

ID FINANCE

# SUSTAINABILITY REPORT

2024





## **Boris Batine,** **Co-founder of ID Finance & CEO of Plazo**

*Dear Colleagues, Partners, and Clients,*

*We are pleased to present our second Sustainability Report, for the first time prepared in accordance with the Global Reporting Initiative (GRI) Standards. This report provides a comprehensive overview of our approach to sustainability, reflecting our ongoing commitment to responsible business practices and transparency regarding our economic, social, and environmental impacts over the 2024 year.*

*Sustainability is not merely a component of our operations—it is an integral part of our corporate identity. We embed its principles into our daily activities and adhere to them rigorously. At ID Finance, we have embraced a robust Corporate Social Responsibility (CSR) policy, with clearly defined CSR objectives. Our commitment to social responsibility is exemplified by our certification of ID Finance Spain's Social Responsibility Management System in accordance with the international standard IQNet SR 10. In 2024, we successfully repassed an independent audit to verify the effective integration of CSR practices across all organizational functions. This process involved reviewing our CSR goals, evaluating progress, and establishing new key performance indicators, reaffirming our dedication to continuous improvement and sustainable development.*

*Our focus remains on responsible growth—supporting our employees through equal opportunity policies, fostering inclusive workplaces, and contributing positively to local communities. We are committed to strict legal compliance and uphold the highest standards of integrity and transparency. To this end, ID Finance received certifications for compliance with UNE 19601 (Anti-bribery Management System) and ISO 37001 (Compliance Management System) across all our Spanish entities—an important step in demonstrating our unwavering commitment to ethical conduct and responsible governance.*

*Our responsible financing practices are central to our business model. We aim to provide accessible, sustainable financial services while continuously enhancing our products and services. In 2024, we formed a strategic partnership with MeetingPros to offer clients legal, telemedicine, and veterinary services directly through our Plazo app, further expanding our support capabilities.*

*Client well-being remains our highest priority. During this reporting period, we expanded support measures for clients facing financial difficulties or affected by emergencies, including tailored solutions for overdue debts, reaffirming our commitment to responsible lending and social impact.*

*Environmental stewardship is fundamental to our sustainability approach. In 2024, we offset 50 tonnes of CO<sub>2</sub> equivalent emissions from 2023 through reforestation projects at the El Vinagre estate. We have also calculated our 2024 emissions and plan to offset a portion of these, reflecting our ongoing commitment to reducing our ecological footprint.*

*Our employees are the foundation of our success. Throughout 2024, we invested in initiatives to enhance motivation and wellbeing, promote diversity and inclusion, and support professional development. We are proud that ID Finance in Spain was recognized as a Great Place to Work in 2024, with 89% of employees affirming that it is an excellent place to work.*

*We sincerely thank our employees, clients, shareholders, and partners for their continued trust and collaboration. Your support is essential to our progress and success in advancing our sustainability agenda.*

*Together, we will continue to uphold responsible practices, foster sustainable development, and create value for all stakeholders.*

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ID FINANCE

# ABOUT THE GROUP

# WHO WE ARE

ID Finance Investments, S.L. (“ID Finance” or the “Group”) is a leading digital finance provider focused on Europe and Latin America under Moneyman and Plazo brands.

ID Finance is a data-driven financing platform that is pioneering fintech innovation with a range of convenient, competitive, and transparent finance services available over the internet. The Group uses machine learning and advanced data science techniques to improve access to competitive financial services.

**Our strategy is to grow our business while reducing environmental impact and increasing social impact through responsible and sustainable lending and financing.**

The strategy is based on building a sustainable financial Group globally. In this way, the Group is involved in activities of measurement and compensation of its emissions as well as in social actions in the Communities in which it operates.

## € 113 mln

Net IFRS loan portfolio

## 2+ mln

Total count of unique registered users

## 3.8 M

Loan applications scored in 2024

## <1 min

Time decision-making

## 700

Clients received individualized debt restructuring in 2024

## 396

Employees in 2024

## 50%

Women

## 89%

Of our employees consider ID Finance a Great Place To Work

# KEY HIGHLIGHTS



ID Finance has been recognised as **the Most Disruptive Fintech at the 2024 Financial Innovation Awards**. This prestigious accolade was presented during the third edition of the awards ceremony, held as part of the [Financial & FinTech Innovation Summit](#) organised by Urban Event Marketing Agency.



ID Finance **obtains carbon footprint compensation certification** for the third consecutive year. We received the "Compenso" badge from the Spanish Ministry of Ecological Transition and Demographic Challenge (MITECO).



ID Finance has been recognised as **Best Fintech Company Spain 2025**, while Plazo Credit has received the award for **Best Alternative Credit Specialist Spain 2025** at the Global Banking & Finance Awards.<sup>1</sup>



ID Finance in Spain is proud to be Certified by **Great Place To Work for the 2024 year** and secured the **13th place** in the ranking of the best companies to work for in Spain in the 101–250 employees' category.



ID Finance has been featured this year by leading Spanish financial publication Expansión in the ranking of **Spanish startups with the greatest potential to become a future unicorn**, where it occupies the **eighth** position.<sup>2</sup>



The ID Finance Group **has obtained dual certification in Criminal Compliance and Anti-Bribery Management** (international standards [UNE 19601 \(Criminal Compliance\)](#) and [ISO 37001 \(Anti-Bribery\)](#)) from Bureau Veritas for its subsidiaries in Spain. The firm thus becomes **one of the first** Spanish fintech companies to achieve this dual accreditation.



ID Finance among **Europe's fastest growing companies ranked by FT 1000**.



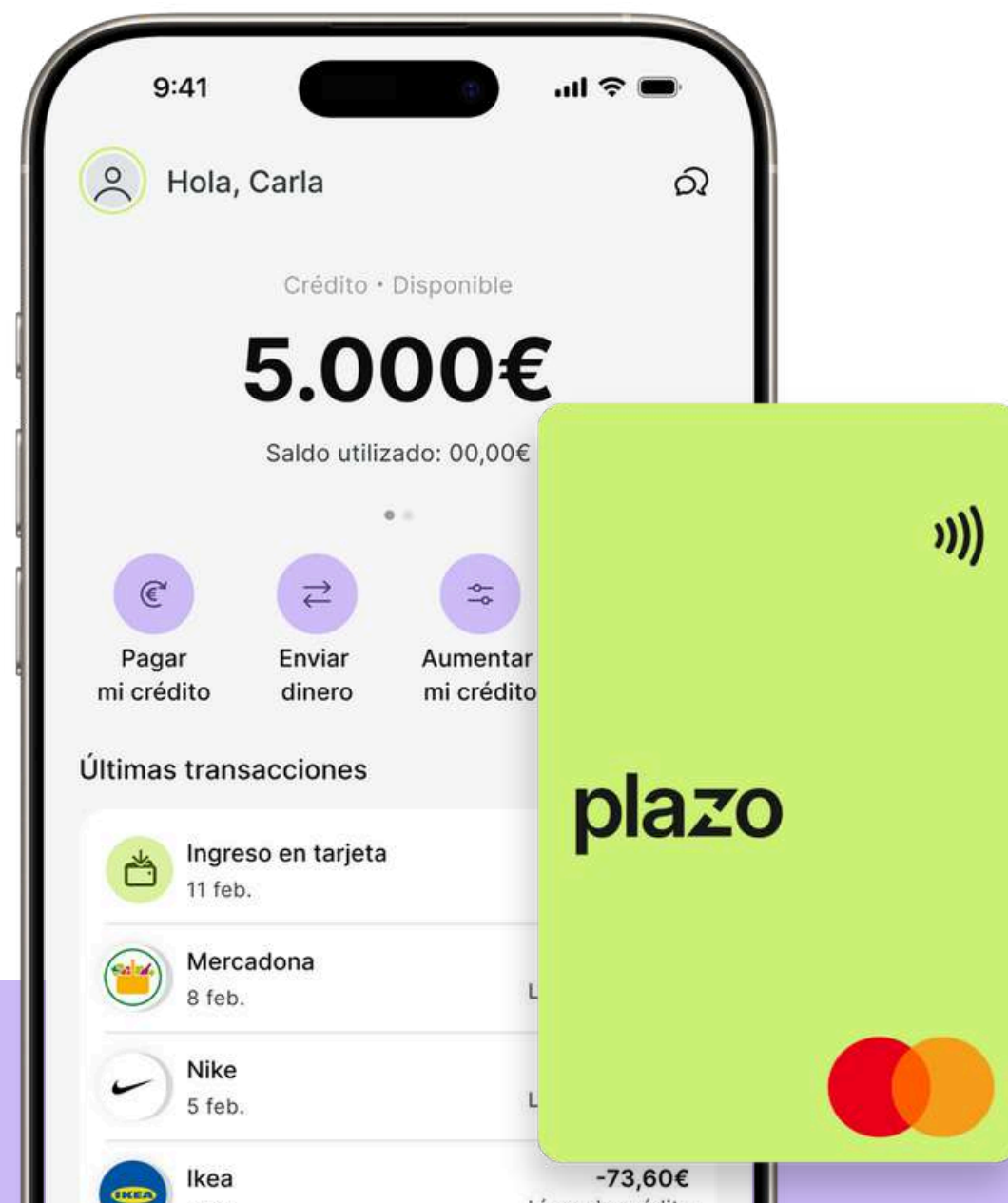
ID Finance2 renewed the **IQNet SR10 Social Responsibility Management System Certificate**.

<sup>1</sup> This award was received in 2025, however, since the report was prepared and published in autumn 2025, some particularly important information is also provided for 2025.

<sup>2</sup> The certificate was received by ID Finance Investments, S.L., Moneyman Spain and Plazo Spain.

# OUR PRODUCTS

We provide a smartbanking service that changes the way people understand and manage their finances allowing them to increase their savings capacity while maintaining full control of their expenses.



**Plazo is a financial wellness mobile app, which offers:**

- Instantly issued FREE virtual card, followed up by physical card.
- Over 30 cashback partners providing the highest cashbacks in Spain.
- Useful features such as top-up via Apple, Google pay, Spanish IBANs, international transfers.

In 2024 we have closed a strategic agreement with MeetingPros to **offer our clients legal, telemedicine and veterinarian services** directly through our app. Plazo's clients have access to medical, legal, and veterinary consultations offered by professionals through chat.

# OUR PRODUCTS

We provide a smartbanking service that changes the way people understand and manage their finances allowing them to increase their savings capacity while maintaining full control of their expenses.



## Moneyman

- Automated loan service operating online 24/7 using innovative credit scoring models.
- Moneyman focuses on providing fast and convenient financial services to clients through web and mobile platforms.
- We provide a loan amount up to EUR1,600 for a period from 7 days to 4 months.
- Our goal is to make short-term financing more accessible by providing quick, personalised liquidity solutions via web and mobile platforms.

# WHAT MAKES US DIFFERENT



**We are digital natives** in terms of operations and client acquisition. The banks tend to outsource SEM and digital affiliate management while this is a core part of our operation.



**Proven track-record:** we have grown our existing franchise from zero to a leadership position on scarce funding in an ultra-competitive market.



**Operational excellence across scalable platform and credit risk expertise:** we have no IT-legacy and a proven pedigree in managing consumer credit balance sheet risk over 10 years.



## Our principles

**In our activities we are guided by the following principles:**

**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.

# SUSTAINABILITY MANAGEMENT

Sustainability management, including stakeholder engagement, is embedded **at all levels of our corporate governance framework**. This integration ensures that sustainability considerations are addressed not only at the highest strategic management level but also within executive bodies, as well as across individual business units and departmental management. Such an approach facilitates a comprehensive and cohesive implementation of responsible practices throughout the organisation.

The Group has established a comprehensive **Corporate Social Responsibility (CSR) policy**, aimed at contributing to sustainable development. This policy emphasises the integration of stakeholder concerns—arising from ongoing dialogue and relationships—into governance and decision-making processes. Our commitment is to operate effectively, safely, and responsibly from social, economic, and environmental perspectives, with a consistent focus on generating positive impacts on both the environment and the communities in which we operate.

**Basic principles** for action in accordance with the CSR Policy:

- **Compliance with the law:** strictly comply with the legal regulations and requirements applicable in the development of its activity.
- **Principles of transparency and standards regarding anti-corruption:** transparency and equal opportunities, zero tolerance to corruption, compliance with established policies (Code of Ethics, Anti bribery and corruption policy).

- **Anti-Money Laundering and Terrorist Financing:** comply with the Anti-Money Laundering Manual and cooperate with the authorities.
- **Ethical Behaviour:** compliance with ID Finance's Code of Ethics.
- **Respect for Human Rights:** comply with all its established policies on equality, equity and non-discrimination (Equality Plan).
- **Minimisation of environmental impact:** committed to measuring and compensating carbon emissions in order to achieve carbon neutrality.

The CEO personally endorses the commitments articulated in the ID Finance CSR Policy and is responsible for ensuring that is communicated, understood, and actively applied across the entire Group. All employees are expected to align their actions with the principles and guidelines outlined in this policy, fostering a culture of integrity and responsibility.

Moreover, specific functional departments—such as HR, PR, and others—is policy is well—play an active role in implementing sustainability initiatives and projects. Their engagement underscores the organisation's collective commitment to embedding sustainability into our operational DNA.

### CERTIFICATION OF SOCIAL RESPONSIBILITY MANAGEMENT SYSTEM

ID Finance in Spain is **certified for its Social Responsibility Management System in accordance with the international standard IQNet SR 10.**

Annually, we undergo an independent audit process to verify that our corporate social responsibility practices are effectively integrated across all areas and processes. In 2024, we **successfully completed** this recertification audit.

Our Social Responsibility Management System ensures that the company's operations align with the requirements set forth in the IQNet SR standard. It encompasses a comprehensive framework that addresses key aspects such as transparency, legal compliance, respect for human rights and

stakeholder engagement, non-discrimination policies, fair and equitable working conditions, data protection, anti-corruption measures, as well as commitments to quality, safety, and environmental sustainability.

Also, in Mexico we obtained an official Certification in Labour Equality and Non-Discrimination (NMX-R-025-SCFI-2015). This certification is a voluntary standard established by the Ministry of Labour and Social Welfare, the National Institute for Women, and the National Council to Prevent Discrimination. It affirms Mexico's commitment to promoting labor equality and non-discrimination. The certification is valid until 2026.

This systematic approach underscores our unwavering dedication to responsible business practices and continuous improvement in social and environmental performance.

# SUSTAINABILITY GOALS

In 2024, during the IQNet SR 10 audit of our Social Responsibility Management System, our Corporate Social Responsibility (CSR) objectives were thoroughly reviewed. As a result, new CSR objectives for the period 2024–2025 were officially approved, aligning our strategic priorities with evolving stakeholder expectations and sustainable development goals. In the future, we also plan to extend these goals to our business in Mexico.



## IMPROVE EMPLOYEE SATISFACTION

ID Finance fosters well-being, work-life balance and engagement through different benefits and motivation programs, such as: two weeks of full remote work, flexible summer hours, Great Place to Work certification, and different team activities.

In 2024 for the Voice of Employee (VOE) survey, ID Finance Spain reached 90% of employee satisfaction with almost 100% of participation across teams. Setting its new goal for 2025 to go from 90 to 92%.



## REDUCE ENVIRONMENTAL IMPACT

ID Finance reduces its environmental impact through carbon offsetting, green energy purchases, awareness initiatives, and reforestation projects, removing 50 tons of CO<sub>2</sub> in 2024 for our 2023 footprint.

The 2024 Carbon Footprint was 307.56 tCO<sub>2</sub>e. We have completed the calculation, independent verification, and official registration of its 2024 corporate carbon footprint with the Spanish Ministry for the Ecological Transition. We are currently awaiting the Ministry's official certification seal confirming the registration and further we plan to compensate for part of our emissions.



## IMPROVE CUSTOMER SATISFACTION

ID Finance drives customer satisfaction through continuous training for agents on processes, products, and tools, while expanding self-service options with knowledge bases and natural language chatbots. IT developments enhance both internal systems and customer-facing apps, ensuring clearer information and smoother experiences. Additionally, improvements in CSAT survey design boost response rates and generate more valuable feedback from clients.

Customer satisfaction average for Moneyman & Plazo for 2024 increased to **82% throughout** the year.



## DIVERSITY & INCLUSION

ID Finance promotes diversity and inclusion through active employee participation in social media content celebrating the LGTBQ+ community, awareness talks, and dedicated training on LGTBQ+ protocols.

ID Finance accumulated a 10% of participation in its diversity and inclusion social activities through active employee participation and promoting new activities for this to take place.

# OUR CONTRIBUTION TO UN SDG

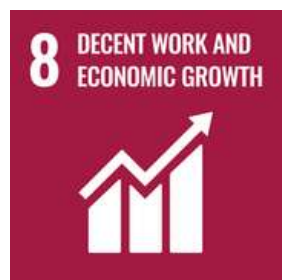
We are unwavering in our commitment to the principles of sustainable development and actively support the United Nations Sustainable Development Goals (SDGs), adopted in 2015 by the UN General Assembly. Our organisation is dedicated to contributing meaningfully to their achievement.

Following a comprehensive analysis of the Group’s activities in relation to the SDGs and our internal sustainability targets, we have identified two priority SDGs where our core operations exert the most significant impact.



We are committed to providing all clients with equal access to our microfinance products, grounded in the principles of responsible lending. Our ongoing efforts include regularly updating our offerings to enhance convenience and user experience.

Additionally, through our financial wellness app Plazo we offer clients valuable tools and solutions to manage daily finances. This includes access to legal, telemedicine, and veterinary services via our trusted partners MeetingPros. To further support their financial well-being, we also provide cashback rewards on all purchases made with Plazo’s commission-free debit card.



We are dedicated to cultivating a cohesive, skilled team by ensuring fair working conditions and fostering equal opportunities for career advancement and professional development. Additionally, we maintain a transparent evaluation system complemented by a reward structure that recognises and incentivises performance through bonuses.

