DOING THE RIGHT THING

GLOBAL CODE OF ETHICS

INTERNATIONAL PERSONAL FINANCE PLC (IPF)

MESSAGE FROM GERARD

Our values and ethics support us in ***building a better world through financial inclusion***. We are an incredibly resilient business because of our strong culture, enduring values, and our powerful purpose. Being an ethical business is at the heart of our Next Gen strategy. Our values and the ethics, which underpin them, communicate what's important to our organisation and provide clarity and direction for decision-making, setting expectations for how we behave when interacting with customers, colleagues, and other partners.

This Code of Ethics is here to support you in your work every day. Please read it and keep it close. It is a reference if you have questions, a guide if you need direction and a reassurance that doing the right thing is good for business, good for our customers and good for us.

Gerard Ryan, Chief Executive Officer

OUR VALUES

We are...

Respectful

Treating others as we would like to be treated

Responsible

Taking due care in all our actions and decisions

Straightforward

Being open and transparent in everything we do

Building a better world through financial inclusion.

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INTRODUCTION

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Why have a Code of Ethics?

We all have a personal responsibility to do the right thing. Our Code of Ethics is our daily guide to how we do this. It should direct the decisions we make at work every day. It helps us understand what to expect from IPF as a company and what is expected from each of us as members of the IPF community. It identifies the topics which require special care so that we can all live up to the high ethical standards which are of vital importance in fulfilling our purpose of building a better world through financial inclusion.

We operate in nine countries and so are subject to a wide variety of cultural and legal considerations. Our Code of Ethics ensures that we apply the same ethical standards wherever we operate. Maintaining our high standards of ethical behaviour and responsible lending is fundamental to our business and our values and is in the best interests of all our stakeholder groups including our people, customers, suppliers, investors and the communities in which we operate. This Code is focussed on our value chain, including our consumers, suppliers, communities and business relationships, as well as our own operations.

Ethics guides us. It helps us answer important questions, like what we will always, or on the contrary, never do. Ethics elevates the role we play in society as a company. We rely on ethics when there are no laws to guide us or when the situation is unclear or unprecedented. This Code is designed to help with these sometimes difficult situations.

What is our Responsible Business Framework?

As a global lending business, we have the responsibility and opportunity to make a real difference to our customers' financial futures and to contribute to the creation of a low-carbon, fairer and more ethical society. Our Responsible Business Framework is our overarching vision for how we can contribute to a more sustainable world. This Framework is underpinned by a vision endorsed by IPF's board of directors which sets out our commitment to conducting our business in a socially responsible and ethical manner, respecting the law, supporting universal human rights, protecting the environment and benefiting the communities where we operate.

This Code of Ethics therefore underpins our Responsible Business Framework, giving an overview of expectations on behaviour and decision making.

Who does this Code apply to?

This Code of Ethics applies to all employees, customer representatives and contractors working for IPF around the world regardless of role, seniority or location. Everyone is expected to comply with the letter and the spirit of these commitments. Breach of this Code may result in disciplinary or other appropriate action. We also favour business partners and suppliers who share the ethical standards as described in this Code.

Who is responsible for this Code?

IPF's board of directors has overall responsibility for this Code of Ethics and review it annually. Our Chief Legal Officer has day to day responsibility for implementing this Code and monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Code and are given adequate and regular training on it.

How do we communicate this Code?

Because the world changes fast we update our Code of Ethics as required to keep it current. It is translated into the local language of all the countries in which we operate. It is regularly communicated to all our employees and customer representatives who also receive training at least annually to support their understanding of our Code. Everyone who works for or with us can easily access this Code on our website at www.ipfin.co.uk along with all the policies referred to in this Code which provide more detailed guidance on the topics covered.

What is Ethics Week?

Every year we hold our global Ethics Week to take the time to emphasise the importance of ethics and remind ourselves about our values and the requirements of this Code. We take part in various events and share and discuss ethical dilemmas which can arise in our daily work. All colleagues are also required to complete annual on-line ethics training.

How do I use this Code?

No document can anticipate and address every situation which may arise. We will constantly face new ethical dilemmas and we recognise that making the right decision is not always easy. This Code sets out standards, offers guidance and provides details of where further information can be found. The document is split into three sections. The first section sets out how IPF looks to do the right thing as a responsible business. The second section sets out how IPF does the right thing as an employer and what this means for everyone who works for the organisation. The third section provides practical guidance on what is expected of everyone who works for IPF.

