

ESG Report

2021

wexTM





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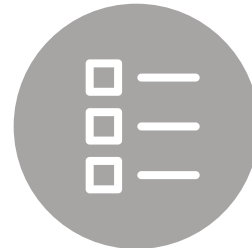
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Introduction





Letter from our CEO

Over the past two years, I've seen how WEX and the customers and partners we serve around the world adapted swiftly to changes in our economies, our businesses, and our communities. We have the ability to be a positive force in our world, allowing our actions to open up possibilities for others. That's why WEX is committed to deepening our impact—from helping our customers transition to cleaner energy, to enabling save and pay for healthcare services, to diversifying and empowering our talented employees.

We understand the importance of a robust environmental, social and governance (ESG) strategy. For this reason, we've established strong oversight from our Board of Directors and executive leadership team focused on where our unique assets and capabilities position WEX to be a successful, responsible leader, considering all of our stakeholders, including the environment and community. This requires both a purposeful plan for long-term, sustainable impact coupled with agility to respond rapidly to the unforeseen challenges that impact our lives every day. With these qualities in mind, WEX's purpose to "simplify the business of running a business" has never been more essential.

With a long-term vision for growth, we are carefully considering the effects of the expected low-carbon transition. As a driver of fleet efficiency, we are well positioned to help our customers as they roll out and manage new electric vehicles and participate in other forms of energy innovation. Accelerating electrification readiness is a strategic business imperative that is intertwined with our ESG commitments. We are focused on offering compelling solutions to help our customers navigate a more complex operating model and exceed their own ESG objectives.

As we tackle some of the greatest challenges of this decade, we've learned over the past two years that we must also remain nimble to address unanticipated issues that demand our action. For example, WEX's commitment to our customers and our situational awareness energized us to quickly launch a solution for employers in

accordance with a federal subsidy for COBRA insurance payments, helping individuals and families maintain healthcare insurance in the wake of COVID-19. Even more recently, as healthcare rights in the U.S. have come to the forefront, WEX has maintained our commitment to providing equitable access to healthcare for our U.S. employees and their families, including for reproductive services and travel expenses for healthcare services that cannot be accessed locally.

Each of these examples helped contribute to our success in 2021 and demonstrate the power of our talented workforce, more than half of which identifies as female. We are proud of our gender diversity and continue to build upon diversity and inclusion as an important part of creating diversity of thought which drives innovation. Our benefit offerings are thoughtfully crafted to support these concepts, and we conduct a pay equity analysis annually to ensure employees are compensated equitably for the work they perform. We believe this is an important foundation for inclusion.

As we move forward on our journey to simplify business for a sustainable future, I'm excited by the opportunities I see and look forward to working with our stakeholders and communities to create lasting change. In the pages that follow, we provide additional transparency and information on these important topics, including the results of our first comprehensive ESG assessment and our many activities to enhance our ESG capabilities.

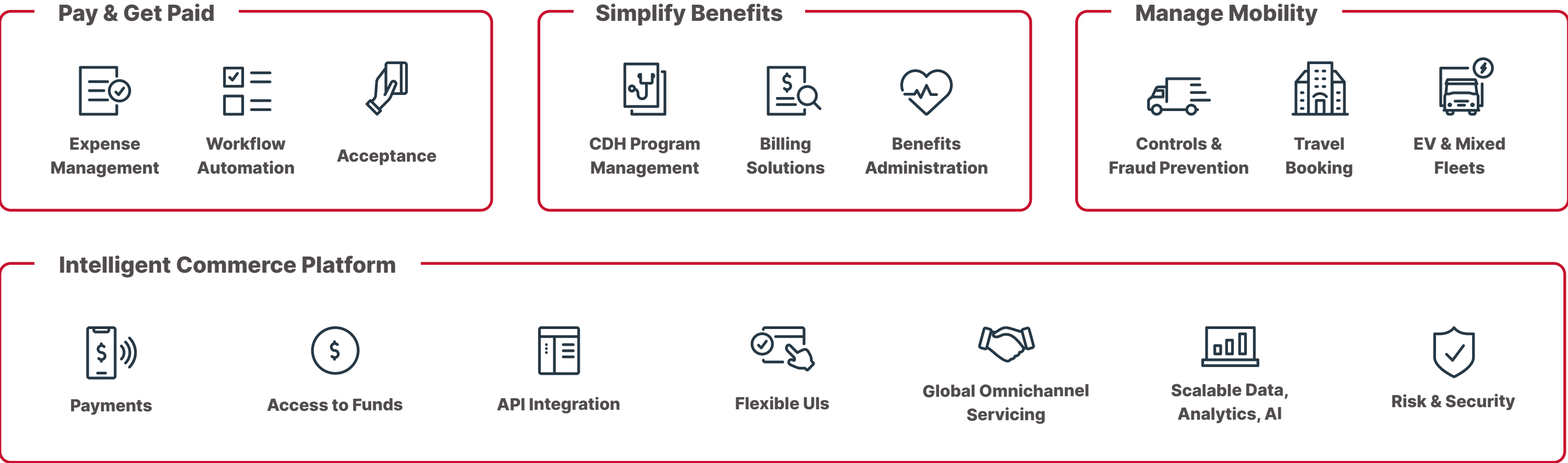
Melissa D. Smith

Melissa Smith, Chair and Chief Executive Officer

About WEX

WEX is the global commerce platform that simplifies the business of running a business. We have created a powerful ecosystem that offers seamlessly embedded, personalized solutions for our customers. Through our rich data and specialized expertise in simplifying benefits, reimagining mobility, and paying and getting paid, we make it easy for companies to overcome complexity and reach their full potential. WEX was founded in 1983, and our shares trade on the New York Stock Exchange (NYSE) under the ticker symbol: WEX.

WEX Solution Ecosystem



WEX by the numbers, 2021

5,622 global full-time employees

\$1.851 billion annual revenue

17 countries where WEX employees are located

29 physical locations/offices

2 acquisitions: HealthcareBank HSA assets and benefitexpress



Governance and oversight

We enhanced our ESG strategy and released our inaugural ESG report in the second quarter of 2021. We provided additional ESG training for our Board and strengthened the governance of our ESG activities, formalizing our Board of Directors’ oversight of ESG and establishing a cross-functional ESG Management Committee that includes representatives from Commercial Business and Products, Corporate Communications, Finance, Human Resources, IT, Legal, Operations, Risk and Compliance and Strategy.

Stakeholders and strategy

During the year, we expanded our shareholder engagement activities. We conducted investor outreach, with several members of the Board and management participating, to solicit investors’ perspectives on our ESG program and of the importance of ESG initiatives in general. We also engaged outside experts to conduct an ESG assessment in order to identify the ESG topics that are most important to our business strategy, our bottom line and our stakeholders. Input on the ESG assessment was largely provided by internal stakeholders, including members of both management and the Board with views of our operations and business activities, as well as the organization as a whole.



This report reflects the findings of our ESG assessment. Our ESG strategy is organized around the following four pillars, alongside our key governance practices:

People & Culture

Our dedication to simplifying the business of running a business demands a diverse, world-class talent base that can respond nimbly to our customers' needs, today and tomorrow. We foster a supportive, engaged culture and invite our employees to bring their whole selves to work every day.

- Culture and engagement
- Talent attraction, development and retention
- Diversity, equity and inclusion
- Employee health and safety
- Labor practices

Environmental Stewardship

Like all organizations, we have a responsibility to minimize our own corporate environmental impact. We are driving operational and energy efficiency to do so.

- Carbon footprint
- Energy management
- Waste management
- Water management

Environmental Innovation

We are building on our long history of innovation in fleet efficiency to help drive the anticipated electric vehicle transition, providing solutions that help our customers simplify this complex process.

- Opportunities in green tech (sustainable solutions)
- Climate transition risk

Social Impact

We work to enhance the health and well-being of our communities, customers and employees both through the products and services we offer and through our community involvement and philanthropy.

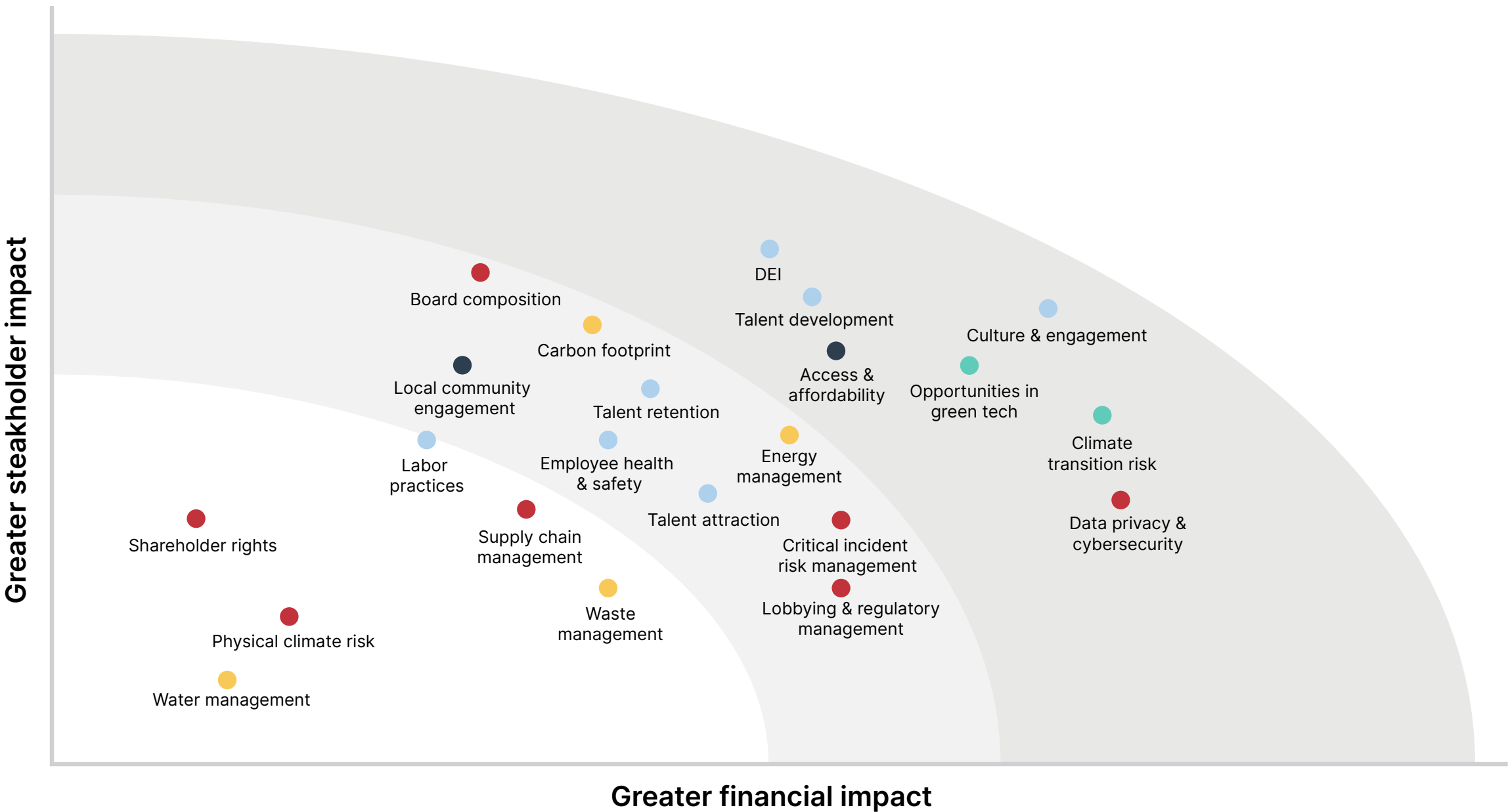
- Access and affordability
- Local community engagement

Governance

Our business is built on a foundation of ethics and integrity, and we have developed the frameworks, processes and tools necessary to uphold our responsibilities to our customers, our shareholders, our employees and our communities.

