

4finance Group Human Rights Policy

Table of Contents

1. 4finance Group's commitment to respecting Human Rights

- 1.1 International references
- 1.2 Internal references

2. Principles

- 2.1. Employment practices
 - 2.1.1. Rejection of forced or compulsory labor and child labor
 - 2.1.2. Respect for diversity and non-discrimination
 - 2.1.3. Freedom of association and collective bargaining
 - 2.1.4. Health, Safety, and Well-being
 - 2.1.5. Good Working Conditions

3. Implementation and Monitoring

4. Stakeholders' grievances

5. Governance

6. Communication, training and assistance

- 6.1. Awareness and training
- 6.2. Assistance



1. 4finance Group's commitment to respecting Human Rights

The Group is focused on creating sustainable value shared with all its internal and external stakeholders, innovating, and pursuing excellence throughout the entire value chain of the business. Our journey started by fostering access to consumer finance for many who have not previously had a regulated option for credit. A sustainable strategy integrated into our business helps us to contribute to United Nations Sustainable Development Goals and to mitigate business risks. We have placed SDG “Decent Work and Economic Growth” at the center of this strategy. As a global leader in digital consumer finance, we seek to improve in:

- driving responsible and ethical business conduct by supporting for financial inclusion and providing responsible, transparent and fair financial services to customers (SDG 16 “Peace and Justice, and Strong Institutions),
- ensuring that all employees, regardless of gender, receive equal pay for equal work and have access to the same opportunities for career growth and advancement within the company (SDG 5 “Gender Equality”),
- providing financial products tailored to the needs of low-income individuals and those living in remote areas and maintaining transparent fee structures for financial products and services (SDG 10 “Reduce Inequality”),
- prioritizing green procurement practices by sourcing products and services from environmentally responsible suppliers; integrating climate considerations into lending practices and supporting projects that are aligned with climate action and sustainability goals (SDG 13 “Climate Action”), and
- offering useful, regulated credit options to underserved people, limiting the scope for unregulated, unsafe lending (SDG 1 “No Poverty”).

To achieve this, we pledge to:

1. Proactively prioritize the needs and priorities of people and society at large, as this fosters process and product innovation, essential for a competitive, inclusive, and sustainable business model.
2. Encourage the active involvement of external and internal stakeholders to raise awareness and engage in constructive dialogues. This collaborative approach generates valuable solutions that effectively mitigate sustainability risks.



Through this policy, we commit to respecting Human Rights, especially those closely linked to our value chain. This process adheres to the guidelines outlined in the "UN Global Compact Guide for Business: how to develop a Human Rights Policy."

We will monitor the implementation of this policy through a dedicated due diligence process.

The Policy is subject to the approval of the Board of Directors and outlines the commitment and responsibilities of all individuals working within our Group, including all our Subsidiaries, concerning Human Rights, particularly those applicable to our business activities and corporate operations. Furthermore, it establishes the standards that our stakeholders must abide by.

1.1. International references

This policy supports the following fundamental values of International and European Law and applies their founding principles:

1. The International Bill of Human Rights of the United Nations (UN)
 - Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
2. The core conventions of the International Labor Organization (ILO) - n. 29, 87, 98, 100, 105, 111, 138, 182 - and the Declaration on Fundamental Principles and Rights at Work
3. The United Nations Convention on the Rights of the Child
4. ILO Conventions n. 107 and n. 169 on the Rights of Indigenous and Tribal Peoples
5. The European Convention on Human Rights

The latest versions of the following business standards and voluntary initiatives have also been taken into consideration:

1. The UN Global Compact principles
2. The Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises
3. The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy
4. The “UN Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework”.

1.2. Internal references

The following internal documents are linked to and support the principles set out in this policy:

1. Group Code of Conduct
2. Group Anti-Bribery and Corruption Policy
3. Group Conflict of Interest Policy
4. Group AML Policy
5. Group Personal Data Protection Policy
6. Group Employee Handbook
7. Group Remuneration Policy
8. Group Workplace Health and Safety Policy
9. Group Remote & Flexible Work Policy
10. Group Whistleblowing Policy
11. Whistleblowing Reports Investigation Procedure



A blue-tinted photograph of a modern office interior. Several people are working at desks with laptops. Some are standing and talking, while others are seated. The office has large windows and a glass partition in the foreground.

