

Our Sustainability Report forms an integral part of our 2024 Annual Report and Financial Statements. Here we bring to life the progress we are making and the commitments and targets we are working towards as we focus on being a responsible business.

# Building a better world



## Responsible business

Sustainability Report 2024

### Our Responsible Business Vision

As a global lending business we have a responsibility to positively impact our customers' financial futures while contributing to a fairer and more ethical society.

Our Responsible Business Framework, which is approved by our Board, is an important part of how we deliver our purpose to build a better world through financial inclusion. It sets out how we are committed to a sustainable future and to improving the social, economic and environmental wellbeing of the communities of which we are a part. It reflects the fact we conduct our business in a socially responsible and ethical manner, and that we respect the law, support universal human rights, protect the environment and benefit the communities where we operate. In this section, we explore how the actions we undertake within the Responsible Business Framework contribute to a sustainable planet, aligned with the objectives of the United Nations Global Compact.

### New disclosures

This year, for the first time, we are also providing disclosures in line with the Corporate Sustainability Reporting Directive (CSRD). These disclosures will further enhance transparency and accountability, supporting more consistent and balanced sustainability reporting. Our CSRD Statement accompanies our 2024 financial statements and can be found on pages 123 to 150.

### 2024 highlights

**£920,270**

total community investment in 2024

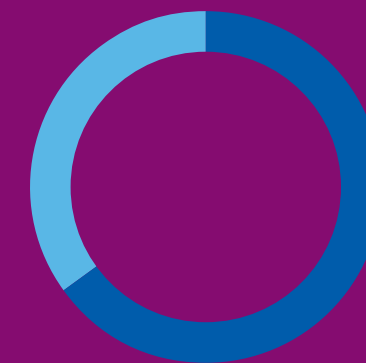
**4,000+**

days volunteered by colleagues to support good causes

**400+**

training programmes delivered

### Global workforce



Female 65%  
Male 35%

\* Includes customer representatives in Hungary and Romania where they are employed to meet local legislation



# Stakeholder engagement

Our stakeholder engagement strategy ensures we listen, understand and act on the views, concerns, and expectations of those we impact. These insights shape our Next Gen strategy to drive growth through financial inclusion and align sustainability initiatives with what matters most to our stakeholders. Regular updates to our Responsible Business Steering Group and Group Board ensure alignment. Below, we outline our 2024 stakeholder engagement efforts and their connection to our broader strategic goals.

Strategic pillars key

**FI** Next Gen financial inclusion

**O** Next Gen organisation

**TD** Next Gen technology and data

## Our customers



Why they matter	What matters to them?	Ways we engage	Board considerations of stakeholder interest
Regular engagement and face-to-face contact with our customers build trust and long-term relationships, which in turn encourages loyalty when they want credit to buy the things they need.	<ul style="list-style-type: none"> <li>Access to financial services</li> <li>Affordability and price</li> <li>Data protection and privacy</li> <li>Flexible repayments when things go wrong</li> <li>Convenience</li> <li>Range of products to choose from</li> <li>Simple, personal and seamless experience</li> <li>Trusted brands</li> </ul>	<ul style="list-style-type: none"> <li>Customer surveys and focus groups</li> <li>Product proposition and usability testing</li> <li>Digital analytics</li> <li>Complaints analysis</li> <li>Double materiality assessment</li> <li>External reputation survey</li> </ul>	<ul style="list-style-type: none"> <li>Board Stakeholder Update</li> <li>Customer metrics form part of the Chief Executive Officer's Report discussed at every Board meeting</li> <li>Customer visits and meetings with customer representatives in all markets</li> <li>"Deep dive" sessions with Chief Marketing Officer twice annually</li> <li>Review of double materiality assessment results</li> </ul>
<p>Strategic pillars</p> <p><b>FI</b> <b>O</b> <b>TD</b></p>			

## Colleagues



Why they matter	What matters to them?	Ways we engage	Board considerations of stakeholder interest
Our colleagues are one of our most important strengths and are key to delivering our purpose and Next Gen strategy. Attracting, retaining and developing talent is therefore integral to our future successful performance.	<ul style="list-style-type: none"> <li>Development opportunities</li> <li>Recognition and reward</li> <li>Wellbeing</li> <li>An ethical and customer-focused culture</li> <li>A safe working environment</li> </ul>	<ul style="list-style-type: none"> <li>Global People Survey</li> <li>Wellbeing surveys</li> <li>Annual engagement conferences</li> <li>Internal reputation survey</li> <li>Double materiality assessment</li> </ul>	<ul style="list-style-type: none"> <li>Board Stakeholder Update</li> <li>Engage with colleagues outside formal meetings including "skip-level" dinners</li> <li>Reviews by the Remuneration Committee of workforce policies and practices</li> <li>Workforce Engagement Director programme</li> <li>Twice annual HR strategy sessions at Board meetings including review of people survey results</li> <li>Non-executive director participation in our Annual Learning Festival</li> <li>Review of double materiality assessment results</li> </ul>
<p>Strategic pillars</p> <p><b>O</b></p>			

