

# ID FINANCE

## **CODE OF ETHICS**

**ID FINANCE Group**

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

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**CHANGE CONTROL**

Version	Sections that are changed	Description of the Change	Date
V. 1.0	Creation of the CODE OF ETHICS		23/05/2022
V.2.0	Section 7	The link to the Ethics Line is included	23/02/2023
V.3.0	Section 3.6  Section 7	Health and environment section is include.  Adaptation to Law 2/2023 of 20 February 23.	24/04/2023

This section will include the successive changes that might be made to this Code.

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## 1 Purpose and Management Statement

This document constitutes the Code of Ethics (hereinafter, the “Code” or the “Code of Ethics”) of the group integrated by the entities, **ID FINANCE INVESTMENTS, S.L.** (as the parent company), ID FINANCE SPAIN, S.A.U., ID FINANCE PLAZO, S.L.U. and PLAZO CREDIT, S.L.U., as independent companies (hereinafter and interchangeably, the “Group”).

The Group carries out its activity according to certain basic principles and a clear premise: being leaders in our sector, venturing on people and having a firm commitment to our social, environmental and cultural surroundings.

Our Code of Ethics is a declaration of basic principles, of our values and of standards of ethics and integrity that govern our activity, and it unifies all of us who form a part of the Group under a set of values that guide our decisions and daily actions.

**The purpose of the Group’s Code of Ethics is to establish a catalogue of ethical principles, values and standards of conduct that must efficiently guide the actions of all the companies and people who form a part of the Group.**

This Code of Ethics defines how we conduct business, therefore describing the conduct that must be promoted and the behaviours that must be avoided.

It constitutes the highest level instrument of our regulatory structure. Its principles are developed in policies, standards and procedures. It represents the Group’s commitment to compliance with laws and with the ethical values that are defended in those laws.

All levels of the entities that form a part of the Group will ensure the real and effective application of these principles such that this system of self-regulation contributes to the elimination of any act that could jeopardize the legal values and rights to be protected.

The failure to comply with this Code will constitute a breach, which will be the object of the corresponding sanction.

Considering that the relationship between a violation of ethical principles and the conduct that is classified as a crime in the Criminal Code and that the main hindrance to the efficacy of the Code of Ethics is the tolerance to a violation of the Code, the criterion of zero tolerance is established at the Group for all levels of its structure. Therefore, maximum cooperation is requested on communicating, through the Ethics Line and/or the Reporting Channel, any risk situation that might be detected, all of which is developed in section 5 of this Code.

This Code of Ethics contains a sanctioning scheme that will be applicable in the event of any violation of the ethical principles contained herein.

## 2 Scope of application and compliance

Our Code of Ethics is applicable to **all people who form a part of the Group (employees, executives, representatives, and members of the management bodies** that are integrated in the Group), who all receive a copy when they join the Group, which they must read. Subsequently, they must agree to the content of the same.

They all have the responsibility to comply with the Code of Ethics and to promote the values and principles contained herein. The managers of every Area and Department of the entities comprised in the Group have the commitment to ensure that the Code is complied with and applied.

All employees, executives and members of the management bodies of the entities that are comprised in the Group will sign an annual declaration of compliance with the Code of Ethics, thereby declaring that they have complied with the provisions set forth in the same and that they undertake to comply thereafter.

The scope of application of the Code of Ethics will extend, to the extent possible, **to suppliers, agents and third parties** with which entities of the Group have a relationship in the development of their business activity, which they will do by including, in their contracts, clauses related to knowledge and acceptance of the Group's Code of Ethics. A breach of such clauses will constitute a serious breach of contract.

The aforementioned persons (hereinafter, the "**Obligated Persons**") will have the obligation to know, comply with and collaborate on applying this Code.

ID FINANCE encourages all Obligated Persons to report, through the channels established in section 5 of this Code of Ethics (the Reporting Channel of ID FINANCE and the Ethics Line), any situation about which they may have doubts regarding whether or not their own actions or those of third persons could eventually violate the ethical principles set forth in this document.

### 3 Principles and values

ID FINANCE is committed to reaching the highest level of the principles and values listed below, which form the foundation of this Code of Ethics, and ID FINANCE will develop the necessary internal policies and procedures to comply with the Code, based on these values:

- **Professionalism:** we develop our work based on absolute professionalism and dedication, which is proved by complete honesty and commitment to the job we perform.
- **Integrity:** we act honestly and transparently according to standards of professional ethics and the applicable regulatory framework.
- **Responsibility:** employees of ID FINANCE must carry out their activities while being guided by the principles of honesty, ethics and good faith.