- Board composition
- Shareholder rights
- Data privacy and cybersecurity
- Risk management¹
- Supply chain management
- Lobbying and regulatory management

ESG assessment matrix



¹ Risk management encapsulates the following topics captured in WEX's ESG Assessment Matrix: critical incident risk management and physical climate risk.

Key ESG achievements



Spring 2021

- Published our inaugural ESG report
- Nominated three new directors, that were elected by shareholders to our Board, strengthening its diversity and expertise
- Recommended the declassification of our Board of Directors, which was approved by shareholders with a phase-in of one year terms commencing in 2022
- Began to conduct employee pulse surveys, which continued throughout 2021. The surveys covered topics such as total rewards, engagement and remote working
- Created a performance benchmarking peer group to provide additional reference information relating to pay program practices and financial performance



Summer and Fall 2021

- Conducted shareholder engagement, seeking feedback on our ESG program
- Conducted an ESG assessment to determine the ESG topics that are most strategically important to WEX
- Began the process of setting ESG-related goals and targets



Winter 2021–2022

- Held training sessions with industry experts presented by third parties to further educate our Governance Committee and Board on current ESG and electric vehicle trends
- Conducted a companywide culture survey
- Hired our first chief diversity and inclusion officer
- Measured our Scopes 1 and 2 greenhouse gas (GHG) emissions data to determine baseline and help inform future climate strategies
- Closed an additional seven data centers in 2021



Spring 2022 and Beyond

- Held a virtual **Investor Day** to discuss our business strategy, including strategic business efforts with embedded ESG considerations such as electric vehicles, benefits and Project Flume
- Published our **Diversity, Equity and Inclusion Special Report** and outlined our aspirational 2025 gender and U.S. employee of color goals
- Publicly released our EEO-1 report on our website for the first time

Electric vehicle transition

Finally, we continued to strengthen our approach to support our customers’ needs in a mixed-fleet environment that requires them to manage both traditional vehicles and electric vehicles (EVs) within their fleets. These changes create more complexity for businesses, and we are building on our deep experience in fleet and mobility to develop and provide solutions to address these specific customer needs, including charging, EV transition planning, and tools to successfully manage a mix of vehicle types ranging from connectivity to advanced route planning and carbon emissions reporting.



About this report

This report is aligned to the Value Reporting Foundation's Sustainability Accounting Standards Board (SASB) standards for the software & IT services industry (see [Appendix](#)) and is further informed by the Global Reporting Initiative (GRI) Universal Standards.



ESG disclosures

We are also enhancing our ESG-related disclosures. We are sharing our Scope 1 and Scope 2 GHG emissions in this report, and our most recently filed EEO-1 report can be found on our [website](#). Both serve as a baseline for further reporting.

Unless otherwise noted, this report covers calendar year 2021 activities.

Preparing for Task Force on Climate-Related Financial Disclosures

We understand the critical importance of assessing and addressing global climate risk while considering and managing its impacts on our business and key stakeholders. Therefore, we are taking steps now to prepare WEX to align to Task Force on Climate-Related Financial Disclosures (TCFD) recommendations in future reporting efforts.



Governance

We have formalized the Board's oversight of ESG across our organization and established a cross-functional ESG Management Committee. This oversight includes our two environmentally focused strategic pillars, Environmental Innovation and Environmental Stewardship. We are formalizing the Board's oversight of climate change-related matters as we continue to develop the strategies for each of these pillars.



Strategy

We are actively making our business strategy flexible to incorporate forward-looking climate-positive business opportunities, such as the anticipated electric vehicle fleet transition, which is discussed in further detail on [page 23](#).



Risk management

As we continue to integrate ESG into our risk management functions, we are also considering the potential physical and transition risks that climate imposes on our business. We will be well positioned to report on this topic in the future.



Metrics and targets

Measuring our impacts has been an important first step in developing an ongoing reduction strategy. In 2021 we set out to measure and disclose our Scope 1 and 2 GHG emissions, which will inform our climate-related goals and targets moving forward. Our emissions data for calendar years 2019, 2020 and 2021 can be found [here](#).



People & Culture

At WEX, our talented and driven employees are vital to our success. Our dedication to simplifying the business of running a business demands a diverse, world-class talent base that can respond nimbly to our customers' needs today—and anticipate what's coming tomorrow. In 2021, as we embraced a global flexible work environment, we focused on the strength of our culture—an essential ingredient in our success to date, and a key factor in our continued growth.



Culture and engagement

Culture and engagement are of utmost importance to our business. We foster a collaborative and supportive culture based on our core values:



Community



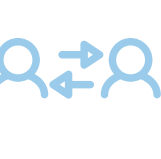
Execution



Innovation



Integrity



Relationships

Our workforce is composed of forward thinkers, problem solvers and lifelong learners. In order to foster a culture where all individuals can bring their best selves to work, we provide a variety of benefits and engagement opportunities to continuously develop our team and enhance our human capital strategy. Beyond offering competitive total compensation (see “[Talent attraction, development and retention](#)”), we also prioritize employee recognition, which helps build bonds across our workforce and acknowledges our staff for their contributions. In 2021, we introduced **Inspire & Celebrate**, a formal employee recognition program that gives all employees a way to celebrate their peers who consistently demonstrate and uphold our company values, drive company goals, and go above and beyond in their contributions to WEX’s success. The program allows WEX employees to give their colleagues real-time appreciation and offers global consistency in recognition. We believe Inspire & Celebrate, as part of our overall approach to talent management, will drive increased employee engagement and retention.

We also continue to present **President’s Club**, our 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 for this peer-nominated recognition until they reach senior leadership levels. Those who are awarded President’s Club recognition personify WEX’s values and leadership behaviors, and

are recognized for making a sustained, positive impact on the organization throughout the prior calendar year. Each year, employees nominate their peers for this highly sought-after award. In 2021, 55 employees were selected from across the organization as President’s Club members. These individuals typically have received an all-expense-paid trip together with their guests and the other recipients to locations throughout the world.

Employee engagement

We regularly engage our employees in a variety of meaningful ways to better understand their perspectives—an essential piece of building a strong workplace culture. As part of our ongoing efforts to ensure we are supporting and developing our workforce, we regularly survey employees anonymously on their job satisfaction, engagement and other factors. Results from our most recent survey that was just completed in early-2022 indicate that we exceed industry benchmarks in several areas, including overall engagement and inclusion. We look forward to reporting the full results in our next ESG Report.



WEX Week Off

At the end of December 2021, we closed our offices with pay for all employees other than essential personnel for the last week of the calendar year. The designated break was designed to encourage work-life balance by providing employees time to slow down and focus on their mental, emotional and physical health. This additional week of paid time off was just one way to demonstrate appreciation for employees’ hard work over the previous 18 months and recognize the impact COVID-19 had on their lives.

Talent attraction, development and retention

Today's incredibly competitive market for talent, especially in the technology sector, makes it even more essential that we prioritize our workforce, including developing and retaining current employees while also recruiting top talent. In 2021, we implemented several strategies to ensure we remain competitive in the talent marketplace to support our future growth.

In response to shifting business demands and employee preferences, in 2021 we introduced a global flexible way of working—enhancing our ability to recruit top talent regardless of geographic location and entrusting our employees to flex their work responsibilities around other important obligations in their lives. As part of this commitment, we developed a series of Ways of Working workshops, aimed at facilitating our workforce's transition to the global flexible work environment. Separate sessions for leaders and employees provided tools and resources for navigating virtual, hybrid and on-site environments. We remain dedicated to intentionally bringing employees together to collaborate, learn and grow.



Talent and leadership development

We prioritize opportunities for employees to learn and grow throughout their careers at WEX. Thus, we assess our talent development strategy on an ongoing basis to ensure employees have opportunities to grow in their roles and expand their skills. In 2021, we restructured our global talent development function with an eye to scalability and sustainability, ensuring we are built to support WEX's future growth. The new structure is based on five pillars of excellence to better support the business:

- ✓ Strategic excellence
- ✓ Learning excellence
- ✓ Leadership excellence
- ✓ Operational excellence
- ✓ Service/sales excellence

We are ever attentive to the skills and capabilities of our leaders. We modified leadership expectations to align with our global flexible work environment. These expectations are now codified to show progressive leadership behaviors and responsibilities as people move from individual contributors to team leads or managers to vice presidents and senior vice presidents. (See box to the right for more on our leadership development programming)

We continually explore innovative technologies and processes to accelerate our employees' development. In 2021, we piloted data-driven **artificial intelligence (AI) micro-coaching** to address the ongoing need for individual sales coaching. WEX coaches used a digital workplace to gather daily input from the employees they work with and leveraged AI algorithms to assess their

needs more accurately and expedite the achievement of their goals. We are also exploring the use of virtual reality and adaptive learning technologies.

To support our commitment to lifelong learning, employees have access to an array of education benefits to encourage skill acquisition and enhancement, including tuition reimbursement. One example of this is our partnership with the **Roux Institute** at Northeastern University, a graduate education and innovation hub that shares space in one of our Portland, Maine, offices, which includes a 20% scholarship for Maine-based WEX employees. Employees in other locations can also receive tuition reimbursement for virtual classes at the Roux Institute.

In 2021, we enhanced our performance management process, which is anchored by an annual review required for all employees in the fourth quarter. At this review, employees are evaluated on their progress toward their annual goals, which are set in alignment with business strategic objectives at the beginning of the year. We also offer employees tools such as Anytime Feedback to facilitate regular performance conversations throughout the year and encourage them to leverage the Thrive in My Career site and subsequent learning opportunities to support their career development.

Personal development is just as important as professional development, which is why we offer our employees the opportunity to participate in **Expedition**, our sabbatical program. Expedition is designed for employees who have been with us for six or more years. The program provides up to four consecutive weeks—20 consecutive working days—of 100% paid leave from WEX, during which selected employees may pursue special interests, personal or professional goals, volunteering, or other life-enhancing activities.

Training, skill development and resources for people leaders

In 2021, we expanded our leadership development and training offerings, building on the momentum from and success of our 2020 efforts to modernize our comprehensive leadership continuum. Our programs and resources include:

Leaders Unleashed, a cohort-based, multi-modal, multi-month continuum that is differentiated by level, with programs for emerging leaders, team leaders, managers, directors, VPs, and SVPs. This portfolio is designed as a progressive continuum to help leaders lead themselves, their teams and the organization as they grow in their careers. More than 125 employees participated in Leaders Unleashed in 2021.

Thrive as a People Leader Resource Center, an online “how do I?” resource center that includes policies, procedures, practices and learning assets. The resource center was developed internally in 2021 and launched in early 2022.