## Investors and rating agencies



Why they matter	What matters to them?	Ways we engage	Board considerations of stakeholder interest
Our investors provide capital, including for growth. We rely on their confidence, support and investment to deliver our strategy and long-term sustainable success.	<ul style="list-style-type: none"> <li>Performance and growth potential</li> <li>Risk management</li> <li>Cash generation</li> <li>ESG risks and reporting</li> <li>Executive remuneration</li> <li>Easily available information on the Group</li> <li>Share price growth</li> </ul>	<ul style="list-style-type: none"> <li>Results presentations and webinars</li> <li>Corporate website</li> <li>Investor meetings</li> <li>Market visits</li> <li>Double materiality assessment</li> </ul>	<ul style="list-style-type: none"> <li>Board Stakeholder Update</li> <li>Shareholder events</li> <li>Debt investor roadshows</li> <li>Chief Executive Officer and Chief Financial Officer updates to the Board</li> <li>Investor feedback reports</li> <li>Annual general meeting</li> <li>Review of double materiality assessment results</li> </ul>
<p>Strategic pillars</p> <p><b>FI</b> <b>O</b> <b>TD</b></p>			

## Communities



Why they matter	What matters to them?	Ways we engage	Board considerations of stakeholder interest
Making a positive contribution to our communities by supporting local causes and addressing issues that colleagues and customers care about, empowers communities and helps attract people to work with us.	<ul style="list-style-type: none"> <li>Community investment</li> <li>Financial literacy</li> <li>Social wellbeing</li> <li>Environmental impacts</li> <li>Volunteering</li> </ul>	<ul style="list-style-type: none"> <li>Our Invisibles programme</li> <li>Other community programmes</li> <li>Colleague volunteering</li> <li>Double materiality assessment</li> </ul>	<ul style="list-style-type: none"> <li>Board Stakeholder Update</li> <li>Visits to community investment projects</li> <li>Updates in Chief Executive Officer Report</li> <li>Review of double materiality assessment results</li> </ul>
<p>Strategic pillars</p> <p><b>O</b></p>			

## Suppliers



Why they matter	What matters to them?	Ways we engage	Board considerations of stakeholder interest
Building strong relationships with our suppliers enables us to obtain the very best value and high-quality service. We look to partner with leading organisations who understand our business and work to the highest ethical standards.	<ul style="list-style-type: none"> <li>Business performance</li> <li>Payment practices</li> <li>Ethical business policies and practices</li> </ul>	<ul style="list-style-type: none"> <li>Supplier feedback</li> <li>Supplier surveys</li> <li>Double materiality assessment</li> </ul>	<ul style="list-style-type: none"> <li>Board Stakeholder Update</li> <li>Approval of key supplier contracts</li> <li>Chief Financial Officer Report highlights any material non-performance by suppliers</li> <li>Review of modern slavery strategy and how these risks are managed in our supply chain</li> <li>Review of double materiality assessment results</li> </ul>
<p>Strategic pillars</p> <p><b>FI</b> <b>O</b> <b>TD</b></p>			

## Regulators, politicians and non-governmental organisations (NGOs)



Why they matter	What matters to them?	Ways we engage	Board considerations of stakeholder interest
Having positive relationships with regulators, politicians and NGOs helps their understanding of our value in society and ensures our business practices reflect their expectations.	<ul style="list-style-type: none"> <li>Regulatory compliance</li> <li>Control and supervision</li> <li>Responsible lending</li> <li>Social inclusion</li> <li>Tax contribution</li> <li>Community engagement</li> <li>Ethical business policies and practices</li> </ul>	<ul style="list-style-type: none"> <li>Membership of trade associations</li> <li>Contributing to public consultations</li> <li>Engagement on draft regulations with decision makers</li> <li>Partnerships with NGOs</li> <li>Double materiality assessment</li> </ul>	<ul style="list-style-type: none"> <li>Board Stakeholder Update</li> <li>Regulatory updates via the Chief Executive Officer Report and to the Audit and Risk Committee</li> <li>Review of double materiality assessment results</li> </ul>
<p>Strategic pillars</p> <p><b>FI</b></p>			

# Section 172 and Board decision making

We maintain an ongoing dialogue with our stakeholders and integrate their feedback into our decision-making processes. This approach ensures we remain responsive and accountable, adapting to evolving needs while upholding the highest standards of transparency and responsibility.

The key areas and methods of engagement are:

- **Product and service improvements:** Customer insights from surveys and direct interactions inform refinements to our offering, for example improving digital experiences.
- **Responsible practices:** Customer feedback guides the development and updating of policies to promote responsible lending and financial wellbeing.
- **Workplace culture and wellbeing:** Colleague surveys provide insights into workplace satisfaction, shaping policies on benefits, professional development and diversity initiatives.
- **Operational efficiency:** Colleague suggestions drive process improvements and innovation.
- **Compliance and risk management:** Engagement with regulatory bodies ensures compliance and informs our risk management framework.
- **Policy advocacy:** Regulatory insights guide our involvement in policy discussions, helping align regulations with sector and societal needs.
- **Investor feedback:** Investor feedback shapes long-term growth strategies, capital allocation decisions, financial transparency and ESG goals and reporting.
- **Community engagement:** Interactions identify local needs, guiding financial literacy initiatives, community projects and volunteering opportunities.
- **Sustainability practices:** Stakeholders inform the development of policies and practices to minimise environmental impact and enhance societal contributions.
- **Ethical sourcing and collaboration:** Supplier and partner feedback ensures responsible supply chain operations strengthening codes of conduct and sustainability practices.

