

# ID FINANCE

## ANTI BRIBERY AND CORRUPTION POLICY

### ID FINANCE GROUP

(ID Finance Investments, S.L., ID Finance Spain, S.A.U., ID Finance Plazo, S.L.U., Plazo Credit, S.L.U.)

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V. 3.0	4. Applicable legislation 7.2. Training and awareness-raising. 7.3. Segregation of duties. 7.4. Procurement of suppliers 7.5. Limitation of cash payments 7.6.3. Influence peddling and facilitation payments 7.6.4. Donations, sponsorships and other non-for-profit contributions. 7.6.5. Periodic review of controls to prevent fraud and corruption 11. Investigation of fraud or corruption 12. Fraud or corruption reporting 14. Updating, improving and publishing	Compliance Dept.	Management body	09/2022
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## 1. INTRODUCTION

Bribery and corruption is one of the most damaging phenomena for worldwide organisations. Business and professional relationships with both private and public entities must be guided by transparency, commitment and legality, ensuring free and fair competition.

These principles are reflected in the **ID FINANCE Group**, including **ID Finance Investments, S.L.**, **ID Finance Spain, S.A.U.**, **ID Finance Plazo, S.L.U.**, and **Plazo Credit, S.L.U.** (hereinafter ID FINANCE), being one of the aspects included in our Code of Ethics.

The objective of this Anti-Corruption and Fraud Prevention Policy (the "Policy") is to create an environment where the risks of fraud and corruption are minimised in order to avoid losses arising from them.

The consequences of fraud and corruption are not only financial, but can affect:

- The reputation of the company
- Investor confidence
- Motivation of professionals

The ID FINANCE Group has a zero-tolerance philosophy towards fraud and corruption, which is why it takes the necessary measures to combat it.

## 2. FINALIDAD Y ÁMBITO DE APLICACIÓN

### 2.1 OBJECT AND PURPOSE

The ID FINANCE Group is committed to the principles of honesty and integrity in the conduct of our business, being guided by transparency and commitment to legality.

Corruption is considered to be one of the greatest obstacles to economic and social development, having a major impact on public opinion and causing market distortions such as disincentives to investment and job losses.

The ID FINANCE Group, in line with the ethical principles expressed in the Code of Ethics, promotes through this policy and the rest of its internal regulations a commitment to responsible management and the establishment of behavioural guidelines that guarantee that our activity complies with current legislation and with the principles of honesty and integrity previously expressed.

The policy, therefore, aims to:

- Develop and reaffirm the basic values and principles of the ID FINANCE Group.
- Describe conduct which may be susceptible to corrupt conduct and which is therefore prohibited by national and international regulations for subsequent prevention and detection.
- To protect the ID FINANCE Group and its members from situations that could be considered corrupt practices and, therefore, to avoid sanctions or situations that could affect reputational risk, by describing general guidelines for action that promote ethical and appropriate behaviour when making correct decisions and that allow the communication of

irregularities and non-compliance with the subsequent assignment of the corresponding responsibility.

## 2.2 SCOPE OF APPLICATION AND ENFORCEMENT

The approval of this Anti-Corruption Policy by the Management Body of the ID FINANCE Group and its communication to the rest of the entities is a further step in the faithful and determined commitment of our organisation to comply with the laws and regulations in force at all times and the ethical principles (defence of zero tolerance towards corruption, among others) established in the Code of Ethics of the ID FINANCE Group.

This policy has been developed within the framework of the Anti-Corruption System implemented in the ID FINANCE Group, as a means of guaranteeing free and fair competition, as well as transparency, commitment and legality in commercial and professional relations with both public and private entities.

This policy must therefore be applicable to the ID FINANCE Group and to all its employees, managers, business partners and functional areas. In any Companies of the Group resident in other countries, insofar as it is possible, the implementation of an Anti-corruption and Anti-bribery Policy shall be promoted in accordance with this Policy.

Failure to comply with the provisions of this Policy on the part of the Subject Persons may lead to the exercise of disciplinary powers by the internal bodies authorised to apply it.

Likewise, the ID FINANCE Group will encourage the main groups with which the entities of which it is composed (partners, customers, suppliers, external collaborators, etc.) (the "Associated Persons") to adopt conduct in accordance with this Policy and to observe the provisions of the same.