Thrive as a Manager Accelerated addresses the changing ways of work due to both the pandemic and WEX's acquisitions and is designed to ensure that people leaders' capabilities are aligned, regardless of their level. We designed and implemented the five-session, 10-hour training for all people leaders up to the VP level. In 2021, more than 450 employees participated, and the remaining eligible participants are scheduled to complete the training in 2022. Going forward, Thrive as a Manager Accelerated will be offered to all new people leaders.

Thrive as a VP, a program we developed to provide additional support for people leaders and instill servant leadership principles and practices. The program imparts 12 distinctive leadership habits, including “Make active listening your superpower,” “Embrace empathy” and “Foster inclusivity and community.” It is delivered via an interactive guide, followed by VP-facilitated Fireside Chats on each habit, which give senior leaders an opportunity to share their experiences of practicing the habits with their peers.

A comprehensive, competitive approach to employee benefits

We are dedicated to providing benefits that help our employees protect their health, families, and overall well-being. Our offerings include:

- Medical and pharmacy
- Dental
- Vision
- Health savings account
- Flexible spending account
- Life insurance
- Short- and long-term disability insurance
- Accident, critical illness and hospital indemnity insurance
- Pet insurance
- Legal plan
- Identity theft protection
- Auto & home insurance
- 401(k) retirement savings plan
- Best-in-class solutions for well-being
- Tuition reimbursement
- Backup child-, adult- and eldercare
- Parental leave
- Adoption assistance
- Sabbatical program
- Conception and reproductive health benefits
- Travel benefits for healthcare services that cannot be accessed locally or are better accessed at leading health centers



Employee retention

We don't just invest in our employees; we also work to re-recruit and retain them. We regularly review talent retention across the organization, comparing the data to our expectations, trends over time and market standards. The Board of Directors and our management team regularly evaluate succession plans to ensure we have robust talent pipelines for our critical leadership positions.

Benefits and compensation

We offer competitive total compensation packages to ensure we remain a valued employer. We conduct an annual survey to ensure our salary ranges are competitive in our industry, and we provide a comprehensive array of benefits. We also support our employees' overall wellness, offering dedicated well-being campaigns and personal financial counseling, as well as on-demand virtual fitness classes via Wellable, among other programming. Throughout the pandemic and into 2021, it was especially important to expand our mental health programming globally. We expanded the benefits available through our Employee Assistance Program, which offers access to unlimited confidential assistance with a vast array of personal matters, including legal consultations, identity theft recovery and daily living services. We also expanded our partnership with Bright Horizons, which arranges temporary backup childcare and eldercare as needed.

WEX's commitment to providing equitable access to healthcare for our employees and their families is steadfast. Our Total Rewards Program is designed to support employees in meeting their social, health, community, financial and career goals. For example, WEX sponsors a 401(k) program with an annual 6% employer match (after one year of service) and offers a level of tuition reimbursement for both undergraduate and graduate education. In addition, employees are eligible for short-term disability coverage after only one week of absence, which covers maternity leave.

In addition, we offer a short-term incentive plan designed to motivate employees and executives to drive profitable growth while diversifying revenues. Our long-term incentive plan provides annual equity-based incentives for our executive leadership team and other employees, which aims to reward stockholder value creation over a multiyear time horizon.

Diversity, equity and inclusion

We are dedicated to cultivating a diverse, equitable and inclusive culture at WEX. This dedication is both part of strong corporate citizenship and an essential element in developing the innovative solutions our customers depend on. We are proud of our commitment to gender equity as it relates to our global workforce demographics — with more than 50% identifying as female — as well as pay equity and total rewards. We will continue to invest in our journey to cultivate diversity in its many forms, and our most meaningful actions are still ahead of us. We are currently focused on developing the systems and tools we need to make substantive progress. In addition to the information below, please see our [2021–2022 DEI Report](#) for details on our activities.

Our commitment to diversity, equity and inclusion (DEI) starts with our Board of Directors and executive leadership team, who recognize the business imperative of ensuring a diverse and equitable workforce and experience. Together with their leadership, we are working to build a strong foundation as we expand our DEI efforts. Recent examples of our Board's and leadership's focus on DEI include:

- Utilizing diversity and inclusion objectives as modifiers to executive leaders' STIP performance
- Signing the Chief Executive Officer (CEO) Action for Diversity and Inclusion Pledge
- Appointing our first chief diversity and inclusion officer, an internal promotion in early 2022
- Ensuring that senior leaders are active executive sponsors of our employee resource groups

Measuring progress

We believe it is important to hold ourselves accountable and make progress on DEI. In early 2022, the Board approved our aspirational 2025 DEI goals:

- ✓ **Achieve gender parity in leadership roles**
- ✓ **Increase employees of color in the U.S. in leadership roles by 50% to be more representative of national demographics and the customers and partners we serve**

We are working across talent acquisition, talent management, learning and development, and leadership to drive a holistic strategy to meet these goals. Our Board of Directors and Leadership Development and Compensation Committee receive regular updates from management regarding our progress toward our 2025 aspirational goals.

As we work toward those goals, we are committed to transparently sharing our progress. To that end, we have publicly disclosed our most recently filed EEO-1 report on our [website](#).

In addition to measuring workforce diversity, we also measure progress on inclusion through our annual employee survey and employee listening strategy. We are committed to equity in the workplace through our annual pay equity analyses as well as through internal audits of our processes and programs.



Employee demographics

Everything we do is dependent on the talent and culture of our company. By leveraging our winning, inclusive and values-based culture, we will mine, grow and maximize talent that adapts to our future business. We strive to achieve a fully inclusive workplace that unifies and celebrates the diversity of our people.



(Total global employees)



(Total U.S. employees)



Hiring military veterans and their families

Our approach to DEI goes beyond gender, race and ethnicity to consider other populations that enhance the range of perspectives our employees bring to work. We are proud to employ a number of U.S. military veterans and veterans' spouses, and in 2021 we increased that population by 56%. Furthermore, as described on [page 20](#) our WEX Vets employee resource group (ERG) provides a space for our veteran professionals and military families to engage, mentor and empower one another. We attribute these figures in part to our efforts to recruit military spouses: In 2021, WEX partnered with VirtForce, which cultivates virtual career paths for active-duty military spouses. In late 2021, we hired 77 military spouses from across the United States.

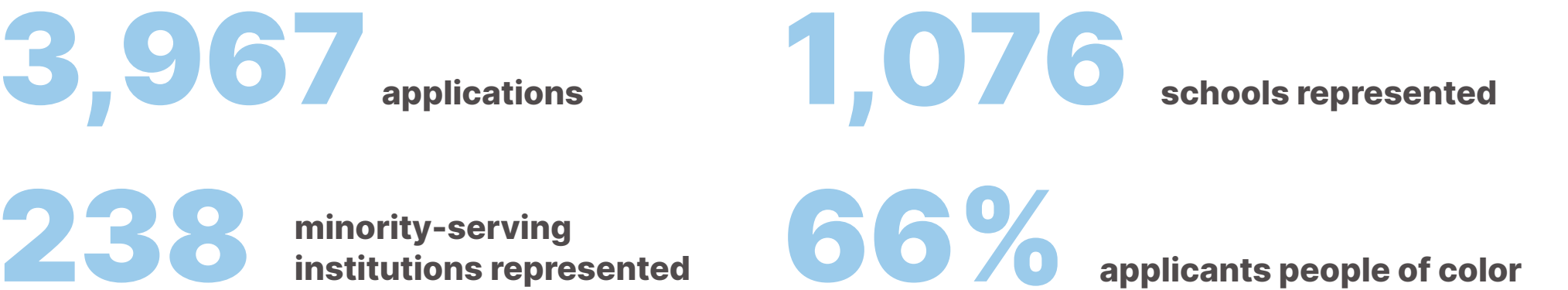


DEI in talent acquisition

As we continue to grow and employ a more distributed workforce, we aim to create a global team that is representative of the communities where we live and the customers and partners we serve. We use inclusive hiring practices, and our Talent Acquisition Team and hiring managers continue to increase our pool for talent. We are currently piloting diverse candidate slates as one of many levers in a diverse hiring process. In 2022, we plan to roll out hiring manager training to support this program.

Our efforts to build a diverse talent pipeline include a focus on summer internships. Since 2018, we have partnered with WayUp, a sourcing platform for diverse candidates, to help us recruit a diverse class of summer interns.

Through our partnership with WayUp, in 2021, we received applications from individuals representing 1,076 colleges and universities as part of our intern recruitment efforts, up 115% from 2019. Our 2021 internship recruiting also included:



The quality of our internship program has been recognized by multiple organizations. We were named among:

- Vault Top Internship 2021, Top 100 overall, and 15th in Best Tech & Engineering Internship
- WayUp Top 100 Internship Programs 2021 (third consecutive year)

In addition, in 2021 WEX was a founding member of the **Maine Diversity Summer Associate Program**, known as D1L. The program is a competitive 10-week paid internship for first-year law students with a demonstrated commitment to diversity and inclusion, as well as strong academic performance. We are hosting our second D1L summer associate in 2022.

•

DEI in our benefits and compensation

Our commitment to diversity, equity and inclusion is woven throughout our human resources strategy. To ensure all our employees have access to our benefits programs, we offer an inclusive total rewards program. In 2021, we expanded that package to include conception benefits, which went into effect in 2022.

We are committed to pay equity and conduct global pay equity analyses on an annual basis. We strive to ensure that, regardless of gender, race or ethnicity, employees across our businesses earn the same pay for the same work.



Disrupting unconscious bias training

More than 99% of our employees completed a disrupting unconscious bias training in 2021. The session provided an awareness of and introduction to the different types of bias encountered in corporate settings along with tips to disrupt or overcome them.





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 the health and safety regulations in every location where we operate. Our Health and Safety Policy provides a framework designed to prevent work-related accidents, injuries and illnesses. We also provide local emergency evacuation awareness training and periodic review of safety topics.

Our Emergency Response Action Plan includes emergency evacuation procedures and protocols for reporting various types of emergencies, and we review and update it annually. Our Organizational Resilience Team enlists and trains our authorized Emergency Response Team, who help oversee our actions in the event of a crisis.

Our Incident or Injury Investigation Guidelines establish when, how and by whom incident and injury investigations are processed. We strive to understand why the incident occurred and respond within 24 hours of any incident.

We know that proper ergonomics are central to employee health and have implemented an ergonomics program that applies to all operations, facilities and workstations. A focus on ergonomics supports the well-being of our employees, as well as reducing absences and associated employee compensation costs. Beginning in 2021, as part of our commitment to a global flexible work environment, we partnered with our workers' compensation insurer to offer virtual ergonomic evaluations and support for employees' remote workstations, including direct shipping of recommended equipment.

Our Employee Relations Center of Excellence takes 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's needs. In these efforts, Employee Relations works in close partnership with our Legal and Compliance Departments. Employee Relations also provides training and manager toolkits and consults with human resources business partners.



Environmental Innovation

Moving toward a low-carbon future requires widespread adoption of emerging technologies, as well as the development of new resources that both enable this transition and track the progress of organizations to help drive transparency and the ability to make data-driven plans and decisions. At WEX, we have a long history of supporting customers' efforts to boost fleet efficiency with better data and tools. We're now building on this legacy of innovation to help drive the anticipated electric vehicle transition, building and launching solutions that help our customers simplify this complex process. Mindful of the effects that climate change may pose across industries that we serve, we are also always assessing the effects that climate change may in turn pose for WEX.





