

ID FINANCE INVESTMENTS S.L.

Statement of Non-Financial Information for the year 2021

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1. About this report

This Non-Financial Information Statement (EINF) has been prepared 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, the consolidated text of the Capital Companies Law approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, on the Audit of Accounts, regarding non-financial information and diversity (from Royal Decree-Law 18/2017, of November 24).

In its preparation, the guidelines on the presentation of non-financial reports of the European Commission (2017/C 215/01) derived from Directive 2014/95/EU have also been considered. Likewise, the provisions of the Guide for the preparation of sustainability reports of the Global Reporting Initiative (GRI Standards) have been taken into account.

In this context, through the Non-Financial Information Statement ID Finance Investments, S.L. (hereinafter -ID Finance or the Group), which forms part of the Management Report and is presented as a separate report, has the objective of reporting on environmental, social and personnel-related issues, on respect for human rights, on the company's commitments to sustainable development and information about society relevant to the Group in the execution of its own business activities.

In 2021 ID Finance Investments, S.L. has not performed a materiality analysis. However, the most relevant aspects regarding the strategy, activity and performance of the organization have been taken into account. The most relevant aspects considered are:

Very relevant aspects	Relevant aspects	Non-relevant aspects
<ul style="list-style-type: none">- Employment- Organization of work- Social relationships- Training- Equality- Company commitments to sustainable development- Consumers- Tax Information- Health and security	<ul style="list-style-type: none">- Sustainable use of resources- Climate change- Universal accessibility for people with disabilities- Fight against corruption and bribery.- Subcontracting and suppliers	<ul style="list-style-type: none">- Protection of biodiversity- Environmental management- Pollution- Circular economy and prevention and management of resources- Human Rights.

This statement of non-financial information has been subjected to an independent external review process. The independent assurance report where the objectives and scope of the process are included, as well as the review procedures used and their conclusions, is included at the end of this document.

For the preparation of this report, the exchange rates of the Mexican peso, the BelaRussian ruble and the Russian ruble to the euro as of December 31, 2021 have been taken as reference¹.

¹ [Central Bank of Belarus](#)
[European Central Bank](#)

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2. General Information

Business model

Description of the business model

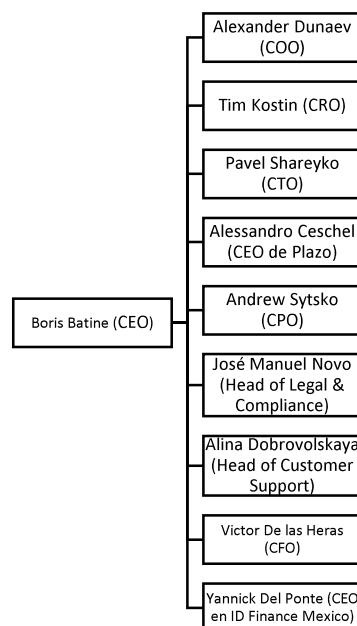
ID Finance Investments S.L. is the parent company of the IDF Investments Group. It was incorporated on September 20, 2016. Its registered office is at Calle Mojà No. 1, 1st floor (08006) Barcelona, Spain. The CIF number of the Company is B66862442. Its registered office was registered in the Mercantile Registry of Barcelona on October 28, 2016 in volume 45605, page 17, and page B 493395, entry 1. The corporate purpose of the Parent Company is to carry out and exploit the following activities:

- Financing of ID Finance Group companies.
- The administration and management of the ID Finance Group.
- The acquisition, transfer, exploitation and assignment in any form of patents, licenses and other forms of industrial or intellectual property.
- Acquire, buy, sell and trade financial instruments of any kind.
- Acquisition, possession, management and administration of securities, holdings and shares.

The ID Finance Group offers financing to people based on data management, the Group uses a pioneering platform in terms of technological innovation, offering its services in emerging markets in a competitive and transparent way through the Internet. The Group is specialized in data science, credit scoring and digital finance. The Group uses machine learning technology and advanced data science techniques to provide competitive financial services. In this way, the ID Finance Group grants micro-loans to individuals in the countries in which it operates to segments excluded from the usual banking circuits. The product offered is similar in the two countries in which the Group has commercial operations, giving the client the possibility of repaying it in a single payment without interest for the first loan or repaying it in terms that range between 3 and 6 months.

Organization and structure

In the following attachment you can find the organization chart of the Group:



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Below is the organizational structure of the Group as of December 31, 2021:

Entity	Country	Equity Percentage
ID Finance Spain S.A.U.	Spain	100%
Debt Management Partners, S.L.U.	Spain	100%
ID Finance Plazo, S.L.U.	Spain	100%
IDF Capital S.A.P de C.V SOFOM, E.N.R.	México	100%
IDF Servicios SAPI de C.V.	México	100%
Online Collect S.A. de C.V.	México	100%
IDF Technology	Belarus	100%
IDF Lab LLC	Russia	100%

Markets in which it operates

The Group currently operates in the following markets:

- 1) Spain.
- 2) México.
- 3) Belarus (where the Group's technological execution capacity is located)
- 4) Russia (where the design and data analysis capacity of the Group is located).

In relation to the markets of Brazil and Poland, ID Finance has ceased to operate in them, having no commercial portfolio there and being in different phases of the exit process from them.

Group objectives and strategies

The ID FINANCE Business Group is a digital platform for consumer finance with the aim of growing the business while reducing the environmental impact and increasing the social impact through responsible and sustainable loans and financing. The strategy is based on building a sustainable financial company at a global level.

Market environment and other factors and trends that may affect the future evolution of the business

Given the markets in which it operates, the Group is subject to certain factors that may affect and condition the future evolution of its business. These aspects are listed below.