2. Principles

The following principles have been selected, taking into account their relevance to our business operations and relationships.

We pledge to uphold these principles in every country where we conduct our operations, respecting the diverse cultural, social, and economic characteristics that may vary from one nation to another.

When we refer to stakeholders, we encompass all parties directly or indirectly associated with the Group's business. This includes customers, employees at all levels, suppliers, contractors, partners, other companies, trade associations, the financial community, civil society, local communities, national and international institutions, the media, and organizations representing these groups.

Moreover, we expect our suppliers to meet not only the required quality standards but also adhere to best practices concerning Human Rights and working conditions. This encompasses aspects such as fair working hours, elimination of forced or child labor, respect for personal dignity, non-discrimination and inclusivity, freedom of association and collective bargaining rights, occupational health and safety, environmental responsibility, and data protection measures by design and by default.

Our commitment to these principles supports sustainable progress and aim to foster prosperity, inclusivity, and resilience for both our company and the communities in which we operate.

2.1. Employment practices

2.1.1 Rejection of forced or compulsory labor and child labor

We denounce any utilization of coerced or mandatory labor and any form of enslavement and human trafficking – as stipulated by the ILO Convention n. 29. Additionally, we refrain from seizing any money or identification documents to detain workers against their volition.

We hold special concern for the welfare of children and young employees, thus taking the utmost care to uphold their rights throughout all the operations linked to our value chain.

We oppose child labor. The minimum age of workers adheres to the prevailing laws in the country where activities are conducted, and it shall, under any circumstances, not fall below the minimum age established by ILO Convention n. 138.





2.1.2 Respect for diversity and non-discrimination

At our core, we follow the principles of diversity, inclusion, and equal treatment, firmly committed to upholding the right to dignified working conditions. Our goal is to foster a work environment where every individual is treated fairly and valued for their individual contributions.

We safeguard the physical and psychological well-being and individuality of each person, firmly opposing any form of discrimination related to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political beliefs, or any other aspect of individual diversity. We also stand against any behavior that undermines an individual's convictions or preferences, actively promoting freedom of expression.

Within our organization, we have a zero-tolerance policy for any form of harassment, be it physical, verbal, visual, sexual, or psychological. We strive to maintain a workplace that is respectful, supportive, and safe, shunning any atmosphere that could be denigrating, hostile, humiliating, intimidating, or offensive.

We are committed to providing innovative and inclusive services for all our customers. We value open communication with our customers and consumer associations, embracing suggestions and addressing complaints promptly and effectively. Our commitment to inclusivity means that we take into account the needs of all our customers. We offer multiple communication channels, such as call center services and dedicated email addresses, to ensure accessibility and responsiveness.

2.1.3 Freedom of association and collective bargaining

Freedom of association and collective bargaining are fundamental principles we actively safeguard and uphold for the people working with us.

We fully support and protect the right of our employees to join or form organizations that advocate for and promote their interests. We recognize and respect their right to be represented by unions or other forms of representation within their respective working units. The election process for such representation aligns with the applicable legislation and practices in the countries where they work.

Our commitment to ensuring freedom of association and collective bargaining empowers our employees, fosters a collaborative work environment, and bolsters the rights of all workers within our organization.

2.1.4 Health, Safety, and Well-being

We value the health, safety, and overall well-being of every individual. This cherished asset deserves protection not only in the workplace but also during their time at home and leisure activities.

The Group is committed to fostering a strong culture of health, safety, and well-being. Our objective is to create workplaces that are entirely free from health and safety hazards while encouraging behaviors that promote work-life balance.

In this pursuit, we actively engage in promoting personal and organizational well-being, recognizing that it is a catalyst for enhancing engagement and unlocking the innovative potential of our workforce.

To achieve these goals, we strive to increase awareness of risks and cultivate responsible behaviors among all employees. This endeavor extends to our suppliers and contractors, as they play an integral role in our development and awareness programs. Each individual must feel a sense of personal responsibility for their health, safety, and the well-being of others.

