their daily interactions with colleagues, customers, and partners. We believe it's not just what we do, but how we do it that matters, and our Great Leader pillars lay the foundation for clear and consistent behavior at all levels. In turn, we are better able to maintain an inclusive, innovative, and collaborative environment for all employees to work, live, and thrive.

Shape Our Markets and Adapt to Rapid Change

Build Bridges to Win

Inspire High Standards While Showing We Care

Be a Talent Multiplier

We also believe the impact of managers and leaders is critical to our success. Ensuring the development of all our employees is of paramount importance to the company, and that begins with a focus on management and leadership skills. All of our development programs are designed to drive leadership and functional behaviors and increase the growth of our employees. We provide flexible solutions to ensure our employees' skills stay sharp, with a commitment to continuous improvement as the business evolves.

There are several ways in which we attract, develop, and retain highly qualified talent. Below is an overview of some of our key programs.

Talent Recruitment and Development

- We strategically recruit diverse, qualified candidates to cultivate our culture of innovation and fostering creativity. We nurture our talent pipeline through internships, co-ops, and partnerships with colleges and universities.

- WEX employees have access to comprehensive training programs, tools and education throughout their tenure with WEX, including online self-service learning platforms, professional development, leadership and mentoring programs, wellness challenges, incentives to foster community and engagement, dedicated well-being campaigns, and personal financial counseling. Furthermore, we offer a sabbatical program to rejuvenate and enrich curiosity and personal development.

- Some examples of the training programs we have in place are Leaders Unleashed, Effective Operations Management, Functional Training Services, and Live Online Workshops. Through these programs, we foster improved individual and business performance as seen through employee engagement, satisfaction and fulfillment.

- Our career development center (Thrive in My Career) was designed as a virtual learning resource to help our employees be self-sufficient and in control of their own growth and development with a focus on leadership development programs. As the COVID-19 pandemic hit, our robust program allowed us to quickly pivot to our online platform and remote resources. We had crucial one-on-one conversations and facilitated panels to share ideas and best practices on how to work from home, how to lead from a distance, how to lead through disruption, how to maintain resilience, and more.

Benefits

- **We provide competitive and valuable Total Rewards benefits that help our employees thrive while protecting what is most important: health and wellness, families, and overall well-being. Our Total Rewards Program consists of five elements: social, health, community, financial, and career, and is designed to support employees in reaching their personal and professional goals. We offer market-competitive compensation packages as well as a variety of benefits through our Total Rewards Program, including a 401(k) employer match, incentive-based cash and/or equity-based compensation awards, company-subsidized medical insurance coverage, recognition programs, paid volunteer time off, and paid time off among other benefits (including our sabbatical program).**

Total Rewards Program

SOCIAL	HEALTH	COMMUNITY	FINANCIAL	CAREER

- **Employees throughout our organization are eligible to receive equity awards as part of their annual compensation, including a number of individual contributors, in addition to senior leadership. Equity compensation supports retention of key employees and further aligns the interests of those individuals with those of our stockholders. We operate in a highly competitive talent marketplace, and our approach to equity compensation supports WEX having the right people in the right roles at the right time to achieve our short-term and long-term goals.**

At WEX, we feel that it's important to recognize excellence — especially when it comes from our own employees. The President's Club is an annual award celebrating the significant achievements of WEX employees. Because we believe in recognizing leading performance at all levels of the organization, our colleagues remain eligible until they reach the senior leadership levels providing for a peer-nominated recognition across the vast majority of the company. Those who win personify WEX's values and leadership behaviors, and are recognized for making a sustained, positive impact on the organization.

Each year, employees nominate an average of 800 of their peers for this highly sought-after award. Only approximately 50 winners are selected from across the organization to become a President's Club winner. For more than 25 years, winners typically received an all-expense-paid trip together with their guests and the other recipients, to locations throughout the world (subject to factors outside the company's control).

DIVERSITY AND INCLUSION

We strive to achieve a fully inclusive global workplace that unifies and celebrates the diversity of our people, and this is embedded in our core values. We have created a unifying strategy for continuing to foster a workplace that ignites a sense of belonging and provides equal access, opportunities and treatment to all of our employees.

Our Diversity and Inclusion (D&I) philosophy is to embrace the unique experiences and backgrounds that make up our rich body of employees. We work hard to create an inclusive culture that celebrates the diversity of our workforce — the cultures, identities, and backgrounds that make up who we are — and enable a fully engaged and thriving workplace, which drives our business forward.

