



TRADING POLICY

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I. INTRODUCTION AND PURPOSES

It is illegal under the securities laws or regulations of Canada and other jurisdictions to trade in shares and other securities while in possession of privileged or undisclosed information and to communicate such information to others who you would expect to trade in such shares or securities. The prohibited activities often are called “insider trading” and “tipping.” The rules and procedures outlined in this trading policy (the “**Policy**”) have been implemented in order to prevent improper trading in the securities of Nuvei Corporation (together with its direct and indirect subsidiaries, “**Nuvei**” or the “**Corporation**”) and the improper communication of privileged or undisclosed Material Information by Nuvei’s employees, managers, executive officers and directors (the “**Nuvei Personnel**”). In addition, this Policy is aimed at preventing Nuvei Personnel from engaging in activities that, although not illegal, may expose them or the Corporation to potential reputational risk.

The Corporate Secretary is responsible for this Policy.

II. DEFINITIONS

“**Designated Insider**” means Nuvei Personnel that the Corporation has designated as a person who is subject to certain trading restrictions due to their access to undisclosed Material Information about Nuvei.

“**Designated Personnel**” means Nuvei Personnel (i) who, as a participant in a material acquisition, outsourcing project or other material event or transaction, has signed a Confidentiality or Non-Disclosure Agreement containing trading restrictions or (ii) who has otherwise been identified as a Designated Personnel by the Corporation.

“**Disclosure Committee**” means the Disclosure Policy Management Committee that is responsible for all regulatory disclosure requirements and overseeing the Corporation’s disclosure practices as established under the Corporation’s Policy on Corporate Disclosure and Confidentiality of Information.

“**Material Information**” means any information relating to the activities, business, affairs, operations and properties of the Corporation that results in, or would reasonably be expected to result in a significant change in the market price or value of the Corporation’s securities or that would reasonably be expected to have a significant influence on any reasonable investor’s investment decisions.

“**Nuvei Securities**” means shares, options, notes and any other securities that the Corporation may issue from time to time (such as bonds or convertible securities) and includes, for the purposes of this Policy, any instrument, agreement or security whose value, market price or payment obligations are based on the value, market price or payment obligations of a security of the Corporation (such as deferred stock units, restricted share units and performance share units) and any other instrument, agreement or understanding that affects, directly or indirectly, a person’s economic interest in a security of the Corporation.

“**Reporting Insider**” means those certain Nuvei Personnel who are directors or executive officers designated by the Corporation as a reporting insider within the meaning of *National Instrument 55-104 – Insider Reporting Requirements and Exemptions*.

III. GENERAL RESTRICTIONS APPLICABLE TO ALL NUVEI PERSONNEL

A. INSIDER TRADING

Nuvei Personnel are prohibited from trading in Nuvei Securities while in possession of undisclosed Material Information, subject to the limited exceptions under applicable law and regulations. They are also prohibited from trading in another public company’s securities while in possession of undisclosed Material Information regarding that public company gained during the course of the work of Nuvei Personnel.

B. TIPPING

Nuvei Personnel are prohibited from disclosing undisclosed Material Information to, or “tipping”, another party or recommending that another party trade in Nuvei Securities or another public company’s securities while Nuvei Personnel have knowledge of undisclosed Material Information. Tipping is a violation of law, even if the person disclosing the information does not personally make a trade or otherwise benefit from disclosing the information.

There are limited circumstances in which undisclosed Material Information may be disclosed in the necessary course of business if there are no grounds to believe the undisclosed Material Information will be used or disclosed contrary to applicable law. If Nuvei Personnel believe they are faced with these circumstances, they should send a request to the Corporate Secretary at dschwartz@nuvei.com to confirm whether such undisclosed Material Information may be disclosed.

C. CONSEQUENCES OF NON-COMPLIANCE

The consequences of insider trading and tipping can be severe. Nuvei Personnel who contravene securities laws or regulations not only expose themselves to criminal, penal and administrative actions by the relevant authorities, which could lead to substantial fines and imprisonment, but Nuvei Personnel who violate this Policy will also be subject to disciplinary actions, which may include restrictions on future participation in equity-based incentive plans or termination of employment without notice or payment in lieu of notice.

IV. ADDITIONAL RESTRICTIONS APPLICABLE TO REPORTING INSIDERS, DESIGNATED INSIDERS AND DESIGNATED PERSONNEL

A. TRADING RESTRICTIONS AND BLACKOUT PERIODS

All Reporting Insiders and Designated Insiders are subject to “regular blackout periods” surrounding the release of Nuvei’s quarterly and annual financial results. **Reporting Insiders and Designated Insiders may not trade in Nuvei Securities during the**

period commencing on the date following each quarter or year end, and ending on the third business day following the release of the Corporation's annual or quarterly financial statements.

The Corporate Secretary may, on the recommendation of the Disclosure Committee, from time to time as a result of special circumstances relating to Nuvei, such as an acquisition, project, event or any other transaction, designate a "discretionary blackout period" for such length of time as is deemed necessary and determine the Nuvei Personnel to which such discretionary blackout period applies. Such Nuvei Personnel will be Designated Personnel and will be prohibited from trading in Nuvei Securities during the discretionary blackout period.

Notwithstanding the foregoing, (i) as part of the yearly operational and planning and budget approval processes, the Board of Directors may, in accordance with applicable laws and regulations, grant stock options and other equity awards to Nuvei Personnel; and (ii) automatic purchases in accordance with applicable laws and regulations may be made during blackout periods under written automatic purchase or disposition plans established prior to the relevant blackout periods and that are approved by the Board of Directors.

Designated Personnel who are not subject to a discretionary blackout period may only trade Nuvei Securities in accordance with the terms and conditions of the Confidentiality or Non-Disclosure Agreement to which they are a party.

Trading blackout periods will also apply to all Nuvei Personnel with access to undisclosed Material Information, such as during periods when certain Nuvei Personnel prepare financial statements but results have not yet been publicly disclosed. Notice of such blackouts may or may not be communicated by the issuance of a formal notice.

B. ANTI-HEDGING RESTRICTIONS

Nuvei Personnel shall not in respect of Nuvei Securities engage in: (i) short sales; (ii) transactions in derivatives in respect of Nuvei Securities such as put and call options; or (iii) any other hedging or equity monetization transaction in which the individual's economic interest and risk exposure in Nuvei Securities is changed, such as collars or forward sales contracts.

C. PRE CLEARING TRADES

All Reporting Insiders, Designated Insiders and Designated Personnel who wish to trade in Nuvei Securities must first submit a request to the Corporate Secretary at dschwartz@nuvei.com. A request should specify the type of transaction (e.g., purchase, sale or exercise of stock options and confirmation on the intention to subsequently hold or sell the underlying shares). **No trade may be carried out without the pre-clearance of the Corporate Secretary.**

Nuvei Personnel are reminded that, notwithstanding the pre-clearance of a trade by the Corporate Secretary, the ultimate responsibility for complying with the insider trading restrictions rests with the individual trading in Nuvei Securities.

D. FILING INSIDER REPORTS

Under applicable Canadian securities legislation, a person or corporation who becomes a Reporting Insider of the Corporation must file an insider report within ten (10) days of the date of becoming a Reporting Insider.

In addition, a Reporting Insider whose direct or indirect beneficial ownership of or control or direction over Nuvei Securities changes, must file an insider report of the change within five (5) days of the date of the change. The Corporate Secretary may assist any Reporting Insiders in completing and filing insider reports, but the ultimate responsibility for complying with the insider filing requirements rests with the individual trading in Nuvei Securities.