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Policy Summary

As a member of personnel in 4finance Group (known as “Group”), you are encouraged to keep Group informed of any illegal or unethical behavior which may violate Group applicable policies, such as, but not limited to, disclosures, accounting, internal accounting or disclosure controls, auditing matters (collectively, the “Covered Matters”), violations of Group Code of Conduct (the “Code”) or to report any other substantial concern(s). It is guaranteed that such reporting can happen without fear of retaliation.

Do’s

- Aim to address the concern with your line manager, or appropriate head of function via the normal issue resolution hierarchical reporting process.
- If unsuccessful, consider raising the issue as an Ethical Report via our SpeakUp! reporting tool.
- Report matters such as disclosures, accounting, internal accounting or disclosure controls, auditing matters (collectively, the “Covered Matters”) and violations of Group Code of Conduct (the “Code”), or to report any other substantial concern(s) that you may have.
- Only report matters which you, in good faith, believe merit attention.
- Alternatively contact the Compliance Department or the Chief Compliance Officer directly via email, phone or personally.

Don’t

- Hesitate to report any matter causing your concern.
- Report matters with the objective to pursue a personal vendetta.

All issues reported are investigated by the Chief Compliance Officer (CCO) with assistance from any appropriate resource required.

Notifications of all ethical reports are consolidated and a report is produced, discussed and reviewed by the Ethics and Compliance Committee (consisting of Chief Executive Officer (CEO), Chief Finance Officer (CFO) (as required), Chief Legal Officer (CLO), Chief People Officer (CPO), and the Chief Compliance Officer (CCO) on a monthly basis. Investigative actions are agreed upon and allocated to the relevant person(s) by the Ethics and Compliance Committee (the “Committee”). Agreement and actions from the Committee are maintained (in an e-mail format) and are retained by the CCO.

Significant investigations are escalated for awareness within Group to the Management or Supervisory Board, or Audit Committee. Evidence and logs of reports and outcomes are documented appropriately.

A quarterly summary report is provided to ExCo and the Management Board also to the Audit Committee and the Supervisory Board as required.

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1 Purpose

4finance Group including any of its subsidiaries (each of the companies from Group - referred to as “Group”) is committed to ensuring that any ‘misconduct’ is immediately dealt with and future recurrence prevented. For this purpose, Group considers it important to implement an Ethical Reporting Policy (Policy) which is run in an open and transparent manner. This is important to protect the Group reputation as part of its ongoing legal and regulatory compliance efforts.

2 Scope

This Policy covers ethical and compliance matters reporting and is binding for the Group. All developed, revised or updated documents within the area of ethics and compliance management will align with this Policy, and all of them together complement the general Ethics and Compliance management area.

3 General Principles

3.1 Introduction

Ethical reporting means the ability for Group personnel (or any other individual working or performing services for Group) to report misconduct at the workplace without fear of retaliation. Group recognizes that effective and honest communication is essential to its success.

If an issue is raised internally, it sends a strong message that bad practice will not be tolerated in the Group. Personnel are happier at work when believing and seeing that mutual trust exists. It enables the Group to take action where there is substance to a concern, thereby helping the person who has expressed that concern and ultimately, the overall organization.

This Policy should be seen in the context of other Group protocols and procedures such as normal issue resolution - hierarchical reporting - between a line manager and their team member where an issue is raised directly with the line manager in the first instance. If these steps do not provide resolution, in your reasonable judgment you believe these processes will not address the issue you wish to raise, or you fear retaliation related to the issue, then consider raising the issue as an ethical report via **“SpeakUp!”** - the confidential reporting tool.



In your reasonable judgment if you believe normal hierarchical reporting will not address the issue you wish to raise, or you fear retaliation related to the issue, then consider raising the issue as an ethical report via “SpeakUp!”.

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3.2 How does it work?