Our Board Chair and CEO, Melissa Smith, and our Executive Leadership Team set the expectations, goals, and tone, and everyone plays a role in bringing our D&I framework to life. Four out of nine members of our executive leadership team are women. We believe this diverse leadership furthers our desire to have a broad range of viewpoints considered in our strategic and operational practices. We have also invited input from our board to ensure visibility and feedback on our efforts.

We measure progress on achieving an inclusive culture through employee surveys, recruitment, development, and retention of diverse and underrepresented talent. We track training completions, measure outcomes from our D&I programs, and measure the impact of our inclusive culture on our business results and corporate brand.

Our global D&I framework has four areas of focus:

WORKPLACE: Create a culture of inclusion to drive innovation

WORKFORCE: Build tomorrow's diverse workforce today

COMMUNITY: Embrace the diversity of our communities

MARKETPLACE: Provide thought leadership to broaden awareness on D&I initiatives

Diverse Talent Acquisition

One of our primary focus areas for diverse talent acquisition is on early career development, as many college campuses can serve as a pool for diverse populations. To address this, we expanded our outreach from 12 campuses in 2015 to over 500 college and university campuses in 2019. We have recruiting efforts specifically focusing on inner-city schools and Historically Black Colleges and Universities (HBCUs), and we sponsor internships and early career programs focused on that demographic. In conjunction with these efforts, we provide robust benefits which include good pay and meaningful work, and in key markets, housing and transportation. These are barriers to access that would normally prevent diverse early career talent from opportunities in corporate America.

2015 OUTREACH

12 Colleges & Universities

2019 OUTREACH

500 Colleges & Universities

We have engaged in unconscious bias training to focus on hiring diverse teams and fostering an inclusive environment. In addition to our internal team's efforts, we also require any recruitment agencies that we work with to provide us with a diverse slate of candidates.

We track our recruitment efforts starting from application to screening, interviewing, offer, and acceptance.

Our Summer Internship Program earned spot #4 on Vault.com's "100 Best Internships of 2020" list and was named to WayUp's list of Top 100 Internship Programs in the U.S. in 2019 and 2020.

Employee Resource Groups

As part of our commitment to creating a diverse and inclusive workplace, we proudly sponsor Employee Resource Groups (ERGs). ERGs are part of our larger commitment to diversity and inclusion and our long-term strategy of commitment to maintaining an inclusive community. ERGs serve as a key partner for the recruitment of minority employees, raising diversity awareness across the company, and driving strategic discussions about the advancement of employees. ERGs also facilitate creating a more inclusive workplace.

The strategic priorities for our ERGs include talent recruiting and retention, professional development, including mentorship and skill building, and employee engagement and education. Our community employee groups include but are not limited to early career professionals, parents, the LGBTQIA+ community, women, employees of color, employees with differing abilities, and multicultural employee interests. We continue to sponsor newly-formed groups and employees are encouraged to form groups to help support their individual needs.

Black Growth Council	WEXPats
LatinX	WEXPride
NexGen	WEXVets
Parents@WEX	Women@WEX
WEXccessibility	Women in Tech

Our ERGs are grassroots affinity groups created by employees and based on a common experience or identity. They are independent, employee-driven groups supported financially by our company and through other resources, with senior management serving as executive sponsors.

To learn more about our ERGs, please visit our [Career website](#).

EMPLOYEE HEALTH AND SAFETY

We are committed to the health, safety, and well-being of our employees, contractors, and visitors and to ensuring compliance with local health and safety regulations. Our Health and Safety Policy provides a framework designed to prevent work-related accidents, injuries and illnesses. We provide safety awareness training when onboarding new employees, local emergency evacuation awareness training, and periodic review of safety topics.

Our Emergency Response Action Plan is reviewed and updated annually. The purpose of this plan is to ensure the protection of all employees in an emergency situation, and it includes emergency evacuation procedures and protocols for how to report various types of emergencies. Our Organizational Resilience Team enlists and trains our authorized Emergency Response Team (ERT).

Our ergonomics program applies to all operations, facilities, and workstations with the goal of making ergonomics central to employee health. A focus on ergonomics not only supports the well-being of our employees, but also reduces absences and associated employee compensation costs.