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Contracts, agreements, arrangements, etc. with any clients of the ID FINANCE Group, as well as with its partners, suppliers and other collaborators will include clauses of acceptance of the Code of Ethics and of the present Policy.

Knowledge of express breaches of any of the provisions of this Policy by Associated Persons shall result in the termination of existing contractual relations.

## 3. GUIDING PRINCIPLES AND RULES FOR ITS ACTIVITIES

### 3.1. Guiding principles for the activity

#### 3.1.1. Principle of due diligence

Any relationships between staff of the ID FINANCE Group and third parties must be in line with the values of the ID FINANCE Group, and observe the applicable regulations and internal ethical standards.

As a result, these principles shall be applicable to staff recruitment processes, ensuring that the technical qualifications and previous experience are duly documented, as well as to hiring processes for goods or services with third parties. It must be guaranteed that an appropriate knowledge, acceptance and monitoring procedure is carried out for customers, and that measures are taken to ensure legal and upright behaviour on the market, while observing any legislation in force which is applicable to the aforementioned at all times, as well as any internal rules that are laid down.



### 3.1.2. Principle of Good faith

All relations between ID FINANCE Group staff and third parties will be governed by the principle of good faith, in the full conviction that good business performance leads to the highest prestige of our entity in the market.

In the same way, we expect the same behaviour from third parties with whom we have dealings, who must assume equivalent ethical standards.

### 3.1.3. Principle of respect for legality

One of the fundamental pillars of the ID FINANCE Group is the respect for the legality in force in our activity. We believe it is necessary for our employees to know the applicable legislation to avoid situations of unconscious or even deliberate ignorance, under the idea that any activity outside the legal precepts is harmful to the Company, regardless of the possible economic profit that may be generated as a result, informing the hierarchical superior through the communication channels provided for this purpose, in any situation of doubt or non-compliance with the legislation or internal regulations.

### 3.1.4. Principle of confidentiality

The information generated in the performance of our activity is of great economic and productive value, as it is a know-how that will allow us to develop our activity in a more efficient way.

Therefore, in all our processes, we must guarantee that this information is only disclosed to those with the necessary credentials, avoiding leaks that could harm us as a Company and hinder the performance of our activity.

## 3.1.5. Principle of respect for corporate image

The ID FINANCE Group considers its corporate image and reputation as one of the most valuable assets to preserve the trust of its clients, people in the organisation, authorities and society in general.

Employees must preserve the image and reputation of the entity in all their actions and professional relations, ensuring that the image and reputation are respected and used correctly, avoiding any unethical practice to obtain a benefit for the organisation or for the employee, as well as any corrupt practice.

The ID FINANCE Group applies the principles of good governance and rejects any corrupt practice, declaring itself against influencing the will of people outside the entity to obtain any benefit through unethical practices, not allowing other people or entities to use these practices with their staff.

Therefore, staff may not accept or send gifts or rewards of any kind outside normal social or courtesy customs, and may not influence or be influenced by third parties in an improper or unethical manner in business, professional or administrative relations, whether with public or private entities.

In case of any doubt or observation of corruption or bribery, ID FINANCE Group staff must inform the entity through their line manager or through the channels set up for this purpose.

## 4. APPLICABLE LEGISLATION

The main national and international legal reference on anti-corruption is as follows:

- Law 19/2013, of 9 December, on transparency, access to public information and good governance.

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- Law 10/2010 of 28 April 2010 on the prevention of money laundering and terrorist financing, implemented by Royal Decree 304/2014 of 5 May 2014.
- Law 12/2003, of 21 May, on blocking the financing of terrorism.
- Organic Law 10/1995 of 23 November 1995 on the Criminal Code.
- USA Patriot Act - Title III.
- US Foreign Corrupt Practices Act of 1977.
- UK Bribery Act 2010.
- UNE - ISO 37001 Anti-Bribery Management Systems.
- UNE 19601 Criminal Compliance Management Systems.
- ISO 37301 Compliance Management Systems

## 5. DEFINITIONS

In order to facilitate the understanding of the Policy, the following definitions are included below, without prejudice to the provisions of current legislation, in particular the Criminal Code:

### **Business Corruption: Private-to-Private Corruption**

An act by which a private individual, by himself or through an intermediary, promises, offers or grants to directors, administrators, employees or collaborators of a commercial enterprise or a company, an unjustified benefit or advantage of any nature, for them or for third parties, as consideration for unduly favouring him or a third party over others in the acquisition or sale of goods, contracting of services or in commercial relations.