By leading the way in fostering a positive culture, the Board seeks to create positive and lasting benefits for the Group and our stakeholders. Read more about the Board's role in shaping culture on page 87. As we position ourselves to deliver further growth through our Next Gen strategy, described in more detail on pages 22 and 23, stakeholder engagement remains central to our journey. The Board values stakeholders' perspectives and recognises their integral role in supporting our long-term sustainable success.

For the purposes of Section 172, the Board reviews and confirms its key stakeholder groups annually. The importance of these key stakeholders to the Group, their concerns and how the Group and the Board engage with them are set out on pages 46 and 47.

The Board recognises that stakeholder engagement is essential to understand what matters most to our stakeholders and the likely impact of our key decisions. Stakeholder considerations received greater focus in 2024, particularly through the completion of our first double materiality assessment, undertaken as a key step in preparing for disclosures under the Corporate Sustainability Reporting Directive (CSRD). Read more about this on pages 123 to 150.

The Board remains committed to our purpose and during the year approved its inclusion into our Articles of Association, embedding stakeholder considerations at the centre of the Group's governance framework and value-creation approach for all stakeholders. Our Matters Reserved to our Board and our Committee Terms of Reference also reinforce the importance of considering stakeholder views in decision making. At each Board meeting, the Chief Executive Officer reports on how the Group has delivered value for our key stakeholders. Additionally, detailed stakeholder updates are presented to the Board twice a year, to ensure that it has comprehensive insight on stakeholders' views. Our Board and Committee papers also include a dedicated section articulating an assessment of the relevant stakeholder impacts. These various stakeholder touchpoints informed Board discussions and shaped Board decisions to balance stakeholders' interests, where possible,

## Stakeholders and Board decisions

Here we highlight some of the key decisions made by the Board in 2024 and how stakeholders were considered during the decision-making process, including Section 172 considerations. The directors confirm that the deliberations of the Board incorporated appropriate consideration of the matters detailed in Section 172. As stewards of the Company, the Board recognises that having regard to the needs and expectations of stakeholders is crucial, as it ensures that the Group is well positioned to deliver long-term sustainable growth for the benefit of all its stakeholders.



### Reviewing the double materiality assessment

In 2024, as part of the Group's strategy discussions, the Board reviewed and approved the Group's double materiality assessment to identify and assess sustainability-related impacts, risks and opportunities (IROs) and to ensure compliance with the CSRD, a framework established to improve corporate transparency and accountability in sustainability reporting.

### Stakeholder considerations

As part of the double materiality assessment process, the Board considered various IROs affecting the Group as well as the Company's impact on the environment and wider communities. The process deepened understanding of key stakeholder perspectives who also took part in the assessment. The outcomes informed strategic decision making including a review of our 2025 strategic plan, and helped prioritise themes in our external reporting and broader stakeholder communication.



### Approval of £15m share buyback programme

In July, the Board approved the commencement of a £15m share buyback to return excess capital to shareholders.

### Stakeholder considerations

To support these discussions ahead of approval, the Board was provided with the views of a number of the Group's largest shareholders on capital return options. Information provided by the Group's joint brokers was also considered in order to understand the perceptions of investors to a proposed share buyback and guide the subsequent announcement at the time of the 2024 interim results. The Board also considered debt holders and credit rating agencies in relation to the decision.

## Board engagement with stakeholders

### Section 172(1) statement

In this statement, we describe how our directors have had regard to the matters set out in Section 172(1) (a) to (f) of the Companies Act 2006 (Section 172) when performing their duty to promote the success of the Company.

This engagement, both directly and through regular reports from individual business areas and various Group functions, ensures the Board is made aware of key issues to enable the Directors to comply with their legal duty under Section 172. Our cultural values of being responsible, respectful and straightforward are at the heart of how we operate and engage with stakeholders. The Board seeks to ensure these values guide decision making and shape how we interact with each other in the workplace and with other stakeholders.

Members of the Board as a whole and individually are bound by their duties under S172. This statement, and the information covering our key stakeholder groups on pages 46 and 47, summarise how the Board promotes the Group's success for the benefit of its stakeholders having regard to:

- the likely long term consequences of decisions;
- the interests of the Group's employees;
- the quality of the Group's relationships with customers, suppliers and other stakeholders;
- the impact of the Group's operations on communities and the environment;
- the importance of the Group maintaining a reputation for high standards of business conduct; and
- the need to act fairly between the Group's shareholders.