As a member of personnel, or any other person working with or for Group, you are encouraged to keep Group informed of any illegal or unethical behavior which may violate Group applicable policies, such as, but not limited to, disclosures, accounting, internal accounting or disclosure controls, auditing matters (collectively, the “Covered Matters”) and violations of Group Code of Conduct (the “Code”), or to report any other substantial concern(s) that you may have. The concerns you may raise mentioned in this Policy are not intended to be exhaustive and any person with related concerns should raise those issues in accordance with this Policy.

Every Group member of personnel or any other person working with or for Group may report such misconduct. It applies whether or not the information is confidential, whether the misconduct is happening now or has already happened. It extends to misconduct occurring anywhere Group does business.

There are three reporting options available to you:

- (1) hierarchical reporting through your management line,
- (2) directly with the Compliance Team or CCO,

or

- (3) confidentially (with the possibility not to enter your name) reporting via SpeakUp!

Only in exceptional situations, where it is unreasonable for the employee to internally report concerns, may it be appropriate to report concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. Group strongly encourages individuals to seek advice from a legal counsel before reporting a concern to anyone outside Group.

3.3 Use Hierarchical Reporting First

If you have a concern you should first try to address the concern with your line manager in normal issue resolution hierarchical reporting. Your line manager and the reporting structure is there to provide you with help and assistance with any issue which is interfering with your normal everyday work process. This approach should be exhausted prior to any escalation.

If this step does not provide resolution, in your reasonable judgment you believe these processes will not address the issue you wish to raise, or you fear retaliation related to the issue, then report the matter to the Compliance Team or the CCO or alternatively consider raising the issue via SpeakUp!.



In your reasonable judgment if you believe normal hierarchical reporting will not address the issue you wish to raise, or you fear retaliation related to the

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issue, then consider raising it to the Compliance Team or Chief Compliance Officer, or as an ethical report via “SpeakUp!”.

3.4 Use of SpeakUp!

3.4.1 Reporting of Matters

You may use SpeakUp! to report concerns which you, in good faith, believe merit attention and which:

(1) May fall within the scope of Covered Matters, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company or its subsidiaries;
- fraud or deliberate error in the recording and maintaining of financial records of the Company or its subsidiaries;
- deficiencies in or non-compliance with the Group internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of Group;
- deviation from full and fair reporting of the Group financial condition;
- improper expenditure of company funds;
- manipulation of Group processes and procedures to circumvent protocol for the purposes of fraud;
- improper use of Group property (including disclosure of proprietary information);
- use of non-public information to trade in securities;
- matters related to corruption and bribery, banking and financial crimes, tax fraud and competition;
- anti-competitive practices;
- discrimination, bullying and harassment in the workplace; or
- environment protection.

(2) May fall within the scope of other ethical matters, including, without limitation, the following:

- Abuse of authority;
- Breach of contract;
- Negligence causing substantial and specific danger to public health and safety;
- Endanger to an individual’s health and safety;
- Damage to the environment;
- Manipulation of company data or records;
- Criminal offence;
- Breach of confidential or propriety information;
- Deliberate violation of law or regulation;
- Waste or misappropriation of company funds or assets;
- Breach of the Code of Conduct; or

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- Any other unethical, biased, favoured or imprudent event.

This Policy is not intended to be used in place of normal hierarchical issue resolution nor is it to be a route for raising malicious or unfounded allegations against other personnel in the company.

3.4.2 Conditions of use

You may submit your report through SpeakUp!:

Link: <https://speakup.4finance.net>

When you use SpeakUp!, you are encouraged to provide your name, position and contact details. See Appendix 1 for details of the form. Anonymous reports are not encouraged because they are not as helpful to the investigators, who must look into the matter, as a declaration supported by your identity. However, if you insist upon anonymity, the report may be processed with additional precautions. You should be aware that in some legal jurisdictions there is no right of anonymity for such reporting i.e. the Czech Republic.

In accordance with applicable personal data protection laws, your identity will be treated as confidential information and will only be disclosed to the individuals listed in Section 3.5 below.