In addition, we have identified 5 additional SDGs where the Group can also contribute to positive change



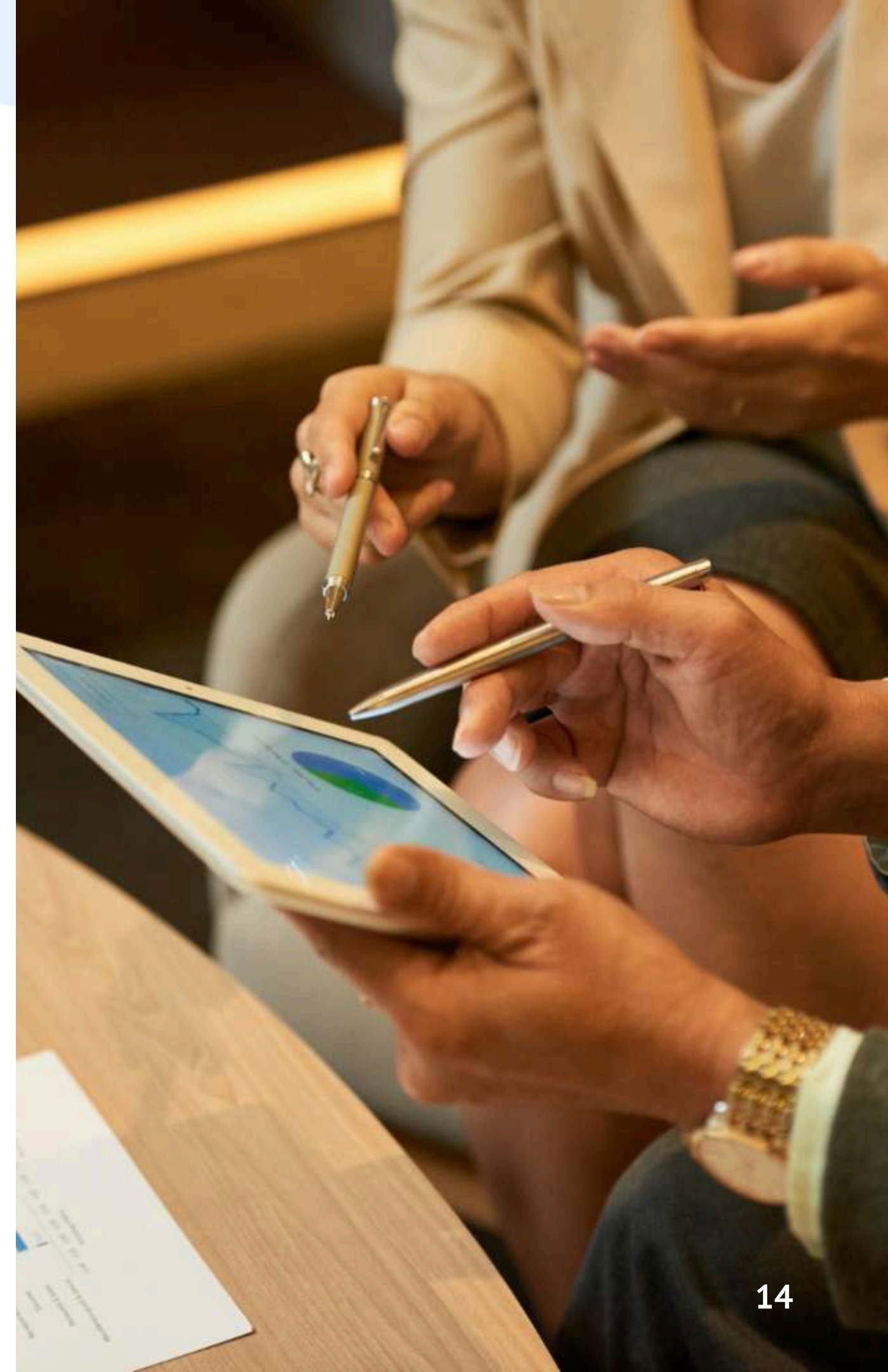
**You can read more about our contribution to each of the SDGs in the Appendix to this Report**

# CORPORATE GOVERNANCE

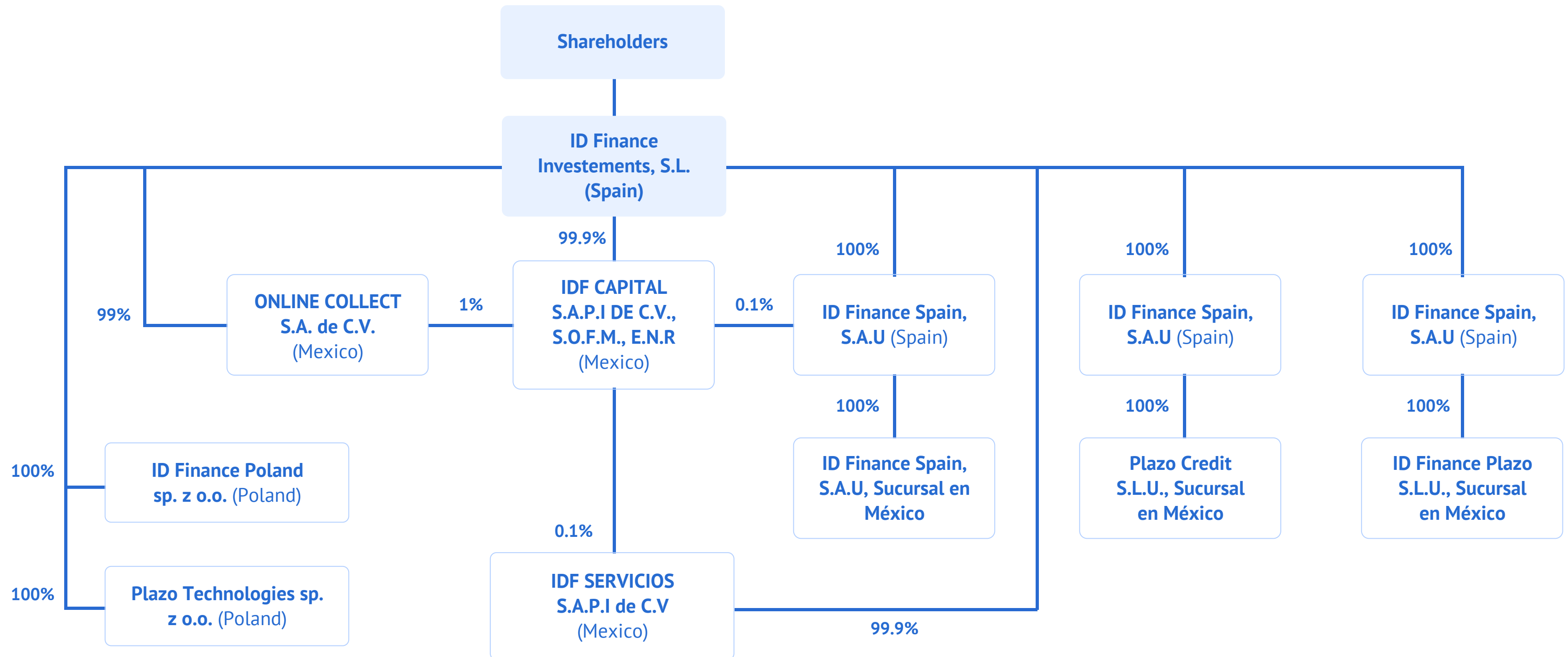
ID Finance Investments, S.L. is a holding company that is directly owned by shareholders.

Corporate structure comprises 3 geographies:

- **Operating entities in Spain:** Moneyman and Plazo brands (ID Finance Plazo and Plazo Credit)
- **Operating entities in Mexico:** Moneyman brand
- **IT hub in Poland:** The Polish subsidiary, "Plazo Technologies, Sp. z o.o.," serves as the IT hub within the ID Finance Group. Its primary responsibility is to develop and maintain the software tools and IT systems utilized in the Moneyman and Plazo products, which are licensed to other subsidiaries within the Group. Although the Moneyman and Plazo products are not marketed in Poland, they are actively promoted and operated in Spain and Mexico.



CORPORATE GOVERNANCE  
ID FINANCE - CORPORATE GROUP STRUCTURE



CORPORATE GOVERNANCE

**We have the following composition of the top management team and corporate governance structure within the Group:**

The highest management body in the Group are the Shareholders: among **shareholders** there are co-founders, UK-based equity fund Kingsway Capital, UK-based crowdfunding platform Crowdcube, as well as minor shareholders including top-management. Shareholders’ meeting are held at least once a year or more frequently upon request. They make decisions on the most significant issues related to the Group’s activities, such as the replacement of the CEO, COO and co-founders, approval of the Group’s accounts, transactions involving shares, etc.

The general management of the Group's activities is carried out by the **Board of Directors**. The Board is responsible for the overall direction, supervision and management of the Group and its business activities. Board meetings are held at least once on a quarterly basis. The Board is composed of two shareholder representatives from co-founders, two shareholders representatives from Kingsway Capital and one independent director - industry expert with over 30 years of relevant experience in banking and finance.

Also, there is **Executive Committee (EXCO)** which is responsible for high- level strategy and operational decisions. EXCO meetings are held on a monthly basis (or more frequently if necessary). EXCO is composed of co-founders, country managers (CEOs) and Global division heads. Currently 9 members.

The current activities of the companies of the Group are managed by country managers (CEOs) and global division heads.

Country managers make operating decisions and manage the business on a daily basis, including budget elaboration.

Division heads are responsible for the relevant directions. The Group follows a dual reporting structure to country manager and to the global head of the relevant division.



## CORPORATE GOVERNANCE

We have set up the multi-level monitoring process in the Group:

- **Daily reports** are sent to the local team, management and EXCO members with the key operating metrics to monitor the daily performance of the company in terms of client onboarding, verification and scoring, loan issuance, collection etc.
- **Bi-Weekly calls** are held with the country manager, local management team and EXCO members to monitor the KPIs of each department: risk, verification, collection, customer service, marketing, product, finance, as well as latest updates/plans of the business in general.
- **Monthly reports** are prepared by each company division separately, including the monthly plan/fact analysis.
- **Quarterly reports** – the country manager presents to the board the quarterly results of the company.



# RISK MANAGEMENT

**We are developing risk management processes in the Group to ensure the stability of its operations and the sustainability of its business. We take a risk-based approach to our work.**

The ID Finance has exposure to the following risks from its use of financial instruments and operating activities: credit risk, liquidity risk, market risk and operational risk.

The Group's structural subdivisions prepare regularly management reporting forms to provide the management bodies with the necessary information to make decisions.

## CREDIT RISK

Credit risk is the risk of financial loss to the ID Finance if a customer or counterparty to a financial instrument fails to meet its contractual obligations and arises primarily from the ID Finance loans from customers.

**Chief Risk Officer is responsible for credit risk management. Credit risk is mitigated as follows:**

- The Group's credit policy defines lending guidelines according to its business strategy and efficient risk management, protecting assets as well as complying with local regulatory requirements. Potential or foreseeable changes in applicable laws are analysed on an ongoing basis and any necessary modifications to the ID Finance operations are implemented proactively.
- Penalties and term extensions are used to mitigate risks associated with unpaid debts. These options are available to borrowers in cases where there is a difficulty or unwillingness to repay the debts, Penalties and extensions generate extra cash flows to the portfolio.
- Loan loss allowances are an adequate way to mitigate risk of losses to be incurred during loan repayment transactions.

## LIQUIDITY RISK

Liquidity risk refers to the availability of sufficient funds to meet borrowed funds withdrawals and other financial commitments associated with financial instruments as they actually fall due.

The Head of Treasury controls these types of risks by means of maturity analysis, determining the ID Finance strategy for the next financial period. Current liquidity is managed by the Head of Treasury as well, which deals with the markets for current liquidity support and cash flow optimization. In order to manage liquidity risk, as part of the assets/liability's management process, the Group's Head of Treasury performs daily monitoring of future expected cash flows from customers.

## RISK MANAGEMENT

**MARKET RISK**

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk covers interest rate risk, currency risk and other pricing risks to which the ID Finance is exposed. Market risk arises from open positions in interest rate and equity financial instruments, which are exposed to general and specific market movements and changes in the level of volatility of market prices and foreign currency rates.

The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimising the return on risk. The Group's Head of Treasury conducts monitoring of the Group's current financial performance, estimates the ID Finance sensitivity to changes in interest rates and its influence on the Group's profitability.

**OPERATIONAL RISK**

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Group's processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risks, such as those arising from legal and regulatory requirements and generally accepted standards of corporate behaviour. Operational risks arise from all the ID Finance operations.

The Group's objective is to manage operational risk by balancing the avoidance of financial losses and damage to the Group's reputation with overall cost-effectiveness, while ensuring that control procedures do not restrict initiative and creativity.

The primary responsibility for the development and implementation of controls to address operational risk rests with senior management within each business unit.

# NON-FINANCIAL RISK MANAGEMENT

ID Finance has an internal management model for non-financial risks, designed to identify main risks, share knowledge with the main stakeholders involved and minimise the potential impacts detected. This model is based on the implementation of the approved policies by each area, as well as on the oversight of their application by the Management Committee. The internal management model for non-financial risks, together with the policies available to the entity, is described throughout this report. Within this framework, the main risks identified are:

**1. Legal risks of a commercial nature:** any regulatory change related to the Group's activities could have a significant impact on its future development. To mitigate this impact, each business unit, as well as the Group at a consolidated level, has specific Legal Advisory areas responsible for analysing and assessing potential changes. These areas also participate in sectoral panels, where not only existing regulatory changes are discussed, but efforts are made to anticipate future developments.

**2. Operational Risks:** ID Finance defines operational risk as any event arising from its operations that may result in a loss. The main operational risks identified are as follows:

- **Business Continuity:** refers to the probability of interrupted business operations for reasons beyond the company's control. To minimise this risk, the Group has implemented several measures, including the ability to shift all staff to remote work, redundancy with critical suppliers (such as credit bureaus and technology providers), and a cloud-based storage policy for its servers that meets the highest technological security standards.

- **Cybersecurity:** closely related to the previous point, one of the Group's main assets is its data. Accordingly, ID Finance has developed policies to protect it from cyberattacks. In addition, by operating in a cloud-based environment, the Group is committed to server decentralisation, thereby reducing exposure to physical risks.

**3. Occupational risks:** the Group is exposed to potential labour conflicts and regulatory changes that could affect its employment relationships. To mitigate this risk, ID Finance promotes a People First culture that places its employees and collaborators at the centre of the organisation. Moreover, the Group has HR departments in all its jurisdictions to support the smooth execution of its activities.

**4. Data Protection Risks:** these risks arise from the availability, integrity, and confidentiality of the personal data processed by ID Finance as part of its normal business activities. Each of the Group's units has staff qualified in Data Protection Officer (DPO) functions to ensure compliance with data handling and processing standards across the organisation.

ID FINANCE

# RESPONSIBLE BUSINESS

# RESPONSIBLE FINANCING

**We believe that financial services, when accessible and fair, can reduce inequality and help more people access opportunities. We aim to play an active role in opening up a world of opportunity for individuals by supporting their financial well-being, and removing the different barriers that people can face in accessing financial services.**

Applying the approach of responsible lending, we strive to provide our clients with financial products and level of service that best meet their needs.

In our Group, we have established a clear and comprehensive process for client care, communication, and engagement. All procedures are meticulously documented within internal policies and guidelines, ensuring consistency and transparency. We utilize standardized scripts to facilitate effective interactions with clients. Additionally, our client support framework is reinforced by three dedicated departments: the Ombudsman, the Customer Support Department, and the Quality Control Department. Each unit is responsible for distinct aspects of client relations and operates independently from one another. This organizational structure enables us to deliver the most efficient and tailored approach to client service, ensuring high levels of satisfaction and trust.

In our work, we adhere to the principles of openness, reliability and completeness of the information provided about our financial products and all microcredit conditions, and also follows all the requirements of the legislation of Spain and Mexico.

We are committed to upholding the principle that all terms and conditions of our financial products must be transparent, comprehensive, understandable, and easily accessible to every client. Throughout the application process for microcredit or Plazo debit cards, clients have the opportunity to review all relevant terms and conditions of the product, as well as the specific agreement, prior to entering into any contractual relationship. Furthermore, we provide an integrated loan calculator within the process flow, enabling clients to explore various loan scenarios—varying amounts and repayment periods—while clearly displaying repayment amounts, durations, and interest costs. This tool empowers clients to make more informed, well-considered decisions that best suit their financial needs.

The Group also ensures that comprehensive information about all terms and conditions is publicly available on the products' websites, enabling clients to review and familiarize themselves with the details before making a decision to choose our products. Our product websites also feature a dedicated FAQ section, designed to provide answers to common questions and assist clients in making informed decisions.

We strictly prohibit the dissemination of any information that may mislead clients regarding the subject of the contract or that could result in ambiguous interpretations of the microcredit terms and the use of the financial product. The use of small print or other tricks designed to deceive or obscure information is entirely unacceptable.

## RESPONSIBLE FINANCING

Additionally, we are always pleased to address any questions our clients may have and to provide detailed explanations of all product conditions. To facilitate open and accessible communication, we offer multiple channels, allowing clients to select the most convenient for them. These include a chatbot available on our websites and apps to assist with frequently asked questions, as well as options such as:

- **Chat widget to speak directly with a Customer Support agent**
- **Dedicated Customer Support phone line**
- **Message widget to contact the Ombudsman (messages are received by the Ombudsman via email)**

These options are designed to ensure our clients can resolve any doubts or concerns effectively before proceeding with a financial product.

We adopt a responsible approach to the client verification process prior to approving their application for our products. Within the Group, the Know Your Customer (KYC) and Verification teams are responsible for conducting thorough checks, which include verifying the client's identity, ensuring they are not listed on any blacklists or sanction lists, and assessing their financial capabilities. This process helps us prevent fraud and enhances customer login security through biometric authentication.

We recognize our responsibility to accurately assess the client's financial capacity to obtain a microcredit, aiming to prevent over-indebtedness and avoid creating significant financial difficulties for our clients.

To evaluate the client's financial capabilities, we request authorized access to their banking accounts via open banking, allowing us to review income, expenses, and cash flows. Additionally in Spain, we check the client's Social Security history to ensure that the requested loan amount aligns with their financial situation. In Mexico, we also conduct inquiries with the Credit Bureau to review the client's credit history.

If, during verification, we determine that the requested amount exceeds the client's capacity or that the client has multiple outstanding debts, we either offer alternative microcredit conditions that better suit their income level or, if necessary, decline to provide the service.

All our employees regularly undergo training to stay updated on the terms and conditions of our products and services, as well as on our operational processes. They also participate in ongoing training in business ethics and communication skills to ensure professional and responsible service delivery.

# CLIENT RIGHTS PROTECTION

The Group treats customers in arrears or default with understanding and careful consideration. We have established clear, fair, and effective procedures for managing such situations to ensure respectful and responsible handling of overdue debts.

The Group has an Ombudsman (separately in Spain and Mexico) who regularly conducts procedures to resolve overdue debts when clients encounter difficulties in fulfilling their obligations and to address conflict situations on an individual basis. The Ombudsman operates independently from other internal structures of the Group and acts as an impartial intermediary between the company and the customer, always aiming to help resolve issues and find amicable solutions.

Guided by ethical principles and full transparency, the Ombudsman informs customers about their situation and rights, maintaining an empathetic and responsive approach. They offer repayment alternatives and solutions tailored to the customer's financial capacity, with the primary goal of genuinely assisting clients in overcoming difficulties, not just recovering debts.

Any client can contact the Ombudsman Office to seek assistance with overdue debts, submit complaints, or raise concerns. Appeals are typically reviewed within approximately 4 days of receiving all necessary documentation, and a response is sent to the applicant's email.

Thanks to this open and client-oriented approach, in 2024, the Ombudsman's reception in Spain handled **6,148** requests, including **1,442** debt-related applications: of these, restructuring was implemented for **688** applications.

In Mexico, **1,218** requests were processed, of which **585** were debt-related applications: we offered debt restructuring to **12** loans.

## CHANNELS TO CONTACT OMBUDSMAN:

### Spain

Leave a request on the website through widget:

[Customer Ombudsman Moneyman / Customer Ombudsman Plazo](#)

Send an appeal to the emails:

[atencionalcliente@moneyman.es](mailto:atencionalcliente@moneyman.es) / [defensor@plazo.es](mailto:defensor@plazo.es)

### Mexico

Leave a request on the website:

[Customer Ombudsman Moneyman](#)

Send an appeal to the email:

[defensorcliente@moneyman.com.mx](mailto:defensorcliente@moneyman.com.mx)

*If client sends a request through another channel or department, this request will be redirected to the Ombudsman.*

## CLIENT RIGHTS PROTECTION

The Ombudsman also handles complaints concerning threats or inappropriate behaviour by employees or agents. The process involves opening an investigation and reviewing all relevant communications, including phone calls, messages, and emails between the agent and the customer. Based on this review, the Ombudsman prepares a report, which is escalated to the agent's supervisor.

The supervisor then decides on disciplinary measures, which may include salary deductions, issuing an administrative record, or, in serious cases, dismissal. Immediate feedback is provided to the agent to ensure proper follow-up and accountability.

To evaluate the effectiveness of the Ombudsman's work, we regularly measure the Customer Satisfaction Score with the Ombudsman. In 2024, **63%** of clients rated the Ombudsman's work positively.

The Group is always ready to support its clients facing emergency situations. We closely monitor events in Spain and Mexico and act proactively to provide timely and effective assistance.

In October 2024, severe flooding occurred in Valencia, affecting many areas, destroying thousands of houses, and tragically claiming the lives of 236 people. In response, ID Finance offered relief measures to borrowers affected by the disaster. Customers in that area were granted a 3-month repayment extension without any increase in interest rates. Thus, **payment deferrals were granted to over 125 affected citizens.**



63%

RATED THE OMBUDSMAN'S  
WORK POSITIVELY IN 2024

# COMMUNICATION WITH CLIENTS

**We place great importance on offering clients multiple channels of communication, recognising their feedback as a valuable source of insight that guides the ongoing improvement of our products and services.**

Clients can contact us through various channels, including hotline, email, live chat, website forms, WhatsApp, and the mobile app. We also monitor social media messages and forward them to the appropriate service teams when needed.