### Considering customer strategy

The Board prioritises fostering a customer-centric culture and enhancing the customer experience, exemplified by our customer representatives' personal interactions and the expanding range of digital products and services. In 2024, the Board reviewed and discussed the Group's customer strategy, informed by progress updates, proposals for the 2024 strategic priorities and presentations on customer research, leading to the Board's endorsement of the Group's customer strategy.

### Stakeholder considerations

Insights from case studies and market research demonstrated the direct link between customer experience and sales performance. With this understanding, the Board was able to consider the Group's customers and evaluate critical factors that affect customer experience, both positive and negative. Consequently, these discussions enabled the Board to endorse the 2024 customer strategy priorities to extend the successful Think Customer programme, focus on tailored training for colleagues and to deliver process standardisation.



# Stakeholders in focus

In this section, we provide insight into how we worked with four of our key stakeholder groups in 2024; our customers, colleagues, suppliers and communities.

## Our customers



### Financial inclusion

We are proud that so many of our customers are from groups that have historically been excluded from access to financial services. Helping so many people who often struggle to access credit reflects the dedication of our business to increase financial inclusion and make a positive impact on the people and communities we serve.

We provide credit to consumers who are often underserved by mainstream lenders, including:

- female customers: around 60% of our customers are women;
- those living in rural areas or locations with limited banking access;
- microbusiness owners, particularly in Mexico;
- older consumers who prefer face-to-face solutions over digital-only options; and
- individuals with past credit difficulties.

As a responsible lender, we invest in financial education initiatives to empower our communities. While many customers expertly manage tight budgets, a lack of formal financial education can sometimes limit their engagement with financial services companies. Through face-to-face and online financial literacy programmes, we aim to help individuals make more informed financial decisions.

### Improving customer experience: Think Customer successes in 2024

In 2024, we extended our Think Customer programme to IPF Digital's six markets, building on the success of this initiative in our home credit operations. It is now embedded across the Company, driving our vision to deepen customer relationships, deliver high-quality experiences and keep customers at the heart of everything we do.

The programme comes to life through initiatives including:

- communicating our Customer Promises and Customer Charter externally in the European home credit markets, reinforcing our commitments;
- using customer journey insights to enhance experiences, leading to increased satisfaction and significant improvements across our home credit businesses over the past two years;
- appointing customer programme leaders in each market to share best practices and support customer-focused behaviours. Regular colleague rewards based on customer KPIs further reinforce this culture; and
- launching an interactive customer experience dashboard to track satisfaction, Net Promoter Scores and unmet expectations, supported by our Voice-of-the-Customer programme which helps us understand and improve how we operate.

In 2024, we also mapped digital lending customer journeys through focus groups, surveys and detailed analysis. This research led to the creation of targeted action plans.

**91%**  
Customer satisfaction

**+77**  
Net Promoter Score

### Advancing financial inclusion through digital transformation

Technology plays a vital role in improving access to financial services for our customers. A new generation of customers expects instant solutions, seamless digital and physical interactions, and uses social media to voice their opinions.

Most customers now engage with us digitally at some point in their journey with us, often via mobile phones or our websites. This shift drives our focus on digital transformation, investing in technology to streamline onboarding, reduce decision times and deliver credit faster.

In 2024, we focused on establishing our new digital lending offering in Romania and the number of mobile wallet users more than doubled to over 115,000, accounting for around half of our digital division's customer base. We also launched a new customer app in Mexico, which attracted 362,000 downloads by the end of the year. This app enhances our credit service by enabling balance checks and communication while supporting financial inclusion. It complements our established app in Poland, and we have plans to introduce similar apps in Hungary, Romania and the Czech Republic. All markets in which we operate now have a digital lending option for customers, with the exception of Hungary where regulation does not facilitate digital lending for our segment.

### Keeping a pulse on customer feedback

We actively seek customer insights to refine our products, improve service quality and remain competitive in a fast-changing market. Customer satisfaction is crucial – it drives loyalty, enhances our reputation and supports our long-term growth ambitions by encouraging repeat business and recommendations.

Our Think Customer dashboard tracks key customer experience metrics across all markets and is reviewed monthly by senior management to guide actions. We measure satisfaction with products, customer representative and call centre interactions, as well as processes like loan issuance and website engagement. This ongoing effort has yielded strong results, reflected in our customer satisfaction and Net Promoter Score (NPS) which, at December 2024, were 91% and +77 respectively.

To enhance service standards, we set new objectives for 2025 to improve customer satisfaction outcomes. Progress against these goals, set out below, will be reported in future years.

#### 2025 objectives

- Undertake customer service standards training for field colleagues in European home credit.
- Extend mobile customer apps across all markets.
- Refresh our 'HeartBeat' analysis of customer pain points.
- Complete a review of how service quality impacts commercial performance and build action plans.
- Enhance the Think Customer programme for our digital channels.

### Acting ethically

Our overall approach to customers, products and services is owned at a Group level by our Chief Marketing Officer, who works closely with Directors of Marketing and customer experience leaders. Consideration of new products and assessment of the performance of existing products from a customer satisfaction perspective are reviewed regularly by Local Product Development Committees, which are established in each of our markets. More significant product, promotion and pricing changes are reviewed by the Global Product Development Committee, which is chaired by the Chief Marketing Officer. The brand and product proposition risk is one of the key risks in our enterprise risk management methodology which enables this risk category to be monitored, and appropriate mitigation measures undertaken where required.