- *Macro aspects: any variation in the main macro magnitudes, especially GDP, may lead to a substantial variation of the Group. Thus, an economic deterioration could lead to an increase in credit losses if the corresponding adjustments are not made. On the other hand, a substantial improvement in that environment could lead to a significant increase. The ID Finance Group constantly monitors these macro magnitudes to adjust and take advantage of the different opportunities they offer.*
- *Financial aspects: it operates in the financial sector, its main activity being consumer lending. In this way, the financial aspects are especially critical in the business since they generate the main magnitudes in the income statement (income, cost of funds and provisions).*
- *Legislative aspects: the Group is subject to the different laws of the markets in which it operates. Any legislative change could have an impact on its future development. ID Finance monitors these legislative changes and their possible implications for your future.*
- *Reputational aspects: ID Finance is subject to different reputational aspects derived from the sector in which it operates. In recent years, as a result of the global financial crisis unleashed in 2008, the financial sector has been one of the most affected*

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in terms of reputation. The Group constantly monitors any impact that may derive from a reputational aspect. It also has a Public Relations team to mitigate and control these aspects.

- *Online commerce: all the Group's activity is carried out using electronic channels (from the loan application to its study and subsequent disbursement), with which the Group monitors any progress that occurs in the electronic commerce environment and thus be able to incorporate it into your daily operations and the improvement of your processes. Likewise, the Group has different departments in its Technology division that monitor any impact related to the security of said electronic channels.*

Non-financial risk management

In recent years, the Group has been implementing a succession of policies that seek to focus and minimize the different non-financial risks that affect it. Thus, in addition to assuming the main environmental standards (certificate of neutral carbon emission, certification by MINECO with the COMPENSO seal), the Council has approved policies that seek to weigh and establish the minimum requirements in relation to labor, social and human rights issues. Human Rights, including a Code of Ethics and Conduct, which compiles the principles on which the Group's activity is based. Thus, the daily performance of work and the quality of the services provided must be governed by the following values: Professionalism, Integrity and Responsibility.

ID Finance has a non-financial risk management model, which seeks to identify the main risks, extend its knowledge to the main parties involved and minimize the potential impacts detected. This model is based on the application by each of the areas of the different approved policies, as well as monitoring by the Management Committee of the application of said policies. Within this model, the main risks that have been identified are:

- 1) Legal risks of a commercial nature: any regulatory change in relation to the Group's activity could have a significant impact on its future evolution. To reduce this impact, each business unit and at the consolidated level have specific areas of Legal Advice, where any potential change is analyzed and evaluated. Likewise, these areas collaborate in sectoral panels where not only the changes already produced are discussed, but future changes are also sought to be anticipated.
- 2) Operational Risks: the Group defines an operational or operational risk, as any event arising from its operations, which may lead to a loss. The main operational risks identified are the following:
 - a. Business Continuity: defined as the probability that the business will be interrupted for reasons beyond its control. To minimize it, the Group has various measures, including the possibility of moving all staff to work from home or duplicity with critical suppliers (analysis of Credit Bureaus, technology providers) as well as a storage policy in the cloud of its servers, with the maximum technological security requirements.
 - b. Cybersecurity: in relation to the previous point, one of the Group's main assets is its data. Therefore, ID Finance has developed policies that seek to protect it from cyberattacks. On the other hand, by developing its activities in a Cloud format, the Group is committed to the decentralization of servers, avoiding their physical risk.
- 3) Occupational risks: the Group is subject to the generation of labor conflicts, as well as regulatory changes that could impact the labor relations it maintains. To minimize this risk, ID Finance has implemented a "People, First" culture that seeks to put the people

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with whom it collaborates at the center of the Group. On the other hand, the Group has Human Resources Departments in all its jurisdictions that support the normal development of its activities.

- 4) Data Protection Risks: are the risks arising from the security, integrity and confidentiality of the data transferred by third parties for the normal activity of the Business. Each of the Group's units has qualified personnel in DPO tasks, who seek to ensure all the Group's actions in relation to the treatment and processing of information.

Environmental issues

The activity of the ID Finance office and the location of the different headquarters of the Group Entities in interurban areas generate a direct insignificant impact on the environment, which is why the Group has not considered aspects related to management to be material for the organization. environment, pollution, circular economy and waste prevention, protection of biodiversity, as well as the consumption of water and raw materials.

Sustainable use of resources

Direct and indirect energy consumption

As mentioned previously, due to the nature of the Group's activity and the development of its activities in offices, their electricity consumption has been taken into account to reflect their energy consumption in 2021. Below, It is presented with consumption for each of the countries in which the Group is present:

Energy consumption by country (electricity)	Total kWh
México	8,349
Russia	1,436
Belarus	39,854
Spain	41,530

Table 1: electricity consumption

Measures taken to improve energy efficiency

During the 2021 financial year, the Group has not taken specific actions to improve energy efficiency.

Use of renewable energies

In 2021, in Spain the contracted energy sources are 100% renewable.

Climate change

Emissions of greenhouse gases

In 2019, ID Finance began measuring the environmental impact of its daily activities in the countries where it operates. With the help of the consulting firm specialized in sustainability and climate change ECOTERRAE, it carried out a study to measure the carbon footprint, applying the methodology of ISO 14064-1:2019, the Spanish adaptation to an international regulation that protocolizes the process of calculation and results of the Emissions Inventory.