3.5 Recipients of the reports collected

The information collected through your report will be shared with a restricted number of the HQ Compliance Team and authorized personnel of the Investigation Team, who will (i) determine what kind of investigation must be conducted and (ii) share this information with other persons (such other personnel or advisors on a “need to know” basis) depending on the nature of the issue(s) reported. Allegations concerning the functioning of ExCo or the Management Board will be directed to the Chairman of the Audit Committee and the Supervisory Board.

Where strictly necessary for the purposes of the investigation, the authorized personnel of the Investigation Team may share a report with, and transfer your personal data to, a limited number of internal and external specialists/experts considering the content of the report, such as specialist forensics experts, its outside legal counsel and financial or tax auditors for the purpose of resolving any difficult issues or conducting any additional investigations or procedures. The information collected in the report may also be disclosed to law enforcement or government authorities as necessary to comply with legal requirements. However, personal data relating to the identity of the individual making the report will be kept confidential as far as possible unless the interest of the individual is outweighed by the interest of compliance with the legal requirements. Any recipient of personal data will be contractually bound by reinforced confidentiality obligations.

In any and all situations, no European Union personal data will be sent outside the European Union to a country that does not provide for an adequate level of data protection (within the meaning of the European Union data protection legislation) without taking the appropriate measures in order to comply with applicable law. In addition, the number of individuals

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involved in any investigation will be limited to the extent consistent with a full and complete investigation.

Complaints relating to Covered Matters will be reviewed under the Audit Committee’s direction and oversight by the CLO, Internal Audit or such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

3.6 What happens with reports via SpeakUp!

(1) *If you made the report*

When reporting a concern, the person who receives the notification, will discuss your report with you and decide if an investigation is merited. If it is determined that the report does not have merit you will be notified of that decision. If the report is determined to have merit you will be contacted and will be kept in contact with the progress of the investigation. If you make a report via SpeakUp! and do not include your name it will not be possible for you to be contacted or to follow the progress of the following actions.

If it is determined that the report has merit, an investigation will be conducted by a team specially appointed depending upon the nature of matter reported and on a case-by-case basis (the “Investigation Team”). See Appendix 2 for the Investigation Procedure.

The reporting person will be informed on the outcome of the investigation and which steps were taken.

(2) *If you are the subject of a report*

The subject will be informed of the report in compliance with respective local data protection legislation and will receive an explanation of the nature of the reported misconduct, the recipients of data related to the report and the subject’s right to access and, if necessary, review and rectify the personal data and information as collected through SpeakUp! However the subject will never receive any personal data relating to the identity of the person reporting a concern.

3.7 Right of Access, Rectification and Opposition

As the person submitting the report, the Compliance Team may collect and process some of your personal data – such that you initially provided or was additionally collected. This personal data will be stored and deleted in accordance with applicable law. To the extent required by applicable law, you may access and, if necessary, review and rectify any personal data collected through SpeakUp! by contacting the Compliance Team.

3.8 No Retaliation

Group will investigate every report in a confidential, efficient and speedy manner while protecting the dignity of every person involved. Confidentiality will be maintained to the

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fullest extent possible, consistent with the need to conduct an adequate investigation of the report and the privacy and data protection laws of the country concerned.

Group will not dismiss, demote, suspend, threaten, harass or in any manner treat less favorably any reporter as a result of their having reported, including complaints regarding Covered Matters, and violations of the Code. If a reporter believes that they have suffered any such treatment, they should inform the CCO immediately. If the matter is not remedied they should raise it to Internal Audit, or the chairs of the Audit Committee or Supervisory Board.



Where reports, irrespective of whether made through SpeakUp! or otherwise, are made in good faith the member of personnel will be protected from retaliation, even if the investigations determine that the report is groundless.

However, if the Investigation Team concludes that a reporter has made false allegations maliciously or solely with a view to personal gain they, may be subject to disciplinary actions, including termination, as permitted by local law. Especially, unfounded reports, malicious reports or reports made to hurt someone are strictly prohibited and considered a breach of personnels duties or contract. Similarly, disciplinary action including termination may follow an unjustifiable external disclosure made without first exhausting the internal procedure set out in this Policy.

