	No.	Approved by	Effective as of	Document Title	Owner	Classification
	IRD/2020/36	Supervisory Board	12.12.2020	GR-A-HEALTH AND SAFETY POLICY-v.1.0	Head of Group Administration	Internal

Approved by the Supervisory Board
Minutes No SBM/2020/17 of 23 December 2020
(intermeeting decision from 9 December 2020)

Approved by the Board
Minutes No. BMM/2020/72as of 9 December 2020

Agreed with the Executive Committee
Minutes No EMM/2020/47 of 8 December 2020

GR-A-HEALTH AND SAFETY POLICY-v.1.0

Policy Summary & (dos and don'ts)

The Group entrusts all Subsidiaries to develop local workplace health and safety policies to preserve the best possible work conditions for Group's employees. The Group and its Subsidiaries must follow local legislation, legal standards and create a hazard-free workplace for its employees.


Dos:

- Promote a safe and healthy working environment by formulating a local policy.
- Keep up to date on changes and try to promote health & safety actively.
- Consider two aspects when setting up a local policy - preventative action and emergency management.
- Train and inform employees on the measures taken to secure safety and health at workplace.

Don'ts:

- Ignore local legislative requirements for the health & safety.
- Forget to train/inform employees on safety measures.

This summary does not replace reading and understanding the Policy in full.

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1. Purpose

The Group aims to preserve the best possible work conditions for its employees. Every employee has a right to feel safe at work. The Group is committed to follow legal standards and create a hazard-free workplace. The Group's workplace safety is anticipating, recognizing, evaluating, and controlling health hazards at the workplace with a goal to protect employee health and wellbeing and safeguard the community at large. The Group supplies a safe and healthy working environment in all workplaces and responds appropriately to prevent accidents, work-related health harm and to reduce occupational risk factors. The Group shall protect employees from sickness, disease and injury arising from their employment.


2. Scope

This Policy applies to the entire Group globally. This Policy is binding to all direct and indirect subsidiaries of the Group.

3. General Principles

All Subsidiaries must develop local workplace health and safety policies to preserve the best possible work conditions for its employees. Subsidiaries shall focus on four areas in which actions can be taken in a safe and healthy workplace. These include:

- physical environment.
- psychosocial environment.
- personal health resources.
- enterprise community involvement.

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There are two aspects to consider when setting up a local Workplace Health and Safety policy:

3.1. Preventative action


- 3.1.1. Preventative action is any action taken to avoid injuries or illness related to workplace conditions.
- 3.1.2. Periodical risk assessments and job hazard analysis must be conducted to discover what is likely to harm employees and set up preventive measures accordingly.
- 3.1.3. Potential threats and dangerous situations include but are not limited to - using dangerous equipment; slippery or uneven surfaces; electrical infrastructure; noise/temperature; quality of air, etc.
- 3.1.4. In compliance with local laws and regulations hold regular employee training sessions in health & safety standards and procedures. Also enforce a substance abuse policy to protect employees from colleagues' misconduct.

3.2. Emergency Management

- 3.2.1. Emergency management refers to the Group plan to deal with sudden catastrophes like fire, flood, earthquake, or explosion. These depend on human errors or natural forces.
- 3.2.2. The emergency management involves the following provisions but are not limited to - functional smoke alarms and sprinklers that are regularly inspected; technicians (external or internal) available to repair leakages, damages, and blackouts quickly; fire extinguishers, other fire protection equipment, evacuation plans that are easily accessible; fire escapes and safety exits that are clearly shown and safe; fully stocked first-aid kits at convenient locations.
- 3.2.3. In compliance with local laws and regulations, hold regular employee training sessions in health & safety standards and procedures on emergency management, schedule fire drills and emergency evacuations periodically. Monitor the performance of health and safety procedures and revise them to ensure a higher level of protection.

3.3. Other measures

- 3.3.1. Where need Subsidiary will consult experts or insurance representatives to ensure it follows local and international standards.