Incorporating risk management into our product development process is essential to creating sustainable, customer-focused solutions. From the initial concept phase through to launch, we conduct thorough risk assessments to identify potential challenges, including market, regulatory, and operational risks. By integrating these insights early, we can tailor products to meet customer needs while adhering to strict standards for security, compliance, and affordability. Our cross-functional teams collaborate closely to ensure that each product aligns with our risk tolerance and company values, helping us deliver offerings that are both innovative and responsibly managed for long-term resilience while delivering our target returns. Ultimately, the Board oversees the management of customers and receives regular market intelligence tracking the Group's performance on a range of customer-related metrics.

In every market, all our marketing communications are prepared with the objective of meeting relevant legal and regulatory standards, and to ensure our customers understand the credit commitment they are choosing. Our advertisements, promotions and product information are created in a way that is easily understood, accurate, does not mislead and complies with applicable regulation. We are always very clear when it comes to the price of our products with all cost information explained clearly in our contracts with consumers. Our Global Pricing and Promotions Policy sets out how we ensure fair advertising policies and procedures globally, which are complemented by market guidelines on this topic.

As part of our commitment to responsible lending, we prioritise prudent credit underwriting to mitigate potential debt challenges. Our approach includes thorough assessments of internal and external data, as well as customers' income and expenses, to ensure loan affordability. In our home credit businesses, direct relationships with customer representatives provide early insights into repayment issues, enabling proactive support should customers experience difficulties.

For customers facing difficulties, we offer flexibility such as agreeing missed or reduced repayments, ensuring this option is not overused to prevent financial strain. Should a customer go into arrears, we collaborate to create short-term arrangements tailored to their circumstances.



## Our customers continued



### Walk in our Customers' Shoes

As part of the Think Customer programme in our home credit businesses we launched the 'Walk in our Customers' Shoes' programme. By means of customer visits, global workshops and videos, our colleagues were able to see things through the eyes of our customers. Having a clear picture of every step our customers go through when interacting with us gives a valuable perspective of their needs, struggles and perceptions, from application and onboarding to repaying their loan. It also shows what we are doing well and, importantly, where we need to improve in our interactions.

### Streamlining customer engagement with AI

Building on the success of our chat-bot initiatives to transform lead management and improve customer engagement, we enhanced our digital processes by introducing AI-driven customer support. Our home credit operations integrated AI into WhatsApp, seamlessly transitioning potential customers from Facebook enquiries to an interactive chat-bot for application processing before involving our field team. This initiative has significantly reduced application times for customers to just five minutes. It has also decreased customer service adviser involvement by 30% in AI-implemented campaigns, time which can now be used to assist more customers and enhance the overall customer experience.

### Empowering financial inclusion with credit health checks

In 2024, we launched a digital credit health monitor in our mobile wallet to help customers better manage their credit profile and improve their financial wellbeing. With a digital content strategy focused on financial education, customers can access tips on managing their household budget and saving. The app also provides customers with their internal credit score and a picture of their financial journey, including simple, educational guides to improve their credit score over time. This is particularly helpful for consumers in Mexico where credit score knowledge is lower.

### Resolving customer concerns and complaints

An effective complaints-handling process is critical for building transparency, trust, and continuous improvement. We manage complaints in line with established policies and legal requirements, ensuring accessibility and responsiveness for all customers. We clearly outline how customers can raise concerns through our consumer-facing websites, which explain the complaints process, expected timeframes and resolution steps.

Customer contracts also provide relevant contact information. Complaints can be submitted online, by phone or in person with a customer representative, and are logged, categorised by severity and managed accordingly. Simple issues are resolved quickly, while complex cases are escalated to our dedicated complaints team for investigation and resolution.

Root-cause analysis also helps identify systemic issues and improve our overall service. As is the case with all financial institutions, we do receive complaints from customers, but the level of complaints received by the Group in 2024 was low. In 2024, complaints totalled approximately 60,200 (2023: 60,000), representing 4% of active customers and the average resolution time was 8 days (2023: 7 days), both of which were broadly in line with the prior year. In 2025, we will continue monitoring complaints trends and addressing root causes to enhance the customer experience.

### Looking ahead

In 2025, we will build on the progress made in 2024 by enhancing our customer-centric culture, evaluating service effectiveness, and delivering customer service standards and training. Plans include further developing our Think Customer programme in IPF Digital, introducing customer appreciation awards and testing AI in service centres to help further improve customer satisfaction.

## Our colleagues



Our 20,500 dedicated colleagues power our success, bringing passion and purpose to their work every day. Their commitment enables us to deliver affordable, accessible and responsible financial services to underserved communities. In return, we foster an inclusive environment where everyone feels valued, supported and empowered to excel. Our people strategy focuses on recruiting, developing, rewarding, and retaining a diverse and high-performing workforce aligned to our purpose.

