

We are responsible,  
respectful & straightforward.

# Our Code of Ethics



# Gerard Ryan

Chief Executive Officer

At IPF our values and ethics are of vital importance. We believe in doing business in a responsible way and that matters to our investors, to our customers and to the communities in which we operate. Maintaining our standard of ethical behaviour and responsible lending will be critical in differentiating ourselves from our growing competition in the long-term.

Our Code of Ethics represents the way we work at IPF and applies to all employees, agents, contractors and suppliers – regardless of level, geographic position or culture. It highlights our commitment to uphold responsible business practices and meet or exceed legal requirements. And most importantly, it impacts the way we conduct business every day.

We have a range of support mechanisms and processes throughout the business to highlight any deviations from the code and to ensure the on-going inclusion of ethical standards in our work.

I'd encourage you to take the time to read this document. I'm sure you'll agree, the way we conduct ourselves is essential to the future growth and success of our business. As always, if you have any feedback or questions don't hesitate to contact me.

Thanks for your continued support.



Gerard Ryan  
Chief Executive Officer



# Code of Ethics

The Code forms a key element of our internal control framework, ensuring that we have the appropriate controls in place to reduce risks and support employees in their roles at IPF.

The principles outlined in the Code are the standards of conduct which determine our business decisions and behaviour. They outline our commitments to each of our stakeholder groups.

Failure to adhere to the Code will result in disciplinary action. All IPF employees must comply with the letter and spirit of these commitments. Compliance with this Code protects our reputation, our commercial interests and our ability to continue serving our customers' interests.



We are...

## Responsible

Taking due care in all our actions and decisions

We are...

## Respectful

Treating others as we would like to be treated

We are...

## Straightforward

Being open and transparent in everything we do



# Employees

**It is in the long term interests of the company to recruit and retain individuals who are not only experienced, well trained and engaged but are also able to demonstrate our values.**

**This will provide future value through a motivated and skilled workforce. The Code complements the IPF Competency Framework.**

**All employees will work in an environment that respects relevant employment laws and internationally recognised human rights, and that:**

- Provides opportunities for personal development and career progression;
- Acknowledges the need for an appropriate work/life balance;
- Ensures equal opportunity in recruitment and progression, and does not discriminate;
- Offers fair and competitive remuneration;
- Prioritises health and safety;
- Protects confidential personal information; and,
- Respects the views of employees and provides mechanisms for employees to share their views and speak up about misconduct.

## Individual responsibilities

**IPF employees will:**

- Always treat all our stakeholders in adherence with our values of respectfulness, responsibility and straightforwardness;
- Comply with the law at all times;
- Act with integrity at all times, never engage in any activities that could be in conflict with our bribery or corruption policies;
- Be familiar with, and comply with all relevant company policies; and, Declare and manage any conflict of interest;
- Never consciously put a colleague into a position where their health and safety is at risk.



# Agents

**We work with agents to issue loans to our customers and to collect repayments.**

**Agents are the ‘face’ of our company as it is primarily them that our customers interact with, so it is essential that they represent our values.**

**All agents will:**

- Be treated fairly and with respect;
- Receive guidance to meet customer expectations and develop their business;
- Be remunerated fairly;
- Receive guidance and support on personal safety;
- Be guided in a positive and responsible way; and,
- Have a lasting, mutually beneficial working relationship with IPF.

## Individual responsibilities

**IPF employees will:**

- Consult and adhere to the IPF competency framework in training and managing agents;
- Make agents aware of how to raise concerns or make complaints.



# Customers

**Customers include: existing customers who have a loan, prospective customers, and previous customers who may return to take out another loan. Our business depends on winning and retaining the trust and custom of our customers.**

**Customer treatment and responsible lending is an increasingly important issue for financial services companies and we are committed to treating customers fairly.**

## All Provident customers will:

- Be treated fairly and with respect;
- Be provided with regular contact that is professional, flexible and convenient;
- Be offered responsible and transparent financial products and services;
- Not be pressured into taking a higher value loan than requested;
- Be provided with accurate information to allow them to properly understand the key features of IPF products and services and reach an informed decision as to the appropriateness of the product and their ability to meet their obligations;
- Be treated with respect and understanding, especially when they have difficulty in meeting contracted repayments;
- Have all their data treated confidentiality; and,
- Know how to make enquiries and provide feedback on how we perform against our stated principles.

## Individual responsibilities

### IPF employees and agents will:

- Consider the financial circumstances and requirements of customers in deciding the level of credit offered
- Refrain from coercing or pressuring customers to buy a product they do not need or want or cannot afford;
- Make customers aware of the terms and conditions of the Loan Agreement, including their cancellation rights; and,
- Make customers aware of how to raise concerns / complaints.



**— We are committed to treating customers fairly & responsibly**





# Communities & Wider Society

**IPF will act responsibly and with integrity with regard to all other stakeholders. The company will continue to identify, seek and engage with relevant stakeholders, and will analyse and respond to feedback.**

**This includes the following:**

## Communities

- The company will be a responsible corporate citizen and make a positive contribution in the communities we operate in;
- The company will create jobs and agencies, and pay taxes to stimulate the local economy;
- IPF will support inclusion in financial services and give communities access to fair and transparent financial services; and,
- The company will engage in community partnerships and invest in communities through time, money and volunteers.

## Regulators

- IPF will comply with all relevant laws and regulations, and aim to operate beyond legal compliance at a best practice standard.

## Governments

- IPF will have open and honest relationships with governments and their agencies;
- The company will not make political donations of any kind nor incur any political expenditure; and,
- The company will pro-actively take part in consultations and will follow ethical guidelines in regard to public policy discussions.

**— We have open and honest relationships with governments and their agencies**



## Media

- IPF will take a proactive approach to explaining our business model and its role in the community; and,
- IPF will issue clear and transparent communications and will answer questions rapidly, openly and honestly;

## Shareholders

- IPF is committed to safeguarding the assets of shareholders through sound corporate governance and risk management practices; and,
- The company will provide easy access and clear, timely information about the performance of the business.



## Business Partners

**Business partners provide goods and services to us. They include contractors; outsourcers that face customers - call centres and debt collection companies; and organisations that provide goods and services.**

**Suppliers can often act as representatives of our company, and in some cases they are the main point of contact with our stakeholders, so it is essential that they uphold our standards.**

**All IPF/Provident businesses will:**

- Work in an environment of mutual trust and respect;
- Be paid promptly and within contracted periods; and,
- Be aware of the sustainability criteria IPF uses when selecting suppliers.

### Individual responsibilities

**IPF employees will:**

- Consult and adhere with the IPF procurement manual when managing supplier relationships



## Natural Environment

**Through managing the environmental impacts of the business IPF seeks to create efficiencies to reduce operational costs.**

**In particular, IPF will:**

- Take measures to fully understand the impact of its activities on the environment by following an externally recognised environmental management system.
- Consider environment impacts in decision making.
- Seek to achieve cost savings through reduced resource use, particularly fuel, and at the same time reduce carbon emissions.
- Acknowledge and manage indirect environmental impacts of the business such as business travel.

### Individual responsibilities

- IPF employees will be mindful of their personal environmental impact and try to reduce this where possible.

**— We are committed to managing our impact on environment**



# Speak-up Service

Independent & Confidential



<https://report.whistleb.com/en/ipf> (Group, IPFD and Europe)

<https://hacerlocorrecto.ethicsglobal.com> (Mexico)