Our Customer Support department is the main contact point for all enquiries and complaints, ensuring each case is reviewed objectively and resolved by the right department. Direct enquiries to the Ombudsman are managed through dedicated channels.

All communications are stored in a centralised database, allowing us to maintain a complete client record and deliver more efficient, personalised support.

We examine each request thoroughly and aim to respond promptly. For enquiries related to product information or our services, the average response time is only a few minutes. For requests or complaints requiring more detailed investigation, we are committed to providing a resolution within 24 hours.

In 2024, **more than 770,000 requests** were received across all communication channels in Spain and Mexico. We successfully reviewed and resolved 100% of these requests and complaints, ensuring timely and professional responses.

In Mexico we additionally have communication channel UNE. UNE was created in compliance with the Law for the Protection and Defense of Financial Services Users to identify, categorise, and address enquiries, complaints, and clarifications from customers, and to determine the appropriate process for resolving each case. Every month we must report to the regulatory authorities about complaints received through the UNE channel. In 2024, **3,073 requests** were processed through this channel, **with 100% of them receiving a response.**

## YOU CAN SEND AN APPEAL OR COMPLAINT THROUGH THE FOLLOWING CHANNELS:

**Moneyman Spain:** +34 937 227 354 / +34 900 533 827

**Plazo Spain:** +34 900 533 861

**WhatsApp Plazo Spain:** +34 623 126 339

**Moneyman Mexico:** +52 800 422 1022 / +52 55 5005 9720

**Spain:** [clientes@moneyman.es](mailto:clientes@moneyman.es) / [clientes@plazo.es](mailto:clientes@plazo.es)

**Mexico:** [clientes@moneyman.com.mx](mailto:clientes@moneyman.com.mx)

**UNE email in Mexico:** [une@moneyman.com.mx](mailto:une@moneyman.com.mx)

**Chat in the apps and on the websites**

**Feedback form on the websites**

## COMMUNICATION WITH CLIENTS

We adhere to strict standards in the way our employees engage and communicate with our customers. Our business ethics do not tolerate any form of aggression, abusive or disparaging words, suppression or threats. Our communications are always based on the principles of respect, openness, honesty and loyalty.

To minimize the risk of unethical behavior, we implement regular monitoring and training for our staff. Our Quality Control department is responsible for ensuring employee compliance with the group's established rules and principles. They routinely review randomly selected call recordings to assess the accuracy of the information provided, communication skills, and adherence to ethical standards.

Each employee receives an internal quality score based on these evaluations, which influences their motivation and development. If violations or low scores are identified, an action plan is developed to address and correct the issues. In cases of serious violations—such as threats, blackmail, fraud, or legal breaches—disciplinary measures are taken, including possible dismissal and involving law enforcement agencies.

Additionally, we actively gather feedback from our customers to evaluate their satisfaction with our services and products. Customer satisfaction is assessed after every interaction across all communication channels, ensuring continuous improvement and high standards of service.

We measure the **NPS (Net Promoter Score) on a monthly basis**. Based on the data we receive, we carry out an analysis during which we carefully examine the collected questionnaires and comparing them with the results of previous periods. Based on the results of the survey, we try to implement the recommendations received or eliminate the identified shortcomings. Also, in case of deterioration of the NPS, we identify possible causes that we seek to eliminate in the future.

48%

Plazo NPS in 2024

42%

Moneyman Spain NPS in 2024

68%

Moneyman Mexico NPS in 2024

*NPS measures the loyalty of customers to a company. NPS scores can be measured using different communication channels and reported with a number from -100 to +100. In MoneyMan we measure NPS using email and push notifications in app and ask customers how likely they are to recommend the product to others on a scale of 0 to 10. In Plazo we use the 5-star measurement approach in Plazo app asking customers the level of satisfaction.*

# COMPLIANCE

ID Finance's corporate culture is founded on the principles of transparency, commitment, equal opportunities, and legality.

We have a zero-tolerance policy towards bribery and corruption in any form and actively oppose actions aimed at gaining unfair advantages over competitors, whether in the market or through public and private contracts, especially when such actions are based on unlawful conduct.

The Compliance department within the ID Finance Group is fully responsible for overseeing all aspects of legal adherence and internal standards. This dedicated team develops, implements, and monitors policies, procedures, and controls to foster a culture of integrity, prevent misconduct, and ensure swift, effective responses to potential violations. Their work encompasses ongoing training, risk assessment, and close collaboration with management to uphold the highest ethical standards across all operations.

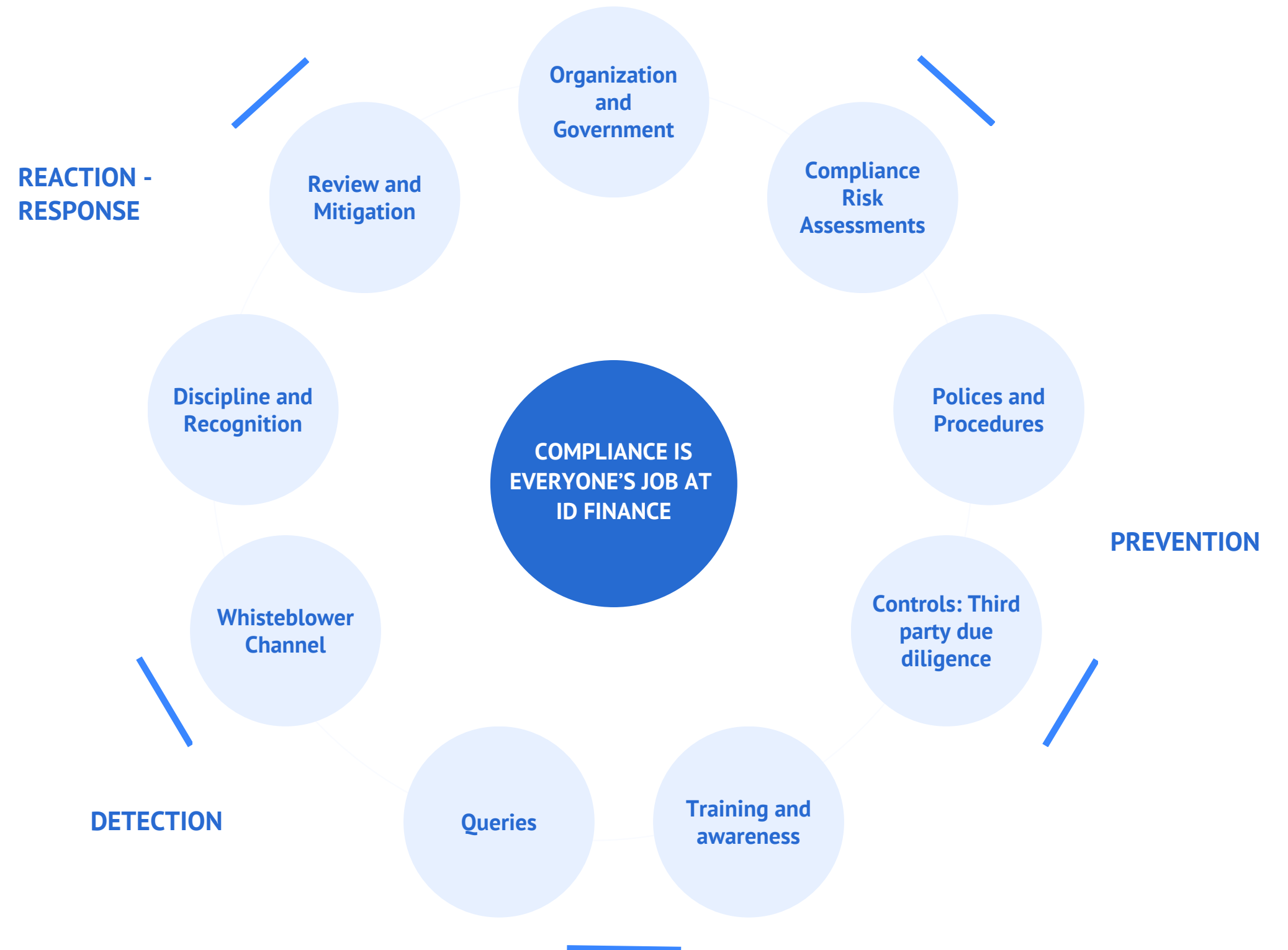
We have a comprehensive set of internal documents that establish processes and measures to manage all aspects of compliance, safeguard against internal and external corruption and fraud, and define our ethical principles and standards of conduct. These documents include:

- Code of Ethics
- Conflicts of interest policy
- Anti-Corruption and Fraud Prevention policy
- Gifts policy and hospitality expenses
- Supplier and third parties' management policy
- Corporate Compliance policy
- Communication Channel Manual and Manual for Classifying Whistle-blower Complaints by Seriousness



COMPLIANCE

Furthermore, the Group has adopted the **Global Compliance Model: Prevention, Reaction, and Response**. This framework provides a comprehensive approach to managing potential breaches, emphasizing proactive prevention, rapid reaction to incidents, and appropriate response measures to mitigate risks and reinforce our commitment to integrity and ethical business conduct.



## COMPLIANCE

In 2024, we conducted comprehensive Compliance Training aligned with all requirements outlined in our Compliance Model. These programs aimed to equip staff with a clear understanding of the compliance framework, their responsibilities under the Compliance Model, and the potential consequences of non-compliance. Training and awareness sessions were delivered to employees of Spain and the Spanish branch in Mexico, both online and offline, in Spanish and English. Additionally, a dedicated training session was held for the Board of Directors to ensure top-level engagement and understanding.

Moving forward, we plan to continue implementing such training initiatives, with a focus on customising and tailoring them for different departments. This approach will consider the specific risks and challenges relevant to each area, thereby maximizing the effectiveness of our compliance education and fostering a stronger culture of integrity across the Group.

**In 2024, ID Finance received certifications for compliance with both UNE 19601 Anti-Bribery Management System and ISO 37001 Compliance Management Standard in all ID Finance Spain companies.**

ISO 37001 is an international standard that provides guidelines to help organisations prevent, detect and combat bribery and corruption. UNE 19601 is a national standard that outlines the requirements for implementing a Criminal Compliance Management System to assist in preventing, detecting, and responding to criminal incidents.

To obtain these certifications, the Group underwent a rigorous external and independent audit under the supervision of the Spanish National Accreditation Body (ENAC).

Adopting these standards demonstrates ID Finance's commitment to ethical and transparent practices, which enhances the company's prestige and reputation. Implementing these standards also supports legal compliance, as the controls established help identify and mitigate risks, thereby reducing the likelihood of criminal incidents.

Moreover, maintaining a robust compliance management system fosters greater confidence among clients, investors, and business partners.

Ultimately, the integration of UNE 19601 and ISO 37001 strengthens ID Finance's market image, affirming its dedication to integrity, transparency, and responsible business conduct.

# BUSINESS ETHICS

**At ID Finance Group, we uphold a strict zero-tolerance policy regarding any violations of business conduct and ethics.** This unwavering principle is mandatory for all leaders, employees, and partners across the Group. We operate in strict accordance with high ethical standards, fostering a corporate culture rooted in compliance with moral and ethical principles at every level.

Our Code of Ethics articulates the moral framework that guides our behavior and business practices worldwide. We expect all employees to act ethically and to hold themselves accountable in their interactions with customers, communities, and colleagues. The Code delineates the core principles and values of the Group, sets standards for interactions within the organization and with external stakeholders, and emphasizes anti-corruption measures, the protection of fair competition, and other ethical considerations.

In 2024, our Code of Ethics was approved by the highest governing body – the Board of Directors. This is an important step because it highlights the significance of the Code for our organization and emphasizes our commitment to the principles and standards outlined within it.

All new employees are introduced to the Code of Ethics prior to commencing their roles. Upon hiring, each employee is required to familiarize themselves with our internal policies, including the Code, and to complete mandatory training on business ethics. We emphasize the importance of reporting any violations, such as fraud, theft,

embezzlement, bribery, corruption, or other unethical conduct. Our zero-tolerance stance ensures that all allegations are taken seriously, including issues related to harassment and discrimination.

For these purposes, the Group provides multiple communication channels for reporting any violations (see the Countering corruption and fraud section). **100% of requests** received through these channels are reviewed and thoroughly investigated. The Group guarantees the absence of any form of retaliation, discrimination or disciplinary action against whistleblowers who make reports in good faith and on the basis of reasonable grounds.

In Spain the Group also has [Ethics Line](#), which is a strictly confidential communication channel accessible to employees, associates, clients and, in general, any interested third party with the aim of informing of any possible violations. We have appointed a designated Whistleblower Officer with the necessary expertise to effectively manage and address the reports received through the Ethics Line.

Furthermore, the Group strictly adheres to antitrust principles and does not engage in practices that hinder market competition. In 2024, ID Finance did not incur any fines related to anti-competitive behavior, nor have there been any legal actions against the Group concerning violations of antitrust laws or attempts to restrict competition.

# 100%

**EMPLOYEES ARE FAMILIAR  
WITH THE CODE OF ETHICS**

**Conflict of interest :**

Every day, our employees make decisions that affect colleagues, clients, partners and other third parties. That is why we pay special attention to regulating these issues.

The Group has a number of internal policies regulating conflicts of interest issues, in particular Conflict of interest policy. This policy contains guidelines for preventing and managing conflicts of interest that may arise as a result of employees' activities.

All our employees should avoid situations where their personal, family or financial interests may conflict with the interests of the Group and clients. If a situation arises where there is a conflict of interest, employees should report it.

We regularly distribute communications to employees, reminding them of the Group's internal policies regarding potential conflict of interest situations, such as the acceptance of gifts during holidays. These ongoing reminders help reinforce a culture of transparency and ethical conduct across the organization.

# COUNTERING CORRUPTION AND FRAUD

**ID Finance is committed to maintaining a zero-tolerance approach to fraud and corruption, recognizing their detrimental impact on both business operations and society as a whole. We firmly oppose all forms of corruption, fraud, and bribery, and actively promote fair competition and full compliance with applicable legislation.**

To support this commitment, we have implemented a comprehensive set of measures aimed at monitoring, preventing, and reducing risks related to corruption and fraud. The cornerstone of our anti-corruption and fraud prevention efforts is the **Anti-Corruption and Fraud Prevention Policy**. This policy underscores our dedication to responsible management and provides clear behavioral guidelines that ensure our activities align with current laws and uphold the principles of honesty and integrity.

The policy details our guiding principles, key controls for fraud and corruption prevention, mandatory training programs on corruption and fraud awareness, procurement procedures, conflict of interest management, and other critical issues.

All employees and divisions within the Group are responsible for adhering to this policy. To ensure understanding and compliance, **100% of our employees** have been introduced to the policy's provisions and completed mandatory training sessions, including Criminal Compliance, Anti-bribery and Anti-corruption, Reputational Risk

Management System, and Conflicts of Interest. Following each training, employees undertake assessments to evaluate their understanding. Additionally, all employees sign a Declaration of Acceptance of Group Policies annually, reaffirming their commitment to uphold our standards of integrity and compliance.

Our employees are aware that they are obliged to report any violations related to the provisions of the Policy. If an employee becomes aware of any violation that has occurred or has suspicions about the occurrence of such a violation, he must contact his immediate supervisor, Compliance Officer, the Regulatory Compliance Department, the Legal Department or the Human Resources Department.

The report also can be made either through the Ethics line, guaranteeing confidentiality and impartiality in the facts reported, or through the Compliance mailboxes. ID Finance guarantees the absence of any retaliation 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 will be grounds for disciplinary action.

## COUNTERING CORRUPTION AND FRAUD

**At ID Finance**, we are committed to ensuring that **100% of complaints** submitted through any channel are resolved in a transparent and prompt manner within a maximum of 5 working days. This dedicated approach reflects our commitment to continuously improving our whistleblowing mechanism, fostering an environment of trust, accountability, and integrity.

All identified indications of fraud or corruption will be investigated promptly and with the utmost diligence. If a violation is confirmed, those responsible for the violation are held accountable. To prevent similar incidents in the future, the Group promptly develops and implements corrective and preventive measures and recommendations.

To ensure full compliance with all policies, ID Finance has established a comprehensive disciplinary program outlined in our Corporate Disciplinary Policy. This policy applies not only to individuals who directly violate internal regulations and related processes but also to those who induce, cooperate with, or assist in such breaches. Additionally, it extends to individuals who have knowledge or indications of non-compliance and who contribute to preventing or hindering the detection of violations.

**In 2024, there were no confirmed cases of corruption within the Group.**

Employees of Mexico companies have access to a channel in our Customer Relationship Management (CRM) system where they can submit reports anonymously to the Compliance Officer in case they detect any suspicious transactions, fraud, etc.

**MESSAGES ABOUT ACTUAL OR SUPPOSED VIOLATIONS CAN BE SENT TO:**

Use the Ethic Line (Spain): [Ethic Line](#)

Write to the e-mail of Compliance Department

Spain: [compliance@idfinance.com](mailto:compliance@idfinance.com) / [rrhhcompliance@idfinance.com](mailto:rrhhcompliance@idfinance.com)

Mexico: [compliance.mx@idfinance.com](mailto:compliance.mx@idfinance.com)

*Employee also can directly contact his supervisor, HR department or the Compliance department*

## COUNTERING CORRUPTION AND FRAUD

We actively and continuously work to protect our clients from external fraud risks by implementing new processes, controls, and safeguards. This includes rigorous screening of every new client against our internal blacklists, as well as industry-wide databases maintained by financial regulatory authorities.

Additionally, we assess each client's Digital Footprint to verify the authenticity of their data, ensuring it is not fabricated. We monitor behavioral patterns on our website and mobile application during registration and throughout interactions, which can help identify suspicious or fraudulent activities.

All clients opening an account are required to undergo KYC (Know Your Customer) procedures. While not all microloan borrowers are subject to full KYC, we verify their identity by cross-referencing data with government services and banking records. In cases of suspicion, we conduct additional KYC checks to confirm the client's identity.

In 2024, several clients fell victim to external social engineering schemes<sup>1</sup>, where in fraudsters manipulated them into registering on our Plazo app and providing personal

data, which was subsequently used to facilitate theft of funds. Upon notification from our clients, we promptly canceled these fraudulent credit accounts. We have also integrated device verification into our verification and approval processes. We are further refining this mechanism: if device IDs do not match, clients are asked to re-verify their identity with a live photo and document submission.

In early 2025<sup>2</sup>, in Mexico, we identified a case of document forgery aimed at external fraud. To address this, we are enhancing our automated identity verification systems to ensure that submitted photos and data match accurately.

Our commitment extends beyond prevention: we prioritize our clients' interests by proactively developing risk mitigation mechanisms. Additionally, we fully waive debts for clients who have fallen victim to fraud, upon receipt of official reports to law enforcement authorities confirming their victimization.

*1 Social engineering is a method of manipulating people to obtain confidential information or access to systems and resources. Instead of exploiting technical vulnerabilities, attackers rely on trust and psychological techniques to deceive the victim and make them disclose personal data, passwords, or other important information*

*2 The report is prepared in autumn 2025, so some important information that occurred in the Group at the beginning of 2025 may be presented.*

# ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM

The Group takes comprehensive preventive measures to establish and maintain business relationships exclusively with reliable clients and counterparties engaged in legitimate activities and earning income from lawful sources.

The Group has implemented an Anti-Money Laundering and Countering the Financing of Terrorism (AML/CTF) Policy and Manuals designed to prevent money laundering. These documents set out standards and rules of conduct that all Group employees must adhere to, along with action protocols, control, and reporting systems to prevent unauthorized access by undesired persons or groups. They also include client acceptance policies and procedures related to customer due diligence and identification.

The Compliance Department is responsible for overseeing and ensuring the effective implementation of the Anti-Money Laundering and Countering the Financing of Terrorism (AML/CTF) policy. Additionally, it monitors compliance with internal procedures and liaises with regulatory authorities to maintain high standards of compliance. In accordance with legislation in Spain, the Group also has established an internal control framework supported by a designated Internal Control Body and a dedicated AML/CTF department responsible for ensuring proper implementation of AML/CTF procedures.

All Group employees are required to undergo AML/CTF training and familiarize themselves with internal policies and procedures.

