



ID FINANCE

CORPORATE SOCIAL RESPONSIBILITY POLICY

Grupo ID FINANCE

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

Approval date: 2021

Approval body: Managing Director and CFO

Version: 2.0

CHANGE CONTROL

Version	Sections that are changed	Description of the Change	Date
V. 1.0	Creation of the Corporate Social Responsibility Policy		2021
V. 2.0	Modification and adaptation of sections	Formatting is edited and several sections are included	16/05/2023

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



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1 Purpose and scope

The ID Finance Group, Fintech dedicated to consumer lending, integrated by ID Finance Investments S.L (as the parent company), ID Finance Spain, S.A.U, ID Finance Plazo, S.L.U, Plazo Credit, S.L.U. as independent companies (hereinafter ID Finance) has the clear aim to contribute to sustainable development, to integrate the concerns arising from stakeholder relations and dialogue into its governance and management and to conduct its business in an efficient, safe and responsible manner from social, economic and environmental perspectives, with the aim of ensuring that our activities have a positive impact on our environment.

This CSR policy creates a reference framework that helps to define and promote behaviors that generate value for all stakeholders (customers, employees, shareholders, suppliers, and society) with the strategy of building a globally sustainable financial company.

All persons who are part of ID Finance, employees, directors, senior management, and board members must base their actions on the guidelines of this Policy.

2 Basic principles of action

In this sense, ID Finance has a social responsibility management system, aligned with the requirements of the international standard IQNet SR10 and has established the following basic principles of action.

2.1 Compliance with the law

Strictly comply with the legal regulations and requirements applicable to it in the development of its activity and with other requirements to which it subscribes, both present and future.

2.2 Principles of transparency and standards regarding anti-corruption

ID Finance's relations are based on the principles of transparency and equal opportunities, and it rejects any action aimed at gaining an advantage over competitors, in the market or in public or private contracts that is based on an unlawful act.

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



2.3 Anti-Money Laundering and Terrorist Financing

ID FINANCE complies with anti-money laundering laws and cooperates fully with responsible authorities in the fight against money laundering or the financing of any illegal activity.

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

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

2.4 Ethical Behaviour

Always behave honestly and with integrity. Striving to achieve the highest standards of quality. To attain this objective, ID Finance has a Code of Ethics that sets out the values, principles and ethical rules that must govern all conduct in the daily development of the activity

2.5 Respect for Human Rights

Comply with all its established policies on equality, equity, and non-discrimination.

2.6 Minimisation of environmental impact

Reduction of the environmental impact of our activities and in particular, the fight against climate emergency, faithful to this commitment since 2020 we have been certified as a carbon neutral company.

3 Respect for stakeholder interests

Dialogue and transparency are the basis of ID Finance's relations with its stakeholders. To this end, it will establish the channels of communication, participation, and dialogue necessary to identify the relevant issues of interest to them and provide a reliable and balanced response to them.



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3.1 Customers

- To place customers at the centre of our activity, favoring clear and reliable communication.
- To favour the development of products with a high social impact in accordance with their needs and within their reach.

3.2 Employees

- Position employees as our main asset, on them depends the success of the Group's sustainability, social and economic impact.
- Respect diversity and promote equal opportunities; all forms of discrimination are prohibited.
- Ensure health and safety at work by implementing occupational risk prevention practices.
- To promote practices to reconcile work and family life.
- Encourage dialogue and internal communication and measure their degree of satisfaction through regular climate surveys.

3.3 Shareholders and Investors

- Continuously offer clear, complete and truthful information to the markets and shareholders, including financial and non-financial aspects of the business.
- Equal treatment of all shareholders and investors that are in the same position.

3.4 Suppliers

- Make them knowledgeable of our Code of Ethics and the policies derived from it.

3.5 Society and the environment

- Developing products that enable financial inclusion and services aligned with a sustainable development model.
- Striving to meet the highest environmental standards in the countries where we operate.
- Fostering a responsible attitude among employees, customers, and society in general

4 Channels of communication, participation, and Dialogue

ID Finance has at the disposal of its stakeholders various channels of communication, participation and dialogue and is committed to disseminating them as widely as possible.

All persons who form a part of ID FINANCE have the duty to report, to its member entities, any situation or behavior that might violate the ethical principles of this Code or any regulations or laws in force, as well as report potentially important irregularities.

These channels are as follows:

- **The ethic line.**

The different companies of the Group have an Ethics Line as a means of reporting any activity that violates the ethical principles of ID FINANCE or to report any circumstance that might mean the materialization of a criminal risk for the company or to report weaknesses of the Criminal Compliance Management System, the objective of which is to handle any compliant that might be made for such purpose.

The Ethics Line is supported by a web application that can be accessed by employees, partners, executives, members of the management bodies, suppliers, clients and, in general, any third party who would like to inform the different companies of the Group about an irregular action that could violate the ethical principles set forth in this Code.

- **Corporate mailboxes:**

compliance@idfinance.com, ID FINANCE has a Regulatory Compliance mailbox for each of its member entities to which any doubts that forms a part of ID FINANCE for sending any doubt or concern related to the ethical principles of this Code or related to regulations or laws in force, as well as in relation to the Criminal Compliance Management Systems, can be addressed.

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

voe.es@idfinance.com and VOE mailbox, ID Finance recognises and promotes the fundamental right of all workers to have a healthy working environment for the optimal performance of their job functions.

VOICE OF THE EMPLOYEE is a program to facilitate open employee communication, measure the work environment and implement corrective action plans for the working conditions in which the employee operates.

5 Competent approval and monitoring bodies

In accordance with the corporate regulations, the approval of the CSR Policy corresponds to the CEO, who personally assumes the commitments expressed herein and undertakes to ensure that this Policy is known, understood and applied by all the people who form part of the organisation, as well as by the relevant stakeholders. Likewise, he/she undertakes to allocate all the necessary resources to guarantee the achievement of the agreed objectives and the continuous improvement of the management system.

Barcelona, Jun 13th, 2023

Signed: Managing Director and CFO

Víctor De Las Heras Hernández





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