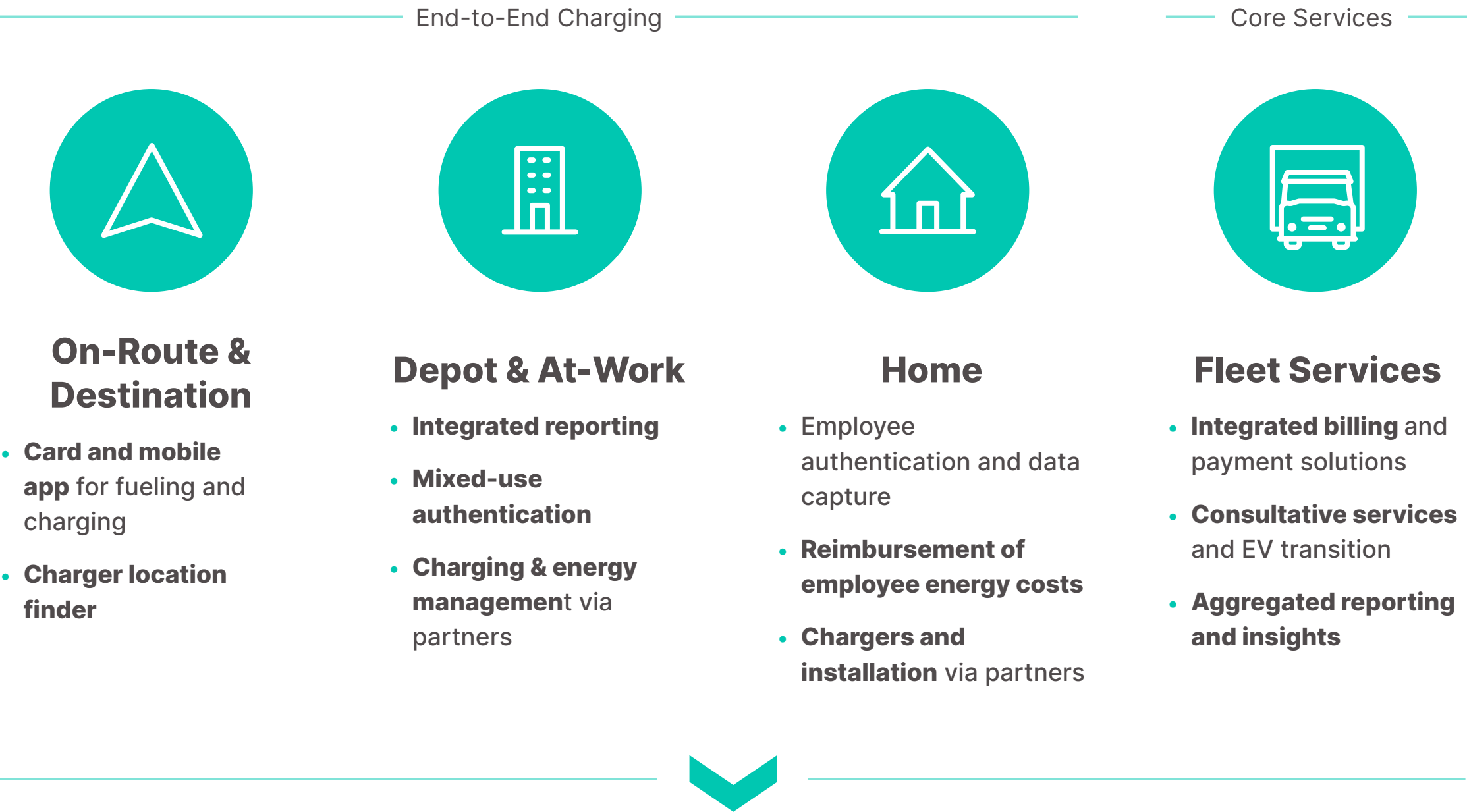
Sustainable solutions

Business has an important role to play in addressing the climate crisis. At WEX, our contribution is twofold: We are working to reduce our operational emissions (see “[Environmental Stewardship](#)”), and we are using our business model to support sustainable fleet solutions.

Optimizing fleet fuel consumption is one of our business’s foundational strengths. We provide a range of products and resources to help improve our customers’ fuel economy and give them access to controls, business insights and data, in addition to tools such as freight management, route optimization and idle-time monitoring.

In 2021, we turned our attention to electrification as one of the most effective ways that we can help move the needle on emissions: The transportation sector contributes to nearly a quarter (23%) of global carbon dioxide (CO2) emissions, the majority from road traffic.² We are uniquely positioned to help fleet operators make the transition to EVs or other forms of efficient transport—and to simplify the business of mixed-fleet operation from end to end.

Roadmap to simplify the complexities of electrification



Expanding solutions are expected to drive **continued market growth**

² International Energy Agency, 2021.

The potential impact is considerable: The federal government fleet alone (excluding the U.S. Postal Service) includes 315,000 buses and light-duty vehicles, 97% of which could be replaced by EVs by 2030 at a cost savings to taxpayers. Doing so could reduce greenhouse gas emissions by as much as 7.6 megatons.³

Electric vehicles are expected to make up 31% of the global light-duty vehicle fleet by 2050, up from less than 0.7% in 2020.⁴ The complexity of this transition requires new solutions for customers, ranging from connectivity to advanced route planning and carbon emissions reporting. WEX is well suited to provide these solutions, and our efforts to do so are a top priority for our Board of Directors

and executive leadership team. Our electrification strategy is overseen by both our Chief Operating Officer, Americas and Chief Operating Officer, International, with a dedicated team focused on execution and delivery. The Board receives frequent updates on our progress and direction.

As part of our commitment to execute on our roadmap to simplify the complexities of electrification, we are working with partners to create an expanded EV charging network. Since 2019, WEX has supported capabilities that allow customers to use their WEX accounts to pay for and track EV charging done within the ChargePoint network via ChargePoint’s fleet programs. At the end of 2021, we expanded our relationship with ChargePoint,

an EV charging network operating in North America and Europe, under which we expect to provide more seamless integration of EV charging for mixed fleets that include internal combustion engine vehicles. This global partnership builds on our longstanding collaboration and aims to provide customers access to expansive and convenient public EV charging networks for on-route charging needs and to enable fleets to deploy and manage commercial charging at workplaces and at employee homes, along with the tools to facilitate employee reimbursement, streamlined payments and reporting.

We are currently in the process of testing a more integrated and intuitive solution for on-route EV charging and

payment for fleets enabled by this partnership expansion, which allows customers to manage, track, and pay for EV charging done at public and destination locations alongside their existing fuel management program. We are developing and launching pilot programs in both the U.S. and Europe to capture lead customer feedback on this integrated solution, which includes aggregated billing and reporting, as well as driver access to mobile applications to locate in-network EV charging locations. We will continue to refine and scale these pilot programs and execute on our roadmap in order to ensure we are in a position to provide comprehensive solutions for our customers and their future mixed fleet needs.



“Our expanded partnership with WEX is a major step in helping fleets prepare for the future of electric mobility with convenient and cost-effective expense management and wide payment acceptance.”

–Rich Mohr, Global Vice President of Fleet at ChargePoint.

³ “Federal Fleet Electrification Assessment,” The Electrification Coalition and Atlas Public Policy, Aug. 18, 2021. ⁴ “EIA projects global conventional vehicle fleet will peak in 2038,” U.S. Energy Information Administration, Oct. 26, 2021.

Climate transition risk

We integrate climate transition considerations into our risk management framework to proactively address emerging risks to our operations. These considerations present both opportunity, as discussed above, and risk for WEX. We continue to assess the potential impacts on our business and our customers and partners, and are thinking critically about the role we play. To understand how we are incorporating best practices and considerations from the Task Force on Climate-related Financial Disclosures (TCFD), click [here](#).





Environmental Stewardship

Like all organizations, we have a responsibility to minimize our own corporate environmental impact. We are driving operational and energy efficiency to do so, starting with measuring our carbon footprint.



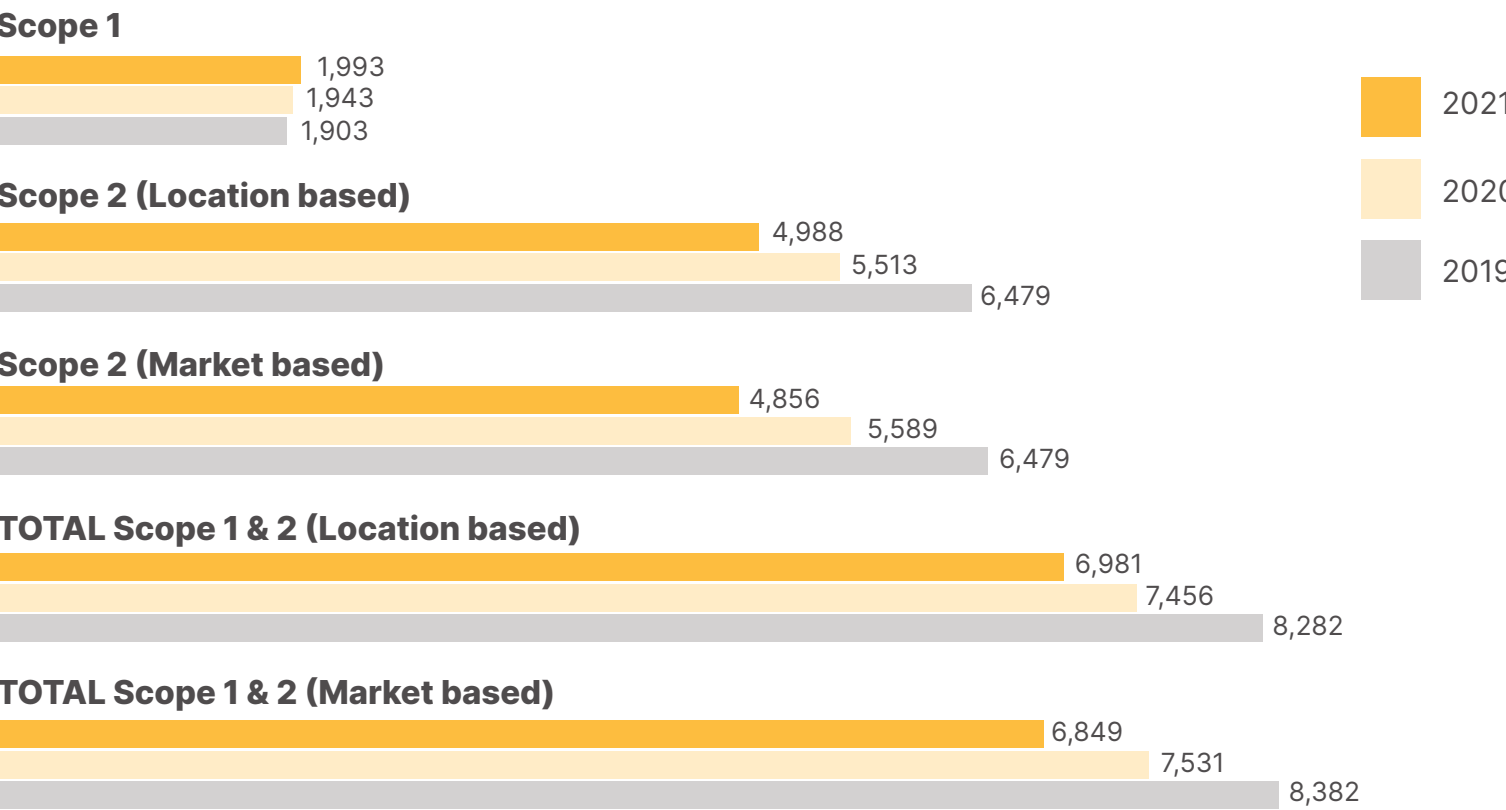
Our carbon footprint

While we believe the environmental footprint of our operations is relatively small, we are focused on reducing it. Many of our employees currently work from home, and the bulk of our operations consist of office space where energy use is limited to lighting, heating and cooling. We are taking steps to measure our owned and vendor owned cloud-based data center emissions and energy consumption and intend to disclose our emissions and energy use footprint in the future.