We encourage a culture of openness where employees and our external stakeholders can raise their concerns. You can raise your concerns about a potential breach of this Code of Ethics with your line manager, local or group management, HR team, legal team or request guidance through our whistleblowing services, whichever feels most appropriate in the circumstances. Our whistleblowing services can be accessed as follows:

https://report.whistleb.com/en/ipf	for Europe or UK
https://www.resguarda.com/hacerlocorrecto.provident	for Mexico

All reports made using our independent whistleblowing channels are handled confidentially. People speaking up are protected from any form of retaliation as a result of raising a concern. See our Whistleblowing Policy for more information.

IPF DOING THE RIGHT THING AS A RESPONSIBLE BUSINESS

- Lending responsibly
- Communicating responsibly
- Information and Cyber Security Governance
- Protecting human rights and fighting modern slavery
- Fighting corruption
- Respecting our planet
- Contributing to a better society
- Being a responsible tax citizen

Lending responsibly

Responsible, transparent lending is key to fulfilling our purpose of building a better world through financial inclusion. Our business depends on winning and retaining the trust of our customers. Responsible lending is fundamental to sustaining our business model and we are committed to treating our customers honestly, fairly, professionally and with respect, taking their interests and rights into account. We commit to ensure that our customers:

- Are offered responsible and transparent products and services, taking into account their circumstances
- Are provided with clear and accurate information to allow them to understand our products and services and their repayment obligations
- Are never pressured into taking a higher value loan than requested
- Are treated with respect, professionalism, and understanding especially when they have difficulty in meeting contracted repayments
- Have all their data treated confidentially; and
- Know how to make enquiries or raise concerns or complaints.

Communicating Responsibly

Transparency and integrity are key when communicating about IPF and its products. We look to ensure that the advertisement and commercial communication on all media are transparent, fair, clear and not misleading. We comply with regulatory requirements concerning advertising of lending products and never seek to exploit our consumers' or stakeholders' lack of knowledge or lack of experience.

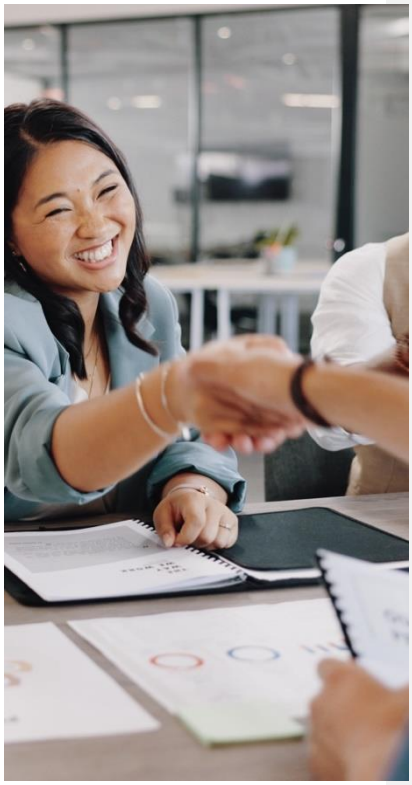
See our Responsible Marketing Policy for further information.

Information and Cyber Security

We are committed to protecting the confidentiality, integrity and availability of all data entrusted to us. Secure and resilient information and technology systems are critical to managing information and cybersecurity risks, protecting our information and ensuring we can continue to serve our customers.

See our Information and Cyber Security Governance Policy for further information.

Protecting human rights and fighting modern slavery



We are committed to operating in line with the United Nation's Declaration on Human Rights in our own operations as well as across our supply chain. We promote respect for all internationally recognised human rights and fundamental freedoms, including the right to:

- Not be discriminated against
- Have a decent job
- Freedom of expression
- Health
- Life and safety
- Privacy

We commit to mitigate detrimental impacts on human rights such as unsafe working conditions, all forms of modern slavery and worker exploitation and harm to communities wherever we can and to help advance human rights by:

- Providing access to responsible finance
- Providing jobs
- Protecting people's rights; and
- Procuring services in a responsible manner

Our teams across all markets receive annual reminder training on counteracting modern slavery.