Corruption between private individuals is also understood to be the act by which the manager, administrator, employee or collaborator of a commercial enterprise or a company, by himself or through an interposed person, receives, requests or

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accepts an unjustified benefit or advantage of any nature, or an offer or promise to obtain it, for himself or for a third party, as consideration for unduly favouring another in the acquisition or sale of goods, or in the contracting of services or in commercial relations.

## **Corruption in business: Corruption in international business transactions**

Offering, promising or granting any undue, pecuniary or any other kind of benefit in order to corrupt or try to corrupt, either by themselves or by means of a third party, any public authority or civil servant, for the benefit of the aforementioned or of a third party, or for their requests to be dealt with on this matter, in order for them to act or to refrain from acting in relation to the exercise of public duties so as to obtain or maintain a contract, business or any other competitive advantage when carrying out international economic activities.

## **Bribery: Corruption of a public official**

Action by which an authority, civil servant or person involved in exercising public duties, for their own benefit or for that of a third party, receives or requests, either themselves or by means of a third party, a gift, favour or payment, or accepts an offer or promise to carry out an action contrary to the duties inherent in their position or an action suitable for their position, or to not carry out or delay something that they must do. As well as any persons who have been assigned and who are carrying out a public service task that consists of managing, in Member States or in third countries, financial interests of the European Union or of taking decisions concerning those interests.

## **Suborn**

An act that is carried out on an individual, either through the giving of a sum of money, a gift, or a handout of any kind, in order to obtain from that person some kind of consideration or favourable treatment that, had it not been for the initial gift, would not have been obtained.

## **Extortion**

An act by which a person, for profit, forces another, with violence or intimidation, to carry out or omit to carry out a legal act or business to the detriment of his or her assets or those of a third party.

## **Authority or public official**

Any employee in public employment who is a member of the civil service.

## **Facilitation payments**

Small payments or gifts made to a person, whether a public official or an employee of a private company, to obtain a favour, such as speeding up an administrative procedure, obtaining a permit, licence or service, or avoiding an abuse of power.

## **Gifts**

Gift, compensation, benefit, advantage, favour, discount, service not available to the general public, reimbursement of expenses, travel, holiday, offer of employment to the recipient or family members, cancellation of debts, gratuitous disposition or any other physical present or pecuniary gift.

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## **Promotional gift**

A courtesy or attention detail that is customary in business in accordance with the different legal regulations applicable.

## **Influence peddling**

Influencing a public official or authority, taking advantage of any situation arising from his personal relationship with that official or with another public official or authority, in order to obtain a decision that may directly or indirectly generate a financial benefit for himself or for a third party.

## **Fraud**

Deliberate abuse of the procedures, systems, goods, products and/or services of the entities that make up the ID FINANCE Group by those with intent to deceive in order to unlawfully benefit themselves or others.

## **6. PROHIBITED CONDUCTS**

- Under no circumstances will we, in order to improperly obtain a contract, offer, receive, accept or solicit any unjustified benefit, payment or advantage of any nature whatsoever to improperly obtain a contract, sale of goods or favour of any kind.
- Under no circumstances shall we seek from any public official or authority, national or international, to act unlawfully in favour of the ID FINANCE Group or against a third party by offering money, gifts of any kind.
- It is forbidden for us to obtain an advantageous agreement or preferential treatment from the administration or public employees by offering and/or

promising, either directly or through intermediaries, personal or financial favours (money, loans, monetary advantages...).

- We do not in any way influence an authority or public official by taking advantage of a personal relationship with them or with another public official in order to obtain a decision that could directly or indirectly generate a financial benefit for the ID FINANCE Group.
- Once we are aware of the criminal origin of the assets, we are prohibited from acquiring, possessing, using or transferring them.
- It is forbidden to carry out any type of activity that could be considered a violation of antitrust laws, such as holding meetings, or holding conversations, with the aim of agreeing, with other companies in its sector, systems of control and operation of the market in which it operates.