During the 2021 financial year, the Group has not had any energy consumption from fossil fuels. Therefore, for the measurement of the carbon footprint for 2021, only energy consumption from electricity consumption in the offices where it carries out its activities has been taken into account. Below is the Group's CO₂ emissions in 2021:

Scope 2	Total kWh	Emission factor (kg CO ₂ eq por kWh) ²	CO ₂ eq
México	8,349	0.4314	3,602
Russia	1,436	0.3102	445

² The equivalent CO₂ emission factors provided by Carbon Footprint (2021) have been used as the methodology for calculating the CO₂ emissions of Mexico and Russia. In the case of Belarus, the data provided by the Joint Research Center Data Catalog (2020, latest version available) has been taken as a reference).

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Belarus	39,854	0.472	18,812
Spain	41,530	0	0
Total	91,169		22,859

Table 2: Carbon footprint calculation

Voluntarily set reduction targets

The Group collaborates with different projects that help offset the carbon emissions that are generated and aspires to be a carbon neutral company in the future.

Measures taken to adapt to the consequences of climate change

The Group works so that its daily activity has the least impact on the environment. In order to mitigate the impact of its footprint, in the 2021 financial year ID Finance offset part (5t of CO2 offset) of its registered carbon footprint corresponding to the year 2020 by participating in a reforestation project on Mount Orzaduero.

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Social and personnel issues

Employment

Total number and distribution of employees by sex, age, country and professional classification

With a total of 574 employees as of December 31, 2021, distributed in 4 countries, the ID Finance group contributes to the generation of employment and income in the countries where it operates:

Distribution of employees by country	Spain	93
	Russia	66
	México	234
	Belarus	182
	Total	575

Table 3: Total employees by country as of December 31, 2021

Employees by gender	Men	345
	Women	230
	Total	575

Table 4: Total employees by gender as of December 31, 2021

Employees by professional category	Management	13
	Middle managers	92
	Administratives	187
	Support staff	283
	Total	575

Table 5: Total employees by professional category as of December 31, 2021

Total number and distribution of employment contract modalities

Permanent contract		Temporary contract		Part time		Total
Men	Women	Men	Women	Men	Women	
319	204	26	26	0	0	575

Table 6: Total employees by gender and type of contract as of December 31, 2021

Number of indefinite contracts by age		
Less than 30	30-50	More than 50
172	334	17

Table 7: Number of indefinite contracts by age as of December 31, 2021

Number of temporary contracts by age		
Less than 30	30-50	More than 50
11	40	1

Table 8: Number of temporary contracts by age as of December 31, 2021

Indefinite contract

Management	Middle managers	Administratives	Support staff
13	89	185	236
Contrato temporal			
Management	Middle managers	Administratives	Support staff
0	3	2	47

Table 9: Total de contratos por tipología y clasificación profesional a 31 de diciembre de 2021

The ID Finance Group is committed to the stability and development of its employees, proof of which is the stability of the workforce in the last year. Taking into account that there has been no significant variation in the workforce during 2021, and considering the average number of employees throughout the year and the total number of employees as of 12/31/2021, the set of personnel indicators of this EINF corresponds to the workforce at the end of the year.

Number of dismissals by sex, age and professional classification

Below is the number of dismissals by sex, age and professional classification:

Gender		Age		
Men	Women	Menos de 30	30-50	Más de 50
37	21	28	26	4

Table 10: Total number of layoffs by Gender and Age as of December 31, 2021

Professional category			
Management	Middle managers	Administratives	Support staff
17	5	5	31

Table 11: Total number of dismissals by Professional category as of December 31, 2021

Average remuneration and its evolution disaggregated by sex, age and professional classification or equal value ³

The information regarding the average remuneration received by the ID Finance Group is indicated below. In order to promote transparency and taking into consideration the socioeconomic and labor context of each country, the report is made country by country with the conversion of the amounts of each local currency to euros.

		Spain ⁴	Russia	México ⁵	Belarus ⁶
Men	Management	141,875 €	22,804 €		
	Middle managers	54,586 €	12,814 €	47,781 €	45,761 €
	Administratives	27,738 €	3,897 €	13,483 €	29,398 €
	Support staff	18,958 €	1,701 €	5,850 €	11,632 €
Women	Management		16,852 €		
	Middle managers	50,416 €	8,908 €	43,513 €	32,599 €

³ Unless otherwise specified, data not reported in the Table refers to professional classifications that are not held by any person in the Entity.

⁴ For reasons of confidentiality, the average remuneration of the Women director of Spain is not reported, since the function is performed by a single person from the Entity (Group of Age 30-50 and professional category Management)

⁵ For reasons of confidentiality, the average remuneration of the executive in Mexico is not reported, since the function is performed by a single person from the Entity (Group of Age 30-50 and professional category Management)

⁶ For reasons of confidentiality, the average remuneration of the manager from Belarus is not reported, since the function is carried out by a single person from the Entity (Group of Age 30-50 and professional category Management)

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	Administratives	28.891 €	4.201 €	11.561 €	20.524 €
	Support staff	18.408 €	759 €	5.891 €	10.879 €
Total Men		50.327 €	5.932 €	10.556 €	28.707 €
Total Women		32.681 €	7.005 €	9.834 €	15.622 €
Wage gap⁷		24% ⁸	-18%	7%	44%

Table 12: Average salaries by Gender, Professional category and country. The wage gap by country is included.

		Spain⁹	Russia	México	Belarus
Men	Less than 30	30,816 €	3,179 €	6,698 €	22,343 €
	30-50	55,660 €	8,811 €	10,066 €	35,283 €
	More than 50	19,038 €		24,007 €	
Women	Less than 30	32,308 €	3,363 €	8,228 €	14,112 €
	30-50	33,160 €	9,433 €	10,198 €	17,347 €
	More than 50	27,354 €		5,675 €	

Table 13: Average remuneration by Gender, Age and country.

The average remuneration of directors

The directors of the Group do not receive do not receive any type of remuneration for acting as directors.