Fighting corruption

We carry out our business with integrity and we have a zero-tolerance approach to corruption. All forms of corruption are illegal and cause poverty, discrimination and harm to the environment. We have a duty to fight against fraud, bribery, money laundering and terrorism financing. We have various internal policies and compliance processes to combat corruption and we perform checks on our suppliers to ensure they uphold similar standards.

See our Anti-Bribery and Corruption Policy for more information.

Respecting our planet

IPF aims to ensure that our current needs are met without compromising the ability of future generations to meet their own needs. This principle of sustainable development demands that we accept responsibility for the direct impact of our own operations on the environment. We will therefore meet or exceed all relevant environmental obligations under laws and regulations in each of the jurisdictions in which we operate. We will also set and continually review goals to minimise the impact of our actions on the environment in our daily operations and strive to reduce waste and minimise the consumption of materials and natural resources.

Our Board has agreed an ambition to become a Net Zero organisation by 2050. We have also committed to a range of interim targets to be delivered by 2034, including moving to 100% renewable energy in our head office locations globally, transitioning 90% of our global fleet to EV or ULEV models and diverting 90% of waste from landfill.

See our Environmental Policy and Corporate Sustainability Policy for more information.

Contributing to a better society

We are a responsible corporate citizen, and we seek to make a positive contribution to the communities in which we operate. We provide access to affordable, fair and transparent financial services. We also create jobs and pay taxes to stimulate the local economy. We engage in community partnerships and invest in our communities through financial contributions and volunteering activities. Our community activities are mainly focused on supporting the “invisibles”, those people who are excluded from financial services. Beyond financial contributions, we are committed to enabling a broad range of opportunities for colleague volunteering, particularly in support of the vulnerable communities we serve.

Being a responsible tax citizen

We pay our fair share of taxes in all the countries in which we operate. This means fully complying with tax laws and paying all local and national tax liabilities as they fall due. It also means being transparent about our tax strategy including how we manage tax risk and our attitude to tax planning.

IPF DOING THE RIGHT THING AS A RESPONSIBLE EMPLOYER

- Being respectful
- Prioritising health and safety
- Eradicating bullying and harassment
- Ensuring equality, non-discrimination, diversity and inclusion
- Leadership and role modelling

Being respectful

Being respectful is one of our core values. It is a basic human right be treated with respect and dignity and that is how we expect our colleagues, including all our employees, contractors and customer representatives, to treat each other. We do not tolerate discrimination, harassment, bullying or any other form of disrespectful behaviour.

Prioritising health and safety

The health, safety, wellbeing and security of every one of our colleagues is our priority. We take care to protect the physical and mental wellbeing of our colleagues, whether they are working at one of our offices or at home, visiting customers or travelling for work. We operate a safety management system and safe systems of work according to the ISO 45001 Occupational Health and Safety Management Standard, emphasising our commitment to continuously improving health and safety practices and promoting a culture of safety.

Regular reminders of safety rules and safe work practices are provided through refresher training, safety campaigns and communications which ensure colleagues understand their individual responsibility in maintaining a safe and healthy work environment.

Colleagues are aware of expected safe behaviours and encouraged to report all safety violations and unsafe work conditions. Consultation is a key element of safety management and colleagues are routinely engaged in improving safety protocols through their involvement in safety risk assessments and surveys.

Our Safety Policy outlines our commitment to complying with all relevant health and safety laws and regulations and plays a crucial role in mitigating risks, protecting our reputation, and fostering a positive and ethical work environment.

Eradicating bullying and harassment

We are committed to providing a workplace free from bullying and harassment. We do not tolerate any form of inappropriate behaviour which undermines the dignity and well-being of our colleagues.

Bullying means persistent and unwelcome behaviour, whether physical, verbal, or otherwise, which intimidates, belittles, or humiliates an individual or group. Harassment means unwanted behaviour related to a protected characteristic, such as race, gender, age, religion, disability, which creates an intimidating, hostile, or offensive work environment.

We do not tolerate any form of bullying or harassment and we encourage anyone who experiences or witnesses it to report it. This includes, but is not limited to:

- Verbal abuse or insults
- Offensive jokes or comments
- Physical intimidation or threats
- Cyberbullying or online harassment
- Exclusion or isolation; or
- Unwelcome advances or inappropriate comments.