We are prohibited from participating in sectoral talks or meetings, which aim to reach agreements on:

- I. Fixing, directly or indirectly, prices or other commercial or service conditions.
- II. Limiting or controlling production, distribution, technical development or investment.
- III. The sharing of markets or sources of supply.
- IV. The application, in commercial or service relations, of dissimilar conditions for equivalent services which place certain competitors at a disadvantage compared with others.
- V. Making the conclusion of contracts subject to the acceptance of additional services which, by their nature or according to commercial usage, have no connection with the purpose of such contracts.

## 7. STANDARDS OF CONDUCT

### 7.1. Main controls for the prevention of fraud and corruption

The ID FINANCE Group has defined a number of actions/controls in order to minimise the opportunity to commit fraud, as well as to ensure early detection of a fraudulent act. Some of these controls that enable the prevention, mitigation, deterrence or detection of fraud and corruption are detailed below:

- Identification of any person with whom business relations are established prior to the commencement of the relationship. Verification of documentation.
- Training and awareness-raising of the Group's professionals, explaining what fraud and corruption are, what the most common practices are, and how to act in the event of any indication or suspicion of fraud, corruption or illicit action.
- Segregation of functions, reducing the possibility that the same person can carry out all the activities of the same process. Existence of authorisation/approval circuits for certain operations.
- Access to IT systems or operations: limiting the permissions assigned to different professionals with specific assignments to certain applications and functions.
- Existence of global policies and procedures for the Group and for each of its constituent entities or even for each of its Areas or Departments.
- Existence of a supplier approval process in order to avoid contracting third parties that are involved in an investigation or criminal proceedings for corruption and/or fraud offences.
- Non-acceptance of cash payments. Some of these controls are explained in more detail below.



## 7.2. Training and awareness-raising

The ID FINANCE Group shall develop and implement training plans on corruption and fraud prevention.

The training provided shall have the following objectives:

- Raise awareness and sensitise staff to the ID FINANCE Group's zero-tolerance stance on corruption and fraud.
- Ensure that all employees are aware of the procedures for the prevention of fraud and corruption, as well as the actions to be taken upon detection of possible cases of fraud or corruption.
- Warn of the consequences of non-compliance for both the ID FINANCE Group and its employees.
- Ensure continuous training appropriate to the responsibilities of each person involved.

## 7.3. Segregation of duties

The functions of each of the business areas/units are duly defined, as well as the specific access permissions to the computer applications.

## 7.4. Procurement of suppliers

The contracting of suppliers must be subject to an approval process, in which the following actions are carried out:

- Validation of technical requirements by the business area proposing the contracting of the supplier.

- Validation by the Compliance area.
- Validation by the Legal area.
- Validation of the information provided by the supplier by each of the contracting areas.

## 7.5. Limitation of cash payments

Cash payments will not be accepted under any circumstances.

## 7.6. Additional actions for the prevention of fraud and corruption

### 7.6.1. Policy on gifts, travel and hospitality expenses.

In the course of our business, we may encounter situations in which third parties offer us gifts or invitations to events and functions, from which travel, accommodation or representation expenses may arise.

In order to avoid potential conflicts of interest and to ensure that our relationship with third parties complies with the law and the ID FINANCE Group's principles, it is prohibited to accept, promise, give or authorise any gift or expense for the purpose of facilitating business transactions or business opportunities.

It is also forbidden to accept or give any gift or gift to authorities or public officials, as well as any gift that is not in accordance with social or industry practice, as well as gifts from companies involved in supplier tendering processes.

Therefore, the criteria to be followed in accepting gifts are as follows:

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- The gift must be voluntary, with no intention of obtaining any advantage beyond due courtesy, without influencing the business decision to be taken by the acceptor.
- Benefiting from discounts or any other advantageous conditions on private purchases made from suppliers or other business partners of the ID FINANCE Group, which do not involve consideration.
- Gifts or hospitality should be occasional, weighted according to custom and proportionality, rejecting gifts that are excessive in amount or value as social or courtesy hospitality. For guidance purposes, any single gift or set of gifts received that may have an amount or value of more than 200 euros will not be accepted.

Normality will be provided by the fact that these are institutional gifts or by their obvious suitability for business purposes, managed through the corresponding area of the ID FINANCE Group.

The ID FINANCE Group does not participate in lobby groups that have a relationship with political parties or similar or related institutions, except in cases where it considers that its activity does not constitute an act of corruption or financing of political parties, and is in accordance with internal regulations.

Travel and hospitality expenses shall be understood to be those arising from the invitation to acts or events of third parties. In this respect these expenses will be paid by the ID FINANCE Group in accordance with the processes set out in the relevant internal rules.