The average remuneration of managers

Below is the information regarding the average remuneration received by the Senior Management people of the Group, disaggregated by gender. For the calculation of the average remuneration, the variable remuneration, allowances, compensation, payment to long-term savings forecast systems and any other perception have been taken into account.

SALARY (€)	Men	Women	TOTAL
High Management	2	0	161.210 €

Table 14: Average remuneration of Senior Management disaggregated by Gender

Implementation of labor disconnection policies

In 2021, the ID Finance Group does not have job disconnection policies.

Number of employees with disabilities

In 2021, the Group does not have any employees with disabilities on the workforce ¹⁰.

⁷ The methodology used to calculate the salary gap for the 2021 financial year was as follows: (difference between the average remuneration for men and the average remuneration for women) divided by the average remuneration for men.

⁸ For the calculation of the following data, the remuneration of the CEO and COO has not been included since it distorts the representativeness of the gap.

⁹ Unless otherwise specified, data not reported in the Table refers to professional classifications that are not held by any person in the Entity.

¹⁰ In reference to the payment certificate for not having employees with disabilities for 2021, the Group does not have it since none of the Entities in Spain exceeds 50 workers.

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Organization of working time

Organization of working time

The working hours of the Group's staff are from Monday to Thursday from 9:00 a.m. to 5:00 p.m. to 6:00 p.m. and Fridays from 9:00 a.m. to 5:00 p.m. to 4:00 p.m.

Likewise, each Group employee will be able to enjoy 24 days of paid vacation. In addition, each employee has 2 days off per year due to undocumented sickness.

Number of hours of absenteeism

In 2021, 220 hours of absenteeism derived from sick leave of a working person have been recorded.

Measures aimed at facilitating the enjoyment of conciliation and promoting the co-responsible exercise of these by both parents

Among its measures, the Group has the Home Office program which seeks to improve the reconciliation of employees. The objective is to promote a flexible work environment, improving the reconciliation of work and personal life for employees, as well as promoting a more sustainable work environment.

Said program allows employees to choose to work twice a week from their home address, as long as this does not affect the work for which they were assigned, nor the objectives established in their jobs and/or the projects in which they are involved find working.

Health and security

Health and safety conditions at work

The Group has an internal action protocol and an emergency plan that serve as a framework to guide all operations related to the field of occupational health and safety.

Measures taken against COVID-19:

ID Finance, in its objective of protecting the health of its employees in the office after confinement, decided to prepare its facilities following the health recommendations to ensure spaces for its staff. To adapt its facilities, ID Finance has undergone an independent audit carried out by AUDELCO, which has developed a "Covid-19 Action Protocol for a safe return to work". This protocol contains and addresses different topics such as the planning or participation of remote workers, signaling of security measures, hygiene and cleaning procedures or guidelines for remote work and references to access control and movement monitoring. In this sense, ID Finance's employee policy is firmly committed to the health and well-being of its employees, offering flexibility and favoring the reconciliation of work and family life and, above all, safety.

Accident rate

Below is the Group's accident rate data for the 2021 financial year:

Accident rate	Women	Men
Total number of accidents	2	1
Work accidents without sick leave	1	1
Work accidents with sick leave	1	0
Commuting accidents	1	0
Accidents at work	1	1

Table 15: Total number of accidents and occupational diseases by gender

During the 2021 financial year there have been no professional nurses:

¹¹ Accident frequency rate		
TOTAL	Women	Men
16,08	16,08	0

Table 16: Accident Frequency Rate by Gender

¹² Accident Gravage Rate		
TOTAL	Women	Men
0,13	0,13	0

Table 17: Accident Gravage Rate by Gender

Social relationships

Organization of social dialogue, including procedures for informing and consulting staff and negotiating with them

ID Finance recognizes and promotes the fundamental right of all workers to have a healthy work environment for the optimal performance of their job duties. This is the reason why the VOE (Voice of the Employee) program was created, which gives employees a channel to communicate in a more open and free way simply by fulfilling the objectives of the VOE.

Percentage of employees covered by collective agreement by country

All ID Finance Spain employees are covered by the office agreement.

The Group Entities located in Mexico, Russia and Belarus ensure compliance with current legislation and encourage dialogue with their employees, however, they do not have a formal collective bargaining agreement.

The balance of collective agreements, particularly in the field of health and safety at work

The aspects of the agreement related to safety and health at work are included in chapter 7 of the same.

Training

Policies implemented in the field of training

The Group does not have a Training Plan as such, but individual training needs are identified to respond to specific needs. Especially, emphasis is placed on language training.

The number of hours of training by professional category

Employees	Hours of training
High Management	312
Middle managers	1,604
Administratives	1,462
Support staff	3,609
TOTAL	6,987

Table 18: Number of hours of training by professional category

¹¹ The methodology used to calculate the accident frequency rate was as follows: (Total number of accidents divided by total hours worked) multiplied by 1,000,000

¹² The methodology used to calculate the accident gravAge index was as follows: (Total number of days lost divided by total hours worked) multiplied by 1,000

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Universal accessibility for people with disabilities

ID Finance does not have employees with disabilities, so no specific measures have been taken in this area.

Equality

In each and every one of the areas in which the Group's activity is carried out, from selection to promotion, including salary policy, training, working and employment conditions, occupational health, the organization of working time and conciliation, Id Finance assumes the principle of equal opportunities between Women and Mens.

Entities located in Spain have a current Equality Plan. Said Equality Plan leaves in writing the commitment to the establishment and development of policies that integrate equal treatment and opportunities between Women and Men, without discriminating directly or indirectly on the basis of sex, as well as in the promotion and promotion of measures to achieve real equality within the organization, establishing equal opportunities between Men and Women as a strategic principle of the Corporate and Human Resources culture.