A breach of the principles and guidelines contained in this Code of Ethics and Conduct could give rise to applying the corresponding labour sanctions, as provided for in the Sanctioning Scheme set forth in the applicable Collective Bargaining Agreement and in the Statute of Workers' Rights.

#### 3.1 Principles of transparency and standards regarding anti-corruption

The trust of shareholders, of clients and, in general, of the environment in which ID FINANCE operates is based on its business activity. Trust can only exist if there is no doubt about the Group's integrity.

Therefore, its relations are based on the principles of transparency and equal opportunity, and it rejects any action based on any illegal act that is designed to gain a competitive advantage over competitors in the market or in public or private contracts.

The Group is governed by the principle of “**zero tolerance**” to corruption. Therefore, together with this Code, ID FINANCE also approves its Anti-corruption and Fraud Prevention Policy.

Trading in influence is considered to be any act or strategy whose objective is to orient or influence the actions of a public official or authority by exploiting any situation derived from a personal relationship

with them or with another public official so as to obtain a decision that could directly or indirectly generate an economic benefit or avoid a loss of any kind for the company itself or a third party.

Consequently, no person who forms a part of the Group must, in the development of their professional activity and whether directly or indirectly, offer or grant, to public officers or officials or to executives of private companies, any gifts, remuneration, commissions, giveaways or other unauthorized advantages, whether in cash or in the form of other services, or in any way influence public officials by taking advantage of any situation derived from a personal relationship with them, for the purpose of receiving favourable treatment in the award of contracts or any other professional services, or personal benefits or benefits in favour of entities that are comprised in the Group.

No person who forms a part of the Group must use their professional position to demand, accept, obtain or cause to get promises of favours, advantages, loans, commissions or bribes from third parties. Exceptionally, the delivery or acceptance of gifts and giveaways will be permitted if the requirements and procedures set forth in the Anti-corruption and Fraud Prevention Policy of the Group are complied with, whose objective is to create an environment in which the risks of fraud are minimized.

The Group has a Compliance Policy that sets forth the commitments assumed by the entities comprised in the Group regarding Compliance, and it has an Anti-corruption and Fraud Prevention Policy, whose objective is to create an environment in which the risks of fraud are minimized. Likewise, ID FINANCE provides all employees with the necessary tools to resolve doubts that could arise regarding the Anti-corruption and Fraud Prevention Policy (through the mailboxes of the Regulatory Compliance Departments of the entities that are comprised in the Group: [compliance@idfinance.com](mailto:compliance@idfinance.com)), as well as for reporting possible breaches of the Policy through the channels that are established in section 5 of this Code of Ethics.

Conflict situations are defined as those in which the interests of a client or possible client come into conflict with the interests of another client and/or the interests of the entities that are comprised in the Group, and consequently there is a material risk that the interests of one or more clients could be jeopardized.

At all levels of all the companies that are comprised in the Group, there is the duty to avoid situations of conflict of interest.



Conflicts that could eventually arise between the interests of employees, executives, members of the management bodies and partners and the interests of our clients must be avoided.

Consequently, all persons who form a part of the Group will act while placing the interests of the Group and of its clients before their own, before those of their relatives or before those of other persons linked to the latter.

Likewise, any potential conflict of interest that could occur within entities that are comprised in ID FINANCE must be reported.

To identify the types of conflicts of interest that could arise when providing services, the existence of which could harm the client's interests, it will be necessary to consider, at a minimum, if the member entity of ID FINANCE; if a "competent person" who is a member of the management bodies; if a partner or an employee thereof; or if a person who is directly or indirectly linked to the entity through a relationship of control or of outsourced services is in any of the following situations:

1. The member entity of ID FINANCE or the considered person could obtain a financial benefit or avoid a financial loss, at the expense of the client.
2. The member entity of ID FINANCE or the considered person has an interest in the outcome of a service provided to the client or in an operation carried out on behalf of the client that is contrary to the client's interest in the outcome.
3. The member entity of ID FINANCE or the considered person has financial or other incentives to favour the interests of another client or group of clients over the interests of the client.
4. The member entity of ID FINANCE or the considered person receives or is going to receive an incentive from a person other than the client, in relation to the service provided to the client, in the form of money, goods or services, apart from the normal commission or remuneration for that service.