Ensuring equality, non-discrimination, diversity and inclusion

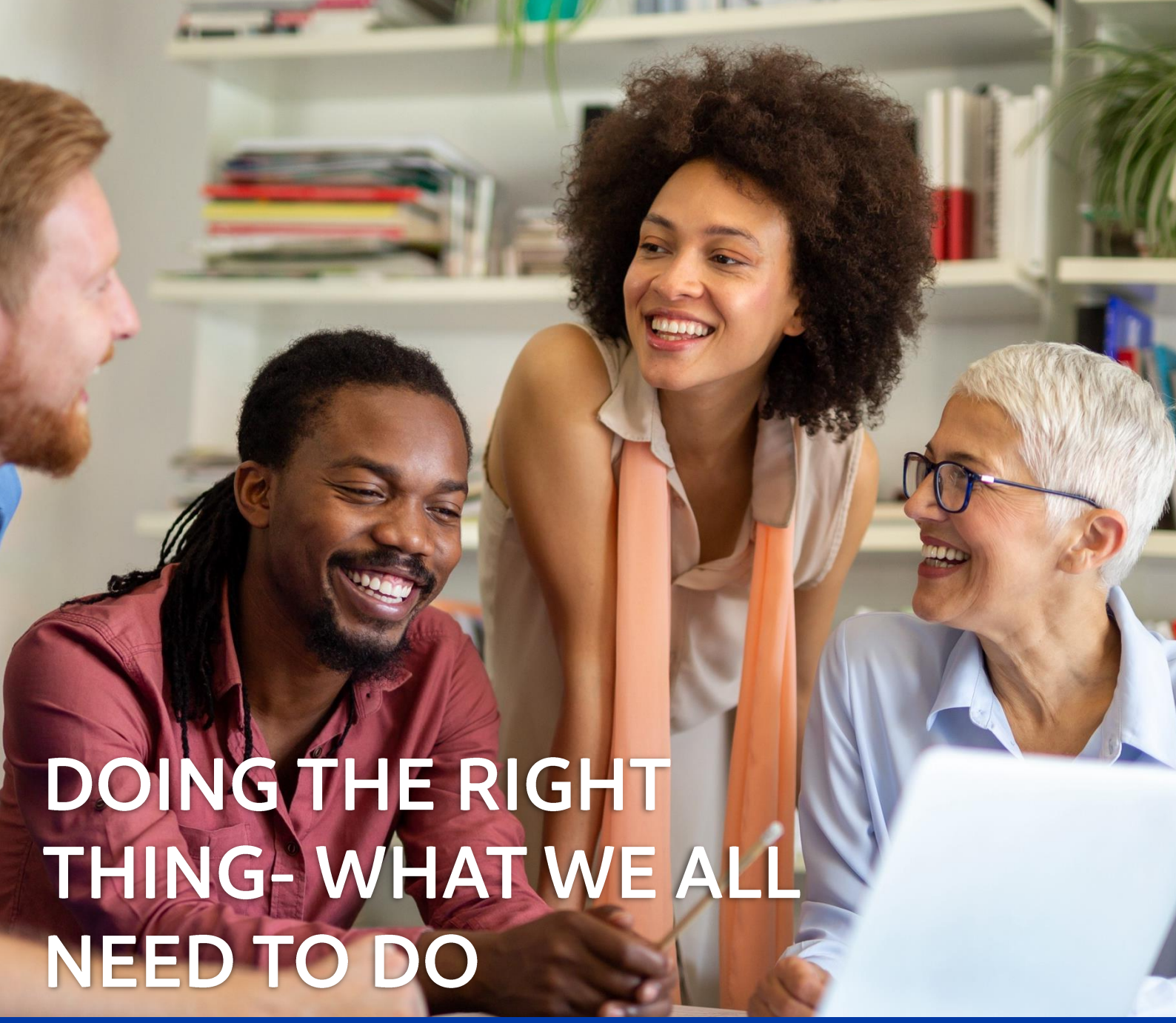
We are an equal opportunities employer. We embrace and celebrate diversity, fostering an inclusive environment which welcomes individuals from all walks of life.