In 2021, we began right-sizing our real estate portfolio to reflect our commitment to a global flexible work environment. While this exercise is reducing our office square footage, we expect future business and staffing growth to slow further reduction.

Also in 2021, we took an important step to better assess our environmental impact by hiring a third-party firm to measure our Scope 1 and 2 emissions, including those from our internal data centers, from 2019 through the present (see tables). We intend to use this data to inform future strategies to make meaningful reductions. While

Our GHG emissions⁵ in tCO₂e

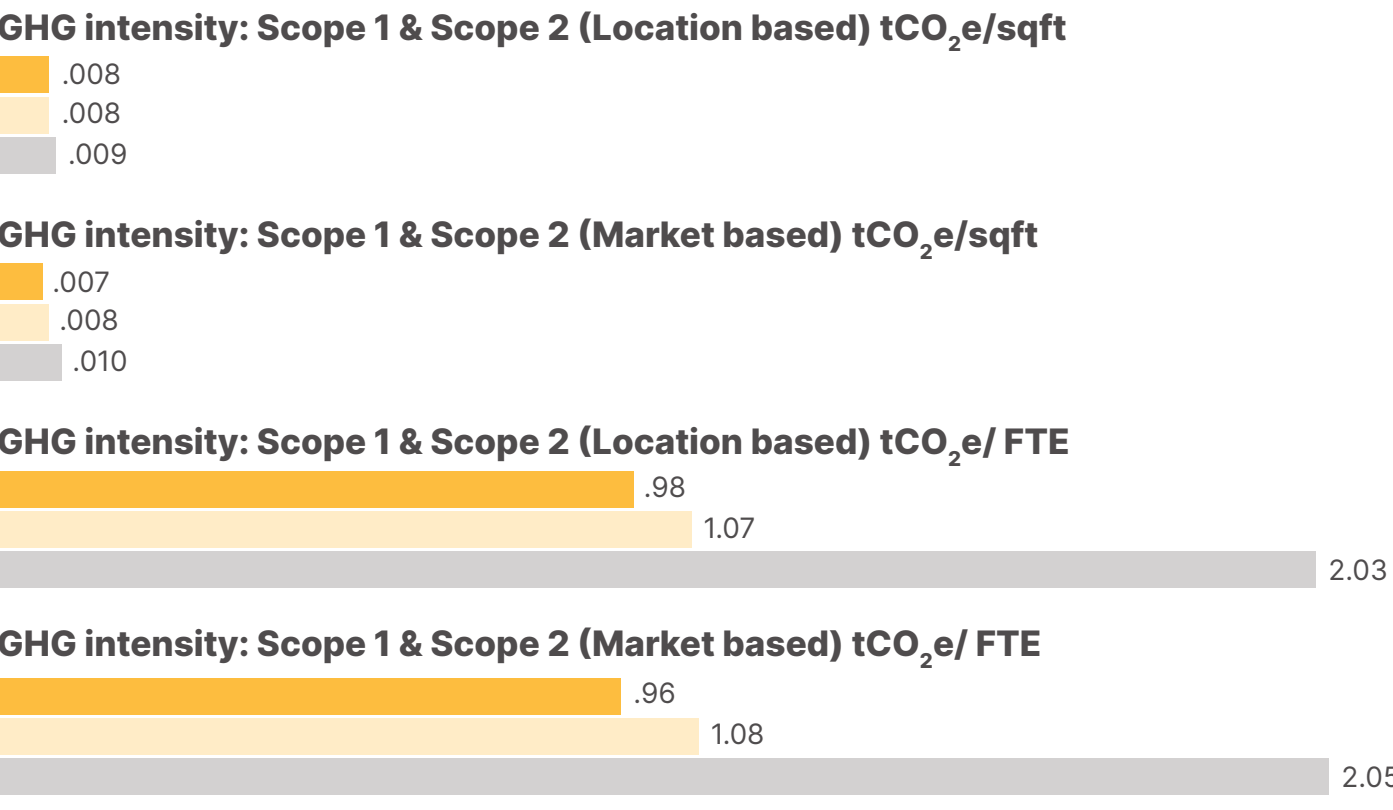


our Scope 1 and Scope 2 emissions are relatively minimal compared to many companies of our size, we are committed to measuring and assessing them, and identifying opportunities to minimize our impact.

In 2021, Scope 1 emissions increased slightly due to increased staff commuting. Scope 2 emissions decreased from 2020 to 2021 due to decarbonization of the global electric grid.

Like many companies today, we recognize the need to reduce the environmental impact of our operations. Now that we have taken a first step in measuring emissions, we are well positioned to better assess strategies to reduce them over time. This includes assessing targets for reducing our emissions, exploring the use of renewable energy sources and transitioning our own small fleet to hybrid or electric vehicles as their leases renew.

GHG intensity



Encouraging low-carbon commutes

WEX embraces a flexible way of working model in which many employees take advantage of the opportunity to work remotely or in a hybrid capacity. As a result, we have phased out our carpooling and public transportation incentives. For employees who do travel to our offices and are able to make low-impact commuting choices, we provide bike rooms and bike racks.



⁵ Scope 1 emissions are the direct emissions that occur from sources a company owns or controls, such as fuel combustion in boilers, furnaces and vehicles. Scope 2 emissions are indirect GHG emissions from purchased electricity, steam, heat or cooling.

Energy management



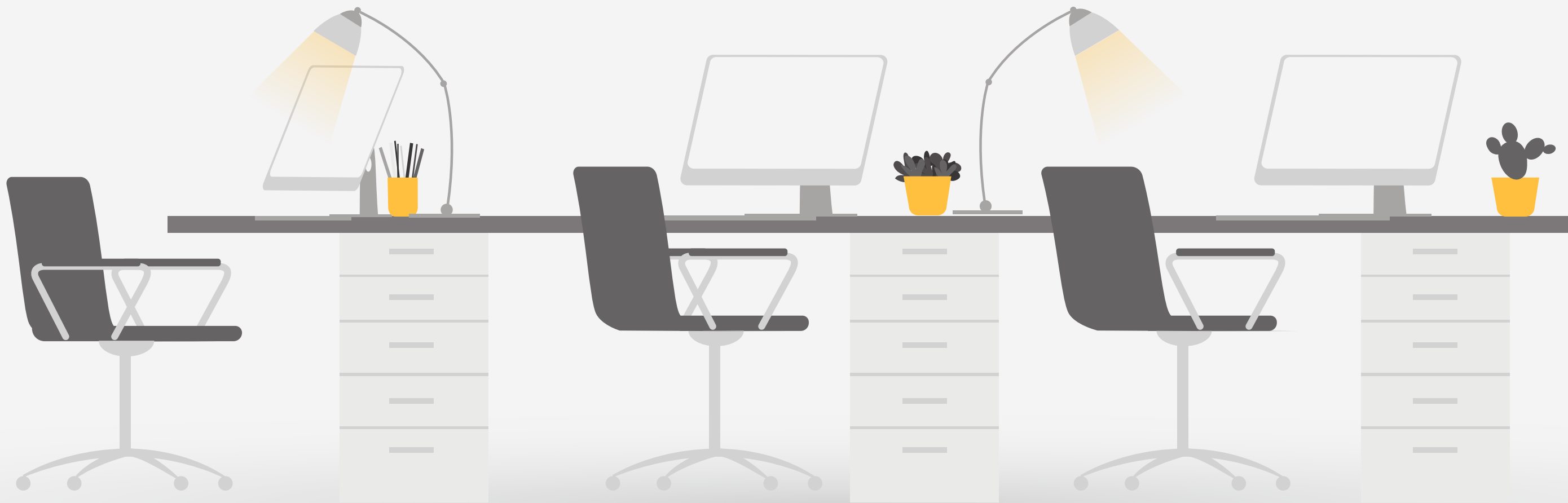
Our operations rely on data centers, which we have been migrating to public cloud service providers rather than in-house managed data centers whenever practical. Migration has several benefits, including improved data security, infrastructure resiliency, system availability, and operational effectiveness, as well as a significant reduction in the amount of power we consume. To that end, our cloud computing partners’ servers currently run or are working toward running on 100% renewable energy.

In 2019, we set a goal to consolidate our data centers. Through 2021, we closed 19 data centers, putting us 90% of the way toward achieving our original goal. These changes have led to an estimated 58% reduction in our internal data center energy use since 2019. We also added 10 data centers through acquisitions. We now aim to consolidate to seven data centers by 2023.

Our main offices use LED lighting throughout, and we adopt best practices including daylight harvesting to minimize our energy use where possible.

58%

reduction in our internal data center energy use



Waste and water management

We recognize that our role as a responsible business requires good stewardship of natural resources. Our employees play an important role in helping us reduce our environmental impacts.

All of our facilities participate in office waste recycling programs using single-stream recycling. We contract with a third party for electronic waste recycling. We also offer environmentally friendly water bottle refilling stations to reduce single-use plastic waste.





Social Impact

We work to enhance the health and well-being of our communities, customers, partners and employees through both our operations and our community engagement. These efforts span our solutions ecosystem, as well as our community involvement and philanthropy. Beyond the basics of good corporate citizenship, we are in the business of providing products and services that positively impact stakeholders around the world.



Healthcare access and affordability

We help companies in the U.S. simplify the complex business of administering their benefits. As a healthcare benefits leader, we have a responsibility to help businesses and individuals navigate a complex healthcare system while minimizing cost. We support our customers in educating their employees about how to access and maximize those benefits.

These efforts are particularly critical today due to the COVID-19 pandemic, which created a massive need for mental and physical health and financial wellness, and the “Great Resignation,” which showed the impact pay and benefits can have on employee satisfaction.

Our benefits technology makes it easy for employers to offer a multi-account solution that can meet the needs of a diverse group of employees. Whether it’s an employee who chooses a traditional health plan with a general-purpose medical flexible spending account (FSA) or a high-deductible health plan and a

health savings account (HSA), one mobile app, debit card and online account is all they need to manage these accounts and many more. These accounts include:

- HSAs
- FSAs, including dependent care FSAs
- Health reimbursement arrangements (HRAs)
- Commuter benefits
- Lifestyle spending accounts (LSAs)

HSAs, in particular, are booming. HSAs, which held \$98 billion in assets in more than 32 million accounts nationwide in 2021, provide employees with a triple tax-advantaged way to save for current and future medical expenses.⁶ HSA participants can also invest the funds in their account, allowing them to set money aside for their future needs as HSAs are not subject to the “use-it-or-lose-it” rule that governs flexible spending accounts. Employers can also contribute to an employee’s HSA.