In 2024, we made significant strides in inclusion, empowerment, and championing diversity, equity, and inclusion. Programmes, including The Pink Initiative, advanced gender diversity, while our neurodiversity awareness campaign enhanced workplace inclusivity. Employee engagement remained a key priority, with townhalls, forums, and informal gatherings ensuring colleagues' voices were heard. Insights from our Global People Survey and pulse surveys drove improvements, with the majority of employees expressing confidence in leaders' care for their wellbeing.

We also deepened our investment in professional development, delivering over 400 training sessions and expanding digital learning pathways through platforms like LinkedIn Learning. Ethics remains at the heart of our culture, with the tenth anniversary of Ethics Week reinforcing integrity in every aspect of our work.

To align with European Sustainability Reporting Standards (ESRS), we conducted a double materiality assessment, identifying working conditions and workers' rights as our most material sustainability-related matters. In compliance with ESRS S-1, we disclosed key workforce data on gender diversity, training, and employee impacts. Details are included in our CSRD Statement from page 123.

As our colleagues continue to drive our purpose, we remain committed to building an inclusive, innovative organisation that meets customers' needs while contributing to a better world through financial inclusion.

### Empowering local talent by embracing diversity

We are committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion (DE&I).

With operations spanning Europe, Mexico and Australia, our commitment to recruiting and developing local talent remains a core element of our people strategy. Having local teams with in-depth knowledge of their markets allows us to better understand the needs of our customers and build trusted relationships within each community. This year, we strengthened our local recruitment efforts and welcomed more than 6,000 new colleagues to our business. Our workforce represents a broad spectrum of backgrounds and cultures, mirroring the diversity of the communities we serve and enhancing our ability to deliver impactful, customer-centred solutions.

We undertake a wide range of activities to promote and celebrate diversity across the organisation. From our Power of Inclusion celebrations to tailored development pathways for women, we strive to create a culture where everyone can thrive. In 2024, we undertook a number of impactful initiatives to increase awareness and understanding of the many aspects of DE&I principles.



## Our colleagues continued



### Building neurodiversity awareness

In 2024, IPF Digital launched its first neurodiversity campaign, "Welcome to the IPF Digital World," to foster inclusivity and highlight the unique strengths of neurodiverse individuals. The three-month initiative included 12 educational newsletters and a dedicated intranet care page with resources and practical tools to enhance understanding. A key highlight was a webinar exploring the workplace experiences of neurodiverse women, addressing the intersection of gender and neurodiversity. This campaign marked a significant step in creating a more inclusive culture, advancing diversity, equity and inclusion while empowering neurodiverse talent and celebrating their contributions.



### Power of Inclusion

In April 2024, we hosted our third Power of Inclusion conference, a global online event attended by 600 colleagues, celebrating diversity and inclusivity. The conference showcased programmes like The Pink Initiative and the Becoming Development Managers programme in Mexico, to increase female representation in our Sales and Service teams. The event highlighted the importance of diversity, equity and inclusion in driving innovation, enhancing workplace culture and boosting organisational performance. Attendees received practical advice on fostering inclusivity and as part of our 5,000 Story Challenge, colleagues shared inspiring examples of their contributions to financial inclusion.



### Celebrating a decade of Ethics Week

2024 marked the tenth anniversary of our global Ethics Week, reinforcing our commitment to making ethical decisions every day. The week began with a video message from our CEO affirming our dedication to doing the right thing, followed by engaging activities promoting our Code of Ethics and ethical awareness.

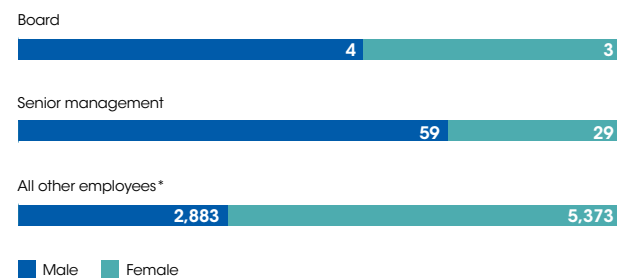
A live global broadcast, hosted by our Hungarian business, featured senior leaders sharing personal ethical challenges and was viewed by over 500 colleagues. Across all markets, local events included film screenings, quizzes and discussions on ethical dilemmas, fostering debate and engagement.

Our ethics e-learning course and quiz, completed by 97% of colleagues globally, provided practical guidance on navigating ethical dilemmas and emphasised the business impact of ethical decision making. This milestone event underscored our unwavering commitment to integrity and high standards in all we do.

**97%**  
of colleagues completed ethics training in 2024

### Gender split of employees

at 31 December 2024



\* All other employees include customer representatives in Hungary and Romania where they are employed to meet local legislation.

### Building trust with customers

Our customer representatives are the face of our business, working directly in the communities we serve. They play a crucial role in supporting our customers, providing financial services that we have designed and tailored to meet their unique needs and upholding our commitment to responsible lending. With around 15,200 customer representatives across the Group they are a fantastic example of our strategy of empowering local talent.