In the Entities of Mexico, Russia and Belarus, the Group ensures equality and non-discrimination, without having policies that make it explicit as such. Additionally, within the VOE (Voice of the Employee) program, sexual harassment is classified as a serious offense so, in accordance with said policy, disciplinary measures are taken to remove the person who commits the infraction.

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Fight against corruption and bribery

Information related to the fight against corruption and bribery

Measures to prevent corruption, bribery and the fight against money laundering

Bribery and corruption are among the problems that cause the most damage to financial organizations. Commercial and professional relationships with private and public Entities must be based on transparency, commitment and legality, guaranteeing free and fair competition.

This commitment is materialized through the Anti-Corruption and Anti-Bribery Policy, approved by the ID Finance Management Body. The preparation and communication of this policy within the Group reinforces the commitment to comply at all times with current laws and regulations. Likewise, the commitment to comply with the ethical principles (zero tolerance against corruption, among others) established in the Code of Ethics and Conduct.

This policy and the principles that support it apply to all the companies that make up the Group; to all its employees, managers and business partners.

ID Finance, to the extent that it receives or manages assets, transfers or deposits from third parties, must apply due diligence measures that allow it to identify, where appropriate, the illicit origin of the funds or payments it receives. The Group refrains from carrying out any operation that, in accordance with its money laundering and terrorist financing prevention policies, actually or apparently presents a high risk of money laundering, and will report this to the corresponding authority in this matter. Likewise, ID Finance will refuse to carry out operations whose risk of incurring in the financing of terrorism is high.

None of the entities located in Russia or Belarus operate by raising or lending funds, so they do not have a money laundering policy.

In order to facilitate the raising of doubts or communications related to any suspicious activity or conduct, there is an electronic mail management that guarantees impartiality and confidentiality when reporting complaints and/or irregularities.

In 2021, no training on corruption, bribery and anti-money laundering has been provided; but the policies are available to all employees.

In the 2021 financial year, the Group has not received any complaint in this matter through its official complaint and communication channels.

Contributions to foundations and non-profit entities

During 2021, no financial contributions have been made to foundations and non-profit entities. However, ID FINANCE has carried out food collection actions and other impact actions described throughout the following section.

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Company

Company commitments to sustainable development

ID Finance regularly contributes to social and solidarity projects with the aim of having a positive impact on the communities where it is present. The Group wants to contribute positively to companies so that it is fairer and more inclusive. For this reason, we try to get involved in projects that seek to go beyond business.

Below are some of the 2021 Group initiatives:

Responsible loans

ID Finance firmly believes that responsible lending is essential to the long-term viability of the business and acts in the interest of its clients by ensuring transparency of loan terms and conditions.

Provide loans that help instead of hinder

ID Finance does not use any aggressive credit policies or intrusive marketing techniques. Nor does it offer consumers credit they don't need or can't afford. ID Finance ensures that its clients are well informed so that they make the best financial decisions.

Regulated loans

The Group proactively engages with national and supranational financial regulators to create a regulatory environment that benefits both companies and consumers of financial services.

Banco de Alimentos

ID Finance has been collaborating with the Barcelona Food Bank since 2019, collecting and providing food to help people in the most vulnerable situations. For this reason, many employees have volunteered and have actively contributed to this cause, having collected almost 450 kg of food in 2021. This action, among others carried out during the year, is part of the ID Finance volunteer program "With you".

Contributing to San Juan de Dios hospital

Since the start of the state of alarm in Spain due to the COVID-19 pandemic, hospital admissions have increased considerably and health infrastructure has reached the limit of its capacity. Due to the lockdown, many patients were in a critical situation and their relatives could not visit them for safety reasons. In this context, ID Finance, in collaboration with the San Juan de Dios charity foundation, donated tablets so that hospitalized patients could communicate with their loved ones. Thanks to this action, ID Finance was certified as a socially responsible company.

Volunteering

With the aim of actively contributing to the 2030 Agenda and its 17 Sustainable Development Goals (SDGs), ID Finance Mexico has launched the "With You" Volunteer Program. This project seeks to generate synergies between the company, its employees and the community through a set of activities that create a participation channel so that all volunteers can contribute their time, skills and talent.

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According to the report Disability considerations during the COVID-19 outbreak, prepared by the World Health Organization (WHO), “people with disabilities could be disproportionately affected due to alterations in services and support networks during the pandemic.

For this reason, thinking of these segments of the population that are most vulnerable to COVID-19, ID Finance, in collaboration with Serendipia and Ilumina, donated adapted computers so that children and adolescents with visual disabilities can use them.

These adapted computers will allow them to access information, complete their studies, and will influence their professional and personal independence and, therefore, will have a significant impact on their self-esteem

Association and sponsorship actions

The Term Entity of the ID Finance Group in Spain belongs to and makes a contribution as a member of the Spanish Fintech Association.

Consumers

Measures for the health and safety of consumers

To ensure customer security, the Group relies heavily on its global data protection policy. ID Finance has the duty to guarantee the reliability, objectivity and integrity of the information it handles, both internally and with third parties. It will also guarantee the secure incorporation into its information systems of employees, clients and any other persons to whose data they have access derived from their own activity, which must include personal, economic or any other data that may in any way affect to the intimate and personal sphere of its owner.

All personal data is treated in a particularly restrictive manner in compliance with current regulations, so that:

1. Only those that are necessary to achieve the intended purpose will be collected.
2. The collection, treatment and use are carried out in a way that guarantees its security, veracity and accuracy, the right to privacy of people and compliance with the guiding principles of the regulations on the protection of personal data, as well as the obligations resulting from the applicable regulations.
3. Only ID Finance employees authorized to do so will have access to said data to the extent that it is necessary for the development of their professional activities.