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4. Roles and Responsibilities

4.1. Subsidiary's Responsibilities

- 4.1.1. A Subsidiary shall promote a safe and healthy working environment by formulating a local policy. Local policies shall be prepared considering national laws and regulations, conditions, and practice. Where needed or required, the policies should be prepared in consultation with local workplace health and safety authorities to develop a preventive safety and health culture that includes information, consultation, and training.
- 4.1.2. Subsidiaries shall keep up to date on changes and try to promote health & safety actively, by updating Policy according to changes in local workplace health and safety legislation.
- 4.1.3. A Subsidiary shall ensure that the workplace is safe and without risk to the employee's health by developing and implementing necessary policies and standards.
- 4.1.4. A Subsidiary shall analyse past incidents to discover what went wrong and set up clear procedures for accident reporting.
- 4.1.5. A Subsidiary shall ensure adequate supervision of work and take all measures to eliminate excessive mental and physical fatigue. Employers also must ensure that work organization, hours of work and rest breaks, does not have a negative impact on an employee's health.
- 4.1.6. Regular employee training sessions in local health & safety standards and procedures must be held by responsible/delegated Subsidiary representatives.

4.2. Employee's Rights and Responsibilities


- 4.2.1. Employees while performing their work must cooperate with the Employer to meet obligations placed on him. Employees must be trained to maintain workplace safety and be informed by the Employer about measures taken to secure safety and health at workplace.
- 4.2.2. Employees should follow health and safety instructions and will be held accountable when they do not. Employer will take disciplinary action under local law when employees disregard health and safety rules.
- 4.2.3. It is everyone's responsibility to contribute to a healthy and safe workplace.

5. Controls

Managers responsible for the respective area regulated by this Document must design, implement, and perform periodical and ad-hoc controls to monitor the compliance of the Subsidiary with the provisions and requirements set in this Document.

6. Awareness

All Subsidiary Managers are notified on the approval of the Group Workplace Health and Safety Policy, who is then responsible for developing and implementation of the local policies on Workplace health and safety.

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7. Final Provision, Binding Documents, Appendices

7.1. The history of the Document:

- 7.1.1. This is first version of the Document and it becomes effective on the 3rd day after approval by the Supervisory Board.
- 7.1.2. All Subsidiary managers are informed about the approval of this Policy who are then responsible for introducing their Personnel with the Document.

8. Terms, Abbreviations and Definitions

Holding company	4finance Group S.A., a Luxembourg public limited liability company (“societe anonyme”) having its registered seat at 8-10 Avenue de la Gare, L-1610 Luxembourg, Grand Duchy of Luxembourg and registered with the Luxembourg Trade and Companies Register under number B 195.643
Supervisory Board	A Supervisory body of the Holding Company
Management Board	The Board of Directors of the Holding company
Executive Committee	Advisory body to the Board
Group	Holding company and its direct and indirect subsidiaries
Subsidiary	Company in which the Holding company owns or controls, either directly or indirectly, more than 50% of voting stock. Employer.
Subsidiary Manager	Executive body of the Subsidiary (board of directors, management board, general director or equivalent)
Employer	Legal entity which operates as Group representative and has concluded employment agreement with Employee
Employee	All Group resources globally, including but not limited to: employees having an employment contract with the Group or its Subsidiary, temporary and seconded employees; any director, manager or other authorised representative, Subsidiary Manager, and; contractors, consultants, and any other person performing contract work for Group, including employment agency staff and self-employed persons and trainees
Policy (Document)	This Group Workplace Health and Safety Policy

9. Approvals

Name / Position	Electronic approval
Paulina Wilmańska, Senior Compliance Manager	Approves 01.11.2020
Daiga Ērgle, Chief People Officer	Approved 27.11.2020
Inita Hāne, Chief Audit Executive	Approved 30.11.2020
Agita Ziedone, Head of Group Administration	Approved 24.11.2020
Rūta Staudža, Administrative process specialist	Approved 24.11.2020