### **3.2 Anti-Money Laundering and Terrorist Financing**

The fight against money laundering and the financing of terrorism referenced in the recommendations of the Financial Action Task Force (FATF) and the standards that are derived therefrom, in addition to being a legal obligation, constitutes a priority for ID FINANCE. As such, ID FINANCE SPAIN and ID FINANCE PLAZO are obliged entities.

Neither ID FINANCE nor any of its employees or collaborators must carry out or become involved in activities that involve money laundering and/or terrorist financing, in any shape or form. ID FINANCE complies with anti-money laundering laws and cooperates fully with responsible authorities in the fight against money laundering or the financing of any illegal activity.

In order to guarantee compliance with laws and regulations against money laundering, ID FINANCE has an Anti-Money Laundering and Terrorist Financing Manual, as well as bodies that are in charge of ensuring compliance with the same. All employees, partners, executives and collaborators must know the internal standards that are applicable to the prevention of money laundering, which are distributed to them.

Any suspicion of a risk situation related to this subject must be immediately reported through the channels established in section 7 of this Code of Ethics.

### **3.3 Right of equality and principle of non-discrimination**

ID FINANCE assumes respect for people and their dignity as a fundamental value of its actions, and it subscribes to the Universal Declaration of Human Rights adopted by the United Nations in 1948 and to the instruments derived therefrom, especially the International Covenant on Civil and Political Rights of 1966; the International Covenant on Economic, Social and Cultural Rights of 1966; and the Convention for the Protection of Human Rights and Fundamental Freedoms of 1950. It also assumes and respects the principle of union representation of its employees.

All persons included within the scope of application of this Code of Ethics must respect the dignity of our clients, employees, partners, management bodies, suppliers and, in general, any natural or legal person who may maintain relations with the entities that form a part of the Group.

ID FINANCE's commitment is based on promoting equality opportunities, not only for accessing our entities and for professional promotion within them, but also for collaborating with them. ID FINANCE therefore prohibits all type of discrimination, harassment, abuse or inappropriate treatment based on gender, race, colour, nationality, belief, religion, political opinion, affiliation, age, sexual orientation, status, incapacity, disability or other situations protected by law, not only regarding our clients, employees, partners, management bodies and suppliers, but also, in general, regarding any natural or legal person who may maintain relations with the entities that form a part of the Group.

### **3.4 Right to Privacy: Professional Secrecy, Confidentiality and Data Protection.**

ID FINANCE respects and protects the privacy of the persons who, in its relations with them, provide it with personal data or confidential information. The confidentiality of the information related to our clients, employees, members of management bodies, partners and suppliers constitutes the essential cornerstone on which the relationship of trust that constitutes the essence of our activity is based.

All persons who form a part of the Group will respect data protection standards and will maintain strict secrecy over all data that they may become aware of through their professional activity.

They must respect the internal standards on personal data processing and data confidentiality, as well as legislation in force at any given time regarding data protection.

Member entities of ID FINANCE are obligated to protect the personal information of clients to which they have access as a result of providing the services according to which they are related. Likewise, they have the obligation to protect the personal information and/or confidential information of their employees, of members of their management bodies and of any natural or legal person with which they may maintain relations. All information received must be presumed to be confidential. Contractually, the Group requires that the third-party supplier companies with which it has a relationship must

preserve the confidentiality of information and must apply the corresponding security measures regarding the data to which they could have access on the occasion of providing services.

The information received may only be processed for the purpose for which it was conveyed and/or collected. Before conveying information to third parties, we must ensure that we are authorized to do so.

Employees and suppliers who access personal data must process them according to the provisions set forth in this Code of Ethics and according to regulations in force.

In marketing campaigns, measures that ensure the correct collection of data will be applied, including the mandatory consent and the necessary information so that data subjects are aware of the scope and purpose of the processing of their data.

### **3.5 Protection of free competition. Market Regulation and Consumers.**

Member entities of ID FINANCE act in the market while respecting the principles of free competition and equal opportunity, and they reject any action designed to achieve an unfair or illegal benefit, use or advantage over clients, suppliers, competitors and other players in the market.

Employees and collaborators who perform marketing tasks must not, in any event, compromise the quality of products and services and must carry out said marketing responsibly and transparently.

Clients must be treated ethically, fairly and, in any event, in compliance with legislation in force at any given time.

Likewise, suppliers of ID FINANCE must comply with and respect the ethical principles and standards contained in this Code.