⁶ “2021 Year-End HSA Market Statistics and Trends,” Devenir Research, March 2022.



Our 2021 acquisition of the benefitexpress business allows us to serve benefits administration customers from end to end, giving us further insight into employers’ benefits usage and creating opportunities to help them expand access to their offerings.

Our human resources and benefits platform gives employers streamlined access to important analytics on benefits usage, including how their employees are using their existing benefits and how their usage patterns compare to those across companies on WEX’s platform. These data-driven insights help employers target their education and communications efforts to the areas of greatest need, expanding access and adoption throughout their employee base. Employers can also customize their

portals, tailoring the employee experience based on what they learn about their engagement levels.






We regularly seek feedback from our stakeholders via surveys, periodic business reviews and the advisory boards we have created for partners, consultants, employers and participants. This feedback allows us to tailor both our product offerings and our education materials (see “**Benefits literacy**”) to meet employees’ needs.

We continue to evaluate our suite of offerings to ensure it supports partners and employers in making healthcare and other benefits broadly accessible to employees.

Supporting COBRA subsidies for employees in need

On March 11, 2021, a COVID-19 stimulus package known as the American Rescue Plan Act (ARPA) was signed into law. Its provisions included a temporary subsidy for employees who had been involuntarily terminated or had their hours reduced and were using COBRA for their health insurance: From April 1, 2021, through September 30, 2021, employers were required to cover 100% of an employee’s cost to continue group health coverage via COBRA. The federal government reimbursed the employer or insurer (for fully insured plans) for the cost of the subsidy, including COBRA administrative fees.

This was a massive change for employers, who needed to quickly understand the extent of ARPA’s coverage, as well as how to administer and document the subsidies. We received more than 14,000 questions from employers after ARPA was announced. Just 33 days after the announcement, WEX launched a COBRA solution for employers as part of our mission to simplify benefits for everyone. In addition, we created a full suite of educational and support materials with respect to COBRA to assist employers, consultants and partners, including:

-  **40 notification emails**
-  **9 webinars**
-  **5 blog posts**
-  **2 podcast episodes**
-  **How-to videos, articles, and FAQs**





Benefits literacy

The more thoroughly our partners, employers and participants understand their benefits, the better chance we have to make a difference. We have developed robust education for participants, which includes:

- ✓ A knowledge base of help articles for participants
- ✓ The Benefits Buzz blog, which shares employee benefits news, trends and insights
- ✓ The Benefits Buzz podcast, which provides thought leadership for human resources teams and benefits professionals
- ✓ A variety of tools, including My HSA Planner, which gives employees personalized insight into how to get the most out of their HSA
- ✓ A data-driven, personalized experience that guides decisions and helps plan participants get the most from their benefits

HSA Day 2021

While HSAs are healthy and growing, their versatility can often lead to confusion on how to best communicate their benefits. We launched National HSA Awareness Day in 2019. Occurring annually on October 15, the day aims to increase understanding of how these important tools can help manage out-of-pocket health expenses, prepare for unexpected healthcare costs, and plan and save for retirement. In 2021, our HSA Day programming focused on what type of HSA education can increase employee understanding and utilization.

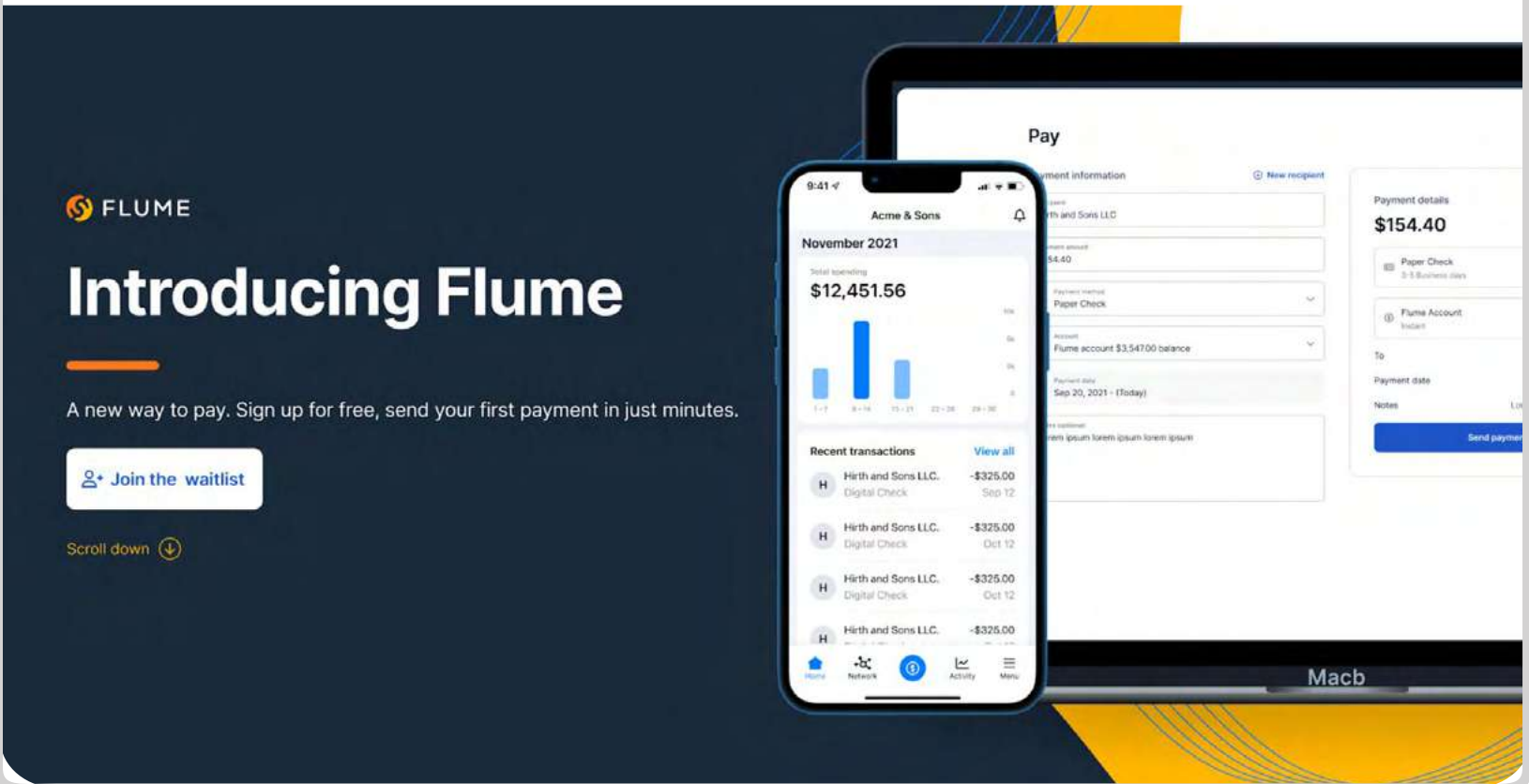
HSA Day 2021 included a live, in-person recording of our Benefits Buzz podcast, featuring a discussion with three HSA experts. We also hosted a pair of HSA webinars and created educational resources for our partners, as well as social media content for employers and employees. All of these efforts are part of our strategy to increase access to savings, health products and financial wellness.



Financial access and affordability

Many small businesses have been underserved by payments processors—at a cost to their business. Specifically, businesses in the trades with less than \$15 million in annual revenue typically rely on paper checks and have limited resources to devote to accounts payable and accounts receivable. As a result, they lack visibility into cash flow and availability of funds, which can hamper their ability to scale.

In 2021, we started addressing this challenge by developing a product to support small businesses through WEX Ventures. An internal program to incubate and test revenue-accelerating innovations, WEX Ventures allows our employees to experiment with new value propositions, products, and business models. Recognizing how critical fast, simple, secure payments are for small businesses, a small team developed Flume, a Federal Deposit Insurance Corporation (FDIC)-insured digital wallet that allows small business customers to send, store and receive payments securely. We premiered Flume—the first WEX Ventures product to launch—at our Investor Day in March 2022.



Community engagement

Community involvement and philanthropic giving are integral to WEX’s culture. We believe that thoughtful corporate philanthropy strengthens our communities, engages our employees, enhances our brand, and helps address social issues. Community is one of our core values, and community engagement helps us attract and retain talent while reinforcing a key element of our culture.

Corporate philanthropy

Our global funding strategy prioritizes social equality, based on the importance of access to opportunities for all. In response to the ongoing racial and social unrest in 2021, we reevaluated our community funding pillars (see box to the right for more on our funding pillars) and reframed the ways in which we both fund and communicate about our funding. We focus on funding for social equality both across the board and as a strategic pillar.

While our commitment to social equality is reflected in nearly all of our philanthropic efforts, our support in this space includes providing funds to and partnerships with organizations that work to ensure equal social capital and access to all families and organizations that serve, are led by or primarily benefit people of color or underrepresented minorities.

In addition, we are right-sizing our philanthropic efforts to help support increased need outside of the U.S. and

to be responsive to employee passions and interests through global charitable budget allocations and funding mechanisms through our employee resource groups. As part of these efforts, we are also evaluating the methods we use to track and report our corporate philanthropic efforts.

Our giving program includes corporate charitable giving, employee fundraising campaigns, a matching gift program and the WEX Compassion Fund. The WEX Compassion Fund, which offers relief for employees with critical financial needs caused by a qualified disaster or other hardship, is funded entirely through employee, Board and company contributions, and is administered via the WEX Cares Foundation Inc., a 501(c)(3) organization registered in Maine. In 2020 and 2021, the WEX Compassion Fund **provided grants to 143 employees who were impacted by COVID-19 and other qualified disasters or hardships.**

The WEX giving program

Our giving program focuses on four strategic areas:



The arts. We believe 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, including the Portland Museum of Art and Indigo Arts Alliance, that provide access for underserved populations and bring exceptional arts programs to our communities.



Education. We believe 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. These organizations include Boys & Girls Clubs, Educate Maine and The Telling Room.



Social equality. Though our commitment to social equality is reflected 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. In 2021, we supported organizations including the Opportunity Alliance, Equality Maine Foundation, Avesta Housing, Milestone Recovery, Prosperity Maine, Wayside Food Programs, YMCA of Southern Maine and Preble Street.



Well-being. Healthy communities mean healthy citizens and families. That’s why it’s important for us to invest in organizations such as the Maine Cancer Foundation, the Center for Grieving Children, the American Heart Association and Maine Medical Center that promote healthy lifestyles, offer access to mental health care, and work to ensure that all citizens can access these resources regardless of financial means.

Employee volunteerism

We encourage employees to support their local communities through volunteerism and civic engagement. To demonstrate our commitment to this concept, our global Volunteer Time Off Program offers employees 16 hours of paid time off every year, specifically to give back to their community in a way that is meaningful to them—without having to use their vacation time. We also encourage employees to develop leadership skills through service on nonprofit boards, and we organize group volunteer opportunities across our locations.

For example, in early 2021 **more than 100 WEX volunteers helped staff a COVID-19 clinic** run by Maine’s largest health system. WEX and other corporate partners provided valuable volunteer infrastructure to handle clinic administration, freeing the health system’s staff to concentrate on vaccine administration. This combined community effort resulted in **the reported administration of more than 87,000 COVID-19 vaccine doses**.

