




4finance Group Employee Handbook



This is an extract from the internal 4finance Group policy approved by the Group's Board of Directors and the parts only relevant for internal use only are not included. 4finance Group personnel are requested to refer to the Group's internal resources for the full version of the Employee Handbook.



Equal Opportunities policy

Introduction

4finance is an equal opportunities Group. As such it is committed to equality of opportunity for existing and potential employees. The purpose of this equal opportunity policy is to create a workplace which provides equal opportunities for all existing and potential personnel, and where their dignity is protected and respected at all times. All persons regardless of gender, marital status, family status, race, religious beliefs, sexual orientation, disability or age, will be provided with equality of access to employment and encouraged and assisted to achieve their full potential. We will continue to foster a genuine culture of equality.



Objective

The aim of the policy is to ensure that no job applicant or any member of the Personnel receives less favourable or different treatment on any grounds which cannot be shown to be justified. This applies to recruitment and selection, learning and development, promotion, pay, grievances and discipline procedures and all terms and conditions of legal relationship established between the Personnel and the Group.

Recruitment and Selection

4finance success depends on attracting the right people to the right roles at the right time; people who have huge potential, are talented, diverse and embody our core corporate values. Any vacancy advertisements, application forms and publicity material will encourage applications from all suitable candidates (external as well as internal) and will not discriminate against any group or individual on any unjustifiable grounds. The objective is to ensure that all candidates have equality of access to all of our opportunities.

Efforts will be made to ensure that interviews are balanced and that interviewers are trained to conduct interviews in a non-discriminatory way and that questions will relate to the requirements of the job. Relevant questions will be asked to all candidates and evaluated in the same way and interviewers will be careful not to ask questions which might be interpreted as discriminatory.

Selection is based on one's merit and ability to demonstrate the suitability for employment according to pre-determined job-related selection criteria stated in recruitment profile. Candidates will also be assessed in compliance of the Group's culture and values. Equality of opportunity will also include accommodating, where possible, the special needs of individuals to facilitate their participation in the recruitment and selection process.

Career Development and Learning

All Personnel has opportunity to acquire the range of learning, skills and experience necessary for their career development. Opportunities for learning and/or promotion are based on the requirements of the job and career development will be based on people's abilities and merit.

Group encourages blended learning approach whereas 70% is self-development, 20% internal trainings and upskilling, and 10% external courses.

Group uses the LMS (Learning Management System) platform which is available to all Personnel. The platform is used for various internal training, including mandatory compliance ones.

Group may sponsor external development activities (e.g., training, conferences, etc.) if they are in line with the planned career path and directed to meeting business needs.

If you need help accessing certain learning resources, please, contact your local HR representative or reach out to the Group Head of People Development at HQ office.



Health and Safety

The Group is committed to providing a clean, safe, and healthy work environment for its Personnel. Maintaining a safe work environment, however, requires continuous cooperation. The Group and all Personnel must comply with all occupational safety and health standards and regulations established by local regulatory bodies. In addition, Personnel is expected to obey safety rules and exercise caution and common sense in all work activities. You must immediately report any unsafe conditions to your Direct Manager.

Personnel who violate safety standards, causes hazardous or dangerous situations, or fails to report or, where appropriate, remedy such situations may be subject to disciplinary action, up to and including termination of legal relationship. In the case of an accident that results in injury, regardless of how seemingly insignificant the injury may appear, Personnel must notify their Direct Manager or the HR Representative. Questions regarding this policy should be directed to your Direct Manager or the HR Representative.





Health and Safety requires total commitment from all Personnel consistent with the following:

- Everyone has a legal obligation to take reasonable care for their own safety and for the safety of other people who may be affected by their acts or omissions;
- Compliance with instructions and procedures issued;
- Reporting any danger to health and safety to your Direct Manager;
- Reporting to your Direct Manager, any incidents which have or may lead or might have led to injury;
- Co-operating with any investigation to prevent accidents;
- Attending mandatory health and safety trainings;
- Using equipment or substances in accordance with instructions for use or training.
- You are strongly advised not to come to office if your health condition may cause a threat to health of other colleagues.



E-Mail, Internet and Telecommunications use

All systems, E-mail and Internet are tools that create great value but can cause problems if used improperly. It is extremely important that all Personnel use good business judgment when using the computer systems. Computer hardware, software, E-mail, Internet connections, and all other computer or electronic communication or data storage systems used by Group are the property of the Group and are intended for business use.

Group prohibits the use of computers and the E-mail system in ways that are disruptive, offensive to others, or harmful to morale. Computer, E-mail and Internet may not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other non-business matters. The unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the Internet is expressly prohibited.

