

Corporate Sustainability Policy

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1. Introduction

The purpose of this policy is to outline our commitment to sustainable development and, in particular, what is expected from the Group and those it does business with in terms of responsible business conduct and sustainable development. This commitment supports our business decision making at all levels and provides a frame of reference for how we want to deal with business opportunities and risks in the context of direct and indirect sustainability impacts.

As a provider of credit and other consumer financial products to underserved communities, IPF PLC is committed to providing for its customers in a way that responds to broader societal challenges and promotes sustainable development. We believe that sustainable behaviour in every aspect of our business is a natural prerequisite for building stronger relationships with customers, employees and contributing to positive development in society.

2. Policy Purpose

The purpose of this Policy is to define the framework for Corporate Sustainability for the Group and provide an appropriate framework for sustainability activities undertaken across all our business units.

Our commitment to sustainable development as detailed in both this policy and the related policies listed at Section 10 have been developed with respect for the following external benchmarks:

- (i) United Nations Global Compact (UNGC)
- (ii) International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- (iii) United Nations Universal Declaration on Human Rights
- (iv) United Nations Guiding Principles on Business and Human Rights
- (v) Organisation Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises (OECD Guidelines)
- (vi) UK Modern Slavery Act
- (vii) UK Bribery Act

3. Policy Scope

This Policy as well as other policies are applicable to all Group employees, products, services and organisational units as well as our business relations with third parties.

4. Definitions

The following definitions are used in this policy:

Definition	Meaning
Group	International Personal Finance plc and all companies in which it directly or indirectly owns or controls the voting rights attaching to not less than 50% of the issued share capital or controls the appointment of the majority of the board of management.
Corporate Sustainability	Providing financial services to our customers in a way that provides long-term economic, social and environmental value for customers, investors and society at large.

5. Policy Requirements

- (i) **Corporate Sustainability Statement**

The Group is committed to contributing to social, environmental, and economic sustainable development. This commitment is founded on respect for internationally recognised core principles on human rights (including labour rights), the environment (including climate) and anti-corruption as reflected in the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The Group considers that sustainable development is an important prerequisite for it to be more successful over the long term. The Group aims to minimise risks of any direct and indirect adverse impact on the environment and climate, human rights and labour rights as well as from issues relating to anti-corruption. This commitment is embedded in our strategy and business operations worldwide through our Board endorsed Responsible Business Framework.

(ii) Sustainability Commitments

The Group operates globally in line with the following specific commitments:

- We respect the rule of law and comply with national regulations in all countries in which we operate.
- We respect human rights by embedding this policy commitment in all our policies and processes in line with the UN Guiding Principles on Business and Human Rights.
- We commit to promote and support environmentally sustainable practices. We will continuously work to reduce our own adverse environmental impacts by applying and developing climate and environmentally friendly services, solutions, and technologies in our operations and product range.
- We commit to being open and transparent about our business activities. We will not accept any form of bribery, corruption or fraud.
- We will conduct our operations in accordance with principles for good corporate governance.
- We do not use nor facilitate tax evasion or tax avoidance arrangements.

(iii) Managing and Reporting on Commitments

Delivering on the commitments outlined above is achieved by continuously identifying, preventing or mitigating potential and actual adverse impacts to the sustainability principles that we support. We will apply a systematic approach in our management of the principles and conduct impact assessments to identify actual and potential adverse impacts in our business practices and value chain.

We will manage adverse impacts that we may cause or contribute to, or to which we are directly linked through our business relations. If we become aware of an adverse impact that we cause or contribute to, we will seek to ensure access to remedies for the affected persons or stakeholders or notify the appropriate authorities.

The Group will be transparent in its efforts to support the long-term sustainable development of its operations. The Group shall report publicly on its sustainability performance, development and impact in its Annual Report. We will provide timely, regular, and reliable information on our business practices, our impact assessments and how we manage adverse impacts. We believe regular assessments and transparent communication will help anchor our commitment and spur sustainable development throughout the Group.

(iv) Our Expectations for Employees

Our employees all hold a key to respecting and promoting our commitment to sustainable development thereby enabling sound and sustainable business practices and responsible economic growth of the Group. We expect all colleagues to abide by our commitment, and we encourage colleagues to alert the Policy Owner of any actual or potential adverse impacts that the Group may cause or contribute to through our practices, services, or products.

(v) Our Expectations for Business Relations of the Group

We purchase a wide range of goods and services required in the operation of our business. Responsible business relationships with our suppliers are therefore central to the success of our business.

Our expectations for our business relationships are based on the same global minimum standard for responsible business conduct to which we hold ourselves accountable.

We expect all our business relationships to work towards meeting the global minimum standard as outlined in the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. They should avoid causing or contributing to adverse impacts on human rights, the environment, and anti-corruption, and should address any actual adverse impacts that arise. Our expectations are detailed further in our Procurement Policy.