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 hands-on volunteer activities during the month of May. In 2021, we coordinated with the United Way Worldwide to pivot our traditional Month of Caring to a virtual campaign, in which employees wrote letters of support to first responders, teachers and the elderly. Employees were also able to answer academic and career questions submitted by students across the country.





Governance

Our business is built on a foundation of ethics and integrity. We have developed the frameworks, processes and tools necessary to uphold our responsibilities to our customers, our shareholders, our employees and our communities. We regularly monitor all these frameworks, processes and tools, updating and adjusting them as necessary to ensure our foundation remains strong and positions us well in the future.



Board composition

Throughout WEX, we are committed to diversity and the benefits it brings to our organization. This commitment extends to Board diversity, as our Board believes that having among its members individuals with a diverse set of skills, experiences and backgrounds can provide valuable insight and guidance on our overall business strategy, as well as our ESG strategy. To that end, 11 of our 12 directors are considered independent, based on our guidelines and NYSE corporate governance standards. Our Board intends to continue to be mindful of diversity with respect to gender, race, national origin, and age, in connection with future nominations of directors not presently serving on the Board.

In 2021, we enhanced our onboarding process for new directors, creating a two-month series of sessions with the executive leadership team, the chairs of all Board committees and other WEX employees as appropriate. This process allows new directors to familiarize themselves with our business quickly, helping them build relationships and understand processes that will help them guide WEX into the future.

Also in 2021, shareholders approved an amendment to our certificate of incorporation in order to declassify the Board, a measure the Board submitted as a proposal and supported as being in the best interest of the company and its shareholders. Furthermore, many investors believe that the election of directors is the primary means for stockholders to influence corporate governance policies and to increase accountability for implementing those policies, and therefore an annual election cycle increases said accountability. We began phasing in the declassification process in 2022, when directors standing for election were elected for one-year terms.

More information on our Board can be found in our [2022 Proxy Statement](#).



WEX Board of Directors

Ethics and integrity

Our commitment to acting with integrity and honesty begins at the very top of the organization, with our executive leadership team and Board of Directors, and is inherent in our corporate values.

The principles outlined in our Code of Business Conduct and Ethics describe the behaviors that help us put our values into action. Our code includes our expectations for maintaining a safe and respectful workplace, diversity and nondiscrimination, 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 regard to topics including but not limited to anti-bribery and corruption, money laundering, fair competition and insider trading. Our code also emphasizes how we respect and protect the human and legal rights of individuals and communities wherever we operate, as well as how we protect information and assets belonging to WEX and our employees, customers and partners.

Employees at WEX are trained on our code as part of our onboarding process and are required to acknowledge the code as part of our annual compliance training. The code applies to directors, officers and employees of WEX Inc., as well as directors, officers and employees of affiliates and subsidiaries controlled by WEX. Certain business partners, such as vendors, consultants, contract workers and temporary employees, serve as an extension of WEX and are expected to follow the spirit of the code.

If employees or others have ethics or compliance concerns, they can contact our confidential Integrity HelpLine, which is available 24/7. The HelpLine is staffed with trained specialists from an independent third party. HelpLine reports may be submitted anonymously, where allowed by local law. In addition, WEX maintains a strict nonretaliation policy, which is described in our code.



Employee compliance training

We deliver mandatory compliance training to our employees across the enterprise in order to comply with legal, regulatory and audit requirements, meet customer and partner obligations, and reduce risk. Our compliance trainings cover topics including but not limited to our Code of Conduct, the Health Insurance Portability and Accountability Act (HIPAA), Bank Secrecy Act/anti-money laundering, the European Union’s General Data Protection Regulation (GDPR), anti-harassment, anti-discrimination, cybersecurity, the Payment Card Industry (PCI), HSAs, and conflicts of interest. We strive to deploy high-quality, relevant and timely training through a consistent and standardized approach. Our focus is on ensuring that we meet regulatory compliance and best practice standards by providing consistent, transparent and accurate evidence for audits and other reporting.

Our enterprise Compliance Team oversees the compliance training curriculum and approves the annual calendar, including specific trainings related to our bank and health divisions, as well as our other regulated entities. Our Human Resources function assigns compliance training several times a year to ensure that appropriate information is delivered to the right audiences on a regular basis. Contract workers are also assigned compliance training as appropriate for their roles. Human Resources tracks the training completion rate and reports it to Compliance.

Across WEX, more than **49,550 individual compliance course assignments were deployed** in 2021, with **99% or higher completion rates across all topics**.



Ethical selling practices

Our operations are primarily business to business, with a small fraction of our marketing and sales efforts targeting consumers. Regardless of which market we are addressing, our **Code of Business Conduct and Ethics** requires that the marketing of our products and services 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.

We have policies and governance processes and controls in place to evaluate and mitigate risks for our sales compensation plans.

Human rights and freedom of association

We respect and protect the human rights of individuals and communities wherever we operate. We do business all over the world. People are at the core of who we are and what we do. Treating people with dignity and respect helps cultivate a reliable and productive workforce. Protecting human rights enhances our reputation and helps ensure our long-term success. Furthermore, we provide proper working conditions, hours, and compensation and respect workers’ rights to associate freely. These obligations and expectations are written in our Code of Business Conduct and Ethics.





Intellectual property and competitive behavior

Protecting the proprietary information and technology used in our business is of critical importance. 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 do so. When we enter into agreements with clients, consultants, service providers and other partners, the agreements generally contain provisions restricting the use and disclosure of our proprietary information and technology.

Our patent policy aims to protect and safeguard company inventions and recognize the importance of patents in

these efforts. It also states our objective of not knowingly infringing on any valid third-party patent claims. Historically, we have sought to register and maintain patents and trademarks for defensive purposes. We are prepared to aggressively defend our intellectual property as necessary.

Our Code of Business Conduct and Ethics requires employees to protect our intellectual property and observe our rules on not entering into agreements with competitors to our detriment or engaging in any anti-competitive behavior.

Shareholders' rights and engagement

As a general practice, we prioritize ongoing communications with our shareholders. In 2021, we expanded our shareholder engagement efforts, seeking to communicate proactively with our investors on issues including our compensation philosophy and strategy practices, our ESG strategy and our corporate governance structure, among other topics. In addition, in early 2022 we held an Investor Day, during which we shared our business results, strategy and vision, including our ESG commitment.

In addition to direct engagement, we have also adopted certain shareholder rights provisions, including proxy access. The Corporate Governance Committee of our Board regularly evaluates our governance practices and assesses how they compare to current and developing best practices across the market. For more information on shareholder rights and engagement, please see our [2022 Proxy Statement](#).



Cybersecurity and data privacy

Data protection is an essential aspect of our operations and is critical to our ability to do business. Our comprehensive Information Security Program is intended to safeguard the confidentiality, integrity and availability of WEX’s physical and electronic information assets. The program’s objectives include:

- ✓ Managing controls to safeguard WEX’s information assets against unauthorized use, access or disclosure
- ✓ Managing a controlled environment consistent with commonly accepted industry standards and frameworks including ISO 27001, Payment Card Industry Data Security Standard, Sarbanes–Oxley Act (SOX) Section 404, System and Organization Controls (SOC) 1/SOC2 reporting, Health Information Trust Alliance (HITRUST) and National Institute of Standards and Technology
- ✓ Managing the risks related to the use of external service providers and related third parties
- ✓ Maintaining business resiliency in the event of a disaster scenario or security incident

Our chief information security officer (CISO) administers our Global Information Security Program, reporting to the chief technology officer, the WEX Bank Board of Directors and the WEX Board of Directors via the Technology Committee. The CISO regularly presents a threat matrix, an analysis of our cyber health, and an update on any recent threat activity to the Technology Committee. The Technology Committee then, in turn, regularly reports out to the Board and/or the Audit Committee as necessary during succeeding meetings.

Our Global Security Team serves to mirror WEX as an organization. As we continue to grow and do business around the world, it is imperative that we have security visibility and resources in the regions in which we conduct business. We have grown our team through our 2021 acquisitions, consistent with the expansion of our business. Today, we have a global team of security practitioners online at all hours of the day.

We review and update both the security framework and all security policies at least annually to respond to the rapidly evolving threat landscape and meet all applicable federal and state regulations. We maintain PCI and HIPAA compliance, and we are subject to external audits, including by the FDIC.

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 24/7 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 on-site assessments.

All employees are trained on and acknowledge our data security policies when they are hired, and they renew this acknowledgement annually. We hold cybersecurity awareness training programs to educate employees about emerging threats and security trends, and to reinforce the role they can play in protecting 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.

Customer privacy

The privacy of our customers and their data is a top priority, and we apply global best practices for data privacy. Since our operations are primarily business to business, we gather and maintain very limited consumer data. We maintain compliance with the European Union’s GDPR and other applicable privacy laws in the countries where we operate. For 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.

We allow our users to choose how we use their personal information for advertising and marketing purposes.

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

Vendor data security

All new vendors are assessed for risk relevant to the services being provided as part of our Vendor Risk Management onboarding process. An important part of this process includes a cybersecurity risk assessment performed by our Information Security Team, which includes continuous monitoring and updating of risk profiles regularly. 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) or personal health information (PHI) and what level of business criticality

they have. Depending on the vendor’s risk profile, we also formally request a SOC1/SSAE18, SOC2/TSC or PCI attestation of compliance (AOC), as applicable.

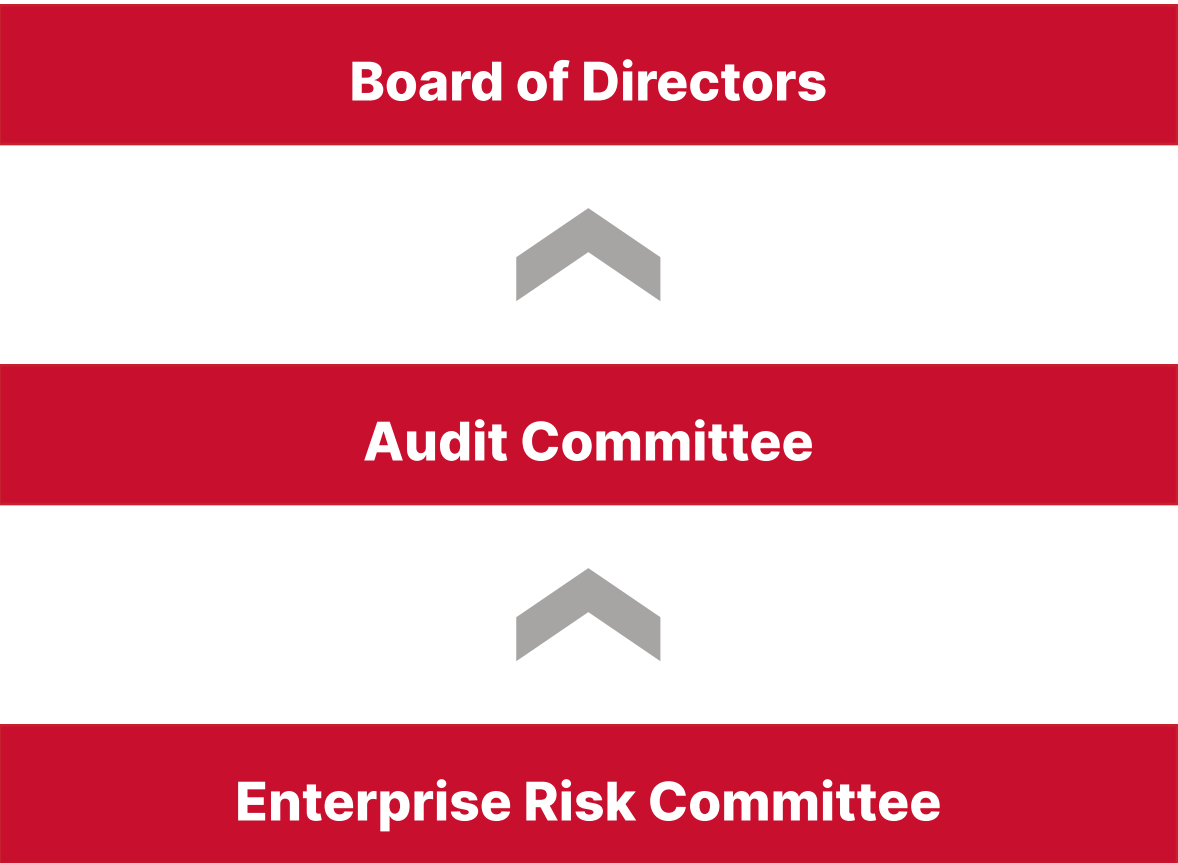
Our third-party risk management solution continuously monitors vendor risk, and the Information Security Team regularly receives updated documentation from these reviews. In this documentation, they look for solutions to previously noted deficiencies, and check to ensure no new deficiencies have been discovered.