Additionally, in 2024, we conducted supplementary AML training aimed at establishing strict compliance standards and procedures to ensure a robust and responsible approach to identifying and responding to suspicious transactions related to money laundering. The training also aims to raise awareness among all employees about the importance of prevention and detection. It was divided into three groups, and 100% of employees in Spain and Spain branch in Mexico completed it, including the Board of Directors and Top Management of the ID Finance Group.

Every employee understands that any suspicion of AML/CTF-related risks must be immediately reported through the channels established in the relevant Manual or Policy.

Additionally, our brands in Spain, Moneyman and Plazo, as obliged entities under Law 10/2010 on Money Laundering Prevention, cooperate with authorities such as SEPBLAC and the Bank of Spain by reporting suspicious transactions. These companies undergo annual independent AML/CTF audits, consistently achieving positive results, including in 2024.

In Mexico, both subsidiaries are subject to rigorous annual AML/CFT audits conducted by external auditors authorized by the regulator, as required by local law. These audits ensure ongoing compliance with Mexican regulation and assess the effectiveness of their AML/CFT measures.

# RESPONSIBLE PROCUREMENT



Following best practices in ESG management, ID Finance is committed to extending its principles of sustainable development to its business partners. The Group adopts a responsible approach to supplier selection, conducting comprehensive risk assessments to identify potential issues related to unfair business practices, legal violations—including anti-corruption and fraud legislation—as well as financial, tax, and compliance risks.

Our Supplier and Third-Party Management Policy governs the engagement process with partners, encompassing due diligence procedures, conflict of interest management,

procurement protocols, and other aspects of third-party interactions. In line with this policy, the Compliance Department at ID Finance Group executes a rigorous approval process for all suppliers and third parties. This process ensures that all collaborators meet our integrity, regulatory compliance, and sustainability standards.

We have established a comprehensive due diligence model from a compliance perspective, which is continuously refined. Certain transactions—such as contracts with suppliers, investors, and any partners—require individualized assessments. Our due diligence process involves collecting relevant information and documentation to verify the identity and activities of each third party. If the information obtained indicates potential risks, our Compliance team will request additional data and conduct a detailed analysis conducted to evaluate its suitability for engagement. A reasoned opinion—either favorable or unfavorable—is issued, guiding our decision on establishing or continuing the relationship.

Our suppliers are obligated to comply with our ethical standards and policies. All third parties are required to sign a declaration of adherence to the Group's Code of Ethics and Compliance Policies. Breach of any clauses within our Code or Compliance Policies constitutes a serious contractual violation.

We also maintain open channels of communication for feedback, appeals, and complaints, ensuring that **100% of requests** are thoroughly considered and responded to with well-founded explanations.

# PERSONAL DATA PROTECTION

At ID Finance, the security of our clients' personal data and the integrity of information systems are fundamental pillars of our corporate governance framework. Recognizing the critical importance of these areas, the Group dedicates substantial resources to the continuous development and enhancement of our information security measures.

We conduct regular audits of our information security systems, updating protocols and controls to mitigate the risks of data leakage, unauthorized access, and data distortion. These proactive measures enable us to maintain a robust security posture aligned with international best practices and legislative requirements.

The Information Security Department oversees the overall organization, coordination, and monitoring of compliance with security policies and standards. It routinely performs internal audits to assess the effectiveness of existing controls. Should any non-compliance be identified, the department develops and implements targeted corrective action plans to address vulnerabilities and strengthen our defenses.

A central document guiding our information security efforts is the **Information Security Policy**, which delineates our approach to safeguarding information assets. It establishes core principles, assigns responsibilities to relevant departments, and references internal policies governing all aspects of security within the Group. This policy is subject to regular review and updates to incorporate technological advancements and process improvements, ensuring it remains comprehensive and effective.

The provisions of this Policy apply to all employees with access to sensitive data or involved in data exchange processes, reinforcing our commitment to a security-aware organizational culture.

In 2024, we introduced a comprehensive **Corporate Business Continuity Plan (BCP)**, supported by updated Business Impact Analyses (BIAs) and an enhanced risk assessment framework. These measures improve our preparedness against operational disruptions, ensuring uninterrupted service delivery and data protection.

Significant upgrades to our security infrastructure include the deployment of a **global, role-based Virtual Private Network (VPN)**, providing secure and controlled remote access for employees and partners worldwide.

We perform quarterly internal audits of our data warehouse to identify and mitigate potential vulnerabilities, reducing the risk of data leaks. Additionally, we conduct regular vulnerability testing of our mobile applications, web platforms, and information systems infrastructure, enabling continuous security enhancements.

To safeguard client data, we utilize three independent databases, ensuring redundancy and resilience. All personal data is stored and transferred strictly in accordance with the legislation of Spain, Mexico, and internal regulatory standards. When transferring personal data to third parties or legal entities, we adhere to contractual obligations and confidentiality agreements, maintaining strict data protection protocols.

To maximize security and operational efficiency, the Group employs modern IT equipment and infrastructure. In 2024, we acquired additional network hardware, which centralizes management, enhances security controls, and reinforces the integrity of our network environment. For example, the deployment of a new telephony server in our data center improved reliability and redundancy; notably, during a nationwide power outage in Spain in April 2025<sup>1</sup>, our servers remained operational throughout, ensuring uninterrupted communication services.

Furthermore, we obtained a license for **vSphere**, a comprehensive virtualization platform designed to create, manage, and optimize our virtual IT infrastructure. This advanced technology enables us to allocate resources efficiently, improve scalability, enhance disaster recovery capabilities, and reduce operational costs, thereby reinforcing our overall security posture.

*1 The report is prepared in autumn 2025, so some important information that occurred in the Group at the beginning of 2025 may be presented.*

## PERSONAL DATA PROTECTION

ID Finance is committed to fully respecting the rights and freedoms of our clients, ensuring their right to privacy is safeguarded in all aspects of personal data processing. We adhere strictly to applicable legislation and best practices to uphold the highest standards of data protection.

All clients are required to familiarize themselves with our Privacy Policy and Terms and Conditions, which are publicly accessible on our website. Additionally, clients provide informed consent for the collection and processing of their personal data—this consent details the scope of data collected, its intended use, our data sharing policies, and mechanisms for revoking consent. Clients affirm this consent not only during registration but also when engaging with our chat services.

The Group has designated a person responsible for overseeing compliance with data protection legislation and internal policies. The DPO's primary responsibilities include monitoring adherence to legal and regulatory requirements, organizing employee training on data protection, and managing inquiries and complaints related to personal data.

To strengthen data security, we implement multi-factor authentication (MFA) across our systems, significantly reducing the risk of unauthorized access. All client data is stored and transferred exclusively within the frameworks established by the legislation of Spain, Mexico, and our internal regulatory standards.

Our staff members are thoroughly trained to understand the importance of confidentiality and are kept informed of all relevant data protection requirements.

Access to personal data is strictly limited to authorized personnel, who are granted access solely on a need-to-know basis for their professional responsibilities. All employees sign Non-Disclosure Agreements (NDAs), undertaking not to disclose confidential information during and after their employment with the Group.

Confidential information is accessible only through secure workstations and VPN systems. Every interaction and action within our internal systems is logged to ensure accountability and traceability, thereby minimizing the risk of data leakage.

Our employees receive ongoing instruction and training in information security best practices. Periodic phishing simulation exercises are conducted to assess and improve their vigilance against cybersecurity threats.

Should any employee suspect a breach or violation of confidentiality policies, they are obliged to report it immediately to their supervisor, HR, or the Information Security Department. The Group emphasizes robust notification and incident response procedures; all reports are thoroughly investigated. Disciplinary measures, including dismissal, may be applied if violations are confirmed. In 2024, **there were no security incidents or breaches**. Although some data protection confidentiality breaches were recorded in Spain during 2024, they were considered minor and subsequently closed by the Spanish Data Protection Agency.

# HUMAN RIGHTS

ID Finance is committed to respecting human rights and fostering a work environment that promotes equality, diversity, and dignity. We strive to ensure equal opportunities for all employees, regardless of cultural background, gender, race, or other characteristics. Upholding respect for honor, dignity, fundamental freedoms, and human rights is a core priority for the Group.

In all our operations, we are guided by the principles articulated in the United Nations Universal Declaration of Human Rights, as well as the relevant legislation of Spain and Mexico. Our commitments are also aligned with the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and other international legal standards pertaining to human rights protection.

ID Finance firmly condemns and works towards the complete eradication of forced, compulsory, and child labor, ensuring that neither our employees nor our clients and partners are subjected to such practices.

We uphold the highest standards of responsibility and respect in our interactions with employees, clients, and partners, and we categorically reject any form of aggressive, degrading, or discriminatory behavior. Verbal abuse, threats, sexual harassment, and intimidation are strictly prohibited and considered unacceptable in our workplace and communication channels.

In addition, within the VOE (Voice of the Employee) program, sexual harassment is classified as a serious offense and, in accordance with this policy, disciplinary measures are taken to terminate the employment of the person who commits the offense.

## Voice of the Employee

Employees are encouraged to report any incidents of inappropriate behavior or violations of human rights through designated channels (*see the Countering corruption and fraud section*), including their immediate supervisor, higher management, or the HR department. Importantly, we maintain a strict non-retaliation policy: any form of persecution, threats, or retaliation against employees who report violations is categorically forbidden.

In 2024, **no confirmed cases of human rights violations** were recorded through our available reporting channels.

Furthermore, the Group recognizes and respects employees' rights to organize, hold meetings, and join or establish associations or labor organizations that represent their interests. These rights are guaranteed in accordance with the labor laws of Spain, Mexico, and the countries in which we operate, and are fundamental to ensuring a fair and respectful working environment.

ID FINANCE

# OUR EMPLOYEES

# HR POLICY

**Our employees are the most valuable asset and the cornerstone of the Group's sustainable growth and success.**

The passion, commitment, and engagement of our team members are key drivers of ID Finance's growth. We are dedicated to creating an environment where our employees can build fulfilling careers, supported by resources and benefits that enable them to reach their full potential.

To this end, we invest proactively in attracting, retaining, and developing talent—both today and for the future. We believe that open and ongoing communication is vital, which is why we prioritize listening to our employees through multiple channels that foster continuous engagement and improvement.

Our personnel policy is guided by a **People First culture**, anchored in core principles such as mutual respect, respect for human rights and freedoms, fair and transparent remuneration, non-discrimination of any kind, and equal opportunities for employment, career development, and growth. We also emphasize ongoing education and training, broad motivation programs, and a steadfast commitment to ethical standards and the Group's corporate culture.

We are committed to continuously developing and enhancing our HR management system to increase its effectiveness. At the Group level, we have a **Global HR Director**, responsible for defining the overall HR strategy and personnel policies across all regions.

Supporting this, each country—Spain, Mexico, and Poland—has a dedicated **Head of HR** who, together with their team, manages day-to-day HR functions such as incentives and compensation, recruitment, onboarding, training, and employee development. This management structure ensures consistency in HR practices across countries, maintaining alignment with shared principles, values, and standards.

Our personnel management approach is rooted in a comprehensive set of internal policies and documents designed to foster a highly effective team and create a positive working environment. These policies cover all aspects of employee relations, including ethics, recruitment and onboarding, training, transparent career development pathways, and incentive and motivation systems, including bonus schemes.

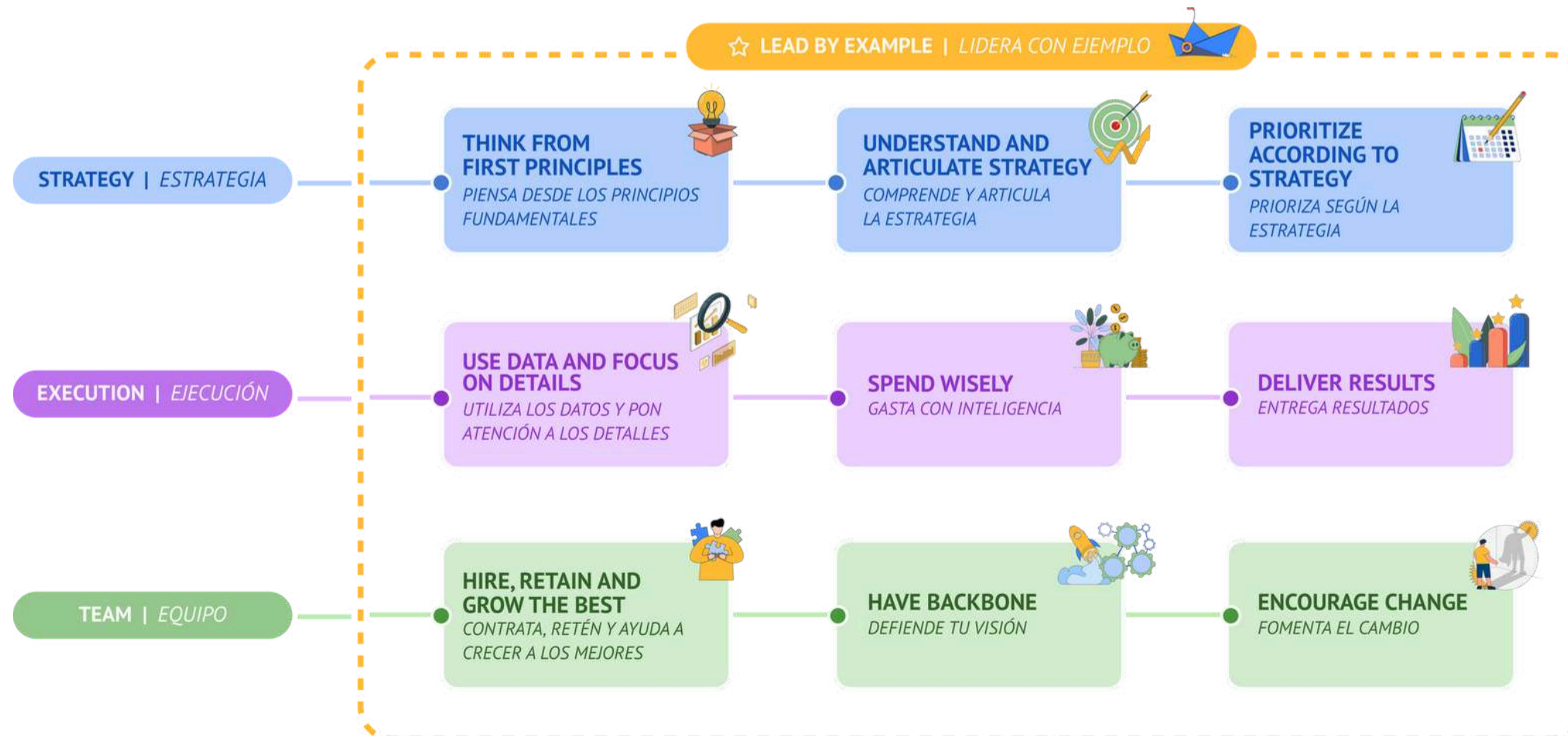
We ensure that every employee is well-informed of these policies by introducing new hires to relevant documents during onboarding, publishing all materials on our internal portal, and communicating updates or policy changes via email. This systematic approach promotes transparency and alignment with our organizational values, supporting a cohesive and motivated workforce.

**All employees are engaged under employment contracts** and operate in full compliance with the laws of Spain, Mexico, and Poland. We also foster an open dialogue with our employees to ensure transparent communication and a positive working environment.

# LEADERSHIP PRINCIPLES

The ID Finance teams are guided by three core groups of leadership principles, that stand for our corporate culture.

These 3 groups, focused on strategy, execution, and teamwork, aim to inspire, motivate, and guide all employees, ensuring that our collective efforts are directed toward achieving common goals. Leading by example is fundamental and applies to all our core principles, ensuring that every value we stand for is consistently demonstrated through our actions.



# DIVERSITY AND EQUALITY

At the core of our Group’s values lies a strong commitment to workforce diversity, which plays a vital role in attracting and retaining talented employees across different genders, ages, and regions. We strive to cultivate a team where each individual’s unique experiences and knowledge contribute to our collective success, fostering innovation, enhancing the quality of our products, and enriching our work environment.

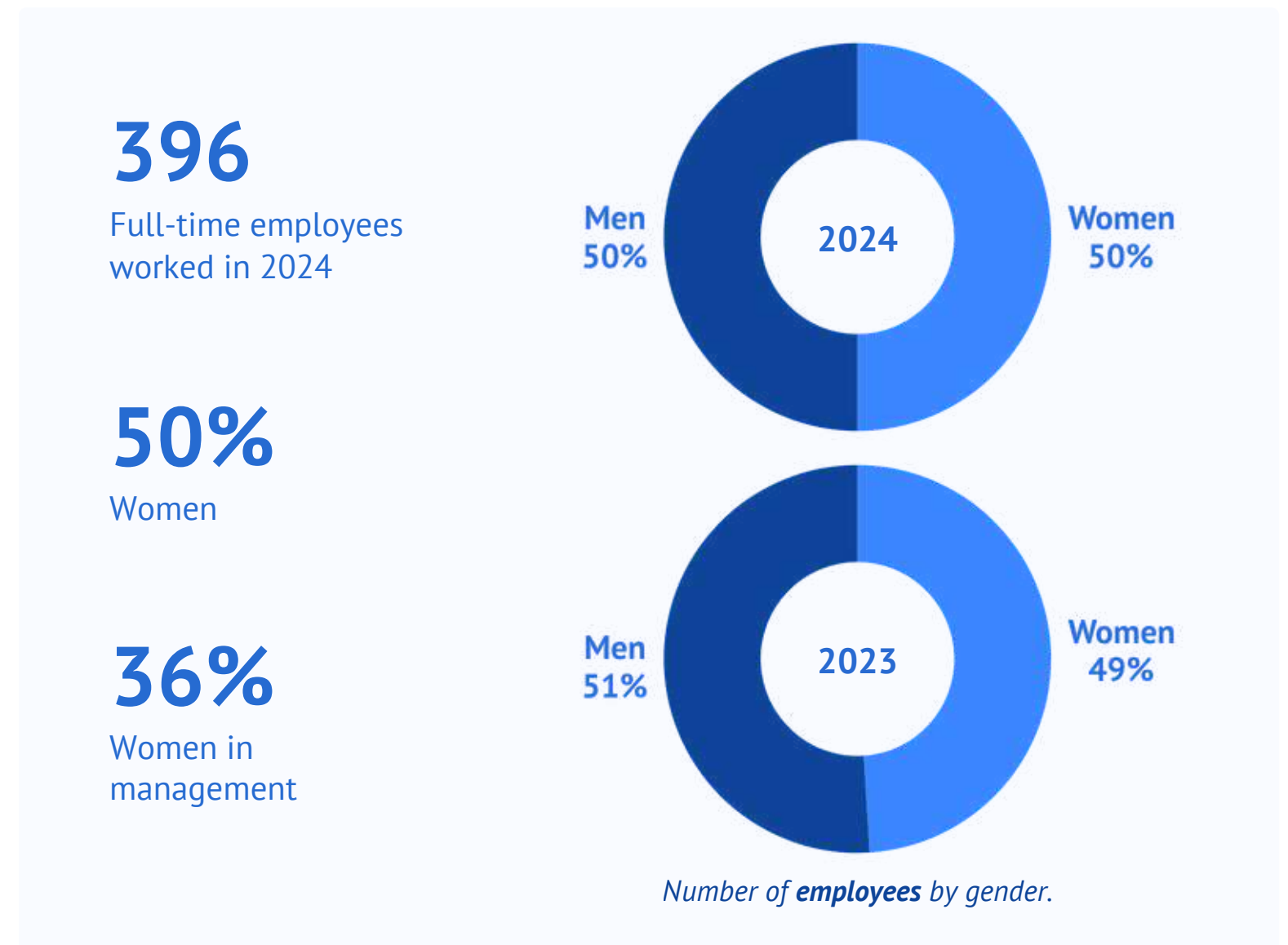
ID Finance strictly prohibits any form of discrimination in the workplace based on gender, age, race, nationality, religion, social status, or other characteristics. ID Finance is dedicated to creating equitable working conditions and adhering to the principle of “equal treatment for equal levels of professionalism and contribution.” Our goal is to promote diversity and engagement at all organizational levels, from entry-level roles to senior management.