The criteria governing these expenses are as follows:

- The total amount of expenses to be paid must follow a certain proportionality with the importance of the client and the amount of the

operation, thus avoiding excessive expenses, whereby this proportionality must be judged by the corresponding department.

- The activities must be related to the Company's activity, and expenses derived from other activities in a personal capacity are not acceptable.
- Attendance to events or acts shall always be from an institutional point of view, and therefore attendance shall be authorized by the pertinent Department.

The principles of action on which this section is based are set out in the "**Gifts and hospitality policy**". This policy adopts the values of the ID FINANCE Group Code of Ethics as the benchmarks that should guide the actions of all the Group's entities in the area of gifts and hospitality, based on the standards set out in ISO 37001.

## **7.6.2. Prohibition of bribery, extortion, and facilitation payments**

The ID FINANCE Group prohibits so-called facilitation payments, bribery and extortion.

Facilitation payments are payments intended to expedite processes or operations, or even practices or activities that can be qualified as bribery.

Bribery is understood as giving or offering, or requesting for oneself or for a third party, a good, service or advantage related to the regular or irregular performance of a public or, as the case may be, even private function, when this takes place outside of the legally established provisions.

By extortion we understand that activity by which another is forced, with violence or intimidation, to perform and omit an act to the detriment of his patrimony or that of a third party.

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### **7.6.3. Influence peddling and facilitation payments**

Any type of activity that may constitute influence peddling is prohibited. That is, any kind of influence over a public official for the purpose of taking advantage of the exercise of the powers of his or her office or of any other situation arising from a prior personal (kinship, friendship, mutual business, etc.) or hierarchical relationship with that particular official or with another official. Likewise, "facilitation payments", in whatever form or modality they may take, consisting of offering, promising, authorising or delivering, directly or indirectly, monetary incentives, commissions, retributions or things of value to public officials and servants or to employees and managers of private entities for the purpose of expediting judicial or administrative procedures, or of any other nature, are also prohibited. In accordance with the provisions of this Policy, it is strictly prohibited to offer, give or accept gifts, presents or hospitality to public officials. Any action suspected of constituting any of the conduct described above must be reported through the channels established in section 10 of this Policy.

### **7.6.4. Donations, sponsorships and other non-profit contributions**

The ID FINANCE Group, in its active commitment to social responsibility, reserves the right to approve donations, grants, sponsorships, collaborations with charitable organisations and other similar contributions. In addition, the entities that make up the ID FINANCE Group may only make donations or sponsor entities whose track record is recognised and whose experience in carrying out the social action that is the object of the contribution can be accredited. It is forbidden to make donations and enter into collaboration or sponsorship agreements with foundations or non-profit organisations controlled, directly or indirectly, by politicians or public officials (or persons related to them such as relatives, friends, partners, etc.) who are involved in any way in operations carried out, or to be carried out, by the ID FINANCE Group. This prohibition shall not be understood in

the sense of preventing the carrying out of works of public or social utility within the framework of collaboration agreements signed with public administrations.

## **7.6.5. Periodic review of controls to prevent fraud and corruption**

The design and effectiveness of the controls that mitigate the risks of fraud and corruption are evaluated periodically, with each of the Units/Areas (1st line of defence) being responsible for identifying the critical risks, as well as the application of the controls. In turn, the Regulatory Compliance department will review the existence, correct design and sufficiency of the controls. In addition, the Audit Plan includes fraud and corruption prevention audits.

## **8. CONFLICT OF INTEREST**

A conflict of interest shall be deemed to exist in all situations in which the legitimate interests of the Group directly or indirectly collide with the actions or interests of the persons bound by the Code of Ethics and Conduct, causing the latter to act:

- I. Engage in activities that directly or indirectly compete with the interests of the ID FINANCE Group.
- II. Make decisions that have been influenced by financial interests or personal, family or friendship interests.

### **8.1. Non-competition with the company**

We employees do not compete with ID FINANCE or take personal advantage of business opportunities that may be presented to them during the course of their employment.

Accordingly, unless expressly authorised by the Governing Body or, where applicable, the Executive Committee, we may not:

- I. Hold, directly or indirectly, shares or participations in direct competitors of the ID FINANCE Group<sup>1</sup>.
- II. Holding positions or functions, either directly or indirectly, in direct competitors of the ID FINANCE Group.
- III. Having related persons holding direct or indirect shareholdings in the capital of a company considered to be a direct competitor of ID FINANCE.