Claim systems, complaints received and their resolution

In order to comply with the protection and satisfaction of clients and guarantee a specific identification of areas of opportunities and options, each operational partner of ID Finance has a portal accessible through its website/App for the communication of complaints. and claims.

As Russia and Belarus do not provide customer services, these markets are not subject to complaints and are therefore not disclosed as such.

In the case of Mexico, a total of 278 complaints and 126 claims have been registered. In the 2021 financial year, 100% of the complaints have been reconciled while 10% of the claims are still in the conciliation phase (90% having been resolved)

On the other hand, in Spain there is a formal procedure for dealing with complaints. The “Customer Ombudsman” procedure defines the actions to be followed by each Entity and how

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these complaints must be registered. In 2021, a total of 2,428 claims and 4,214 complaints were received, which were treated according to the procedures established throughout the year.

Subcontracting and suppliers

The third party management policy is the tool through which ID Finance establishes its criteria and action framework for its relations with third parties for the contracting of goods and services.

The process of selection, approval and management of suppliers of goods and services is directed in any case by the department that makes the purchase together with the Finance Department.

The Finance Department maintains a catalog of potential suppliers and an inventory of suppliers with whom business relationships already exist. The catalog and inventory must be kept up to date and must be reviewed periodically to ensure that the criteria that motivated the inclusion of the supplier are maintained.

When the needs so require, the operating units, through the line manager, submit the appropriate request to financial management for the acquisition of a good or the contracting of a service from a supplier.

If the amount of the requested contract (good or service) is less than €15,000, the financial department places the order directly, which may be requested from a single supplier listed in the inventory.

When the total amount of the item (good or service) requested to contract is equal to or greater than €15,000, per project or per year, the financial department generates a request for proposal inviting as many suppliers as necessary to collect at least three alternatives of different providers.

These alternatives are previously evaluated and approved by the Financial Management, drawing up a record that contains a reasoned assessment of the offers presented in accordance with the following aspects:

- Technical offer: quality of the product or service provided, degree of adaptation to specific needs, flexibility, adaptability and delivery times.
- Commercial offer: prices, payment conditions and guarantees.
- Commercial offer: stability, reputation, proximity, references from third parties and existence of a regulatory risk management system.

Due to the configuration of ID Finance and the industry in which it operates, most of the contracts signed are limited to the fields of marketing, licensing and consulting.

During the 2021 financial year, ID Finance has not carried out any audits of suppliers.

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Tax information

ID Finance is committed to providing true, accurate and precise information to all those who are related to the Group.

The commercial accounting, books or tax records fully reflect all the operations carried out in a precise, certain manner and in accordance with the applicable regulations, reflecting the true image of all the transactions carried out. The accounting records will be at the disposal of the internal and external auditors at all times, and will be audited periodically.

ID Finance complies with all its tax and fiscal obligations, collaborating at all times with the state, regional and local authorities that require it. The management of public aid and subsidies is transparent, at all times allocating the amounts granted to the purpose of their concession.

Below are the profits obtained before taxes by the Group, as well as the taxes on profits paid, by country, during 2021 (expressed in thousands of euros):

(as of December 31)	Benefits obtained by country ¹³ (2021)
Spain	5,262 €
México	2,209 €

Table 19: Benefits obtained by country

This amount includes the result before taxes for Spain (IDF Investments, IDF Spain, Debt Management Partners, IDF Termo) and for Mexico (IDF Capital, IDF Servicios and Online Collect).

(as of December 31)	Taxes on profits paid by country (2021)
Spain	1,063 €
México	729 €

Table 20: Taxes on profits paid by country

In the 2021 financial year, the Group has not received any subsidies from public Entities.

¹³ The Companies of Belarus and Russia are not part of the fiscal consolidation of ID Finance.

ANNEX 1: Requirements of Law 11/2018 regarding non-financial information and diversity

Information requested by Law 11/2018	Section of the EINF where the answer is given	GRI reporting criteria (Version 2016 if not otherwise indicated)	Comments
General Information			
A brief description of the business model including its business environment, organization and structure	Business model	GRI 102-2 GRI 102-7 GRI 102-9	
Markets in which it operates	Markets in which it operates	GRI 102-4 GRI 102-6 GRI 102-7	
Objectives and strategies of the organization	Group objectives and strategies	GRI 102-14	
Main factors and trends that may affect its future evolution	Market environment and other factors and trends that may affect the future evolution of the business	GRI 102-15	
Reporting framework used	About this report	GRI 102-54	
Environmental issues			
Management approach: description and results of the policies related to these issues, as well as the main risks related to these issues linked to the Group's activities	It develops throughout the epigraph	GRI 102-15 GRI 103-2	
Environmental management			
Detailed information on the current and foreseeable effects of the company's activities on the environment and, where appropriate, health and safety	Not material		Non-relevant indicator due to the activity of the organization
Environmental evaluation or certification procedures	Not material		Non-relevant indicator due to the activity of the organization

Resources dedicated to the prevention of environmental risks	Not material		Non-relevant indicator due to the activity of the organization
Application of the precautionary principle	Not material		Non-relevant indicator due to the activity of the organization
Amount of provisions and guarantees for environmental risks	Not material		Non-relevant indicator due to the activity of the organization
Pollution			
Measures to prevent, reduce or repair emissions that seriously affect the environment; taking into account any form of air pollution specific to an activity, including noise and light pollution	Not material		Non-relevant indicator due to the activity of the organization
Circular economy and waste prevention and management			
Prevention measures, recycling, reuse, other forms of recovery and disposal of waste	Not material		Non-relevant indicator due to the activity of the organization
Actions to combat food waste	Not material		Non-relevant indicator due to the activity of the organization
Sustainable use of resources			
Water consumption and water supply according to local limitations	Not material		Non-relevant indicator due to the activity of the organization
Consumption of raw materials and measures adopted to improve the efficiency of their use	Not material		Non-relevant indicator due to the activity of the organization
Consumption, direct and indirect, of energy	Consumption, direct and indirect, of energy	GRI 302-1 GRI 302-2 GRI 302-3	