We believe that diverse perspectives, experiences, and backgrounds enable ID Finance to achieve superior business results, develop innovative solutions, and respond more effectively to both external and internal changes. Supporting diversity also fosters an inclusive corporate culture, which enhances employee satisfaction, motivation, and loyalty.

Our employees are guided by the Code of Ethics, which provides clear principles for decision-making in complex situations, including issues related to harassment, discrimination, and other forms of misconduct. **In 2024, no incidents of discrimination were reported within the Group.**

At the end of 2024, the gender distribution among all employees was evenly balanced at 50% men and 50% women, compared to 49% women and 51% men in 2023. This demonstrates our ongoing commitment to ensuring equal opportunities for all employees, regardless of gender.

However, the composition of our leadership remains less balanced: among managers, 64% are men and 36% are women. This highlights the necessity of continuing our efforts to increase female representation in leadership positions and to promote greater gender diversity across all organizational levels.

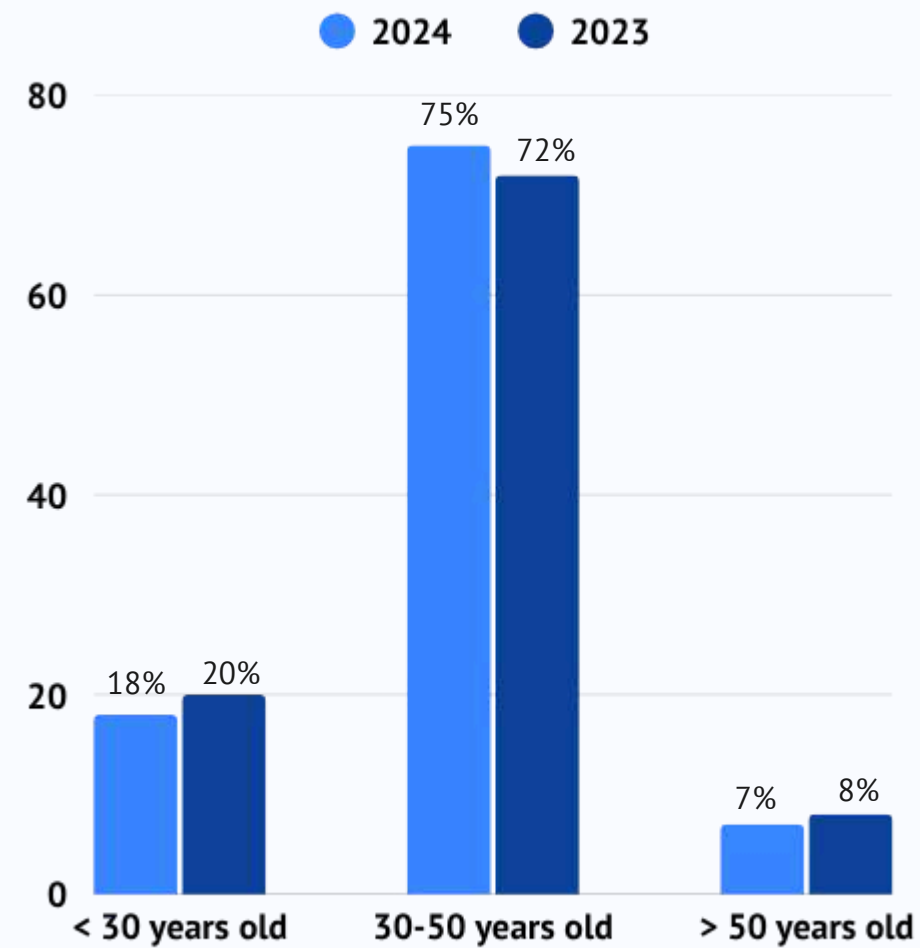


DIVERSITY AND EQUALITY

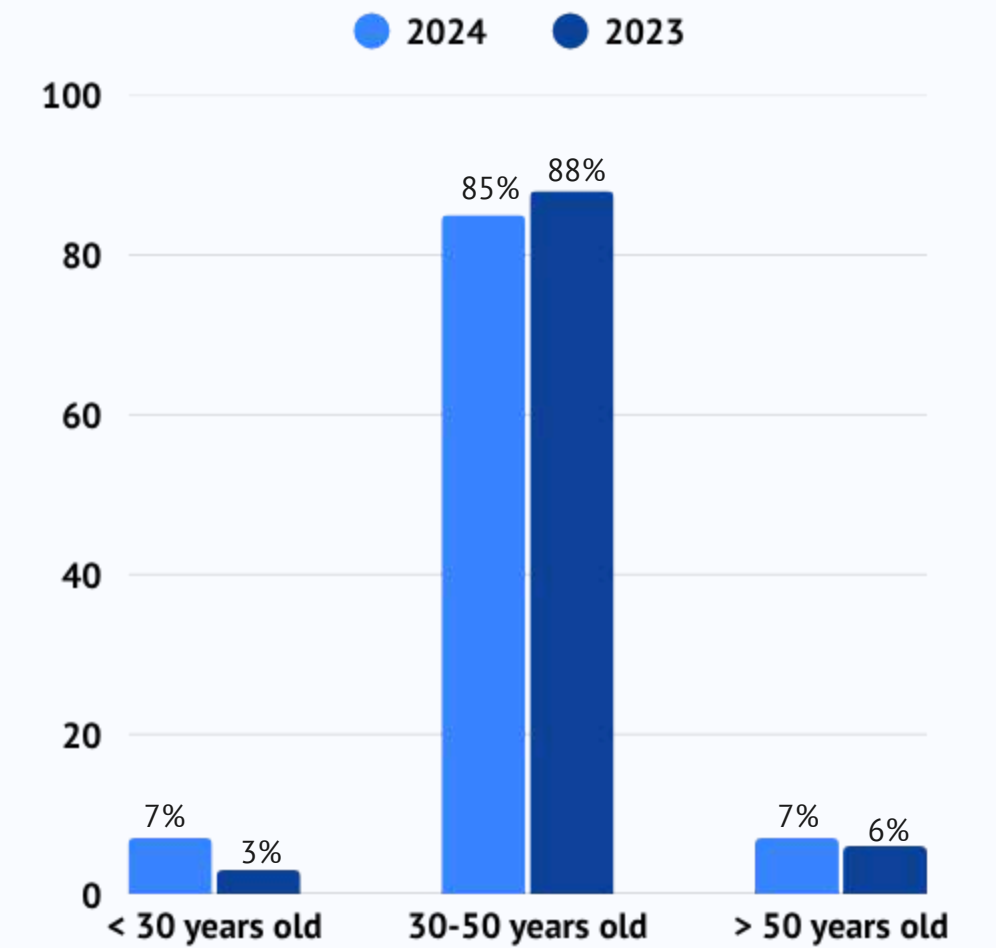
The entities based in Spain have an **Equality Plan** in place, which explicitly articulates our commitment to fostering an inclusive workplace. This plan outlines our dedication to establishing and developing policies that promote equal treatment and opportunities for women and men, without discrimination—whether direct or indirect—**on the basis of sex**. It also emphasizes our ongoing efforts to implement measures that achieve tangible gender equality, positioning equal opportunities as a core strategic principle within our corporate and human resources culture.

Our Mexican and Polish entities also uphold principles of equality and non-discrimination, ensuring fair treatment across all employees. However, these subsidiaries do not currently have formalized policies explicitly dedicated to gender equality, though our overarching commitment to fostering an inclusive and equitable environment remains unwavering across all regions.

In 2024, **the majority of our employees**—75%—were between the ages of 30 and 50, which indicates that our team comprises a substantial number of both young and experienced professionals. At the same time, we continue to grow actively and are always pleased to welcome new young specialists, who made up 18% of our workforce under the age of 30 in 2024.



Number of **employees** by age



Number of **managers** by age

# RECRUITMENT AND ONBOARDING

**At ID Finance, our «People First» culture drives us to attract, select, develop, and retain the best talent, fostering collective success across the Group. Recognizing that our people are our most valuable asset, we place a strong emphasis on creating an inclusive environment where each individual has the opportunity to thrive.**

The recruitment and selection process is a fundamental pillar of strengthening our corporate culture. Guided by the principles of equal rights and opportunities, we consider the dignity of every person inviolable and strictly oppose discrimination in any form or on any grounds. Our Group does not discriminate based on gender, race, nationality, age, disability, or other social characteristics. We adopt an equal opportunities approach to recruitment, ensuring fairness for men and women, disabled applicants, indigenous peoples, and other social groups.

The primary document that provides the framework for our talent acquisition practices across the Group is the Recruitment and Selection Policy. This policy ensures that we bring in the most qualified individuals for each role and work environment. The Head of HR in each country are responsible for ensuring that this policy, along with all related processes, is executed efficiently, effectively, and with integrity. Our unwavering commitment to equality guarantees fair and equitable hiring practices, explicitly excluding discrimination and bias.

Personnel recruitment is conducted in accordance with the approved staffing schedule for vacant positions. We prioritize the development and promotion of internal talent, leveraging our talent pool to foster internal career growth and enhance motivation. A key criterion for promotion is high-quality performance, complemented by assessments of competencies and personal development.

When selecting candidates, we are guided solely by professional qualifications, skills, and competencies. As part of our rigorous hiring process, all candidates must undergo a compliance assessment to evaluate their suitability for employment. The HR department collaborates with the Compliance department to analyze each candidate's profile and determine the viability of their recruitment. This process includes risk assessments and cross-checks against relevant watchlists.

ID Finance ensures that all investigations and assessments are carried out in strict accordance with applicable laws, regulations, and employment standards, maintaining transparency, fairness, and integrity throughout the recruitment process.



In 2024, our group welcomed **101 new employees** across our companies. Of these new hires, **67%** were aged between 30 and 50 years, reflecting our focus on attracting experienced professionals. Additionally, women accounted for **53%** of the new intake, underscoring our commitment to fostering gender diversity and promoting an inclusive workplace.

## RECRUITMENT AND ONBOARDING

At ID Finance, we are committed to creating the most comfortable onboarding experience for new employees. A well-structured adaptation process enables newcomers to quickly establish communication with colleagues and feel at ease in their new roles. The onboarding journey begins immediately after the candidate accepts the offer, by which point they have already been introduced to HR and their direct supervisor.

Following acceptance, the new hire receives an email containing instructions on how to access the intranet (Bamboo). On the intranet, the employee is prompted to provide essential data required to complete the onboarding process. They are also given access to a range of Group policies, including the Code of Ethics, Global Data Protection Policy, Occupational Risk Prevention, Prevention of Sexual Harassment, Anti-Corruption and Anti-Bribery Policy, Conflict of Interest Policy, and other relevant documents which comprehensively outline our communication protocols, operational procedures, motivation systems, bonus policies, and more. Employees are asked to review all documents and sign the acknowledgement list.

Additionally, new hires receive Welcome presentations that provide detailed information about the Group, our products, organizational structure, key personnel, compensation systems, and available motivation programs.

For each department we have developed a **tailored onboarding calendar** that guides and regulates the entire onboarding process specific to their functions.

On the first day, we introduce the new employee to their team and assign two buddies who will assist with their adaptation, ensuring a smooth and rapid integration into the team, work environment, and corporate culture. The direct manager sets clear goals and performance indicators to evaluate progress during the probationary period.



As part of the onboarding process, employees also undergo mandatory training sessions covering health and safety, criminal compliance, anti-bribery and anti-corruption measures, reputational risk management, and conflict of interest policies. Furthermore, each employee undergoes targeted training programs essential for the effective performance of their roles.

We also maintain an open-door policy, encouraging employees to freely approach colleagues, managers, or top management with any questions or concerns.

At the end of the probation period, HR conducts a review meeting and interview with the new employee to assess their integration experience, address any issues, and ensure a successful transition into their permanent role.

Our goal is to retain talented employees by fostering a positive work environment, implementing preventive measures against burnout, and offering opportunities for career growth and development. We are committed to continuously improving working conditions and introducing programs that help reduce staff turnover and enhance employees' loyalty to our Group.

# MOTIVATION AND REWARD

Throughout 2024, our Group maintained a strong focus on fostering a motivated and engaged workforce. We are committed to providing our employees with a fair and competitive compensation package, coupled with a transparent and comprehensible performance evaluation system. This approach ensures clarity in career progression and rewards individual contributions effectively. We highly value each team member's input and trust even our junior colleagues with significant responsibilities, thereby encouraging the development of their potential, accountability, and leadership skills.

Our comprehensive employee motivation system encompasses both material and non-material incentives, designed to recognize and reward dedication and achievement. Compensation levels are aligned with industry standards and are determined solely based on qualifications, job complexity, attitude and performance metrics, ensuring fairness regardless of gender or age.

By the end of 2024, the average pay gap between male and female employees within our Group was 37%. This figure includes Shareholders and top management personnel; for example, in Spain, the wage gap stands at 35%, primarily due to the gender composition of the Management Committee, which is predominantly male, with only two female members. In Poland, the 70% gap reflects the male composition within managers relative to the overall staff which counts to 14 employees only. Conversely, in Mexico, the pay gap is only 6%, a figure that more accurately reflects the real wage disparity among employees when excluding shareholders and management. This indicator warrants ongoing analysis and targeted actions to promote equal pay opportunities and eliminate factors contributing to imbalance.

In 2024, we conducted a comprehensive Gender Pay Gap Analysis in Spain, examining wage disparities across all legal entities to better understand and address potential inequalities.

To ensure equitable recognition of performance, each employee is assigned a grade level ranging from L1 to L9, based on their experience, responsibilities, and skills. This grading system influences salary levels and plays a key role in the calculation of annual bonuses, which are awarded based on performance assessments.

Additionally, in 2024, we developed a new Employee Bonus Policy that clearly articulates our approach to rewarding employee contributions. The policy emphasizes recognition of effort and outlines eligibility criteria, bonus types, and the procedures for awarding bonuses. It also details the calculation methodology, which depends on the employee's grade level and performance results, and introduces a Phantom Share Program. Phantom shares are a form of performance-linked compensation, granting employees the right to receive cash payments tied to the company's share price, contingent upon specific conditions being met. This program aligns employees' interests with the long-term success of the Group, fostering a shared commitment to sustainable growth.

## MOTIVATION AND REWARD

Throughout 2024, our Group maintained a strong focus on fostering a motivated and In addition to our core compensation and recognition systems, we have implemented a comprehensive package of additional material and non-material motivation measures to support and engage our employees. These initiatives include:

- **Voluntary Medical Insurance (VMI):** After passing the probationary period, each employee is enrolled in our corporate VMI program, which covers outpatient and polyclinic services, dental care, planned and emergency inpatient treatment, as well as reimbursement for medicines.
- **Loyalty Program:** Employees earn one extra vacation day every two years as a reward for their loyalty and long-term commitment.
- **Paid Time Off:** Employees are entitled to 18 hours of leave for medical absences and an additional 16 hours off for personal reasons or emergencies.
- **Wellness Support:** We cover 50% of the cost of gym memberships to promote a healthy lifestyle among our staff.
- **Office Perks:** Provision of food and drinks within the workplace to enhance comfort and convenience.
- **Educational Programs:** We offer free language lessons, including English and Spanish, with plans to add Russian language courses in 2025.
- **Remote Work Opportunities:** Employees have the possibility to work from home for up to two weeks, supporting flexibility and work-life balance.
- **Flexible Work Schedule:** In 2024, we developed and implemented the Home Office Policy, which formalizes the process for remote work, aiming to foster a flexible and supportive work environment.
- **Corporate Events:** Regular monthly parties and events to strengthen team cohesion and morale.
- **Health Monitoring:** Employees in Spain have the option to undergo health tests every two years to monitor and maintain their well-being. Also, we invite IMSS (Instituto Mexicano del Seguro Social (Mexican Social Security Institute)) to our offices in Mexico to make vaccinations and eye exams to our employees.
- **Additional Social Support:** We provide financial assistance in challenging life situations, such as in the event of the death of an employee or their relatives, to offer further social support and security.
- **Referral program:** The Referral Program rewards employees who help grow our team by recommending top talent. Successful referrals lead to increasing financial bonuses.

These initiatives collectively aim to create a motivating, supportive, and flexible workplace environment that values the well-being and development of our employees.

## MOTIVATION AND REWARD

We are committed to supporting our employees' enthusiasm for participating in sports and recreational activities, recognizing their positive impact on well-being and team cohesion. To promote healthy competition and team bonding beyond daily work interactions, we organize various sports events such as beach volleyball tournaments, tennis matches, and soccer games. These activities are highly appreciated by employees, as they foster camaraderie and provide opportunities to connect with colleagues from different departments who they may not work with regularly.

In addition to sports, we consistently organize a variety of office events to enhance workplace culture and employee engagement. At the last Friday of each month, we host diverse activities, ranging from guest talks on historical or cultural topics to short master classes led by employees or external experts. We also celebrate major holidays and festivities, including Halloween parties, Christmas celebrations, and other cultural or seasonal gatherings.

As part of our ongoing commitment to fostering a collaborative and inclusive workplace, we organized a dynamic activity called "**Speed Coffee.**" This engaging event involved multiple rounds, during which each participant had a minute and a half to uncover key details about their colleagues and their respective roles. To reinforce learning and team cohesion, all participants then took part in a quiz where each answer was directly linked to a team member.

These initiatives aim to create a vibrant, inclusive environment where employees feel motivated, connected, and appreciated.



# RECOGNITION PROGRAM

In recognition of the high contribution of our employees to achieving the objectives set for the Group and extraordinary behavior in supporting our People first culture, we have developed a Recognition program.

There are four nominations within this program:



## EXCELLENCE AWARD

*Quarterly / Trimestral*

For people who demonstrate extraordinary behavior or who are always willing to help others. Nominated by the entire ID Finance team and selected by the majority of votes. The winner also receives a cash prize.



## BEST PLAYER AWARD

*Quarterly / Trimestral*

For the best performing employee. Nominated based on KPIs, absenteeism, availability and proactivity. Managers will select the winner. The winner also receives a cash prize.



## BEST TEAM AWARD

*Quarterly / Trimestral*

For the team that has obtained exceptional results, demonstrating teamwork, open communication and commitment. Managers will select the winning department. The team receives a cash prize to make a meal for all team members.



## PEOPLE FIRST AWARD

*Annual / Anual*

For the employee among the excellence and best player award winners during the year who achieves high performance in several areas of work and communications. Nominated based on KPIs, absenteeism, availability and proactivity. The top management will select the winner. The winner receives a trip for two people announced at the Christmas party.

RECOGNITION PROGRAM



Our winners Spain-Mexico branch:

Q1



**EXCELLENCE:**  
Angel Morales



**BEST PLAYER:**  
Sergio Adir

Q2



**EXCELLENCE:**  
Sergio Navarro



**BEST PLAYER:**  
Byron Gaytán

Q3



**EXCELLENCE:**  
Mirian Ceron



**BEST PLAYER:**  
Daniela Ortega

Q4



**EXCELLENCE:**  
Eduardo Cruz



**BEST PLAYER:**  
Judith Aldana

ALWAYS PEOPLE FIRST  
AWARD WINNER



Byron Gaytán



RECOGNITION PROGRAM



Our winners Mexico:

Q1



**EXCELLENCE:**  
David Silva



**BEST PLAYER:**  
Citali Cuaxospa



**TEAM:**  
Customer Service

Q2



**EXCELLENCE:**  
Daniel Casas



**BEST PLAYER:**  
Daniel Benitez



**TEAM:**  
Verificación

Q3



**EXCELLENCE:**  
Nayeli Vazquez



**BEST PLAYER:**  
Raúl Cortés



**TEAM:**  
Finanzas

Q4



**EXCELLENCE:**  
Giovanni Stringhini



**BEST PLAYER:**  
Angélica Garnica



**TEAM:**  
Collections

**ALWAYS PEOPLE FIRST  
AWARD WINNER**



Nayeli Vazquez



RECOGNITION PROGRAM



Our winners Spain:

Q1

Q2

Q3

Q4



**EXCELLENCE:**  
Tamara Spir



**EXCELLENCE:**  
Camila Yamada



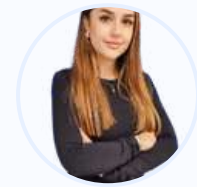
**EXCELLENCE:**  
Lucia Jiménez



**EXCELLENCE:**  
Miguel Puig



**BEST PLAYER:**  
Joana Rovira



**BEST PLAYER:**  
Andrea Molina



**BEST PLAYER:**  
Carolina Lapid



**BEST PLAYER:**  
Nerea Gamero



**TEAM:**  
Operations



**TEAM:**  
Finance



**TEAM:**  
Legal



**TEAM:**  
Collections

**ALWAYS PEOPLE FIRST  
AWARD WINNER**



Joana Rovira



# PERFORMANCE ASSESSMENT

**Employee performance assessment is a vital component of our HR management system, designed to sustain high operational standards and foster continuous development. The process involves several key elements:**

- **Goal-Setting System (KPIs):** Each year, employees collaborate with their immediate managers to establish individual objectives for the upcoming year. These goals are documented on our internal Bamboo platform, which provides employees with ongoing access to review and update their targets as needed throughout the year.
- **Performance Review:** At the end of the year, employees participate in a formal review meeting with their managers to discuss the results achieved, gather feedback, and identify areas for development.
- **Employee Attitude Evaluation:** In addition to goal achievement, managers assess each employee's attitude and engagement through a dedicated evaluation form. This evaluation considers factors such as motivation, teamwork, and adherence to core leadership principles.
- **Performance Rating System:** KPI and Employee Attitude are rated on a four-level scale, which determines the coefficient applied in calculating the bonus. Each performance level (from L9 to L1) also corresponds to a specific coefficient used to determine the size of the annual bonus. For employees above level L6, the bonus calculation also considers the company's **Profit After Tax (PAT)** and the overall country performance relative to the budget, reflecting the company's and country's financial results for the year.