Our Incident or Injury Investigation Guidelines establish when, how, and by whom incident and/or injury investigations are processed. The primary focus of such an investigation is to understand why the incident occurred and provide a response within 24 hours of the incident.

Employee Relations

We support our employees through our Employee Relations Center of Excellence (Employee Relations). Employee Relations serves a multitude of purposes regarding the employee experience, including being a dedicated resource for Employee Relations casework, providing training and manager toolkits, consulting with Human Resources Business Partners, and partnering with our Legal and Compliance Departments. Employee Relations leads with an employee centric approach that aligns with our commitment to be a great place to work, foster a community of trust, and meet the business' needs.

The Employee Relations Center of Excellence works in close partnership with our Legal, and Compliance Departments to ensure compliance with all applicable policies and laws. They identify employee relations trends to allow a proactive response mitigating any potential conflicts before they arise. We have also established the Employee Relations Trends Analysis Committee (ERTAC), which collects, monitors, and reports on employee relations data across the company.

Our company also acts as a steward of our communities. We have a long history of giving back, engaging with local organizations, and ensuring sustainability in our philanthropic endeavors. We give because it's the right thing to do. Thoughtful corporate philanthropy can open the door to partnerships that benefit our company and communities, engage employees, help solve social issues, and elevate our brand. Our philanthropic programs help us attract and retain talent, reinforce our core value of Community, and contribute to WEX's culture.

Our mission is to enable the growth of our local communities by supporting nonprofit organizations that are focused on building a healthy and vibrant community. This, in turn, helps develop, attract, and retain talent in the communities where we are located. By acting as a responsible and engaged corporate citizen, we will enable the growth of our local economies and position ourselves as an employer in which our workforce can take great pride.

Underlying this work is a deep belief in creating communities where social equality is a priority. Our grants help to level the playing field in many areas to ensure access to opportunities for all. Social equality is baked into our ethos as funders. It is our position that, in order for all to succeed and for communities to thrive, we must help lift up those with fewer resources and opportunities.

GLOBAL PHILANTHROPY & COMMUNITY PROGRAM

In 2019 we laid out a strategic vision with the goals of supporting and engaging our employees and their communities, and clearly established our funding priorities. We have adopted a corporate philanthropy and community engagement policy to establish the process by which we contribute to nonprofit and community organizations. This policy also provides a framework for our employees to support their local communities through volunteerism and civic engagement.

Our global philanthropy and community program has several components including charitable giving, enterprise fundraising campaigns, a matching gift program, a volunteerism and civic engagement component, nonprofit board service, and the WEX Compassion Fund. In each of our locations, an appointed employee representative works with the office of Corporate Philanthropy & Community to spearhead giving in their respective community and provide quarterly reporting to the corporate office.

We support organizations that work toward robust and healthy communities, and operate in one of the four focus areas of our giving program:

THE ARTS – We believe that the arts are a fundamental building block to thriving, creative communities. Art serves as a catalyst for creativity, innovation, and growth, and should be accessible to all. We support organizations that provide access for underserved populations and bring exceptional arts programs to our communities.

EDUCATION – We believe that education offers the keys to professional success and guides the way into the future. We are committed to supporting organizations that address educational needs from pre-K to post-grad, with a focus on STEM education, and ensuring equity in access to education in our communities.

SOCIAL EQUALITY – Though our commitment to social equality is present in all of our philanthropic efforts, our support in this space focuses on funding that ensures equal access to basic needs such as shelter, food, and healthcare to all families, regardless of socioeconomic status. We are also focused on supporting organizations that are led by or primarily serve people of color and other underrepresented minorities.

WELLBEING – Healthy communities mean healthy citizens and families. That's why it's important for us to invest in organizations that promote healthy lifestyles, offer access to mental health care, and work to ensure that all citizens can access these resources regardless of lifestyle or financial means.

We also manage several employee fundraising campaigns including the United Way Campaign (US) and the Compassion Fund Campaign (global). We offer employees matching gift funds to any organization within our giving guidelines.

HSADay

WEX is deeply committed to the financial wellness of our customers. As a leader in the employee benefits market, WEX extended that commitment by launching a national HSA Awareness Day — an event for the public and the healthcare benefits industry to gather and discuss the power of health savings accounts (HSAs). At this annual event which we launched in 2019, we feature a panel of experts, and educate the public on how to manage health-related out-of-pocket expenses, prepare for unexpected healthcare costs, and plan and save for retirement. We believe that using our leadership position and expertise in the health payments space has uniquely positioned us to reach a broad population of coverage providers, employers, and consumers, and with that reach we can provide them with the knowledge necessary to bolster access to savings, health products, and financial well-being. We are proud to have empowered further access.