Medidas tomadas para mejorar la eficiencia energética	Measures taken to improve energy efficiency	GRI 302-4 GRI 302-5	
Use of renewable energies	Use of renewable energies	GRI 302-1	
Climate change			
Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	Greenhouse gas emissions	GRI 201-2 GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4	
Measures taken to adapt to the consequences of climate change	Measures taken to adapt to the consequences of climate change	GRI 103	
Metas de reducción establecidas voluntariamente a medio y largo plazo para reducir las emisiones de gases de efecto invernadero y los medios implementados para tal fin	Reduction goals voluntarily established	GRI 305-5	
Protección de la biodiversidad			
Measures taken to preserve or restore biodiversity	Not material		Non-relevant indicator due to the activity of the organization
Impacts caused by activities or operations in protected areas	Not material		Non-relevant indicator due to the activity of the organization
Social and personnel issues			
Enfoque de gestión: descripción y resultados de las políticas relativas a estas cuestiones, así como de los principales riesgos relacionados con esas cuestiones vinculados a las actividades del Grupo	Se desarrolla a lo largo del epígrafe	GRI 103-2	
Employment			
Total number and distribution of employees by country, gender, age, professional classification and employment contract	Employment	GRI 102-8 GRI 405-1	
Annual average of permanent contracts, temporary contracts and part-time contracts by sex, age and professional classification	Employment	GRI 102-8	

Number of dismissals by sex, age and professional classification	<u>Employment</u>	GRI 103 GRI 401-1	
Average remuneration and its evolution disaggregated by sex, age and professional classification or equal value	Employment	GRI 405-1	
Salary gap, remuneration for equal or average jobs in the Company	<u>Employment</u>	GRI 405-2	
Average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term savings forecast systems and any other perception disaggregated by gender	<u>Employment</u>	GRI 103 GRI 405-2	
Implementation of labor disconnection policies	Employment	GRI 103	
Number of employees with disabilities	<u>Employment</u>	GRI 405-1	
Work organization			
Organization of working time	Organization of working time	GRI 103 GRI 401-3	
Number of hours of absenteeism	Number of hours of absenteeism	GRI 103 GRI 403-9 (Versión GRI 2018)	
Measures aimed at facilitating the enjoyment of conciliation and promoting the co-responsible exercise of these by both parents	Measures aimed at facilitating the enjoyment of conciliation and promoting the co-responsible exercise of these by both parents	GRI 103	
Health and security			
Health and safety conditions at work	Health and security	GRI 403-1 (Versión GRI 2018)	
Occupational accidents, in particular their frequency and seriousness, as well as occupational diseases; disaggregated by sex	Health and security	GRI 403-9 (Versión GRI 2018) GRI 403-10 (Versión GRI 2018)	
Social relationships			
Organization of social dialogue including procedures for informing and consulting staff and negotiating with them	Social relationships	GRI 103	
Percentage of employees covered by collective agreement by country	Social relationships	GRI 102-41	

Balance of collective agreements, particularly in the field of health and safety at work	Social relationships	GRI 403-4	
Training			
Policies implemented in the field of Training	Training	GRI 103	
Total number of training hours per Professional category	Training	GRI 404-1	
Integration and universal accessibility of people with disabilities		GRI 103	
Equality			
Measures adopted to promote Equality of treatment and opportunities between Women and Men	Equality	GRI 103	
Equality plans, measures adopted to promote employment, protocols against sexual and gender-based harassment	Equality	GRI 103	
Policy against all types of discrimination and, where appropriate, diversity management	Equality	GRI 103	
Respect for human rights			
Management approach: description and results of the policies related to these issues, as well as the main risks related to these issues linked to the Group's activities			
Application of due diligence procedures			
Application of due diligence procedures in the area of human rights and prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and repair possible abuses committed	Not material		Non-relevant indicator due to the activity of the organization
Complaints for cases of human rights violations	Not material		Non-relevant indicator due to the activity of the organization
Measures implemented to promote and comply with the provisions of the fundamental ILO conventions related to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in employment and occupation; the elimination	Not material		Non-relevant indicator due to the activity of the organization

of forced or compulsory labor; the effective abolition of child labor			
Fight against corruption and bribery			
Management approach: description and results of the policies related to these issues, as well as the main risks related to these issues linked to the Group's activities	It develops throughout the epigraph	GRI 103-2	
Measures taken to prevent corruption and bribery	Information related to the fight against corruption and bribery	GRI 102-16 GRI 102-17	
Measures to combat money laundering	Information related to the fight against corruption and bribery	GRI 102-16 GRI 102-17	
Contributions to foundations and non-profit entities	Contributions to foundations and non-profit entities	GRI 201-1	
Information about the Company			
Management approach: description and results of the policies related to these issues, as well as the main risks related to these issues linked to the Group's activities	It develops throughout the epigraph	GRI 103-2	
Company commitments to sustainable development			
The impact of the Company's activity on Employment and local development	Company commitments to sustainable development	GRI 103	
The impact of the Company's activity on local populations and the territory	Company commitments to sustainable development	GRI 103	
The relations maintained with the actors of the local communities and the modalities of the dialogue with these	Company commitments to sustainable development	GRI 103	
Association or sponsorship actions	Company commitments to sustainable development	GRI 103	
Subcontracting and suppliers			
SubcontractInclusion in the purchasing policy of social, Gender Equality and environmental issues	Subcontracting and suppliers	GRI 103	