Consequently, the following acts or behaviour will not be considered ethical and will therefore be prohibited:

1. Unauthorized access to the confidential information of other enterprises.
2. Industrial espionage.
3. Disclosure of company secrets.
4. Use of one's own or outside privileged information for any type of transaction or business.
5. Acts targeted at creating false advertising.
6. Any kind of swindling, fraud or deceit.
7. Dissemination of false rumours about products, services, market conditions, etc.
8. Tactics to alter the price of third-party products.
9. Tactics to alter the trading price or the value of a company.
10. Manipulation of public invitations to tender.
11. Falsification of means of payment.
12. Tactics to place the company in a situation of insolvency in order to defraud creditors.

Regarding these activities, special attention will be paid to the following unpermitted behaviours, among others:

1. Accessing the data, the technical information of products or the business strategies of a competitor through a common supplier, a relative, a trusted contact or an investigation that does beyond information that could be considered public.
2. Making false statements or promises to a client or to the market about the qualities or characteristics of the company's own product or that of the competition.
3. Falsifying the economic or financial information of the company, especially the annual financial statements.
4. Disseminating rumours on social networks, in the media or directly to clients about a competitor, about their products and services or about any other company.
5. Taking advantage of secret information to which there may have been access because of the position that is occupied or because of the work that is being performed at the company in order to transfer it to third parties, to sell it or to use it to acquire or sell stocks or for any other transaction or business.

### **3.6 Prevention of human health and environment.**

At ID Finance Group we believe that commitment to society is a key element of transformation. All of us must take care of our Values and respect the principles of our Code of Ethics in order to create a more sustainable society.

This implies that we:

We engage with society and contribute to initiatives that improve the quality of life:

We **respect** our Values and the Principles of our Code of Ethics to ensure that we conduct our daily business in an ethical manner.

We **support** anyone who wants to contribute to charitable causes.

ID Finance Group understands that social responsibility is a fundamental part of our business strategy, as it reinforces our legitimacy in the health and wellness sector, enhances our reputation and serves as a driver of innovation and growth.

Challenges such as ageing, the rise of chronic diseases, the creation of healthy workplaces and climate change have an impact on people's health and quality of life. The ID Finance Group responds to these challenges through our sustainability strategy, which has a dual purpose: to help people lead healthy lifestyles and to reduce the impact of our business on the environment.

To this end, we have set ourselves two clear objectives:

To **help** people adopt healthy lifestyles so they can live longer, healthier and happier lives.

To **reduce** our carbon footprint.

#### **CARING FOR PEOPLE'S HEALTH**

One of the commitments of the ID Finance Group is to provide people not only with health, but also with well-being and quality of life. We try to involve our employees in this commitment through healthy lifestyle, training and information programmes:

- Agreements with sports organisations
- Participation and organisation of sporting events.
- Fruit in the office.
- Private mutual health insurance
- Wellness at work
- Participation in charity events.

### **COMMITMENT TO THE ENVIRONMENT**

The ID Finance Group works to develop our activities in a way that respects the environment, which provides added value to our activities and therefore to the quality of life of our clients and society in general. Our commitment to the environment and sustainable development can be summed up in one major objective: to substantially reduce our carbon footprint and to be a CO2 neutral company by offsetting gross emissions with environmentally clean actions.

## **4 Financial information of the company and tax obligations.**

We are committed to true, accurate and precise information for anyone who may have a relationship with us.

The commercial accounting, books or tax records must completely reflect all operations that are conducted, accurately, truthfully and in accordance with applicable regulations, thereby reflecting a true and fair view of all transactions that are conducted.

Accounting records will, at all times, be available to internal and external auditors, and they will be periodically audited.

ID FINANCE will comply with all its tax and fiscal obligations, while at all times collaborating with state, regional and local authorities who may require it.

The management of public aid and subsidies must be transparent, while at all times allocating the granted amounts to the purpose for which they were given.

## **5 Use of the company's resources**

The technological resources or those of any other type provided by ID FINANCE must be used within the strict scope of the professional relationship with the company and for executing the functions assigned to each employee. Nevertheless, the personal use thereof may be permitted, as long as that use does not interfere with the responsibilities or productivity of the employees or with the general affairs of the entity, and as long as it takes place according to good faith and in compliance with internal regulations.

The information technology resources of ID FINANCE must be used responsibly and in conformity with this Code of Ethics and Conduct and with all other internal policies. These notably include those policies related to specific information technology, data protection, information security, confidential information and intellectual property rights.



All computer equipment that ID FINANCE may have, regardless of the physical location thereof, will be considered to be its technology resources. These resources include but are not limited to mobile phones, personal computers, laptop computer devices, network servers, Internet access (if applicable), the company's Intranet and all email access devices.