WEX COMPASSION FUND

The WEX Compassion Fund, funded through employee, board, and company contributions, offers relief for employees with critical financial needs caused by a qualified disaster or other hardship. The WEX Compassion Fund is administered by the WEX Cares Foundation Inc., a nonprofit organization established for the express purpose of providing charitable aid to employees in times of need. Applications are handled with strict confidentiality by an internal Board of Directors that is representative of our global population.

EMPLOYEE VOLUNTEERING

We believe corporate philanthropy is as much about employee and community engagement as it is about monetary contributions. As part of our annual "Month of Caring," employees at our offices around the globe are encouraged to engage with local nonprofits and give back to their local communities by participating in a hands-on volunteer activities during the month of May.

To support our employees' involvement in their local communities, we offer two paid days off per year for employees to volunteer for a nonprofit. From time to time we organize group volunteer opportunities across our locations and we also encourage the development of leadership skills through service on nonprofit boards.

Read more about WEX in the Community, our Volunteer Time Off (VTO) program and follow our community blog.

BOARD DIVERSITY AND INDEPENDENCE

We are committed to board diversity. We believe our Board should embody a diverse set of skills, experiences and backgrounds, which provides us an informed approach to governance, strategy and focus.

The Corporate Governance Committee is mindful of diversity, with respect to gender, race, national origin, and age in connection with selection and nomination of directors to serve on the board. As an alternative to term limits, subject to waiver, any director who reaches the age of 72 is subject to mandatory retirement at the end of his or her then-current term. Female representation on the Board is nearly one-third of our Board. Taking into account Mr. Ghosh's background as a South Asian, and Mss. Smith, Sobbott, and Sommer, our directors offer ethnic and gender diversity that provide valuable and varied insights.

Based on our guidelines and New York Stock Exchange (NYSE) corporate governance standards, our board has determined nine of the ten directors are independent, including each of the members of the Corporate Governance Committee, Audit Committee, and the Compensation Committee. We have also appointed an independent Vice Chair and Lead Director of the board.

GENDER DIVERSITY

30%

70%

■ Men ■ Women

For a full discussion about our board and its composition, please see our latest Proxy Statement.
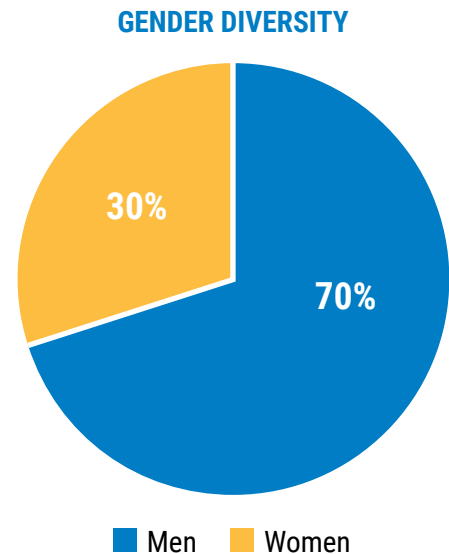
ETHICAL BUSINESS PRACTICES

Operating ethically and with integrity has always been core to our identity as a company. We fulfill our purpose by living our values—every day, in everything we do. The principles outlined in our Code of Business Conduct and Ethics (Code) describe the behaviors involved in living our values. How we achieve our goals is as important to us as what we achieve, and our values include integrity, execution, innovation, relationships, and community. The Code applies to directors, officers, and employees and also to vendors, consultants, contract workers, and temporary employees.

Our Code includes our expectations for maintaining a safe and respectful workplace, diversity and non-discrimination, avoiding conflicts of interest, and interacting with clients and business partners in a fair and honest way. It also includes clear guidelines on following the letter and the spirit of the law with regards to insider trading, money laundering, anti-corruption, and anti-bribery. Our Code emphasizes how we respect and protect the human, cultural, and legal rights of individuals and communities wherever we operate.

To allow anyone to share ethical concerns, our Integrity HelpLine and associated web portal are available 24/7 with trained specialists from an independent third-party. The HelpLine and portal both allow for anonymity and we have a strict non-retaliation policy included in our Code.