In this case, the following shall be considered to be persons related to the obligated subject:

- The spouse or persons with an analogous relationship of affectivity (de facto or de jure partners).
- Ascendants, descendants and siblings.
- Relatives with whom a relationship of affinity of first and second degree is maintained, whether in the vertical or collateral line.

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<sup>1</sup> To this end, direct competitor companies of the ID FINANCE Group are considered to be any belonging to the financial technology industry and others related to the provision of financial services, with the exception of any that are quoted on secondary markets (Stock Exchange), despite engaging in the same activity.

DEGREES OF CONSANGUINITY AND AFFINITY				
First grade	Parents	Parents-in-law	Sons	Son-in-law/daughter-in-law
Second grade	Grandparents	Siblings	Brothers-in-law	Grandsons

- Likewise, any other member of the family who lives with the obligor or who, in any other way, is financially dependent on the obligor shall be considered to be a related person.

- IV. To carry out, on one’s own account or on behalf of others, the same or a complementary type of activity that constitutes the corporate purpose of the Group.

The ID FINANCE Group respects the participation of the obligors in other financial or business activities, provided that:

- I. The performance of such activities does not conflict with the provisions of the Code of Ethics and Conduct and this policy, as well as with the obligations arising from the employment contract or collaboration agreement of the obliged party with the Group.
- II. They are legal activities and do not conflict or give rise to potential conflicts of interest with their responsibilities as regulated entities of ID FINANCE.



## 8.2. Hiring of relatives

Immediate family members and partners of employees may be hired as employees or consultants, provided that they pass the selection process established by the company on the basis of their qualifications, performance, skills and experience, and provided that there is no direct employment relationship between the employee and his or her family member or partner.

The hiring of family members is subject to the same principles that ID FINANCE has for all other employees in terms of promotions, remuneration, type of contract, etc., depending on the position held.

## 8.3. Contracts with suppliers and customers

We will avoid situations with suppliers or customers that involve or may involve a conflict between their personal interests and those of ID FINANCE, and we will refrain from representing the Group or intervening in the taking of decisions in which, directly or indirectly, we ourselves, or a related person, have a personal interest.

In any case, we must inform the hierarchical superior of the existence of the aforementioned conflict of interest, so that the necessary measures can be taken.

For these purposes, a person related to the obligated parties is understood as follows:

- The spouse or persons with an analogous relationship of affectivity.
- Ascendants, descendants and siblings.
- Relatives with whom a relationship of affinity of the first and second degree is maintained, whether in the vertical or collateral line. The following are included in this classification: father-in-law/mother-in-law and brother-in-law/ sister-in-law.
- Any other member of the family who lives with the obligor or is otherwise financially dependent on him/her shall also be considered a related person.

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## 9. COMMUNICATION CHANNEL

In order to facilitate the raising of doubts or communications, we must inform the Compliance Officer, the Regulatory Compliance Department, the hierarchical superior, the Legal Department or the Human Resources Department of any activity or suspicion of conduct contrary to this policy or to national or international regulations, as well as doubts about the lawfulness or otherwise of any behaviour that we have noticed or of which we are aware.

The report may be made either through the ethics hotline (Whistleblowing Channel) set up on the company's intranet and on the ID Finance Group's corporate website, PLAZO and Moneyman, guaranteeing confidentiality and impartiality in the facts reported, or through the Compliance mailboxes that ID FINANCE makes available to its employees ([compliance@idfinance.com](mailto:compliance@idfinance.com), [rrhhcompliance@idfinance.com](mailto:rrhhcompliance@idfinance.com) if the consultation is related to behaviour of the Compliance Department).

Neither the ID FINANCE Group nor its employees will retaliate against employees who, acting in good faith, have reported irregular matters relating to the provisions of this policy. Any retaliation will be considered a serious breach of the Code of Ethics and Conduct and will be grounds for disciplinary action.

In fact, no director, officer, employee or third party (except obviously the relevant judicial authorities), should or may request the identity of the whistleblower from the person managing the communication/whistleblowing channel.

Likewise, any complaint submitted through this procedure will be resolved in a transparent and prompt manner, with the aim of continuously improving the functioning of this mechanism.

