

Human Rights Policy



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1. Introduction

The United Nations recognises human rights as rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. The Group is committed to operating in line with the United Nation's recognition of human rights across the products and services it offers, in its own operations as well as across its supply chain.

In line with the United Nations Guiding Principles on Business and Human Rights, the Group's human rights policy commitment is based on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The Group seeks to follow the OECD Guidelines for Multinational Enterprises and is guided by its membership of the United Nations Global Compact when determining its approach to this area.

The Group operates in many different countries and recognises that situations may occur where local and national laws and regulations are not aligned with internationally recognised human rights standards. In all cases the Group is committed to upholding the high standards outlined above to the greatest extent possible.

1. Policy Purpose

The Group makes a substantial contribution to human rights as a responsible provider of credit to underserved customers through our purpose of building a better world through financial inclusion. The Group commits to mitigate wherever possible any detrimental impact on human rights such as unsafe working conditions, migrant worker exploitation and harm done to communities and to help advance human rights by providing jobs, providing access to responsible finance, protecting people's rights and procuring services in a responsible manner. This policy sets out the Group's commitment to meeting its responsibility to respect internationally recognised human rights standards.

2. Policy Scope

This policy applies to anyone working for the Group or on its behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, interns, contractors, customer representatives and business partners. The principles in this document are brought to life for our employees and customer representatives through our Code of Conduct.

3. 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.

4. Policy Requirements

The Group is committed to respecting all internationally recognised human rights throughout its operations, while placing specific efforts on those rights that are at risk of the most severe negative impact through its activities and business relationships. The Group's business activities impact on millions of people's lives globally as a responsible provider of finance to underserved customers. While this creates opportunity, the Group understands that human rights risks and issues exist in global value chains and that they are often deep-rooted and endemic. The Group further recognises that it must take steps to identify and address any actual or potential adverse impacts which it may cause or contribute to through its own activities or which may be directly linked to its operations, products or services or by its business relationships. Human rights due diligence is an ongoing process that requires particular attention at certain stages in the Group's business activities, such as when new partnerships are formed or operating conditions change, as these changes may create new potential or actual impacts on human rights. The Group focuses our efforts in the following key impact areas.

5.1 Our People

The Group actively works to create a safe, fair and inclusive workplace for its employees and customer representatives. The Group's Code of Conduct sets out its commitments to doing the right thing and is designed to ensure all colleagues help to shape the culture of the Group, in turn ensuring that respect for human rights is upheld at all times. The Group is committed to equality and fairness for all employees with particular reference to wages, working hours, freedom of association, humane treatment, health and safety, anti-corruption and whistleblowing and the right to speak up. The Group has zero tolerance for discrimination or harassment and is committed to advancing diversity and inclusion.

5.2 Our Customers

The Group makes a substantial contribution to human rights as a responsible provider of credit to underserved customers through its purpose of building a better world through financial inclusion. The Group's business depends on winning and retaining the trust of its customers. Responsible lending is fundamental to sustaining the Group's business model and it is committed to treating its customers fairly and with respect. It commits to ensure that its customers are offered responsible and transparent products and services, that their rights to privacy and protection of personal data are upheld and that they are treated with respect and understanding, especially when they have difficulty in meeting contracted repayments.

5.3 Our Supply Chain

The Group's commitment to human rights in its business and supply chains is communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate on an ongoing basis. The Group's procurement processes include a risk assessment of suppliers against relevant standards in the Group's Responsible Business Framework including human rights, modern slavery, anti-bribery and corruption, health and safety and data privacy to ensure that the Group's principles and standards are upheld throughout its supply chain. The Group may give support and guidance to suppliers to help them address coercive or exploitative work practices in their own businesses and supply chains. Unless approved at a senior level, the Group will not do business with any supplier which cannot provide adequate assurance on its approach to

human rights and cannot co-operate with any proposed remediation plans.

5. Roles and Responsibilities

The PLC Board	Overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations.
Chief Legal Officer	Primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring internal control systems and procedures are effective in protecting and promoting human rights.
Chief HR Officer	Responsible for ensuring that the global HR Function deploys both policies and engagement practices across our entire workforce, whether employed or self-employed, which reflect and support the principles detailed in this policy.
Group Head of Procurement and Supplier Management	Responsible for ensuring that the Procurement Function understands and complies with this policy and that individuals in the Procurement Function receive adequate and regular training on it and the issue of human rights in supply chains.
Local Market Boards	Responsible for putting in place procedures and controls to comply with this policy, setting up and enforcing compliance arrangements specific to their businesses and dealing with any breaches and reporting them to the Chief Legal Officer.
Everyone	All employees and customer representatives, whether employed or self-employed, must comply with this policy and are responsible for reporting any concerns or non-compliance with this policy.

6. Policy governance

6.1. Breaches and Exceptions to Policy

Exceptions to Policy	No deviations from this policy are permitted.
Breaches of this Policy	All breaches of this policy must be notified to the Chief Legal Officer.
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.

6.2. Assurance

Owner	This Policy is owned by the Chief Legal Officer.
Assurance mechanisms	<p>The PLC Board receives annual reports on human rights and modern slavery.</p> <p>The Global Procurement Committee reviews data on supplier categorisation and risk management on a quarterly basis and oversees compliance with the Group Procurement Policy and Procurement Standards.</p> <p>Annual training is provided to all employees and customers representatives.</p>

7. Related Policies

Code of Conduct

Sustainability Policy

Data Protection Policy

Modern Slavery Policy

Anti Bribery and Corruption Policy

Responsible Procurement Policy