Employee Compliance Training

Our primary goal is to deploy high-quality, relevant, and timely training through a consistent and standardized approach which supports compliance training requirements. Our focus is to ensure that regulatory compliance and standards are met by providing consistency, transparency, and accurate evidence for audits. The employee curriculum of compliance training is identified and categorized based on legal requirements (e.g., code of conduct, HIPAA, AML/BSA, GDPR, etc.), areas where audits are required (e.g., cyber security, PCI, HSA Compliance, etc.), and training to reduce risk (e.g., government contracting, conflicts of interest, record management, fair trust, etc.).

Our enterprise-wide Compliance Committee oversees the Compliance Training Program and approves the annual calendar, including specific trainings related to our bank and the health division. We have a quarterly cadence to ensure compliance training is delivered to appropriate audiences on a regular basis. Both employees and contractors are required to take our compliance training. The training completion rate is tracked and reported back to the Compliance Committee.

Specific to anti-harassment and anti-discrimination training, because policies differ across our locations, we ensure the entire company completes the maximum required training.

Ethical Selling Practices and Product Marketing

As per our Code of Business Conduct and Ethics the marketing of our products and services must be truthful and accurate. False claims about competitors' products and services are never acceptable. Our distributors and partners are subject to our due diligence process to ensure they meet our standards.

Our business is primarily business-to-business with a small fraction of our marketing and sales efforts targeting consumers.

For our sales compensation plans, we have policies and governance processes and controls in place to evaluate and mitigate risks. During 2020, we completed a review and standardization of our sales compensation plans. It is an example of how our governance processes and controls work, as during that review we ensured that we have windfall clauses in our employee contracts.

Intellectual Property and Competitive Behavior

We rely on a combination of patent, copyright, trade secret, and trademark laws, in addition to confidentiality procedures, contractual provisions, and other similar measures to protect the proprietary information and technology used in our business. We generally enter into agreements with clients, consultants, service providers, and other partners, whether current or prospective, that contain provisions restricting use and disclosure of our proprietary information and technology.
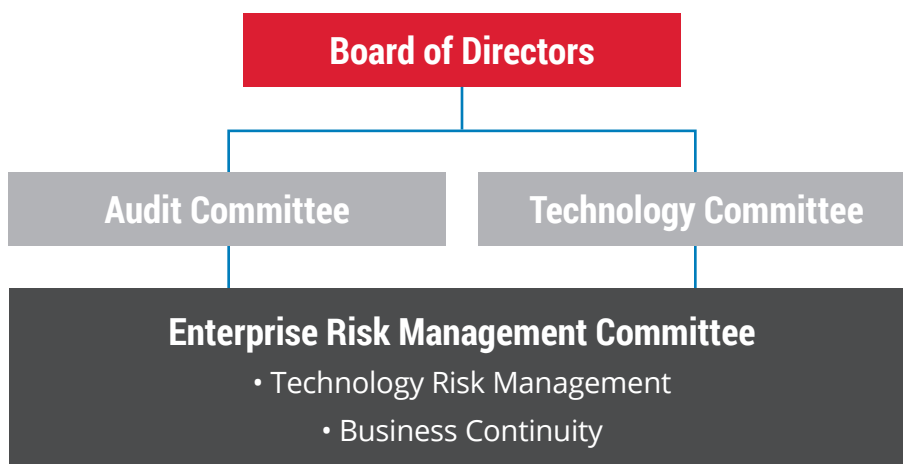
We have a patent policy which aims to protect and safeguard company inventions and recognize the importance of patents in these efforts, as well as state that our personnel should not knowingly infringe on any valid third-party patent claims. Historically, we have sought to register and maintain patents and trademarks for defensive purposes and are prepared to aggressively defend our intellectual property as necessary.

When employees are trained on our Code of Business Conduct and Ethics they are made aware of the importance of protecting our intellectual property (IP) as well as our company rules on not entering into agreements with competitors to our detriment or engaging in any anti-competitive behavior. New employees sign a non-disclosure agreement (NDA) and an inventions agreement.