Consideration in relationships with suppliers and subcontractors of their social and environmental responsibility	Subcontracting and suppliers	GRI 103	
Supervision systems and audits and their results	Subcontracting and suppliers	GRI 414-2	
Consumers			
Measures for the health and safety of consumers	Consumers	GRI 103	
Claim systems, complaints received and their resolution	Consumers	GRI 103	
Tax information			
The benefits obtained country by country	Tax information	207-4 (Versión GRI 2019)	
Taxes on profits paid	Tax information	207-4 (Versión GRI 2019)	
Public subsidies received	Tax information	GRI 201-4	

Independent Limited Assurance Report of the Consolidated
Non-Financial Statement for the year ended
December 31, 2021

ID FINANCE INVESTMENTS, S.L. AND SUBSIDIARIES

INDEPENDENT LIMITED ASSURANCE REPORT OF THE CONSOLIDATED NON-FINANCIAL STATEMENT

Translation of a report originally issued in Spanish. In the event of discrepancy, the Spanish-language version prevails

To the Shareholders of ID Finance Investments S.L.:

Pursuant to article 49 of the Code of Commerce we have performed a verification, with a limited assurance scope, of the Consolidated Non-Financial Information Statement (hereinafter NFS) for the year ended December 31, 2021, of ID Finance Investments S.L. (Parent Company) and subsidiaries (the Group), which is part of the Group's attached consolidated Management Report for 2021.

The content of the NFS includes additional information to the already required by prevailing mercantile regulations in relation to non-financial information that has not been subject to our verification. In this regard, our assignment has been exclusively limited to the verification of the information shown in Appendix 1 "Requirements of Law 11/2018 on non-financial information and diversity" included in the attached consolidated Management Report.

Responsibility of the Board of Directors

The preparation of the NFS included in the Consolidated Management Report of the Group and its content, is responsibility of the Board of Directors of ID Finance Investments S.L. The NFS has been prepared in accordance with the contents required by the prevailing mercantile regulations, following the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards) selected and described in accordance with the provisions for each subject in Appendix 1 "Requirements of Law 11/2018 on non-financial information and diversity" of the aforementioned Consolidated Management Report of the Group.

The Board of Directors is also responsible for the design, implementation, and maintenance of such internal control as it may determine necessary to enable the preparation of an NFS that is free from material misstatement, whether due to fraud or error.

Furthermore, the Board of Directors is responsible for defining, implementing, adapting, and maintaining the management systems from which the information necessary for the preparation of the NFS is obtained.

Our independence and quality control procedures

We have complied with the independence and other Code of Ethics requirements for accounting professionals issued by the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of professional integrity, objectivity, competence, diligence as well as confidentiality and professional behavior.

Our Firm complies with the International Standard on Quality Control No. 1 and thus, maintains a global quality control system that includes documented policies and procedures related to compliance with ethical requirements, professional standards, as well as applicable legal provisions and regulations.

The engagement team consisted of experts in the review of Non-Financial Information and, specifically, in information about economic, social, and environmental performance.

Our responsibility

Our responsibility is to express our conclusions in an independent limited assurance verification report based on the work performed exclusively in 2021. The data corresponding to previous years were not subject to the verification provided for in the current commercial regulations. Our review has been performed in accordance with the requirements established in prevailing International Standard on Assurance Engagements 3000 "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the guidelines for verifying Non-Financial Statement, issued by the Spanish Official Register of Auditors of Accounts (ICJCE).

The procedures carried out in a limited assurance engagement vary in nature and execution timing and are smaller in scope than reasonable assurance engagements, and therefore, the level of assurance provided is likewise lower.

Our work consisted in requesting information from Management and the various Group units participating in the preparation of the 2021 NFS, reviewing the process for gathering and validating the information included in the NFS, and applying certain analytical procedures and sampling review tests as described below:

- ▶ Meeting with Group personnel to know the business model, policies and management approaches applied, the main risks related to these matters and obtain the necessary information for our external review.
- ▶ Analyzing the scope, relevance and integrity of the content included in the NFS for the year 2021 based on the materiality analysis made by the Group and described in section "1. About this report", considering the content required by prevailing mercantile regulations.
- ▶ Analyzing the processes for gathering and validating the data included in the 2021 Non-Financial Statement.
- ▶ Reviewing the information on the risks, policies and management approaches applied in relation to the material aspects included in the 2021 NFS.
- ▶ Checking, through tests, based on a selection of a sample, the information related to the content of the 2021 NFS and its correct compilation from the data provided by the information sources.
- ▶ Obtaining a representation letter from the Board of Directors and Management.

Conclusion

Based on the limited assurance procedures conducted and the evidence obtained, no matter has come to our attention that would cause us to believe that the Consolidated NFS of ID Finance Investments S.L. and subsidiaries for the year ended December 31, 2021 has not been prepared, in all material respects, in accordance with the contents required by the prevailing mercantile regulations, following the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI standards), selected and described in accordance to the selected and described in accordance with the provisions for each subject in Appendix 1 "Requirements of Law 11/2018 on non-financial information and diversity" of the aforementioned Consolidated Management Report.

Use and distribution

This report has been prepared as required by prevailing mercantile regulations in Spain and may not be suitable for any other purpose or jurisdiction.

ERNST & YOUNG, S.L.

(Signature on the original in Spanish)

Albert Fernández Chafer

April 22, 2022