More often than not, our customer representatives are longstanding members of the communities they serve, which enables them to understand and respond to our customers' evolving needs. By regularly visiting customers in person, they build meaningful relationships that go beyond financial transactions. Every year we conduct millions of face-to-face customer visits across our markets, creating a sense of connection and trust. These face-to-face interactions are particularly valuable in emerging markets, where customers may not have access to traditional banking services and appreciate the reassurance of an in-person relationship.

With a deep understanding of local cultures and communities, our customer representatives are instrumental in building trust and fostering strong relationships with customers across all our regions.

### Personal development and career growth

Our success is built on the growth and development of our people. By investing in their personal and professional development journey, we equip colleagues with the skills, knowledge and confidence to deliver the high standards our customers expect.

In 2024, we provided over 400 training interventions to our colleagues across ten countries covering a range of topics, including technical upskilling, storytelling and leadership development, all designed to meet industry demands and deliver responsible, ethical customer service. We also expanded our career development programmes for customer-facing colleagues with our established learning academies supporting structured pathways for over 15,200 customer representatives. Topics included sales and territory management, personal development and customer-centric service, ensuring colleagues are equipped for ongoing success.

Digital learning remains a cornerstone of our people development strategy. Through our global learning management system and platforms like LinkedIn Learning and Pluralsight, we offered tailored online resources, enabling self-paced learning aligned with roles and career aspirations. In 2024, over 300 colleagues completed nearly 1,300 courses, enhancing their expertise and adapting to evolving professional demands. Our 'Let's Talk Me' performance appraisal process reinforces this approach by encouraging colleagues to set personal development goals and collaboratively design tailored training plans, reinforcing our commitment to nurturing talent and supporting individual success. Internal mobility also highlights our commitment to career progression. In 2024, over 500 colleagues transitioned into new roles within European home credit, demonstrating our dedication to nurturing talent and providing meaningful opportunities for growth across the organisation.

### Supporting colleague wellbeing

The safety and wellbeing of our people are central to our success. Through the Global Care Programme, a key part of our Next Gen organisation pillar, we create a supportive environment where colleagues can thrive personally and professionally.

In 2024, our care plan focused on four key pillars:

- Engaging with colleagues to identify their wellbeing priorities.
- Promoting mental health through psychological safety training and enhanced support systems.
- Encouraging physical health with initiatives like health screenings and step challenges.
- Strengthening team connections through social events.

#### Wellbeing highlights:

- In Romania, psychological safety training boosted trust and collaboration as part of our Culture of Compassion programme.
- In Mexico, our Diversity, Equality, Inclusion and Belonging initiative engaged employees across 17 branches, fostering understanding and inclusion.
- In Poland, a new employee assistance programme, Mental Benefits, provided over 1,000 psychological consultations.
- IPF Digital launched its Neurodiversity in the Workplace campaign, raising awareness and supporting neurodivergent employees.

Looking ahead to 2025, we will focus on fostering innovation, strengthening connections and enhancing psychological safety to address evolving needs. By caring for our people, we continue to build a workplace where everyone can excel.

### Engaging with our colleagues

In 2024, we prioritised meaningful engagement with our workforce, ensuring colleagues' perspectives were actively heard and addressed. Through a range of communication channels, we encouraged open dialogue and inclusivity. Townhall events allowed employees to connect directly with leadership fostering transparency and discussions on critical topics, while informal gatherings created a relaxed environment for colleagues to share their views and open discussions. Formal employee and customer representative forums were also established across our home credit markets and reflected workforce diversity by considering factors like location, division, tenure, and seniority to ensure that the voices of all colleagues were heard on a range of important issues.

Building on insights from the 2023 Global People Survey, conducted biannually across the business, we refined programmes to address employee feedback. In 2024, Group-wide pulse surveys delivered overwhelmingly positive results, with over 80% of responses reflecting positive scores. Notably, a significant proportion of colleagues (97%) felt their leaders genuinely care about their wellbeing.

These positive results reaffirm our commitment to fostering a culture of empathy, inclusion, and trust. By actively listening to and addressing the needs of our workforce, we continue to strengthen collaboration and ensure employees feel valued and motivated. This commitment to engagement reinforces our goal of making IPF a great place to work.



## Rewarding impact and innovation

Recognising our people's contributions is key to driving performance and innovation. Our total reward approach combines monetary and non-monetary rewards to attract, retain and engage colleagues, ensuring a competitive and equitable experience. In 2024, we proudly achieved accreditation as a UK Living Wage employer, reflecting our commitment to fair and sustainable wages and supporting workforce wellbeing.

A vital part of our approach is regular performance appraisals and feedback through our 'Let's Talk Me' performance management process, in place for over a decade. This framework focuses on employee performance and development, driving opportunities across our businesses and fostering growth aligned with organisational goals.

## Looking ahead

Our focus for the future is advancing initiatives that support colleague growth and wellbeing while aligning with organisational goals. Our strategic priorities include expanding access to tailored digital learning programmes and strengthening local leadership development to equip teams for a rapidly changing environment.

We will enhance engagement efforts, fostering a resilient, inclusive, and customer-focused culture. By prioritising inclusivity, development and wellbeing, we empower colleagues to thrive and deliver on our purpose.