SYSTEMIC RISK MANAGEMENT AND ORGANIZATIONAL RESILIENCE

We have a comprehensive business continuity and resilience framework within which our organization operates. That framework focuses on response and recovery, and on proactive risk management. Our goal is to work far upstream of any potential problems and to mitigate them before they have a chance to manifest themselves. We use Enterprise Risk Management practices such as Business Impact Analysis, Risk Assessment, and Control Effectiveness Measurement. For new products and services, our aim is to improve overall business resilience by integrating compliance and business-resilience objectives into project management and software development lifecycles. We believe that if we address these considerations in the technology design phase, we lay the groundwork for a better overall process and end result.

In late 2020, we created a Risk and Compliance Organization to centralize all risk management and compliance functions and appointed our first Chief Risk and Compliance Officer. The Chief Risk and Compliance Officer reports to the CEO but has direct access to the Board as needed. Systemic risk management and organizational resilience are incorporated into our overall company risk management framework as described below.

Board of Directors

Audit Committee   **Technology Committee**

Enterprise Risk Management Committee
• Technology Risk Management
• Business Continuity

Systemic Risk Management

Within our structural framework, we have positioned a group of individuals as responsible for overseeing systemic risk management. This group includes members of our board, and members of our executive leadership team (ELT).

The Technology Committee on our board has a direct role in how WEX engages with technology. This committee reviews and oversees our overall strategic direction, including such details as what investments we make in information technology, and what perceived risks there may be in new innovations. They also study emerging products, and new ways to engage in processes that could have a significant impact on our operations. The committee assists the board and the Audit Committee to oversee risk management regarding technology, data security, disaster recovery, and business continuity including details such as risks related to hardware, organizational structure, innovation, and research and development.

Our Chief Information Officer reports to our Chief Technology Officer, is a key decision-maker within our systemic risk management organization, and has global responsibility for infrastructure, internal applications, and business systems, as well as all end user services.

One of the ways we ensure our risk management practices are successful is through the use of a combination of cloud and physical infrastructure. This enables the resilience and recoverability of our operations across the globe. Production systems are made resilient through the use of high-availability architecture within each data center and by duplicating systems across multiple cloud zones. We also have a comprehensive disaster recovery solution in place to ensure recoverability of production systems in the case that our first few means of defense are incapacitated. We also maintain a fully functional Emergency Command Center at each location.

Organizational Resilience

To provide organizational resilience and safeguard against unexpected events, we have an Organizational Resilience Program which is overseen by an Enterprise Risk Management (ERM) Executive Committee and guided by our Business Continuity Plan (BCP). The Director of Organizational Resilience provides quarterly status reports to the Chief Technology Officer, who is a member of the ERM.

Our Board of Directors is responsible for overseeing the BCP. They are updated annually on the program status, and in some cases those updates occur more frequently. The board's Audit Committee also receives periodic reports.

The objective of our BCP is to provide a comprehensive and systematic process of prevention, mitigation, preparedness, response, continuity, and recovery. The BCP outlines an ongoing, dynamic, and interactive process for before, during, and after a disruptive event and it consists of business unit, technology, and emergency response plans covering physical security, emergency response, and recovery responsibilities, tasks, and procedures. In addition, we use multiple automated resiliency tools and services to ensure global situational awareness, effective preparation, communication, and collaboration across the enterprise related to resiliency planning, testing, and incident management.

| Prevention | Mitigation | Preparedness | Response | Continuity | Recovery |

The BCP includes emergency response plans that address the safety of our employees, customers, and partners as well as the protection of physical and information assets. It applies an all-hazards approach which means it is designed to address a full range of threats, risks, and the overarching impact they may have on our organization.

Our BCP is aligned with the ISO 22301 framework and is integrated with our physical, information security, and risk management systems. It is built to adhere with FDIC regulations as well as SOX compliance and we undergo multiple regulatory exams annually. In addition, we maintain PCI certification on five of our platforms, as well as a HITRUST certification for our health division.

All business continuity plans are tested before implementation and are exercised regularly to ensure their viability and continued improvement. In addition to consistently evaluating our organizational resilience plans, procedures, and capabilities, we also regularly monitor and measure parts of our operations that have a material impact on performance. These include partnership and supply chain relationships of which we monitor performance metrics and other means of assessment.

Consistent with our commitment to compliance, we continuously evaluate our organizational resilience programs' compliance with all applicable legal and regulatory requirements. We also keep apprised of industry best practices to regularly ensure alignment.