This comprehensive assessment makes the process more transparent and understandable for all employees. It helps recognize individual contributions, aligns employee objectives with corporate goals, and provides clear pathways for professional growth and rewards.



**100% of employees** undergo regular performance and career development assessments, ensuring a consistent and fair evaluation process across the organization.

# COMMUNICATIONS AND ENGAGEMENT

## Internal communications

Internal communications is one of the key priorities in our HR initiatives. ID Finance adheres to the principles of open dialogue and strives to respond promptly to employee feedback by providing transparent information about operational activities, corporate culture, and key events and initiatives within the group.

The primary communication channel with employees is our internal MS Teams platform, where all news, announcements, and useful information are regularly published. We also share joyful moments from our group's life. Additionally, all important messages related to organizational changes, operational updates, or policy and process revisions are sent via email.



# GREAT PLACE TO WORK

**ID Finance in Spain is proud to be Great Place to Work-Certified™ in 2024 and secured the 13th place in the ranking of the best companies to work for in Spain in the 101–250 employees' category.** This prestigious certification is conducted by a globally recognized, independent organization and applies on an international level, spanning multiple countries and regions.

The certification process is comprehensive and rigorous, consisting of three distinct stages. First, it involves objective and standardized measurement through an internationally validated survey that assesses employees' perceptions across five critical cultural dimensions: Credibility, Respect, Fairness, Pride, and Camaraderie. This survey provides a deep insight into the organizational climate and employee experience.

Second, an evaluation of leadership styles and people management practices is conducted. This involves analyzing documents that capture and interpret the policies, practices, and behaviors that shape daily operations and influence the workplace environment.

Third, external comparison and independent validation are carried out through both national and international benchmarking. This allows to identify strengths and pinpoint areas for improvement relative to other companies of similar size or within the same sector.

The results of this certification are highly dependent on the authentic feedback of current employees, as the surveys are conducted anonymously to guarantee independence and accuracy. Employees' perceptions primarily reflect the quality of relationships with management, the strength of teamwork, and opportunities for growth and development within the organization. These factors are fundamental to fostering a sense of respect, inclusivity, and belonging within the Group.

**We are very proud to report that 89% of our employees consider ID Finance a Great Place To Work,** reflecting our dedication to fostering an engaging, supportive, and inclusive environment. Looking ahead, we are actively working to incorporate our teams in Mexico and Poland into future certification cycles.

Great  
Place  
To  
Work®

# Voice of the Employee

To respect the right of all employees to a healthy work environment, we created the Voice of Employees (VOE) program.

VOE aims to regularly study and monitor employee satisfaction and develop subsequent corrective measures to eliminate identified problems and improve the work environment.

Twice a year, VOE Committee conducts a global survey of the state of the work environment on the following indicators: satisfaction, commitment, leadership, treatment, communication, integration, development and working conditions.

Based on the results of the study, the committee prepares a detailed report, which also compares and analyzes the dynamics of the obtained indicators compared to previous periods. We also held a focus group to discuss the main findings of the research, address issues, and share suggestions.

As part of the report, a detailed plan is also drawn up to eliminate the identified problems and improve the working conditions of employees.

Also, each employee can make suggestions for improving the working environment by sending their appeal to the email address [voe@idfinance.com](mailto:voe@idfinance.com), placing a written proposal in a special box in the office, or personally contacting VOE ambassadors. If desired, an employee can submit a request anonymously.

*1 One of our companies in Spain has a branch in Mexico, the data is provided for this branch*

## Results in the 2024 last survey

Spain

**84%**

Participation rate

**90%**

Satisfaction rate

México

**95%**

Participation rate

**83%**

Satisfaction rate

Branch<sup>1</sup> in  
Mexico

**73%**

Participation rate

**95%**

Satisfaction rate

Poland

**94%**

Participation rate

**96%**

Satisfaction rate

# TRAINING AND DEVELOPMENT

The development and success of the Group is impossible without a professionally trained and competent team, therefore regular training and development of our employees is a long-term and priority area of the human resources management policy.

The training is aimed at creating a professional and committed team and improving work efficiency. Development helps employees to identify their professional capabilities and potential, plan and build a career, quickly adapt to new technologies and tools in a changing business environment. In 2024, the number of training hours of our employees amounted to **more than 3,000 hours**, on average, employees participated in about **8 hours** of training per year.

We support the professional and personal development of our employees by offering different trainings, educational programs and language skills.

Each year, our HR department conducts a comprehensive survey to identify employees' development needs aligned with their daily responsibilities. This process involves collecting input on training and professional development opportunities that employees believe are necessary for their ongoing performance, growth, and skill enhancement throughout the year. Based on these insights, we organize targeted training programs and educational initiatives to meet the identified needs, ensuring our team members have access to the resources required for their professional advancement.

Furthermore, managers have the authority to assess and determine the specific training and development requirements of their team members on an individual basis. When an employee's role necessitates advanced skills or specialized knowledge to improve performance, we support their participation in external training programs provided by reputable third-party organizations, covering all associated costs.

ID Finance has implemented and continuously conducts basic training for new employees in business areas, who will then start working with the Group's clients. The training includes the main aspects of the work of employees in their respective positions, including in-depth knowledge of all product information, standards of business ethics and business communication, etc.

**3,000+**

Hours of training in  
2024

**8**

Hours of training  
completed by an average  
employee per year

# HEALTH AND SAFETY

**The health and safety of our employees is an absolute priority for ID Finance.**

The provisions on labour health and safety plan includes the organizational structure, responsibilities, functions, practices, procedures, processes and resources under the terms established in the Occupational Health and safety regulations which must also be approved by the company's management and known by all its employees.

The Group has established an internal action protocol and emergency plan that serves as a guiding framework for all occupational health and safety operations. These protocols delineate specific steps to be followed in the event of an accident at work, incorporating all guidelines mandated by the applicable regulations in Spain, Mexico, and Poland. Compliance with health and safety prevention laws is mandatory for all companies within the Group.

Furthermore, each country maintains a designated person responsible for workplace safety. These individuals oversee the implementation of safety policies, conduct regular safety assessments, and serve as points of contact for any health and safety concerns.

In Spain we also collaborate with the external prevention service agency (GESEME), a certified company that cares for and protects the safety of our employees.

Each newly hired employee must be instructed on health and safety and fire safety before starting work. Also, each new employee must undergo a health and safety training.

During the year 2024, only 3 accidents have been registered: 2 in Spain and 1 in Mexico. Each incident was subject to an internal investigation and measures were taken to minimize the risk in the future.

Whenever there is a substantial modification of the offices an external inspection (GESEME) is carried out to ensure they meet the requirements for safe and comfortable work. For example, as part of this inspection, the level of lighting, sound, furniture, compliance with fire safety requirements, etc. are checked.

**Some of the policies established are:**



**Accident protocol**



**Viral disease prevention protocol**



**Risk assessment and risk prevention training**



**Medical check-ups upon incorporation and/or after 2 years or long-term sick leave (Voluntary and paid by the company).**

# SOCIAL INITIATIVES

ID Finance is committed to making a positive impact on the communities where we operate, driven by our goal to foster a fairer and more inclusive society. Beyond our core business activities, we actively participate in social and solidarity projects that promote social well-being and community development.

In 2024, we took part in several key social and volunteering initiatives:



In total, we donated over €3,500 to various charitable causes throughout the year.



## Collaboration with the «Llars de l'Amistat Cheshire» (Residence for people with disabilities):

Our employees spent quality time with residents of the facility for people with disabilities, sharing coffee, ice cream, and engaging conversations. This initiative aimed to promote inclusion and offer companionship to individuals in need.

SOCIAL INITIATIVES



by the seaside at Castelldefels

**Team Building and Philanthropy in Barcelona:**

Our Barcelona team organized their summer team-building event. The winning team was awarded a €1,500 prize, which they chose to donate to a charitable foundation. The selected beneficiary was the Pere Tarrés Foundation, dedicated to promoting the education and development of children and young people during their free time.



**Blood Donation Campaigns:**

Throughout the year, we actively participated in blood donation drives organized in collaboration with local Spanish hospitals and Red Cross Mexico, supporting vital healthcare services.

## SOCIAL INITIATIVES

**"Marxa contra el Càncer":**

We proudly took part in the eighth edition of the race organized by the Spanish Association Against Cancer. The event aims to raise funds for cancer research and support for those affected by the disease. As a company, we contributed race registrations fee, with 100% of the proceeds allocated to the cause. 17 employees participated as runners, choosing distances of 10 km, 5 km, or 2.5 km, reflecting our commitment to community engagement and social responsibility.

**Magic Line:**

Our team participated in the 10K Magic Line walk, a charitable event organized by San Juan de Dios Hospital. This non-competitive walk brings participants together in teams to follow a designated route, with the primary goal of raising funds for social and healthcare projects. Our collective contribution of €1,000 was donated to various charitable initiatives, with the full amount dedicated to supporting the hospital's ongoing programs and community initiatives.

## SOCIAL INITIATIVES

**Toy Donation Campaign:**

We organized a toy donation drive benefiting Casa de las Mercedes, Hospital Pediátrico de Legaria, and Fundación Ayúdanos a Ayudar. This initiative aimed to bring joy and comfort to children in need, fostering community solidarity and support for vulnerable populations.

**World Down Syndrome Day and Children's Day –Fundación Mosaico Down:**

To mark World Down Syndrome Day (Trisomy 21) and Children's Day, a dedicated group of employees visited Fundación Mosaico Down. Through engaging recreational and educational activities, our team aimed to promote inclusion, respect for diversity, and uphold every child's right to play and shared experiences. This event underscored our commitment to fostering a more inclusive society.

## SOCIAL INITIATIVES

ID Finance partners with **EAE Business School Barcelona** to enhance the educational experience for students specializing in Finance and Fintech. As part of this collaboration, students from the Master's in Finance & Fintech visited our Barcelona offices, gaining firsthand insights into our operations and strategic initiatives.

To bridge academic knowledge with real-world application our specialists engaged students in a practical case study focused on Plazo, our financial wellness app. This initiative provided students with a direct understanding of the challenges faced by fintech companies and the opportunity to apply their skills to a live project.

This collaboration exemplifies our commitment to fostering emerging talent and supporting the development of future fintech leaders. It also reinforces our dedication to sharing industry insights and contributing to the practical education of upcoming professionals in the financial technology sector.



ID FINANCE

# ENVIRONMENTAL CARE

# ENVIRONMENTAL RESPONSIBILITY

**The Group's activities have a minimal negative impact on the environment. Nonetheless, we adopt a responsible approach to environmental stewardship, consistently striving to minimize our ecological footprint. We promote a culture of conscious resource consumption within our offices and among our partners, fostering responsible attitudes toward environmental preservation.**

We are committed to the responsible and careful use of natural resources. Our employees adhere to strict guidelines aimed at reducing resource waste, including energy and water conservation. Additionally, we actively seek to minimize paper usage across all operational processes. The primary sources of energy consumption within the Group are our offices. During the reporting period, total energy consumption amounted **to 118 kWh**, based solely on data from our offices in Spain and Mexico; offices in Poland operate within shared workspaces, and thus, their consumption data is not disaggregated. Energy usage was calculated based on actual data provided by landlords.

Our Spanish office is located in a modern facility designed to meet the highest standards of energy efficiency. Key sustainability features include an advanced DALI lighting system that adjusts brightness according to natural sunlight, automatic lighting controls in low-traffic areas such as restrooms, and an efficient climate control system. The office also incorporates a separate waste collection system and water-saving technologies. To promote proper waste segregation, we conduct periodic training sessions for employees, providing detailed guidance on waste sorting procedures.

In 2024, several facilities in Mexico underwent modernization, resulting in increased energy consumption due to the installation of new refrigeration equipment.

In 2024 and 2023, the electricity contracted in Spain was sourced entirely from renewable energy providers. For other countries, landlords do not report the origin of energy sources; therefore, the renewable status of electricity in those regions cannot be confirmed.

The Group solely relies on municipal water supplies for our domestic and technical needs. Water consumption is limited to our offices, with intake and discharge managed in accordance with agreements with property landlords. We do not utilize water from alternative sources or in regions experiencing water scarcity. Due to the nature of our operations, comprehensive data on water consumption is not available, as it is not individually monitored.

Given the Group's core activities, there is no direct extraction of raw materials nor impacts on biodiversity.

To foster environmental awareness among our clients, we regularly publish tips and lifehacks through our Plazo app and social media channels. These communications aim to promote not only financial savings but also environmentally friendly practices. For example, we share simple strategies for clients to reduce their natural resource consumption at home, encouraging responsible behavior beyond our direct operations.

# CLIMATE CHANGE

ID Finance takes the challenge of climate change and global warming seriously. The Group has committed to assessing its carbon footprint in accordance with ISO 14064-1:2018 standards and UNE-EN ISO 14064-1:2019 verification, in line with the Group’s commitment to reduce its environmental impact.

Since 2020, ID Finance has been dedicated to reducing, measuring, and offsetting the environmental impact of its activities. An annual carbon audit is conducted by an independent organisation to ensure transparency and accuracy.

As part of our annual quantitative assessment of greenhouse gas (GHG) emissions, we analysed and calculated emissions for 2024. The overall reduction in emissions compared to 2023 amounted to **75%**. This significant reduction primarily results from the absence of refrigerant leaks in 2024—after a leak incident in 2023—and the effects of our relocation, which included associated expenses and waste management costs.

The calculations were carried out across 4 categories (category A, B, C and D):

**Category A – Direct Emissions:** This category encompasses emissions from sources directly under the organisation’s control, including company-owned vehicles, buildings, refrigerant leaks from air conditioning systems and fire extinguishing equipment, stationary combustion in boilers, and fugitive emissions from industrial processes or facilities, etc. ID Finance does not own real estate or transportation assets, and therefore, direct emissions are limited to refrigerant gases from air conditioning units in offices and vehicles. **In 2024, direct emissions amounted to 0 tCO<sub>2</sub>e.** In 2023, however, refrigerant leaks from air conditioning units at our headquarters contributed to direct emissions of 183.9 tCO<sub>2</sub>e.

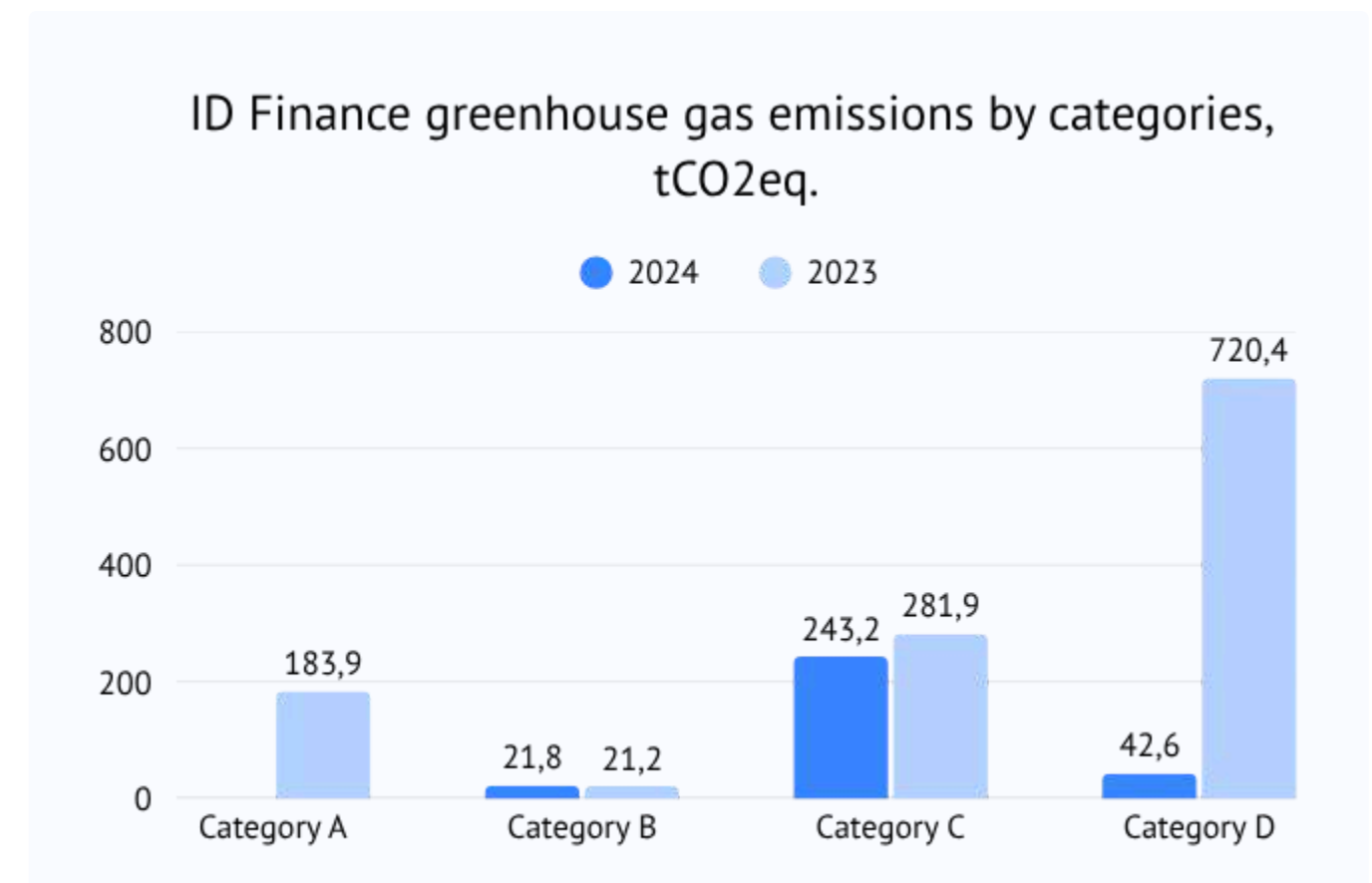
**Category B – Indirect Emissions from Purchased Electricity:** This category accounts for emissions resulting from electricity consumption necessary to operate our offices. Electricity usage data was primarily obtained from utility bills. In 2024, emissions from electricity consumption **totaled 21.8 tCO<sub>2</sub>e.**

**307.6**

tCO<sub>2</sub>eq. were ID Finance’s total emissions for 2024

**0.8**

tCO<sub>2</sub>e were ID Finance’s emissions per employee in 2024



**21.8**

tCO<sub>2</sub>eq. were ID Finance’s indirect emissions category B for 2024

CLIMATE CHANGE

**Category C – Indirect Emissions from Transport (Commuting & Business Travel):**

This category includes emissions from employee commuting to and from work, as well as business trips undertaken during 2024. Data on employee commuting was collected through surveys regarding their travel methods and frequency. Total emissions from employee commuting and return trips in 2024 amounted to **159.5 tCO<sub>2</sub>e**. Emissions from business travel, including hotel accommodation, airplane, train, taxi, etc. totaled **83.66 tCO<sub>2</sub>e**.