We integrate health and safety considerations into our processes and training activities. Selection and management of suppliers and contractors form a crucial aspect of our approach. We prioritize sharing knowledge and consistently benchmark our practices to drive continuous improvement.

2.1.5 Good Working Conditions

We commit to providing every person working with us, throughout the entire value chain, with working conditions that uphold their health, safety, well-being, and dignity. This includes ensuring appropriate limits on maximum working hours, providing sufficient daily and weekly rest periods, and granting an annual period of paid leave.

The remuneration of our workforce is based on principles of fair reward, and we commit to pay equality between men and women who perform the same job (ILO Convention n. 100). Moreover, we ensure that the minimum compensation for our employees never falls below the minimum living wage stipulated in collective labor contracts and the prevailing regulations of each country, in alignment with the ILO Conventions.

We strongly believe in the value of professional orientation and training for the development of our people and their skills. Our approach involves enhancing existing potential through reskilling and upskilling programs. These initiatives facilitate a just transition, providing our workforce with the tools and knowledge necessary to thrive in a rapidly evolving landscape.



2.2. Communities and society

2.2.1 Respecting the Rights of Communities



We acknowledge that our operations can directly or indirectly impact the communities in which we operate. Therefore, responsible community relations form a fundamental aspect of our strategy.

We recognize the intrinsic link between individual well-being, social and economic development, and the overall welfare of communities. With this understanding, we commit to carry out our capital expenditure sustainably. Furthermore, we actively promote cultural, social, and economic initiatives that benefit the local and national communities involved. Our aim is to foster social inclusion by focusing on education and awareness.

Additionally, we are committed to ensuring that our products and services are designed to be inclusive and accessible for all.

We strive to establish and maintain strong, positive relationships with the communities we serve, contributing to their development, prosperity, and overall well-being.

We hold ourselves accountable for collaborating exclusively with suppliers, contractors, and partners who share our dedication to upholding Human Rights and making positive contributions to the social and economic development of the communities where we operate.

2.2.2 Integrity: Zero tolerance of corruption

We reject corruption in all its forms, as we understand its detrimental impact on institutions, democracy, ethical values, justice, and societal well-being and development.

To combat corruption, we commit through our zero-tolerance approach to bribery and corruption, which constitutes one of the cornerstones of our anti-bribery management system. This comprehensive plan helps us implement rigorous measures to prevent, detect, and address any instances of corruption, ensuring the highest standards of ethical conduct and governance in all aspects of our operations.

By upholding integrity and maintaining a zero-tolerance stance toward corruption, we aim to build trust and credibility in our organization, foster a fair and just society, and contribute to the overall well-being and sustainable development of the communities we serve.



2.2.3 Privacy

We place a strong emphasis on respecting the confidentiality and right to privacy of all our stakeholders, including employees, customers, and other individuals connected to our organization. Proper and ethical use of information and data is of utmost importance to us.

As we navigate the challenges brought on by digitalization and market globalization, data protection and processing remain a priority. We commit to processing personal data in full compliance with the fundamental rights of data subjects, adhering to the principles recognized in law, including the right to privacy, protection of personal data, freedom of thought, expression, and information, among others.

To ensure the required level of privacy and data protection, we have incorporated data protection by design and default into our digitalization processes. This means that privacy considerations are integrated into every aspect of our business processes, and data processing is limited to only what is strictly necessary and for the necessary duration. Risk analysis and the protection of sensitive data form essential components of our data handling practices.

Our commitment to privacy extends to adopting international standards and adhering to the guidance provided by our Group and subsidiary Data Protection Officers (DPO). We develop our data processing and storage practices in alignment with our policies and any relevant European and national regulations.

Furthermore, we take measures to monitor third-party companies that might have access to customers' personal data. Contracts with these partners include specific clauses to ensure compliance with data protection principles and safeguard customer information.



2.2.4 Communications

For our customers, we have stringent requirements for contracts and communications. They must:

1. Be clear and straightforward, using language that closely aligns with the understanding of the intended audience.
2. Comply with all relevant applicable legislation, refraining from any evasive or improper practices.
3. Provide comprehensive information without omitting any relevant details that may influence the customer's decision-making process.
4. Be made available on our websites for easy access and reference.
5. Be designed to be accessible, taking into consideration the needs of people with disabilities.