This also includes access to the Internet, to the resources and to the email of ID FINANCE through equipment and installations unrelated to the company.

## 6 Criminal Compliance Management System

ID FINANCE makes every effort to prevent the commission of the criminal acts to which the Group is exposed in the performance of its activities.

Obligated Persons must comply with the provisions set forth in **ID FINANCE's Corporate Compliance Policy and in the Criminal Compliance Management Systems**, which include all the criminal risks to which such persons are subject, in accordance with the provisions set forth in Article 31 bis of the Criminal Code.

The Criminal Compliance Management Systems also include all relevant aspects that provide evidence of the existence of a model of organization and management that has the proper monitoring and control measures for preventing and, if applicable, detecting the occurrence of criminal acts within ID FINANCE.

All levels of the entities that form a part of the Group must ensure the real and effective application of the prevention and control measures provided for in said Management Systems, such that this system of self-regulation succeeds in eliminating behaviours that could jeopardize the reputation of ID FINANCE.

## 7 Communication Channels - Ethics Line

All the members of ID FINANCE have the duty to inform the entities that make up the Group of any situation or behaviour that infringes the ethical principles of this Code, the regulations or current legislation, as well as any irregularities of potential importance.

The different companies of the Group have an **Ethics Line** as a means of communication of any activity that does not comply with the ethical principles of ID FINANCE or any circumstance that may involve the materialisation of a criminal risk for the company or weaknesses in the Criminal Compliance Management System, with the aim of dealing with any complaint that may be made to this effect.

The **Ethics Line** is supported by a web application that can be accessed by employees, partners, directors, members of the management bodies, suppliers, customers and, in general, any third party who wishes to report to the various companies of the Group any irregular conduct that may breach the ethical principles set out in this Code. The Ethics Line can be accessed through the following link: <https://www.idfinance.com/es/linea-etica/>

To ensure the functioning of the Criminal Compliance Management Systems, the Code of Ethics and the Ethics Line and Whistleblowing Channel, ID FINANCE has a **Corporate Compliance Committee**.

Neither the Group entities, nor any of their members, will take any form of retaliation, discrimination or disciplinary action against whistleblowers who make reports in good faith and on the basis of reasonable grounds.

The Ethics Line is the means enabled in ID FINANCE to report any activity that does not comply with the Principles included in the Group's Code of Ethics, Internal or External Regulations, or any other circumstance that may give rise to a criminal risk for our Entity, or that may represent a weakness in the implemented Criminal Compliance Management System.

In addition to actions contrary to the provisions of our Code of Ethics, other actions included in our Policies or in current legislation may be communicated and reported through the Ethics Line.

As established in Law 2/2023, of 20 February, Regulating the protection of persons who reporting breaches of regulations and anti-corruption, it is permitted to file complaints on a completely anonymous basis. All communications will be treated with strict confidentiality by the Compliance Officer or, failing that, by a person who is part of the Regulatory Compliance team.

## 8 Regulatory Compliance Mailboxes

ID FINANCE has a Regulatory Compliance mailbox for every entity that forms a part of ID FINANCE ([compliance@idfinance.com](mailto:compliance@idfinance.com)) for sending any doubt or concern related to the ethical principles of this Code or related to regulations or laws in force, as well as in relation to the Criminal Compliance Management Systems.

Furthermore, ID FINANCE has enabled a specific mailbox for addressing communications and/or complaints that could affect the Compliance Officer or any member of Regulatory Compliance ([rrhhcompliance@idfinance.com](mailto:rrhhcompliance@idfinance.com)).

## 9 Sanctions and Sanctioning Procedure

A violation of legislation in force at any given time, of the Code of Ethics or of the implementing regulations thereof by employees of ID FINANCE will be constitute a violation whose scaling and sanctioning will take place in accordance with the provisions set forth in the Collective Bargaining Agreement at each of the entities that form a part of the Group.

The sanctioning procedure will begin based on a complaint or a report, as a result of an investigation or due to any other reason that allows knowledge of the alleged violation by the Corporate Compliance Committee.

In the event that a violation were committed by a person who holds a sensitive position, then the violation could be qualified at a higher degree, in the judgement of the Corporate Compliance Committee.

A violation of legislation in force at any given time, of the Code of Ethics or of regulations of the Group by suppliers or any third parties contracted by member entities of ID FINANCE will be submitted to the consideration of the Corporate Compliance Committee, which will adopt the corresponding sanction according to the violation that is committed.

# ID FINANCE