Our approach is that no job applicant, employee, or customer representative will receive less favourable treatment because of their race, colour, nationality, ethnic or other national origin, gender, sexual orientation, marital status, age, disability or religion.

The purpose of this is to ensure that recruitment and progression opportunities are open to all and based purely on merit, with all colleagues having the same access to training and career development. We also give full and fair consideration to applications for employment from disabled people, having regard to their aptitudes and abilities. If a colleague becomes disabled, we make every effort to ensure their employment with the company continues and reasonable adjustments are arranged where necessary.

Leadership and role modelling

Leaders and managers have a responsibility to set an example by adhering to this Code of Ethics, supporting all colleagues to act in accordance with this Code and in promoting a positive, ethical culture. We encourage a culture of openness where colleagues can raise their concerns. In the event of conflicts or disagreements, people are encouraged to seek resolution through open communication and constructive dialogue. Our leaders and managers are expected to create the conditions for ethical questions to arise and be discussed, support colleagues to answer these questions and to recognise and value ethical and courageous behaviour.



DOING THE RIGHT THING- WHAT WE ALL NEED TO DO

- Complying with laws and regulations
- Dealing constructively with regulators
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- Inside information and market abuse

Complying with laws and regulations

We comply with all applicable laws and regulations. Colleagues are informed about which internal policies apply to them and have a responsibility to ensure they understand and comply with the policies and procedures relating to their role. All colleagues are expected to comply with the spirit as well as the letter of applicable policies or regulations.

This means:

- All your actions and decisions must be in line with your local laws and regulations.
- If you are thinking about doing something that is illegal, do not do it.

Dealing constructively with regulators

We have open and honest relationships with regulators and governments and are proactive in helping to develop regulation which protects both consumers and businesses and promotes responsible lending. This means we will communicate transparently our main public policy positions. We do not make political donations of any kind nor incur any political expenditure. We respect our colleagues right to participate as individuals in the political process so long as they make sure that, in doing so, they do not represent IPF or cannot be perceived as doing so.

This means:

- You must clearly specify that you do not represent IPF in any way if you participate in personal political activities.
- You should inform your manager if your participation in political activities could prevent you from effectively carrying out your role or create confusion between your personal political views and IPF.

See our Political Donations Policy for more information.

Communicating with our investors and funding partners

IPF is a privately-owned company within the BasePoint group, and our shares are no longer traded on a public market. We remain accountable to a wide group of investors and funders, including our bondholders, our banks and our shareholder, and we continue to be committed to sound corporate governance and risk management. We publish annual and half-yearly financial reports and a corporate governance statement, we meet our continuing obligations as an issuer of listed debt securities, and we report transparently on our environmental, social and economic performance

This means:

- You must refer any communications from bondholders, lenders or ratings agencies to the Treasury Team.
- If you are providing information which we will use in our public disclosures or in reporting to our funders, you must ensure all information provided is accurate and comprehensive.

Building strong relationships with our business partners

We work in an environment of mutual trust and respect with business partners who provide us with goods and services. We are committed to having transparent and fair selection criteria and to giving honest and respectful feedback to business partners. Our procurement processes include a risk assessment of our business partners against the relevant standards in our Responsible Business Framework and this Code. We set out our ethical expectations and support business partners in meeting them while having the conviction to end relationships with those who are unwilling or unable to do so. We respect our commitments to our business partners and pay them promptly and within contracted periods.

This means:

- If your role involves selecting or working with suppliers, you must comply with our procurement standards as detailed in our Responsible Procurement Policy. You should never engage a new supplier without confirming whether you need the involvement of your Procurement Team.
- If you have concerns about the performance of a supplier, you should contact your local Procurement Team.

See our Responsible Procurement Policy for more information.

Treating our competitors fairly

Healthy competition stimulates innovation and ensures our customers get the best deal in terms of price and product. As a leader in our sector of the financial services industry, it is important for us to set a good example. We treat our competitors with respect as we would like them to treat us, and we only collect information about our competitors through transparent and lawful means.

This means:

- You should immediately inform your manager if you inadvertently find yourself with confidential information relating to our competitors.
- You should notify the Legal Function in advance of meetings with competitors (including meetings at professional trade associations).
- No colleague should be in contact with competitors where confidential information is discussed.