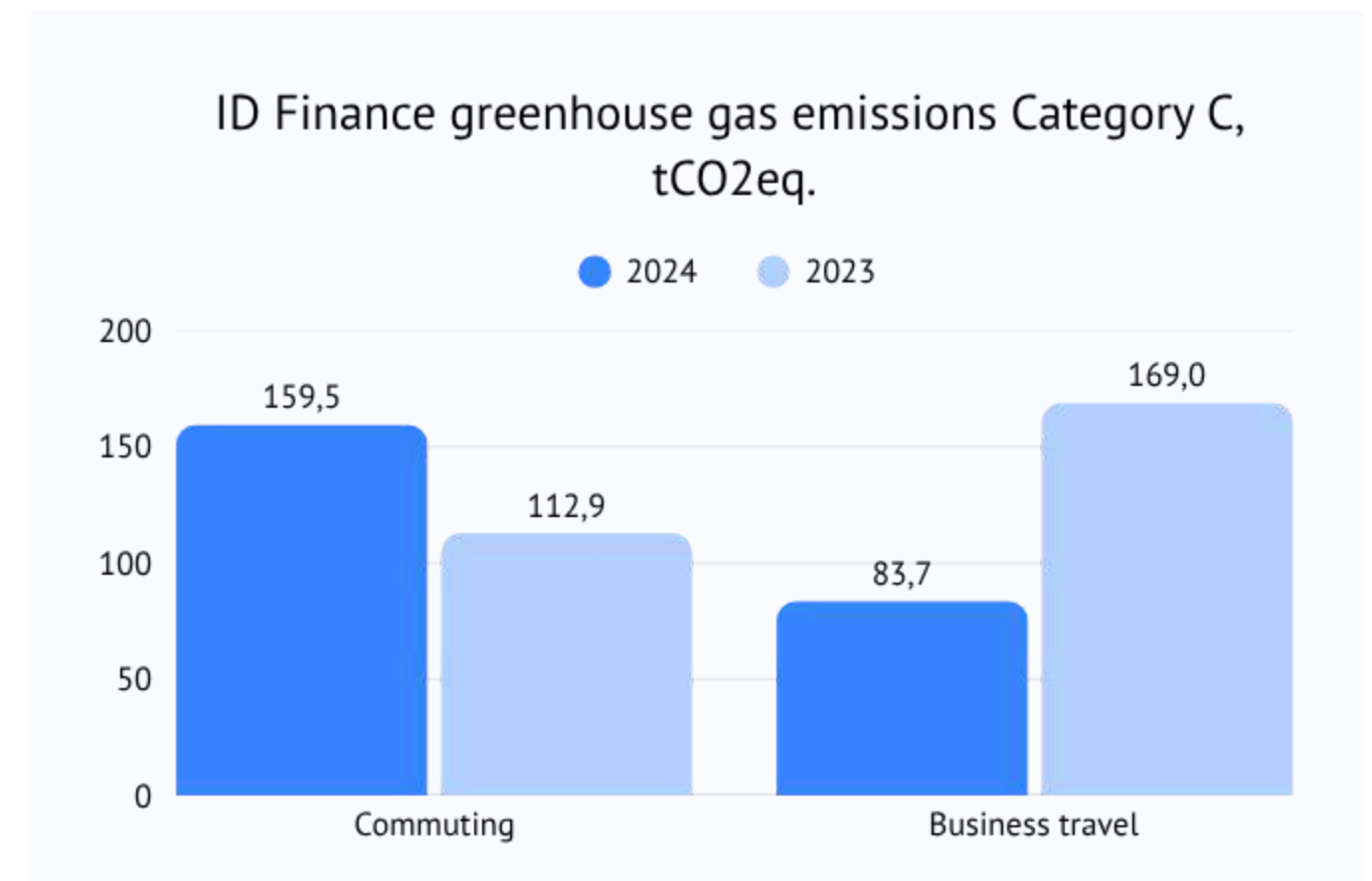
**Category D – Indirect emissions from products/services used (materials, telework, waste, water, services, electricity losses):**

This category encompasses water consumption at our offices, waste management, remote work, and costs associated with maintenance and procurement.

In 2024, emissions from this category amounted to **42.6 tCO<sub>2</sub>e**. In 2023, however, emissions were significantly higher at 720.4 tCO<sub>2</sub>e, primarily due to office relocations in that year. The 2023 figures included all relocation-related expenses, waste disposal services, cleaning, and related activities.

This detailed assessment underscores our commitment to transparency and continuous improvement in our environmental footprint management.

**243.2** tCO<sub>2</sub>eq. were ID Finance’s indirect emissions category C for 2024



**42.6** tCO<sub>2</sub>eq. were ID Finance’s indirect emissions category D for 2024

## CLIMATE CHANGE

Following the calculation and verification of emissions generated in 2023, ID Finance participated for the second consecutive year in a reforestation project at the El Vinagre estate, located within the municipalities of Paterna del Campo and Berrocal in Huelva province. Through this initiative, **we offset 50 tons of CO<sub>2</sub>**. The project aims to restore land affected by a wildfire in 2019 by promoting ecosystem regeneration through the removal of burnt wood, reforestation with eucalyptus and native species, and the application of innovative technologies such as Waterboxx, which enhances water efficiency for plant growth.

As a result of offsetting 50 tCO<sub>2</sub>eq. emissions for 2023, we received the "**Compenso**" badge from the Spanish Ministry of Ecological Transition and Demographic Challenge (MITECO). The "Compenso" badge, often part of the "Calculo, Reduzco, Compenso" seal, is awarded to organizations that accurately calculate their carbon footprint, implement emission reduction strategies, and actively compensate for residual emissions by participating in CO<sub>2</sub> absorption projects like reforestation.

Also we have initiated a project to offset a part of our greenhouse gas emissions for 2024. **We plan to compensate a total of 122 tCO<sub>2</sub>**, which accounts for approximately **40% of our annual emissions**, through the implementation of two reforestation initiatives:

- **Post-Forest Fire Restoration Project on the "El Vinagre" Estate:** we will continue to support this project and through it we will offset 102 tCO<sub>2</sub>.

- **Reforestation with Native Species in Móra d'Ebre (Tarragona):** Situated on the property of Mr. Joan Pérez Ribes, this initiative aims to offset 20 tCO<sub>2</sub>. Its goals include restoring native tree cover, increasing biodiversity, improving habitat connectivity, supporting dispersal of native vegetation, enhancing soil conditions, promoting rural employment, and improving both the landscape and agricultural productivity of the area.

These projects reflect our commitment to environmental responsibility and our proactive stance in contributing to climate change mitigation efforts.

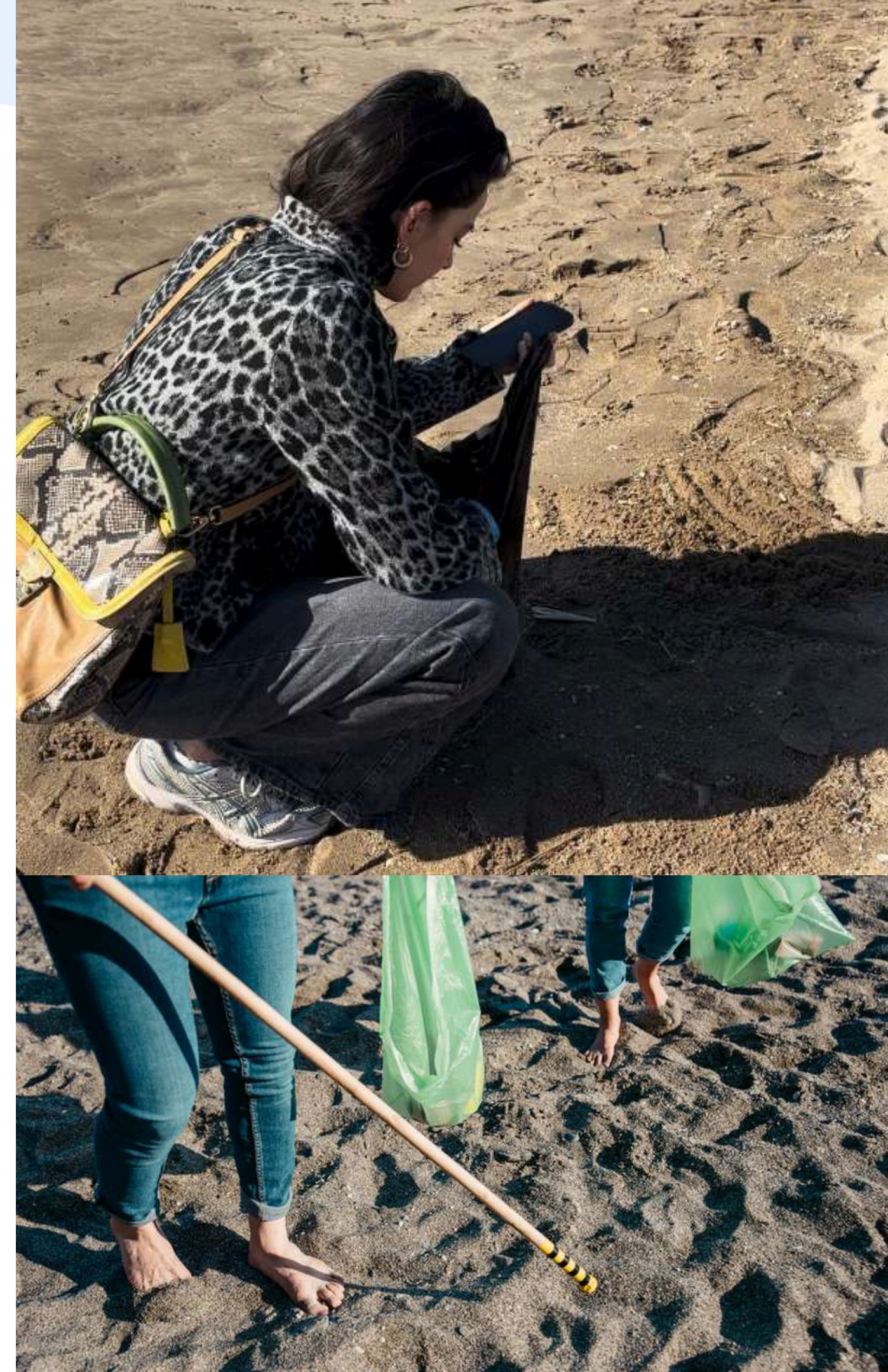


# ENVIRONMENTAL VOLUNTEERING

At ID Finance, we are dedicated to environmental stewardship and sustainability. As part of Proyecto Libera's '1m2 for Beaches and Seas' campaign, our Barcelona team participated in a cleanup at Can Camins Beach in El Prat de Llobregat.

Over a **600-meter stretch**, we collected a significant amount of litter, including **325 cigarette butts**. This effort represents our small but meaningful contribution toward preserving our natural environment and reaffirming our commitment to a sustainable future.

In Mexico, we carried out a **metal ring recycling campaign**, later delivering the collected materials to Fundación Andar. This initiative combined environmental awareness with social responsibility, as the recycled material is transformed into resources that support inclusion projects for people with disabilities.



# APPENDICES

# STAKEHOLDER ENGAGEMENT

Effective stakeholder engagement is a sustainability priority for ID Finance. The Group's key stakeholders include employees, customers, government authorities and relevant communities, partners and suppliers, local communities, shareholders and investors.

We use a variety of communication channels to effectively engage with each stakeholder group.

## Employees

### QUESTIONS AND INTERESTS OF THE STAKEHOLDERS

- Employment
- Fair pay and benefits
- Social support
- Safe and comfortable working conditions
- Opportunities for professional and career development
- Training and development
- Equal opportunities and non-discrimination
- Respect for human rights

### FORMS AND TOOLS OF ENGAGEMENT

- Employment in full compliance with the Labour Codes of jurisdiction in which Group operates
- Realization of Equality plan in Spain
- Bamboo platform for HR policy management, with access to key indicators
- Job satisfaction/climate measured via biannual survey
- Transparent wage and bonus pay system
- Implementation of compensation and benefits programs
- Voluntary medical insurance system
- Provision of safe and comfortable working conditions in the office
- Training of employees in the field of occupational safety and fire safety
- Training of employees on combating fraud and corruption, conflict of interest, etc
- Transparent system of personnel evaluation and goal setting for the year
- Training opportunities, training events and seminars
- Corporate events

## STAKEHOLDER ENGAGEMENT

 **Shareholders and investors**
**QUESTIONS AND INTERESTS OF THE STAKEHOLDERS**

- Business performance
- Strategy implementation
- Corporate governance
- Transparency of operations
- High quality of products and services

**FORMS AND TOOLS OF ENGAGEMENT**

- Preparation of corporate reports, including annual and half-yearly financial results
- Meetings with investors and regular communications
- Presentations to professional communities and investors
- Publications and mandatory internet and media disclosures
- Preparation of reports and materials on individual requests
- Passing the due diligence process if necessary

 **Clients**
**QUESTIONS AND INTERESTS OF THE STAKEHOLDERS**

- Providing clients with a wide range of high quality products
- Ensuring prompt and easily accessible interaction with clients, responding to appeals and complaints
- Settlement of overdue debts and assistance to clients
- Ensuring information security and protection of personal data of clients
- Responsible marketing activities
- Ethical business practices
- Fraud and corruption prevention

**FORMS AND TOOLS OF ENGAGEMENT**

- Expanding the range of products and adapting them to clients' needs
- Improving methods of engaging clients including the website and mobile app
- Regular measurement of client satisfaction (NPS)
- Multiple channels for receiving customer requests and queries: phone, WhatsApp, email, internal chat, chatbot
- Responding and investigating each incoming complaint through all Group channels
- Provision of individual conditions for debt repayment (debt restructuring)
- Ensuring information security and the protection of personal data
- Strict compliance with the applicable legislation
- Implementation of strict ethical standards for communication with clients, including when dealing with debt
- Client screening process before approval
- Investigation of all reports of potential fraud and corruption

## STAKEHOLDER ENGAGEMENT

 **Government authorities and relevant communities**
**QUESTIONS AND INTERESTS OF THE STAKEHOLDERS**

- Operational and regulatory issues in the sector
- Carrying out licensed activities in accordance with the requirements of the law
- Compliance with tax legislation

**FORMS AND TOOLS OF ENGAGEMENT**

- Compliance with all requirements of the legislation of jurisdiction in which Group operates
- Regular tax deductions to the budget in accordance with tax legislation
- Carry out licensed activities strictly and only in accordance with legal requirements
- Elimination of any identified violations and implementation of recommendations
- Holding meetings of working and expert groups, commissions, committees, personal meetings and negotiations
- Participation in conferences, round tables and other events

 **Partners and suppliers**
**QUESTIONS AND INTERESTS OF THE STAKEHOLDERS**

- Transparent engagement and procurement conditions
- Compliance with ethics and anti-corruption standards
- Long-term partnership

**FORMS AND TOOLS OF ENGAGEMENT**

- Transparent procurement procedures
- Meetings and workshops with business partners
- Prompt response in case of problems
- Protection of confidential information
- Compliance with Group anti-corruption policies

## STAKEHOLDER ENGAGEMENT

 **Media**
**QUESTIONS AND INTERESTS OF THE STAKEHOLDERS**

- Increasing information transparency
- Increasing brand awareness of ID Finance and increasing loyalty of stakeholders
- Building a balanced dialogue with the media

**FORMS AND TOOLS OF ENGAGEMENT**

- Active coverage of the Group's activities, major events and news, including in ESG
- Promotion of key projects
- Active participation of the Group's speakers in profile events, conferences, etc.
- Strengthening the Group's HR and PR brand




 **Local communities**
**QUESTIONS AND INTERESTS OF THE STAKEHOLDERS**

- Implementation of various social and environmental programs
- Informing about the current activities of the Group and its development plans



**FORMS AND TOOLS OF ENGAGEMENT**

- Implementation of various social and environmental projects, interaction with charitable foundations
- Publications in the media and on the Group's website
- Maintaining the Group's social networks



# CONTRIBUTION TO THE UN SDG

UN SDG	Goal	Our contribution
 <p>1 NO POVERTY</p>	<p>1.2 By 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all its dimensions according to national definitions</p> <p>1.4 By 2030, ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance</p>	<ul style="list-style-type: none"> <li>• Providing equal access to financial products for different categories of citizens</li> <li>• Providing access to microfinancing online, which allows clients receive the necessary funds at any convenient time from anywhere in those markets we operate (Spain and Mexico)</li> <li>• Providing additional cashback for purchases</li> <li>• Providing a convenient App that helps clients manage their daily finances</li> <li>• Providing our clients legal, telemedicine and veterinarian services through our Plazo app</li> <li>• Providing clients with information on financial literacy and financial planning, thus contributing to improve their financial education</li> </ul>
 <p>3 GOOD HEALTH AND WELL-BEING</p>	<p>3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all</p>	<ul style="list-style-type: none"> <li>• Implementation of a voluntarily medical insurance (VMI) program for all Group employees</li> <li>• Provision of free office check-ups and health tests</li> <li>• Covering 50% of the cost of gym memberships to promote a healthy lifestyle among our staff</li> <li>• Conducting sports and recreational activities for employees</li> </ul>
 <p>4 QUALITY EDUCATION</p>	<p>4.4 By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship</p>	<ul style="list-style-type: none"> <li>• Training programs and advanced training courses for employees</li> <li>• Provision of foreign language classes</li> <li>• Collaboration with EAE Business School Barcelona</li> </ul>

CONTRIBUTION TO THE UN SDG

UN SDG	Goal	Our contribution
<p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p> 	<p>8.4 Improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-Year Framework of Programmes on Sustainable Consumption and Production, with developed countries taking the lead</p> <hr/> <p>8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value</p>	<ul style="list-style-type: none"> <li>• Separate waste collection</li> <li>• Reducing paper consumption in offices</li> <li>• Compensation of CO2 emissions and participation in reforestation projects</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Ensuring equal pay conditions for men and women</li> <li>• Conducting a comprehensive study on wage gaps in Spain</li> <li>• Transparent employment system</li> <li>• Transparent performance evaluation and bonus system</li> <li>• Transparency and equality of opportunities in career advancement</li> <li>• Realization of Equality plan in Spain</li> </ul>
<p><b>10</b> REDUCED INEQUALITIES</p> 	<p>10.1 By 2030, progressively achieve and sustain income growth of the bottom 40 per cent of the population at a rate higher than the national average</p> <p>10.4 Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality</p>	<ul style="list-style-type: none"> <li>• Expansion of access to financing and non-discrimination when deciding on granting a loan</li> <li>• Creation of secure financial products and implementation of anti-fraud measures in compliance with the financial sector's regulation</li> <li>• Participation in social and charitable projects aimed at reducing socio-economic inequality</li> <li>• Realization of Equality plan in Spain</li> <li>• Assistance in settling overdue debts and assistance to victims of emergency situations</li> </ul>

CONTRIBUTION TO THE UN SDG

UN SDG	Goal	Our contribution
	<p>13.2 Integrate climate change measures into national policies, strategies and planning</p>	<ul style="list-style-type: none"> <li>• Compensation of CO2 emissions and participation in reforestation projects</li> <li>• Participating in different ecological activities</li> <li>• Green energy purchases</li> </ul>
	<p>16.5 Substantially reduce corruption and bribery in all their forms</p>	<ul style="list-style-type: none"> <li>• Monitoring compliance with corporate ethical principles and policies, including criminal compliance and anti-bribery (receiving certifications)</li> <li>• The existence of a number of mechanisms for reporting violations related to the provisions of the anti-corruption policy</li> <li>• Investigation of all cases of violation</li> </ul>

## Performance in the reporting period

Table 1. Number of employees by employment contract, type of employment and gender