We aim to foster open and transparent communication with our customers, ensuring they have access to information that is easy to comprehend and relevant to their needs. We prioritize inclusivity and clarity, as we recognize the importance of providing fair and respectful communication to all individuals we serve.



3. Implementation and Monitoring

Our commitment to the principles outlined here is implemented and monitored through a robust due diligence process. This process includes a thorough risk assessment and gap analysis to identify potential areas of concern. Based on this assessment, we evaluate the residual risk and determine necessary improvement actions.

To ensure the protection of Human Rights within our supply chain, we introduced a robust vendor risk assessment process that serves to identify the main risks to which the Group is exposed due to cooperation with vendors and outline principles on how to assess and control these risks.

The responsibility for overseeing our stance on Human Rights lies with the Group Compliance Department. This unit is tasked with guiding and overseeing the integration of the Policy on Human Rights into our business processes and ensuring proper execution of due diligence activities.

At a local level, the implementation of the Policy on Human Rights is overseen by subsidiary's compliance officers or assigned local lawyers. These functions are dedicated to ensuring the proper implementation of Human Rights principles in their respective regions, fostering a culture of respect and responsibility across our operations.



4. Stakeholders' grievances

It is crucial to the Group's sustainability and integrity that any illegal behaviour or any other type of misconduct related to Human Rights is reported as soon as possible. Reporters are encouraged to report immediately misconduct that could cause any type of harm (e.g. economic, environmental, safety or reputational) to the Group's employees, customers, shareholders, co-operation partners and, more generally, the community.



Both internal and external stakeholders who believe a violation of the Policy or respective Human Rights regulations may have occurred, may report their concerns through different channels, including reporting it to the direct manager, Group Heads, in particular, to Internal Audit Executive or Head of Group Compliance Department or using the confidential and anonymous Group [Whistleblowing Channel](#).

When a report is received, it is processed according to the Group Whistleblowing Policy and Whistleblowing Reports Investigation Procedure. The established framework ensures consistent treatment of reports at the local and Group level, in adherence to the Group's policies, local regulations and best practices.

In cases where a violation of the principles outlined in this Policy is confirmed, the appropriate procedures are applied according to the Group Whistleblowing Policy.

The identity of the reporter is confidential and can be disclosed only on a strictly necessary basis to persons assigned to receive and follow up on the report. All reports are treated in a confidential manner, to the extent possible.

The Group prohibits retaliation or any other negative actions against a person who reports the misconduct, whenever they make a report or provide information internally or externally.

We expect that our business partners adopt the same approach with regards to grievance mechanism and protection of reporters, and to cascade it in their value chain.



5. Governance

The responsibility and accountability for the management of Human Rights issues extends across the Group and is supported by our engagement in the UN Global Compact, an international initiative that is intended to support Human Rights. We do not follow customs of any kind that would constitute a breach of our Code of Conduct and this Policy.

At the executive management level, the Group Risk Committee reviews progress on the Policy implementation and mitigation actions for any identified Human Rights risks. The Group Compliance Department identifies current and emerging Human Rights risks, advise on key product, and corporate decisions and their impact on Human Rights, plan and coordinate the implementation of the due diligence process in collaboration with other relevant functions, and produce an annual report within the Group's Communication on Progress report, detailing the Group's performance concerning the commitments outlined in the Human Rights Policy.



Finally, business functions and local operations are responsible for implementing actions to help meet the commitments outlined in this policy and other relevant Group requirements.

A photograph of a man and a woman in an office environment. The man, on the right, is wearing glasses and a denim jacket, smiling broadly and high-fiving the woman. The woman, on the left, is seen from the side, her hand raised to meet his. The background shows office shelves and desks, all under a blue overlay.

6. Communication, training and assistance

6.1 Awareness and training

To promote awareness and understanding of the Human Rights Policy, it will be circulated among both internal and external stakeholders through targeted communication initiatives. In addition, the Group will conduct training to ensure that all employees comprehend and adhere to the principles outlined in the Policy. These efforts aim to foster a company-wide commitment to respecting and upholding Human Rights across all aspects of our operations.

6.2 Assistance

All inquiries about this Policy should be directed to the Head of Group Compliance Department.