See our Competition Policy for more information.

Handling personal data with care

We have a responsibility to uphold everyone's right to privacy. We only collect data that is necessary and ensure that it is securely processed. We ensure that all third parties from whom we obtain personal data or who collect, store or use personal data on our behalf, share our data privacy standards. We do not collect sensitive information unless we are legally obliged to do so or have the consent of the person concerned. We do not keep personal data longer than is necessary to meet the legal or business need for which it was collected.

This means:

- You should notify your local Data Protection Officer in the event you become aware of data being lost or compromised.
- You should treat with care any data belonging to IPF in your possession.

See our Data Protection Policy and our Information and Cyber Security Governance Policy for more information.

Protecting confidential information

We must protect the confidential information of IPF and our business partners. Disclosing such information could harm our reputation and raise significant regulatory concerns. We have processes in place on information protection and security and on use of digital technology, social media and AI.

This means:

- You must immediately inform your manager if you have inadvertently disclosed confidential information or if you discover that confidential information has been disclosed.
- You must be careful not to discuss or work with confidential information in a public area where conversations can be overheard, or data compromised.

See our Data Protection Policy and our Information and Cyber Security Governance Policy for more information.

Being open about conflicts of interest

You may at one time or another find yourself in a situation where your personal or financial interests might appear to be in conflict with the interests of IPF. This is known as a "conflict of interest". All potential conflicts of interest including any personal relationships, outside activities or financial interests which might influence or appear to influence our judgments or decision-making must be managed appropriately.

This means:

- You should disclose conflicts of interest when they arise to your line manager and the Legal Function.
- You should seek advice if you are not sure what might be considered a conflict of interest in a particular situation.
- You must never use your position within IPF to favour in any manner your direct personal interests or indirectly those of our friends or family.

See our Conflicts of Interest Policy for more information.

Gifts and Hospitality

Giving and receiving Gifts and Hospitality is a risk-sensitive activity that requires careful management in order to avoid bribery risks and/or damage to IPF's reputation. IPF recognises that in some circumstances Gifts and Hospitality can be an acceptable part of business conduct. However, ensuring we are vigilant about what kinds of Gifts and Hospitality we give or accept is a way of ensuring we do not facilitate bribery and corruption. All gifts and hospitality can only be given or received in accordance with our Gifts and Hospitality Policy.

This means:

- Without delay, you should inform your manager of any gift or hospitality you receive, regardless of their value and nature and complete submit an entry to the Gifts & Hospitality Register maintained by each Legal Function.
- You should never accept or give any gifts or entertainment in breach of our Gift and Hospitality Policy.
- Regardless of the value of the Gift or Hospitality, you are expected to make a judgment call to determine if the Gift or Hospitality offered, given, accepted or received is legitimate, not lavish or excessive, moral and does not create an obligation on the recipient to give something in return.

See our Gifts & Hospitality Policy for more information.

Ensuring the right use of company resources

Resources are made available to all colleagues in order to perform their roles successfully. Each of us is responsible for taking care of these resources.

This means:

- You should safeguard any resources provided by IPF PLC from loss, damage, theft, waste or improper use.
- You should comply with policies designed to ensure your security and the security of your colleagues.
- You should promptly report the loss of any items belonging to IPF PLC to your manager.
- You should not use company resources to carry out or support our personal activities or those of our friends or family.

Inside information and market abuse

Although IPF's shares are no longer publicly traded, our bonds remain listed and we continue to be subject to market abuse regulations and disclosure and transparency rules. Inside information is precise, non-public information which, if made public, would be likely to have a significant effect on the price of our listed securities. Dealing on the basis of inside information, unlawfully disclosing it, or encouraging someone else to deal, are criminal offences carrying severe penalties, including imprisonment. We maintain procedures to identify inside information, control who has access to it and disclose it to the market when required.

This means:

- You must never deal in IPF's listed bonds, or in the securities of any other company, on the basis of information which is not public.
- You must never encourage or advise anyone else, including friends and family, to deal on the basis of such information.
- If you come into possession of information which you think may be inside information, you must tell the Company Secretary immediately and treat it as strictly confidential until told otherwise.
- You must not discuss material non-public information in public places, in public forums or on social media.