We encourage responsible business conduct and sustainable development at all levels of our value chain. We commit to using or building our leverage as a global company to encourage others to address their severe impacts and move towards meeting the globally-accepted standards (UNGC/OECD).

(vi) Corporate Sustainability Governance Framework

The Board of the Group is responsible for the Group’s strategy, organisation and oversight of performance including in relation to Corporate Sustainability-related matters. In respect of Corporate Sustainability this includes the establishment of an appropriate strategy and governance arrangements. The Board fulfils these responsibilities through the approval of (i) the Strategic Plan, (ii) the Responsible Business Strategy (iii) the Group Corporate Sustainability Policy (v) thematic Policies for the Group relevant to this area and (vi) the Annual Report. The Board is regularly updated on Corporate Sustainability matters.

The Chief Executive Officer has overall responsibility for the execution of the Corporate Sustainability matters and implementation of plans set by the Board. The Chief Executive Officer has delegated to the Chief Legal Officer responsibility for overseeing the management of sustainability-related matters and sponsors the Group’s Responsible Business Framework. The function the CLO leads is responsible for the Responsible Business Strategy on a day to day basis including providing updates that include any sustainability-related issues of relevance to the Responsible Business Framework that should be communicated to the Executive Oversight Group when required.

<p>Responsible Business Framework Executive Oversight Group</p>	<p>This body, which comprises all members of the Group Executive and is chaired by the CLO, is responsible for the overall execution of the Responsible Business Strategy, which covers sustainability-related issues, in alignment with the strategic direction set by the Group Board. It oversees input in the Group’s strategic processes to make sure sustainability is given appropriate consideration in long-term strategy and planning. It receives regular updates from the Responsible Business Framework Steering Group to assist it with these objectives.</p>
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Responsible Business Framework Steering Group	The Steering Group helps drive key sustainability initiatives, as part of the broader Responsible Business Strategy. It provides governance, strategic leadership and execution guidance, making recommendations to the Executive Oversight Group
Responsible Business Framework Champions Group	The Champions Group is responsible for integrating and implementing the Responsible Business Framework and, where applicable, sustainability best practices and climate strategy into the activities of each of our markets

6. Sustainability commitments

The Group recognises the importance of participating in and supporting international commitments that enable businesses to operate in a more sustainable way. The Group supports the international agreements and international frameworks listed below.

International Agreement Description	Detail
The Paris Agreement	An agreement between governments to limit global warming to well below 2 degrees compared to pre-industrial levels
The Universal Declaration of Human Rights	An expression by all governments in the United Nations of the rights and freedoms everyone is entitled to
The eight ILO Core Conventions on Labour Standards	9 Eight ILO principles and rights at work that are considered fundamental for the world of work and should be prioritised for ratification into national laws
The UN Guiding Principles on Business and Human Rights	A set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations
The Children's Rights and Business Principles	Principles to guide companies on actions they can take in the workplace, marketplace and community to respect and support children's rights
The OECD Guidelines for Multinational Enterprises Recommendations	They provide non-binding principles and standards for responsible business

The Group is a member of, or has signed, the following business- related commitments:

International Framework	Description
UN Global Compact	Framework for corporates to implement universal sustainability principles in the areas of human rights, labour rights, environment and anti-corruption
Task Force on Climate related Financial Disclosures, (TCFD)	The TCFD is an industry-led initiative created to develop a set of recommendations for voluntary climate-related financial disclosures for use by companies in providing information to investors, lenders, insurers, and other stakeholders. The Group is a registered supporter of the TCFD.

7. Roles and Responsibilities

Everyone	All employees and directors must comply with this policy.
Legal Function	Responsible for management and oversight of this policy.

Procurement Function	Responsible for ensuring appropriate policies and processes are in place for suppliers which match the requirements detailed in this policy
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8. Policy governance

8.1. Breaches and Exceptions to Policy

Exceptions to Policy	Exceptions to this policy should be requested from the Deputy General Counsel
Breaches of this Policy	All breaches of this policy must be notified to Deputy General Counsel
Whistleblowing	If for any reason you are uncomfortable reporting a breach as requested above you can access our independent whistleblowing services at https://report.whistleb.com/en/ipf for European, IPF Digital or Group-related matters or https://hacerlocorrecto.ethicsglobal.com/ for Mexico.

8.2. Assurance

Owner	This Policy is owned by the Chief Legal Officer
Assurance mechanisms	The Group will communicate on progress and compliance with this policy commitment in its Annual Report and other public disclosures as necessary

9. Related Policies

In line with our overall commitment to sustainable development, our related core policies and theme policies also align with the UNGC/OECD guidelines and describe our ambition to neither cause nor contribute to adverse social, environmental or economic impacts within specific areas of interest.

Code of Ethics

Anti-Corruption Policy

Human Rights Policy

Procurement Policy