4 Roles and Responsibilities

4.1 Roles and responsibilities

The CCO is responsible for appointing the Investigation Teams to follow up on reports made directly or through SpeakUp!. The CCO will maintain and retain, in accordance with applicable law, a log of all complaints, tracking their receipt, the investigation and actions.

The Committee is responsible for supporting the CCO in execution of investigations and monitoring.

ExCo and the Management Board's responsibility is to review periodic reports on the numbers of matters reported.

The Audit Committee's responsibility is to ensure that employees can submit a good faith complaint regarding financial statement or other disclosures, accounting, internal accounting or disclosure controls, auditing matters or violations of the Code and can do so without fear of dismissal, or other lesser punishment, of any kind.

Chair of the Supervisory Board is the point of contact for complaints against the CCO, the CEO or Board Members.

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4.2 Violation of duties

Non-compliance with this Policy will be considered a breach of personnel's working duties and can result in disciplinary action up to and including termination. Non-compliance may also result in civil and criminal liability for the Group and/or individuals.

4.3 Reporting

All issues reported are investigated by the CCO with assistance from any appropriate resource required. Significant investigations are escalated for awareness within Group to the appropriate committee.

Notifications of all ethical reports are consolidated and a report is produced, discussed and reviewed by the Ethics and Compliance Committee (the "Committee" - consisting of CEO, CLO, CPO, and the CCO) on a monthly basis. Investigative actions are agreed upon and allocated to the relevant person(s) by the Committee. Evidence and logs of reports and outcomes are documented appropriately.

Agreement and actions are maintained (in an e-mail format) and are retained by the CCO.

As requested a quarterly report is provided to the Audit Committee and Supervisory Board by the CCO.

5 Controls

The Ethical Reporting Policy determines that any reports are made in strict confidence and that no adverse actions will be tolerated to those who make an ethical or compliance report.

SpeakUp! is operated confidentially by the Compliance Team and provides a notification of any ethical reports to the CCO, the Committee and Internal Audit.

Information about how to make reports is communicated at least annually.

Posters advertising the tool and the Policy are placed in Group offices and break out areas.

6 Awareness and Training

The Group ethical reporting tool (SpeakUp!) is advertised by email, the intranet and through awareness sessions run by the Compliance Team. This Ethical Reporting Policy sets out 'when' and 'how' personnel use the tool. The Policy is advertised at least once per year and is available on the intranet. The Code is advertised at least once per year and is available on the intranet. Training on the Code is undertaken annually.

Information about how to make reports is communicated at least annually.

Posters advertising the tool and the Policy are placed in Group offices and break out areas.

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7 Additional Information and Assistance

All enquires about this Policy should be directed to the Compliance Team or the CCO.

8 Final provisions

8.1 This Policy shall be reviewed annually or as required.

8.2 This Policy should be read in conjunction with:

- Code of Conduct
- Group Anti-Corruption Policy
- Group Policy for Personal Data Protection.

8.3 Appendices

- The SpeakUp! Form
- Investigation Procedure.

8.4 The history of the document:

- This is the first version of this document. It becomes effective on the third business day after approval by the Supervisory Board.

9 Terms, Abbreviations and Definitions

Group	4finance Group and all its, direct and indirect, subsidiaries.
The Committee	The Ethics and Compliance Committee appointed by ExCo to oversee the Group Code of Conduct and Ethical Reporting process.
Personnel	All Group resources globally, including (i) employees, temporary employees and seconded employees; and, (ii) contractors, consultants, and any other persons performing contract work for Group, including employment agency staff and self-employed persons.
The Code	The Code of Conduct
Covered Matters	Disclosures, accounting, internal accounting or disclosure controls, auditing matters.

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Appendix 1: SpeakUp! form

Contact

Country

Issue/product or process*

Description*

Date*

Risk level

Category

Submit and send

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Appendix 2: Investigation Procedure (Internal Use only)