Pandemic Plan and COVID-19 Response

Our Pandemic Plan lays out our strategic approach and preparations for an influenza pandemic or other infectious disease pandemic. It is designed to minimize risk to the health and safety of our employees and clients and to ensure the continuity of business operations. We follow guidance from the Centers for Disease Control and Prevention (CDC) and the World Health Organization (WHO) to ensure global situational awareness. Early in the pandemic we activated a cross-functional pandemic incident management team and global Pandemic Response Team to implement our response plan. The team coordinated efforts to enable operational continuity in a remote environment, initiated the crisis communication plans, and managed resource allocation, incident response and management structure outlines and assignments.

This pandemic risk response matrix which was developed and implemented provides detailed criteria for implementing travel and event restrictions, remote workforce and business continuity plans, workforce and facility impairment planning, confirmation of uninterrupted source material from critical vendors, and communications to employees and customers on our response to the COVID-19 crisis.

The ongoing focus of our Pandemic Response Team includes the development of a phased return-to-work-plan and long-term facilities strategy, continuous monitoring and evaluation of resurgence risk by location, and implementation of a business travel approval process and reintegration approach. This reintegration approach includes protocols and measures that ensure a safe workplace, reduce the exposure risk, and ensure ongoing monitoring of critical vendor risk. We continue to provide communications and information to our employees through a dedicated Chief Human Resources Officer COVID-19 newsletter series, town hall meetings, an internal COVID-19 Google Site, and an external web page.

Prior to COVID-19, our BCP efforts were focused on making the primary work environment resilient so that business operations could continue, unimpacted, through an emergency situation. Currently, with corporate offices no longer being the primary work environment for many companies, BCPs have had to be adjusted and new priorities established. We have shared our perspective on these changes in a [BCP blog post](#), and added ideas and resources such as [how to build an efficient work from home model](#), and we continue to provide up-to-date [emergency resources](#) on our website.

CUSTOMER PRIVACY

We apply global best practices for data privacy and continue to evolve our approach. Our business is primarily business-to-business focused and any gathering and maintaining of consumer data is very limited. We maintain compliance with the General Data Protection Regulation (GDPR) and other applicable privacy laws in the countries where we operate. As an example, in the U.S. we have a comprehensive [Privacy Policy](#) outlining how data is collected, used, and shared. It also outlines the options for accessing, correcting, or deleting personal information. Additionally, we allow our users to choose how we use their personal information for advertising and marketing purposes.

All our employees complete annual customer privacy training on topics such as cybersecurity, data privacy and GDPR. We also complete an annual privacy risk assessment across our operations. This internal audit examines the likelihood and impact of a risk event, and controls effectiveness of tactics to mitigate various privacy risks.

DATA AND CYBER SECURITY

Data protection is an essential aspect of our operations. Our Information Security Program consists of a comprehensive set of policies, procedures, and guidelines across standard information security domains. All policies are reviewed and updated at least annually to meet all applicable federal and state regulations. We have adopted the ISO 27001/27002 framework for protecting information assets, we maintain PCI and HIPAA compliance, and we are also subject to external audits, including

ISO   PCI   HIPAA   FDIC   Federal Regulations   State Regulations
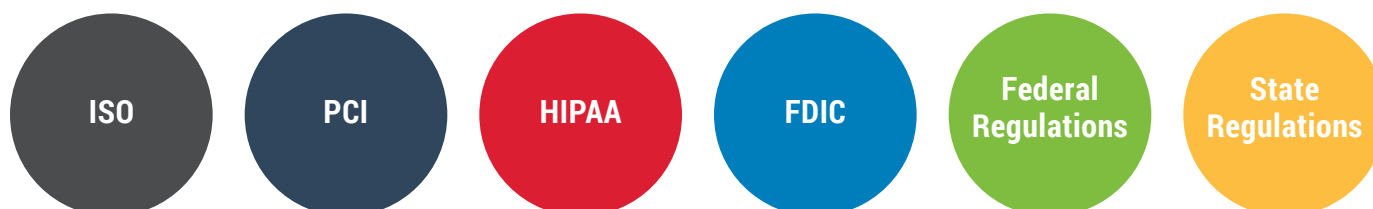
by the FDIC.

Our overall security function includes Governance, Risk and Compliance, Identity and Access Management, Security Architecture, and Security Operations and Engineering functions. The security framework is reviewed regularly and updated at least annually to respond to the rapidly evolving threat landscape. Our Global Chief Information Security Officer reports through the Chief Technology Officer up to the Technology Committee of the board, which is responsible for the oversight of cybersecurity risks. On a regular basis, the Chief Information Security Officer presents a threat matrix, analysis of our cyber health and any recent threat activity to the Technology Committee.