Risk management

Our business continuity and resilience framework is based on a straightforward philosophy: We seek to foster a proactively resilient organization that can respond nimbly as events occur, rather than merely recovering after the fact. This is especially true as our business grows and expands.

Our chief risk and compliance officer, who oversees our risk and compliance program, reports directly to the CEO and has direct access to the Board as needed. Our corporate risk management framework incorporates both systemic risk management and organizational resilience. Furthermore, as part of our broader enterprise risk management program, we consider business risks, risks from climate change and volatile weather, technology risks and vendor or third-party risks.



Systemic risk management

Our approach to systemic risk management largely centers on our use of technology. The Technology Committee of the Board reviews and oversees our overall strategic direction, including details such as the investments we make in information technology and any perceived risks that new innovations present. The committee also studies 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 in overseeing risk management regarding technology, data security, disaster recovery and business continuity. This effort includes risks related to hardware, organizational structure, innovation and research and development.

Our chief information officer, who reports to our chief technology officer, has global responsibility

for infrastructure, internal applications and business systems, as well as all end user services.

We use a combination of cloud and physical infrastructure, which enables the resilience and recoverability of our operations across the globe. We use high-availability architecture within each data center and duplicate systems across multiple cloud zones to ensure the resilience of our production systems. We also have a comprehensive disaster recovery solution in place to ensure recoverability of production systems in the event that our front-line means of defense are incapacitated.

In addition to our focus on technology-related risk, we also view ESG as a lens for assessing potential risk. As we continue to mature our ESG governance and strategy, we intend to enhance this aspect of risk assessment.

Organizational resilience

We take all appropriate measures to ensure our business can anticipate, prevent, mitigate and respond to disruptive events. Our Organizational Resilience Program is overseen by the 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 Executive Committee. Our Board of Directors, which oversees the BCP, receives updates on its status at least annually. The Board's Audit Committee also receives periodic reports.

Our BCP aims to provide a comprehensive and systematic process of prevention, mitigation, preparedness, response, continuity and recovery. The BCP outlines a dynamic, interactive process for before, during and after a disruptive event. It includes 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.

The BCP's emergency response plans 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, meaning it is designed to address a full range of threats and risks, as well as 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. The program is SOX compliant and follows FDIC regulations and guidance. In addition, we maintain PCI certification on five of our platforms, as well as a HITRUST certification for our health division.

All BCP components are tested before implementation. We regularly run BCP exercises to ensure the plan's 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, such as partnership and supply chain relationships, that have a material impact on our performance.

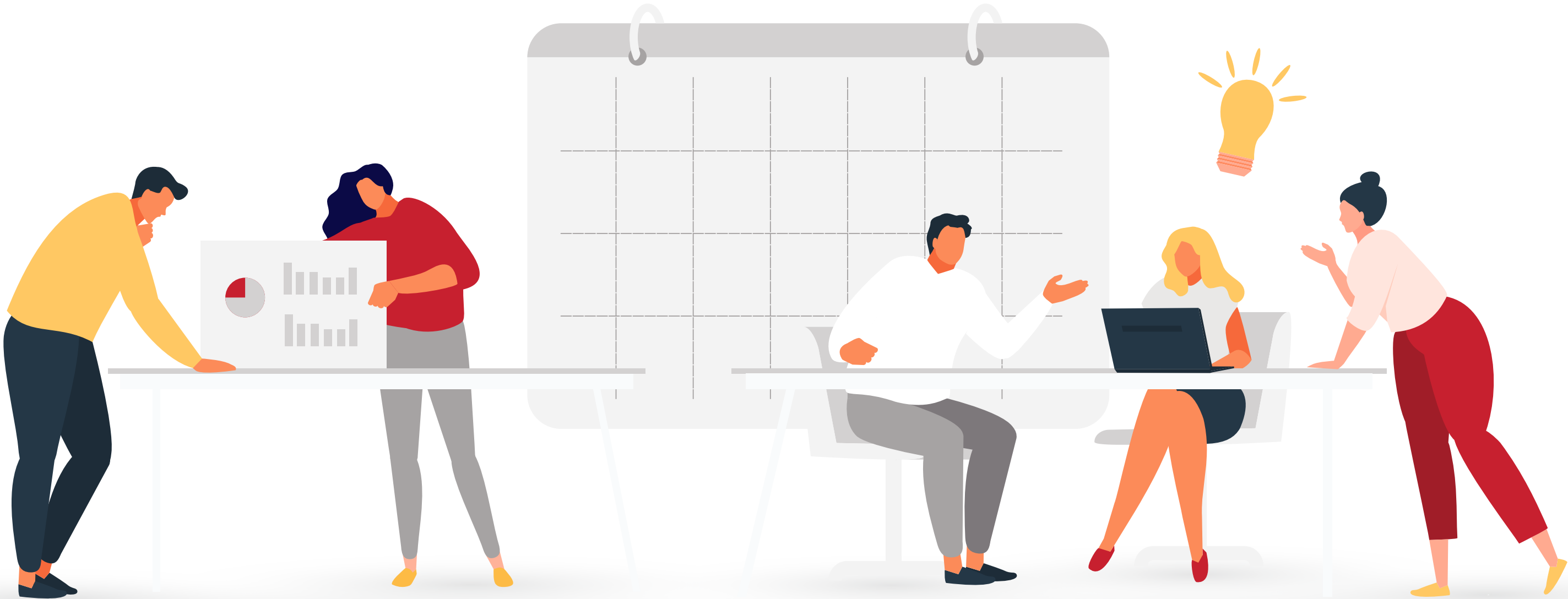
We continuously evaluate our organizational resilience program's compliance with all applicable legal and regulatory requirements and stay apprised of industry best practices.



Responding in real time to volatile weather

Some of our Nashville call center employees were impacted by the 2021 tornadoes that affected the area. Thanks to our geographic diversity and our cross-training program, we were able to absorb their responsibilities without affecting our customers, giving our employees the time they needed to attend to the damage. We continue to monitor volatile weather events associated with climate change as we consider broader climate risks to our business.

For information on how we support our employees through life-changing events, including our EAP program, see ["Benefits and compensation"](#).





Supply chain management

As a technology company, our supply chain management needs are relatively minimal. As applicable, vendors are assessed through Coupa’s third-party risk assessment, and they must agree to our Code of Business Conduct and Ethics.

We continue to evaluate our approach to supplier management and engagement, including supplier diversity, and expect our practices to evolve in the years to come.

Political engagement

Our lobbying activities, which are overseen by our Legal Team, are limited. We occasionally engage policymakers and legislators on matters of interest to our healthcare, banking and payments businesses and comply with all applicable laws and regulations when we do so.

As an organization, WEX does not make significant political contributions.

Thank you for reading our 2021 ESG Report.

We welcome any input from our stakeholders as we continue to develop and enhance our ESG strategy and performance in years to come.

For more information, please visit our [ESG website](#) or please reach us at ESG@wexinc.com.





Appendix



SASB INDEX

In developing this report, we have referenced the IFRS Foundation’s SASB standards for the 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 and Page Numbers
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	TC-SI-130a.1	Please see the Environmental Stewardship; Energy Management section for a description of our effort to reduce our hardware infrastructure energy consumption <u>Page 28</u>
	(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	WEX does not currently track this data. We do not consider this information to be material given material amounts of water are not consumed as part of our operations and our current transition to public cloud service providers.
	Discussion of the integration of environmental considerations into strategic planning for data center needs	TC-SI-130a.3	Environmental Stewardship; Energy Management <u>Page 28</u>
Data Privacy & Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	TC-SI-220a.1	Governance; Cybersecurity and Data Privacy; Customer Privacy <u>Page 44</u>
	Customer Privacy Number of users whose information is used for secondary purposes	TC-SI-220a.2	Not reported. Please see the Governance; Cybersecurity and Data Privacy; Customer Privacy for more information regarding our customer privacy practices. <u>Page 44</u>
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	TC-SI-220a.3	In 2021, WEX had no material monetary losses as a result of legal proceedings associated with user privacy.
	(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	Not reported. Please see the Governance; Cybersecurity and Data Privacy; Customer Privacy for more information regarding our customer privacy practices. <u>Page 44</u>
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	TC-SI-220a.5	This is not applicable to WEX provided services.

SASB INDEX (cont.)

Topic	Accounting Metric	SASB Code	Report Section and Page Numbers
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	TC-SI-230a.1	Please reference our reports filed with the SEC for further information on our cyber security risks. See the Governance; Cybersecurity and Data Privacy section of this report for additional information on our data security programs. <u>Page 43</u>
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	TC-SI-230a.2	Governance; Cybersecurity and Data Privacy. <u>Page 43</u>
Employee Engagement, Diversity & Inclusion	Percentage of employees that are (1) foreign nationals and (2) located offshore	TC-SI-330a.1	Introduction <u>Page 5</u>
	Employee engagement as a percentage	TC-SI-330a.2	The results of our engagement survey fall outside of the reporting period of this report. See the People and Culture; Culture and Engagement; Employee Engagement for more information on how we measure and manage employee engagement. <u>Page 12</u>
	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	TC-SI-330a.3	People and Culture; Diversity, Equity, and Inclusion; employee demographics. <u>Page 17</u> Our 2021 EEO-1 Report can be found <u>here</u> .
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	In 2021, WEX had no material monetary losses as a result of legal proceedings associated with anti-competitive and when we have material losses, they will be reported in our public SEC filings.
Managing Systemic Risks from Technology Disruptions	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	TC-SI-550a.1	Not reported. Please see the Governance; Risk Management; Systemic Risk Management and Organizational Resilience for more information regarding our management of systemic risks. <u>Pages 45-46</u>
	Description of business continuity risks related to disruptions of operations	TC-SI-550a.2	Governance; Risk Management; Systemic Risk Management and Organizational Resilience <u>Pages 45-46</u>