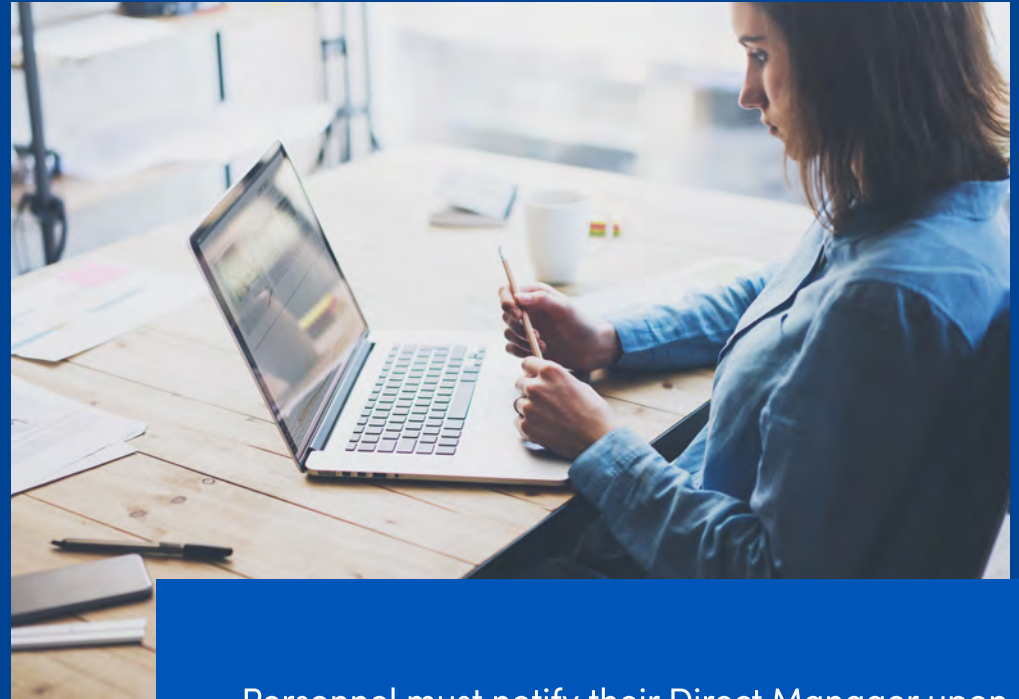
E-mail and Internet systems are at all times the property of the Group.

Group has tools and processes to monitor and to limit unauthorized computer and Internet usage and to prevent data leakage according to its Information Security Policies. By using Group's computer systems, Internet and E-mail services Personnel acknowledge that the Group may monitor Personnel activities and collect audit logs on usage of its resources (e.g. computer, Internet, E-mail, software), provided that it will operate with respect for the employee's personal rights and the right to privacy. Group has the right to extensively monitor activity on its systems to prevent and to investigate malicious activities performed on or using its systems.

Detailed rules on acceptable use of Group's computing systems are available in the End User Security Policy. All Personnel shall read the policy and must always follow it.

The following behaviours are examples of activities that are prohibited and can result in disciplinary action:

- Stealing, using, or disclosing someone else's code or password without authorization;
- Copying, pirating, or downloading software and electronic files without permission;
- Sending or posting confidential material, trade secrets, or proprietary information outside of the Group;
- Violating copyright law;
- Failing to observe licensing agreements;
- Engaging in unauthorized transactions that may incur a cost to the Group or initiate unwanted Internet services and transmissions;
- Attempting to break into the computer system of another organization or person;
- Refusing to cooperate with a security investigation;
- Sending or posting messages that disparage another organization's products or services;
- Engaging in any other illegal activities.



Personnel must notify their Direct Manager upon finding out any violations of this policy or any other Information Security Incident. Abuse of this policy may result in disciplinary action, up to and including termination of employment.



Anti-bullying, harassment and discrimination policy

The Group is committed to the promotion and implementation of all necessary measures to protect the dignity of Personnel and to encourage respect in the workplace. This will be done by creating a work environment, free from any type of discrimination, harassment, including sexual harassment, bullying and disrespectful behavior, through implementation of effective procedures to deal with any complaints of such conduct as they may arise.

Discrimination, harassment, sexual harassment, bullying or disrespectful behavior takes many forms and can be of a verbal, physical or visual nature. It can be described as unwanted behavior, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive and affects the dignity of Personnel at work.

Discrimination

To "discriminate" against someone means to treat that person differently, or less favorably, for some reason. These protected reasons include race, ethnicity, gender identity, age, disability, sexual orientation, religious beliefs, or national origin, marriage partnership, pregnancy and maternity. Discrimination in the workplace can happen between coworkers, with job applicants, or between employees and their employers. Whether on purpose or by accident, discrimination, regardless of intention, is illegal.

Direct discrimination occurs when someone is treated less favorably than other employees, for example when one employee is paid less than others for no good reason that can be e.g. different responsibilities and job experience.