	Spain		Mexico		Poland		Total	
	2024	2023	2024	2023	2024	2023	2024	2023
<b>Number of employees with an indefinite employment contract</b>	<b>154</b>	144	<b>219</b>	217	<b>14</b>	16	<b>387</b>	377
Including women	79	73	108	103	9	9	196	185
Including men	75	71	111	114	5	7	191	192
<b>Number of employees with fixed-term employment contract</b>	<b>2</b>	3	<b>7</b>	6	<b>0</b>	1	<b>9</b>	10
Including women	1	1	1	4	0	1	2	6
Including men	1	2	6	2	0	0	7	4
<b>Number of full-time employees</b>	<b>156</b>	147	<b>226</b>	223	<b>14</b>	17	<b>396</b>	387
Including women	80	74	109	107	9	10	198	191
Including men	76	73	117	116	5	7	198	196
<b>Number of part-time employees</b>	<b>0</b>	0	<b>0</b>	0	<b>0</b>	0	<b>0</b>	0
Including women	0	0	0	0	0	0	0	0
Including men	0	0	0	0	0	0	0	0

## Performance in the reporting period

Table 2. New employees by gender and age

	Spain						Mexico						Poland						Total					
	2024			2023			2024			2023			2024			2023			2024			2023		
	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old
<b>Number of new employees</b>	21	44	0	15	15	0	8	24	4	4	7	0	0	0	0	4	5	0	29	68	4	23	27	0
<b>Including women</b>	13	23	0	8	5	0	5	11	2	3	3	0	0	0	0	2	2	0	18	34	2	13	10	0
<b>Including men</b>	8	21	0	7	10	0	3	13	2	1	4	0	0	0	0	2	3	0	11	34	2	10	17	0

Table 3. Parental leave

	Spain		Mexico		Poland		Total	
	2024	2023	2024	2023	2024	2023	2024	2023
<b>Number of employees on parental leave</b>	12	4	0	5	2	2	14	11
<b>Including women</b>	5	2	0	4	2	2	7	8
<b>Including men</b>	7	2	0	1	0	0	7	3
<b>Total number of employees who returned to work after parental leave</b>	11	4	0	3	0	0	11	7
<b>Total number of employees who returned to work after the end of parental leave, and who are still working 12 months after returning to work</b>	11	2	0	2	0	0	11	4

## Performance in the reporting period

Table 4. Socio-cultural diversity of managers and employees by gender and age

	Spain						Mexico						Poland						Total					
	2024			2023			2024			2023			2024			2023			2024			2023		
	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old	Up to 30 years old	30-50 years old	Older than 50 years old
<b>Managers</b>	4	42	2	0	18	0	0	12	3	0	8	2	1	3	0	1	4	0	5	57	5	1	30	2
<b>Including women</b>	4	13	0	0	8	0	0	5	2	0	4	1	0	0	0	0	0	0	4	18	2	0	12	1
<b>Including men</b>	0	29	2	0	10	0	0	7	1	0	4	1	1	3	0	1	4	0	1	39	3	1	18	1
<b>Employees</b>	34	65	9	31	85	13	31	168	12	39	159	15	2	8	0	7	5	0	67	241	21	77	249	28
<b>Including women</b>	16	46	1	23	39	4	16	84	2	16	80	6	2	7	0	6	4	0	34	137	3	45	123	10
<b>Including men</b>	18	19	8	8	46	9	15	84	10	23	79	9	0	1	0	1	1	0	33	104	18	32	126	18

Table 5. Average annual number of hours of training per employee by gender and position

	Spain		Mexico		Poland		Total	
	2024	2023	2024	2023	2024	2023	2024	2023
<b>Managers</b>	16	8	0	-	0	14	12	7
<b>Employees</b>	11	10	4	6	24	17	7	6
<b>Women</b>	16	12	4	7	27	38	8	8
<b>Men</b>	10	8	2	6	0	10	6	5

Table 6. Staff turnover rate

	2024	2023
<b>Spain</b>	32%	25%
<b>Mexico</b>	24%	41%
<b>Poland</b>	19%	30%
<b>Total</b>	<b>28%</b>	<b>32%</b>

## Performance in the reporting period

Table 7. Energy consumption by country (electricity), kWh

	2024	2023
<b>Mexico</b>	42.8	29.6
<b>Spain</b>	74.9	67.3

Table 8. Greenhouse gas emissions , tons of CO2 equivalent

	2024	2023
Category A – Direct emissions	0.0	183.9
Category B – Indirect emissions from purchased energy	21.8	21.2
Category C – Indirect emissions from transport (commuting & business travel)	243.2	281.9
<i>commuting</i>	159.5	112.9
<i>business travel</i>	83.7	169.0
Category D – Indirect emissions from products/services used (materials, telework, waste, water, services, electricity losses)	42.6	720.4
<b>Total verified emissions 2024</b>	<b>307.6</b>	<b>1,207.3</b>

## Performance in the reporting period

Table 9. Consolidated income statement, ths euros

	2024	2023
<b>Interest and related Income</b>	<b>215,265</b>	<b>179,205</b>
Net Impairment Losses	(132,367)	(113,472)
<b>Net Interest and related Revenue</b>	<b>82,898</b>	<b>65,733</b>
Marketing and issue Expenses	(35,337)	(28,817)
Administrative Expenses	(19,360)	(17,466)
Depreciation and Amortisation	(4,886)	(4,727)
<b>Operating Income/(Loss)</b>	<b>23,315</b>	<b>14,723</b>
Financial Expense	(16,208)	(13,976)
Net foreign currency gain/(loss)	(5,536)	4,991
Other gain /(loss)	7,329	2,944
<b>Profit/(Loss) before Income Tax</b>	<b>9,071.000</b>	<b>8,694</b>
<b>Profit/(Loss) for the year</b>	<b>6,614.000</b>	<b>7,055</b>

Table 10. Consolidated balance sheet, ths euros

	2024	2023
<b>Total Assets</b>	<b>175,517</b>	<b>140,454</b>
Cash	6,238	8,986
Net Portfolio	113,473	80,842
Other assets	55,806	50,626
<b>Liabilities and Equities</b>	<b>175,517</b>	<b>140,454</b>
<b>Liabilities</b>	<b>147,461</b>	<b>129,579</b>
Loans and borrowings	130,172	112,188
Current tax liability	4,559	1,077
Other liabilities	1,273	16,314
<b>Equity</b>	<b>28,056</b>	<b>10,875</b>

# ABOUT THE REPORT

ID Finance Investments, S.L. for the second time publishes a Sustainability Report. The Report for the first time was prepared in accordance with the Global Reporting Initiative Standards (GRI Standards) 2021 edition. Additionally, the content of the Report discloses information about the Group's progress in organizing its activities in line with the United Nations Global Compact (UNGC) and the UN Sustainable Development Goals (SDGs), adopted by the UN General Assembly in 2015.

The Group also regularly prepares the Non-Financial Information Statement (EINF) in line with the requirements established in Law 11/ 2018 of December 28, 2018 on non-financial information and diversity approved on December 13, 2018 by the Congress of Deputies amending the Commercial Code.

In this Report, we disclose information about our Group's progress in sustainability and demonstrate the results achieved in responsible business conduct, employee development, support for local communities, and environmental protection. The Report covers the Group's activities in two jurisdictions: Spain and Mexico, and also includes information on all legal entities owned by ID Finance Investments, S.L., in particular IDFinance Spain, S.A.U. (Spain), IDFinance Spain S.A.U., Sucursal en México, Plazo Credit, S.L.U. (Spain), Plazo Credit S.L.U., Sucursal en México, IDFinance Plazo, S.L.U. (Spain), IDFinance Plazo S.L.U., Sucursal en México, ID Finance Poland sp. z o. o.(Poland), Plazo Technologies sp. z o.o. (Poland), IDF CAPITAL S.A.P.I. DE C.V., S.O.F.O.M., E.N.R (Mexico), IDF SERVICIOS S.A.P.I de C.V. (Mexico) ,ONLINE COLLECT S.A. de C.V.(Mexico).

The information contained in this Report covers the period from January 1 to December 31, 2024. The Report is prepared in English and Spanish and is published on the Group's official website <https://idfinance.com/>.

The Report has been reviewed and approved by the Group's Board of Directors.

# MATERIAL TOPICS

One of the key stages in preparing this Sustainability Report in accordance with GRI Standards is the identification of material topics. According to the GRI Standards, a material topic is defined as an issue that has a significant economic, social, and/or environmental impact, including human rights considerations, and is of high importance to both internal and external stakeholders. These material topics warrant comprehensive and detailed disclosure in the Report.

The process of identifying material topics for this Report comprised several stages. Initially, we compiled a list of 15 potentially significant topics relevant to ID Finance, based on our CSR goals and expert assessments of the Group's impact on the environment, society, and the economy, in line with GRI Standard 3-1. This process incorporated an in-depth analysis of the requirements of rating agencies, international standards such as the SDGs, and a review of material topics relevant to comparable companies within the financial sector.

Subsequently, we conducted a comparative analysis of sustainability reports from leading international and European microfinance organizations and banks. This step aimed to identify the most pertinent issues for our industry and geographic context.

The final stage involved ongoing dialogue and engagement with key stakeholders—including shareholders, partners, employees, and clients. This stakeholder interaction enabled us to pinpoint topics of critical importance to each group.

By synthesizing all collected data, insights, and stakeholder feedback, we developed a prioritized list of material topics, which we have comprehensively disclosed in this Report.

## MATERIAL TOPICS

1. **Responsible financing**
2. **Customer satisfaction**
3. **Compliance and anti-bribery**
4. **Privacy and data security**
5. **Fair and favorable working conditions**
6. **Diversity & Inclusion**
7. **Reduction of environmental impact**

# GRI INDEX

Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
2-1	Organizational details	Who we are	The Company operates in Spain and Mexico. The head office is located in Spain, Barcelona.
2-2	Entities included in the organization's sustainability reporting		ID Finance Investments, S.L. and all subsidiaries, in particular IDFinance Spain, S.A.U. (Spain), IDFinance Spain S.A.U., Sucursal en México, Plazo Credit, S.L.U. (Spain), Plazo Credit S.L.U., Sucursal en México, IDFinance Plazo, S.L.U. (Spain), IDFinance Plazo S.L.U., Sucursal en México, ID Finance Poland sp. z o.o. (Poland), Plazo Technologies sp. z o.o. (Poland), IDF CAPITAL S.A.P.I. DE C.V., S.O.F.O.M., E.N.R (Mexico), IDF SERVICIOS S.A.P.I de C.V. (Mexico), ONLINE COLLECT S.A. de C.V. (Mexico).
2-3	Reporting period, frequency and contact point		The Sustainability Report is published annually. This Report was published in November 2025. Contact information is provided on the last page of the Report.
2-4	Restatements of information		There were no significant changes in the provision of non-financial information in the reporting period.
2-5	External assurance		No external assurance of non-financial information was provided.
2-6	Activities, value chain and other business relationships	Our products	
2-7	Employees	Diversity and equality Performance results	Data provided as of 12/31/2024.
2-8	Workers who are not employees		There were no such employees in the Group in 2024.

Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
2-9	Governance structure and composition	Corporate governance	In 2024, there were five members of the Board of Directors – all members are men. The Group does not disclose information about the affiliation of Board members to underrepresented social groups for reasons of confidentiality.
2-10	Nomination and selection of the highest governance body		Members of the Board of Directors are elected by decision of shareholders.
2-11	Chair of the highest governing body	Corporate governance	The Chairman of the Board of Directors in 2024 was Alexander Dunaev.
2-12	Role of the highest governance body in overseeing the management of impacts	Corporate governance Sustainability management	The Group does not have a separate due diligence process for ESG impacts. Instead, Board of Directors oversees the potential negative impacts of the Group's activities.
2-13	Delegation of responsibility for managing impacts	Corporate governance Sustainability management	The EXCO reports to the Board of Directors. Reporting occurs at different intervals and in accordance with the communication procedures established.
2-14	Role of the highest governance body in sustainability reporting		The Board of Directors approves the Sustainability Report.
2-15	Conflicts of interest	Business Ethics	In ID Finance, in accordance with the Compliance principles, Code of Ethics and Conflict of interest policy, all necessary measures are taken to prevent and eliminate conflicts of interest. Internal documents define the procedure for action in the event of a conflict of interest. Regarding the risk of a conflict of interest arising from cross-membership on the Board of Directors or other senior management bodies, we strictly comply with Spanish legislation.

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Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
2-16	Communication of critical concerns		All critical issues are necessarily consolidated by the head of the legal department and reported to the CEOs, Global division heads or Board of Directors, depending on the issue. In 2024, decisions were made at the Board of Directors level in the following areas: corporate issues, financing and investments, strategic development, internal control and audit, financial reporting.
2-17	Collective knowledge of the highest governing body		There is currently no separate training on sustainability for the Board of Directors.
2-18	Evaluation of the performance of the highest governance body		At present, a separate assessment of the Board of Directors' activities in monitoring the management of the Group's impacts on the economy, environment and society is not carried out.
2-19	Remuneration policies		The General Meeting of Shareholders determines the remuneration policy. As of the end of the reporting period, the Group did not use KPIs in the area of sustainability when forming the remuneration of Board directors. However, top management have some KPIs related to ESG.
2-20	Process to determine remuneration		The decision on the payment and amount of remuneration is determined by the General Meeting of Shareholders.
2-21	Annual total compensation ratio		For confidentiality reasons, the average remuneration of the Board of directors is not reported.
2-22	Statement on sustainable development strategy	Sustainability management Sustainability goals	
2-23	Policy commitments	Sustainability management Compliance Business Ethics Our employees Responsible procurement	

## GRI INDEX

Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
2-24	Embedding policy commitments	Sustainability management Sustainability goals Compliance Business Ethics Responsible procurement	
2-25	Processes to remediate negative impacts	Client rights protection Communication with clients Compliance Countering corruption and fraud Human Rights	
2-26	Mechanisms for seeking advice and raising concerns	Client rights protection Communication with clients Compliance Countering corruption and fraud Human Rights	
2-27	Compliance with laws and regulations		In 2024, there were no violations.
2-28	Membership associations		The Group is a member of AEMIP (Asociación Española de Micropréstamos (Spanish Microloan Association)) and AEFI (The Spanish Fintech and Insurtech Association) in Spain and CONACOM in Mexico.
2-29	Approach to stakeholder engagement	Human Rights Stakeholder engagement	The Group is committed to respecting the human rights of all stakeholders involved. We actively engage with our stakeholders through various communication channels, and we also expect business partners to respect human rights and business ethics during their interactions.
2-30	Collective bargaining agreement		We do not currently have formal collective bargaining agreements.

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Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
3-1	Process to determine material topics	Material topics	
3-2	List of material topics	Material topics	
3-3	Management of material topics		Management data for each major topic is located in the relevant topic sections.
201-1	Direct economic value generated and distributed	Performance results	For more detailed information on our financial results, please refer to our audited financial statements.
201-3	Defined benefit plan obligations and other retirement plans		The Group has no such obligations.
201-4	Financial assistance received from government		During the reporting period, the Group did not receive financial support from the government.
205-2	Communication and training about anti-corruption policies and procedures	Countering corruption and fraud	
205-3	Confirmed incidents of corruption and actions taken	Countering corruption and fraud	In 2024, no corruption offenses were identified.
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		In 2024, there were no recorded cases of legal action against the Group in connection with obstruction of competition and violation of antitrust laws.
207-1	Approach to tax		ID Finance's tax strategy is to fully comply with tax laws of the countries where legal entities operate. All senior management bodies regularly monitor the implementation of this strategy.

Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
302-1	Energy consumption within the organization	Environmental responsibility	In 2024 and 2023, the electricity contracted in Spain was sourced entirely from renewable energy providers. The Group does not consume cooling and steam, and does not sell heat and fuel and energy resources. The Group does not have a practice of consuming the energy produced. Energy consumption data is provided by the landlord.
303-1	Interactions with water as a shared resource	Environmental responsibility	The Group uses water exclusively for domestic and technical purposes, the only consumers of water are the Group's offices. Water is withdrawn and discharged from/to municipal water supply sources (water circulation) in accordance with the agreement with the landlord. The Group does not consume water in areas with water shortages.
303-2	Management of water discharge-related impacts		Wastewater is discharged through a centralized municipal sewerage system.
305-1	Direct (Scope 1) GHG emissions	Climate change Performance results	The carbon footprint calculation not only took into account the CO2 calculation but also included the most representative polluting gases, such as CH4 and N2O. The Global Warming Potential (GWP), which allows us to determine the tons of CO2 equivalent of these two gases, was extracted from the IPCC source using the 100-year scenario, as indicated by ISO 14064-1:2018.
305-2	Energy indirect (Scope 2) GHG emissions	Climate change Performance results	The carbon footprint calculation not only took into account the CO2 calculation but also included the most representative polluting gases, such as CH4 and N2O. The Global Warming Potential (GWP), which allows us to determine the tons of CO2 equivalent of these two gases, was extracted from the IPCC source using the 100-year scenario, as indicated by ISO 14064-1:2018.
305-3	Other indirect (Scope 3) GHG emissions	Climate change Performance results	The carbon footprint calculation not only took into account the CO2 calculation but also included the most representative polluting gases, such as CH4 and N2O. The Global Warming Potential (GWP), which allows us to determine the tons of CO2 equivalent of these two gases, was extracted from the IPCC source using the 100-year scenario, as indicated by ISO 14064-1:2018.

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Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
305-4	GHG emissions intensity	Climate change	The GHG emission intensity factor is 0.8 tCO <sub>2</sub> e/employee. The denominator for the calculation is the total number of employees.
305-5	Reduction of GHG emissions	Climate change	The overall reduction in emissions compared to 2023 amounted to 75%. This significant reduction primarily results from the absence of refrigerant leaks in 2024—after a leak incident in 2023—and the effects of our relocation, which included associated expenses and waste management costs.
401-1	New employee hires and employee turnover	Diversity and equality Recruitment and onboarding Performance results	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Motivation and reward Performance results	
401-3	Parental leave	Performance results	
403-1	Occupational health and safety management system	Health and safety	The Group's occupational health and safety management system covers all employees.

Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
403-3	Occupational health services	Health and safety	
403-5	Worker training on occupational health and safety	Health and safety	
403-8	Workers covered by an occupational health and safety management system		The occupational health and safety management system applies to 100% of employees.
403-9	Work-related injuries	Health and safety	There were 3 accidents recorded in 2024.
403-10	Work-related ill health	Health and safety	In 2024, the Group had no recorded occupational diseases or fatal cases related to occupational diseases.
404-1	Average hours of training per year per employee	Training and development Performance results	Training is offered to all employees depending on the development needs and requirements of the Group and regardless of nationality, gender and age.
404-2	Programs for upgrading employee skills and transition assistance programs	Training and development	

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Disclosure	Disclosure description	Place of disclosure in the Report	Comment on disclosure
404-3	Percentage of employees receiving regular performance and career development reviews	Performance assessment	100% of employees receive regular feedback as part of the annual performance appraisal process.
405-1	Diversity of governance bodies and employees	Diversity and equality / Performance results	
405-2	Ratio of basic salary and remuneration of women to men	Motivation and reward	The size of the basic salary does not depend on the gender and age of the employee. It depends solely on the qualifications of the employee, the complexity of the work performed, the quantity and quality of the labor expended.
406-1	Incidents of discrimination and corrective actions taken	Business Ethics / Human Rights	In 2024, no cases of discrimination were recorded.
408-1	Operations and suppliers at significant risk for incidents of child labour		The Group's activities, including the activities of sales offices and contractors, are covered by the legislation of the countries where companies operate, which provides for a ban on the use of child labor.
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour		The Group's activities, including the activities of sales offices and contractors, are covered by the legislation of the countries where companies operate, which provides for a ban on the use of forced labor.
411-1	Incidents of violations involving rights of indigenous peoples		There were no cases of violation of the rights of indigenous and small-numbered peoples in 2024.
413-1	Operations with local community engagement, impact assessments, and development programs	Social initiatives	
418-1	Substantiated complaints concerning breaches of client privacy and losses of client data	Personal data protection	In 2024, there were no complaints or orders regarding violations of client privacy and loss of client data.

ID FINANCE

# CONTACTS

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