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## 10. COMPLIANCE BODY

The application of the Anti-Corruption and Anti-Bribery Policy is the responsibility of the Compliance Committee, whose main function is to ensure compliance with this Policy, the Gifts Policy, the Conflicts of Interest Policy and other regulations that develop the Anti-Corruption management system, as well as the regulations that develop the Criminal Compliance System. This is a collegiate body, with autonomous powers of initiative and control and independence in the exercise of its functions.

Specifically, the Compliance Committee shall be responsible for:

- I. Verifying the implementation of the Anti-Corruption Policy through specific activities, by assessing the control processes of the risks identified. Specifically, the Anti-Corruption Policy shall be subject to updating and continuous improvement processes, as well as periodic audits;
- II. Establish, review and measure compliance with the Anti-Corruption objectives implemented in the ID FINANCE Group;
- III. Encourage the dissemination, knowledge, understanding and compliance of the Anti-Corruption Policy, promoting the preparation and implementation of appropriate training programmes;
- IV. To advise on the resolution of any doubts that may arise in the application of the Anti-Corruption Policy;
- V. Receive, analyse and resolve reports of conduct contrary to the Anti-Corruption Policy;
- VI. Promote the regulations necessary for the development of the Anti-Corruption Policy and the prevention of infractions;
- VII. Annually evaluate the changes that should be made to the Anti-Corruption Policy and propose to the Governing Body the modifications and additions to be made to the Anti-Corruption Policy that it deems appropriate.

## 11. INVESTIGATION OF FRAUD OR CORRUPTION

All identified indications of fraud or corruption shall be investigated promptly and with the utmost diligence. The purpose of the investigation shall be to evaluate, as a whole, all the facts for analysis. The investigation data shall be properly documented and archived. The analysis carried out and the information obtained will enable the ID FINANCE Group to strengthen existing controls and to make recommendations for the processes implemented in order to make the Group's fraud and corruption risk management model more robust.

## 12. FRAUD OR CORRUPTION REPORTING

Following the identification of a case of fraud or corruption and its investigation, whether it has been committed or whether there is only an indication or suspicion, the corresponding report will be made to the Corporate Compliance Committee, detailing, among other aspects:

- Relevant file data: date of knowledge, date of occurrence, type of fraud, whether it has been consummated or whether there is only suspicion, description of the action, details of the persons involved, financial data, etc..
- Analysis carried out by the Chief Compliance Officer of the entity concerned.
- Supporting documentation justifying the analysis.
- Conclusion and action plans carried out..

Whenever appropriate and if, after communication and analysis by the Corporate Compliance Committee, it is so determined, all the documentation necessary to file a complaint with the Judicial Authorities or to carry out the appropriate actions shall be prepared. All file documentation (transaction documents,

investigations, etc.) shall be filed in such a way as to enable internal and external requests for information from regulators or authorities to be dealt with in a timely manner, ensuring confidentiality.

## 13. DISCIPLINARY SYSTEM

In case of breach of the precepts set out in this Policy, the disciplinary system set out in the ID FINANCE Group Code of Ethics will be applied.

Once the facts reported or detected by the Compliance Committee have been confirmed and proven, depending on their magnitude and nature, the breach or violation of the provisions of this ID FINANCE Group policy and of the law may lead to the application of a disciplinary measure that may consist of reprimands, warnings, or even the termination of the employment relationship or of the collaboration relationship between the ID FINANCE Group and the offender. All in accordance with the Disciplinary Regime provided for in the Collective Bargaining Agreement applicable to the employees of the ID FINANCE Group.

In the event of infringements constituting a criminal offence, the ID FINANCE Group will report such conduct to the competent authorities.

## 14. UPDATING, IMPROVEMENT AND PUBLICATION

The ID FINANCE Group is committed to updating and improving the Anti-Corruption and Anti-Bribery Policy, implementing specific measures that allow for the periodic review of the system and its performance evaluation.

In any event, the Anti-Corruption Policy shall be reviewed by the Compliance Committee on an annual basis and, in any event, whenever there is a regulatory change that entails its updating or modification.

[CONFIDENTIAL] –

The Anti-Corruption Policy may be published through the ordinary means of communication of the ID FINANCE Group so that the governing body, managers and employees, as well as business partners and interested parties are fully aware of it.