We have a comprehensive strategy to manage risk to organizational operations and assets, individuals and other organizations associated with the operation and use of our information systems. We actively monitor new risks, evaluate them through a risk management process and produce a risk register. We have contracted with a Managed Security Service provider to perform 24x7 real time threat intelligence, security monitoring and incident response. Periodically we engage independent auditors and other subject matter experts to validate compliance against existing security policies and standards via onsite assessments.

All employees are trained and acknowledge our data security policies when they are hired, and they renew this acknowledgement annually. We hold Cyber Security Awareness Training Programs to educate employees about emerging threats, security trends, and their role to help protect against them. We also train employees to understand the risks associated with electronic communications and run quarterly phishing awareness campaigns. Developers receive job specific data security training based on their role.

Vendor Data Security

All new vendors undergo a review by our Information Security Team and are assessed and classified according to our Risk Classification Standards. This assessment includes a set of questions for vendors to answer, including whether they access our information and data, whether they handle Personal Identifiable Information (PII), Personal Health Information (PHI) and what level of business criticality they have. We also formally request a SOC1/SSAE18, SOC2/TSC or PCI Attestation of Compliance (AOC), as applicable, from each vendor.

Vendor risk is continuously monitored by our third-party risk management solution. The Information Security Team regularly receives updated documentation produced by these reviews. In this documentation, they look for solutions to previously noted deficiencies, and check to ensure no new deficiencies have been discovered. If no concerns are raised, the security risk can then be evaluated for reclassification and re-approval.

SASB INDEX

In developing this report, we have referenced the SASB Frameworks for Software and IT Services industries. According to the SASB Industry Level Materiality Map, the following categories are most relevant to companies in our industry. To find more information about our efforts in a specific area, the below table was created to identify the specific section in the report relevant to the stated metrics.

Topic	Accounting Metric	SASB Code	Report Section
Environmental Footprint of Hardware Infrastructure	**(1)** Total energy consumed, **(2)** percentage grid electricity, **(3)** percentage renewable	TC-SI-130a.1	Environmental Commitment
	(1) Total water withdrawn, **(2)** total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	TC-SI-130a.2	
	Discussion of the integration of environmental considerations into strategic planning for data center needs	TC-SI-130a.3	
Data Privacy & Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	TC-SI-220a.1	Customer Privacy
	Number of users whose information is used for secondary purposes	TC-SI-220a.2	
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	TC-SI-220a.3	
	(1) Number of law enforcement requests for user information, **(2)** number of users whose information was requested, **(3)** percentage resulting in disclosure	TC-SI-220a.4	
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	TC-SI-220a.5	
Data Security	**(1)** Number of data breaches, **(2)** percentage involving personally identifiable information (PII), **(3)** number of users affected	TC-SI-230a.1	Data and Cyber Security
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	TC-SI-230a.2	
Employee Engagement, Diversity & Inclusion	Percentage of employees that are **(1)** foreign nationals and **(2)** located offshore	TC-SI-330a.1	Our Team
	Employee engagement as a percentage	TC-SI-330a.2	
	Percentage of gender and racial/ethnic group representation for **(1)** management, **(2)** technical staff, and **(3)** all other employees	TC-SI-330a.3	

Topic	Accounting Metric	SASB Code	Report Section
Intellectual Property Protection & Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	TC-SI-520a.1	Intellectual Property and Competitive Behavior
Managing Systemic Risks from Technology Disruptions	Number of **(1)** performance issues and **(2)** service disruptions; **(3)** total customer downtime	TC-SI-550a.1	Systemic Risk Management and Business Resilience
	Description of business continuity risks related to disruptions of operations	TC-SI-550a.2	

ALIGNMENT WITH UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

We consider our impact on society and have identified the United Nations Sustainable Development Goals with which our business and activities are most closely aligned. We support working to advance these globally-shared priorities. We have determined that our current activities most closely align with the following goals:

3 GOOD HEALTH AND WELL-BEING

4 QUALITY EDUCATION

5 GENDER EQUALITY

8 DECENT WORK AND ECONOMIC GROWTH

12 RESPONSIBLE CONSUMPTION AND PRODUCTION