Indirect discrimination occurs when certain rules or regulations put certain staff members at a disadvantage. For example, employees are required to work on certain days of the week, but their religion prohibits them from doing so.

Harassment

Harassment is any form of unwanted conduct towards other individuals.

Personnel may not and should not comment, harass, or discriminate each other on any of the following grounds:

- Gender;
- Marital status;
- Family status;
- Sexual orientation;
- Religious belief or lack of religious belief;
- Age;
- Disability, lack of disability or the nature of disability;
- Race, color, nationality or ethnic or national origins.

Harassment is any form of unwanted conduct towards other individuals.

The following are examples of inappropriate behavior, which may constitute harassment:

- Verbal harassment, e.g. jokes, derogatory comments, ridicule or a song;
- Written harassment, e.g. text messages, e-mails or notices;
- Physical harassment, e.g. touching, jostling or shoving;
- Intimidating harassment, e.g. gestures or threatening poses;
- Visual displays, e.g. posters, emblems or badges;
- Persistent negative body language;
- Ostracizing or exclusion of a person.

This list is non-exhaustive, and all cases will be treated individually.

Harassment may consist of a single incident or repeated inappropriate behavior.

The following are examples of inappropriate behavior, which may constitute harassment:

- Verbal harassment, e.g. jokes, derogatory comments, ridicule or a song;
- Written harassment, e.g. text messages, e-mails or notices;
- Physical harassment, e.g. touching, jostling or shoving;
- Intimidating harassment, e.g. gestures or threatening poses;
- Visual displays, e.g. posters, emblems or badges;
- Persistent negative body language;
- Ostracizing or exclusion of a person.

This list is non-exhaustive, and all cases will be treated individually.



An act of harassment may occur outside the work premises or normal working hours provided the perpetrator was acting during employment, for example, at a training course, conference or work-related social event.

Sexual Harassment

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, being conduct which in either case has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

Without prejudice to the generality of the above, such unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material.

Sexual harassment may consist of a single incident or repeated inappropriate behavior. The examples of types of inappropriate behavior contained in the section on harassment apply in the case of sexual harassment as well.

Lack of Respect

Lack of respect can be shown by direct comments, sarcasm, snide remarks, inappropriate language and jokes or banter directed towards a colleague either face to face or behind their back. It can also arise where colleagues are ignored, overlooked, avoided or shunned without good reason and in a manner likely to be hurtful or disrespectful. Jokes or comments directed at or referring to a colleague could be thought amusing by others but are unpleasant, uncomfortable or hurtful to the colleague.

Bullying

Workplace bullying is repeated inappropriate behavior, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others at the place of work and/or during employment, which could reasonably be regarded as undermining the individual's right to dignity at work.

Without prejudice to the generality of the above, such unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material.

Sexual harassment may consist of a single incident or repeated inappropriate behavior. The examples of types of inappropriate behavior contained in the section on harassment apply in the case of sexual harassment as well.

The following are examples of bullying behavior:

- Undermining an individual's right to dignity at work;
- Humiliation;
- Intimidation;
- Verbal abuse;
- Victimization;
- Exclusion and isolation;
- Intrusion by pestering, spying and stalking;
- Repeated unreasonable assignments to duties that are obviously unfavorable;
- Repeated requests giving impossible deadlines or impossible tasks;
- Implied threat;
- Gestures.

This list is non-exhaustive, and all cases will be treated individually.

An isolated incident of the behavior described in this definition may be an affront to dignity at work, but, as a one-off incident, is not considered to be bullying.

Complaints relating to instructions issued by the Direct Manager, assignment of duties, terms and conditions of employment or other matters, which are appropriate for referral under other normal grievance procedures, do not constitute bullying.

Legitimate management responses to pressurized situations, which require an immediate action are not considered to be bullying.

Constructive and fair criticism of a one's conduct or work performance is not bullying.

Complaints

The Group strongly encourages the reporting of all instances of discrimination, harassment, or retaliation. If you believe you have experienced or witnessed harassment or discrimination based on sex, race, national origin, disability, or another factor, promptly report the incident to your Direct Manager. If you believe it would be inappropriate to discuss the matter with your Direct Manager, you may bypass your Direct Manager and report it directly to the local HR Representative, the Group HR Representative or the Group Compliance Officer, or use the confidential reporting platform via this link: <https://app.falcony.io/wb4finance/links/whistleblowing>.

Any reported allegations of harassment or discrimination will be investigated promptly, thoroughly, and impartially. Any member of the Personnel found to be engaged in any form of sexual or other unlawful harassment may be subject to disciplinary action, up to and including termination of employment.

Non-Retaliation

The Group expressly prohibits retaliation against any individual who reports discrimination or harassment, or who assists in investigating such charges. Any form of retaliation is considered a direct violation of this policy and, like discrimination or harassment itself, will be subject to disciplinary action, up to and including termination of employment.