## Our suppliers



Our goal is to co-operate with informed and engaged suppliers who understand how their products and services contribute to the delivery of our purpose and business goals, and who also act according to our values and culture.

## Our supply chain

In 2024, we spent around £200m on a broad range of products and services with almost 3,000 suppliers globally. We categorise our suppliers into four tiers – strategic, critical, leverage and routine, depending on an assessment of defined business risk factors, sustainability risk assessment, regulatory requirements and spend. Of our global suppliers, 142 are deemed strategic or critical. The major areas of expenditure within our supply chain are marketing, property services, professional services and IT.

## Doing business responsibly with suppliers

Our procurement and supplier management activities are provided by an internal procurement function, which is part of the Group's broader finance function. The procurement function is responsible for sourcing, supplier selection, negotiations and contracting, and continuous supplier relationship management for assessing, managing and mitigating risks relating to supplier relationships including potential breaches to approved sourcing processes. Their actions are overseen in each of our markets by a Local Procurement Committee, which comprises members of the local board and procurement function, and which meets every quarter. Important matters, including any suppliers evaluated as high risk, are reported subsequently to the Global Procurement Committee which meets on a quarterly basis and comprises members of the Group's procurement, finance, legal, and internal audit functions. The Group's Global Responsible Procurement Policy and Group Procurement Standards document the minimum standards for our engagement with suppliers, including sourcing, supplier selection, negotiations, contracting, supplier risk management, contract requirements, and supplier management and evaluation processes. Group Procurement Standards ensure that all procurement activity is undertaken according to the following principles:

- Social responsibility, in particular that suppliers and outsourcing partners comply with international labour standards including fair wages, safe working conditions, non-discrimination, and prohibition of child or forced labour; respect human rights throughout the supply chain aligned with the United Nations Guiding Principles on Business and Human Rights; and support community development, fair trade practices, and inclusion of diverse and underrepresented groups;
- Ethical governance, ensuring that procurement and outsourcing decisions are made with transparency, accountability, and ethical considerations. Suppliers and service providers must demonstrate anti-corruption and anti-bribery measures, ensure compliance with GDPR in managing personal data across outsourced operations and maintain robust governance structures to promote business ethics and accountability; and
- Environmental responsibility, ensuring that suppliers and outsourced service providers demonstrate environmental responsibility. The Group's Global Responsible Procurement Policy is approved by the Chief Financial Officer.

## Creating a sustainable supply chain

Our Global Responsible Procurement Policy and Group Procurement Standards detail our approach to managing our supply chain sustainably. Our supplier evaluation process involves identifying, assessing and monitoring supplier practices in the areas of human and labour rights, the environment, health and safety, anti-corruption, data protection, ICT resilience, supplier reputation and others. This is achieved through the undertaking of a supplier evaluation process against relevant standards in each of these areas, and supplier re-evaluation in the case of introduction of improvement plans or any risk mitigation activities. This effort is designed to ensure that relevant principles and standards are upheld throughout our supply chain and is in line with our commitment to the UN Global Compact. As defined by the Supplier Operational Management Standard, our Code of Ethics is shared with all suppliers who are required to adhere to equivalent behaviours and standards. Suppliers can raise any matters of concern through our whistleblowing channels. We pay suppliers promptly and within contracted periods.

We believe that given the markets we operate in, modern slavery and human rights remain the most significant potential sustainability risks within our supply chain. In 2023, we undertook a comprehensive human rights and modern slavery assessment process which identified suppliers of cleaning, maintenance and facilities services to be the greatest potential risks areas in our supply chain. Following this assessment, we amended our supplier segmentation procedure to include these risks in our evaluation criteria and extended our definition of critical suppliers to include relevant suppliers. In 2024, we expanded on these earlier efforts with our supplier segmentation programme which identified 44 suppliers globally as critical from a human rights and modern slavery perspective. These suppliers were subsequently reclassified and are now fully integrated into our supplier risk assessment process. We also introduced a Supplier Sustainability Questionnaire which is a key component of our Supplier Risk Management Group Procurement Standard. This new questionnaire plays a crucial role in evaluating human rights and modern slavery risks in our supply chain. As of 2024, all 142 strategic and critical suppliers are subject to this sustainability assessment, further strengthening our commitment to responsible sourcing.



## Engaging with suppliers

The procurement function engages with suppliers to better understand their perspectives on the Group. Those suppliers which are assessed as strategic or critical are the focus of our engagement activity. Engagement takes place through multiple channels, from discussing with specific suppliers when at the point of contract renewal or termination, tender processes with existing and potential suppliers and dedicated supplier relationship management activities. The discussions with existing suppliers address their performance, including on sustainability matters.

Recognising our suppliers as key stakeholders of our business, we engaged a number of key suppliers in the double materiality assessment, undertaken to support compliance with the new Corporate Sustainability Reporting Directive and which helps us prioritise sustainability and ESG issues based on their impact on our business and our potential for positive influence. To ensure comprehensive insights, we invited 50 suppliers across our European markets to participate in a survey, a key step in identifying the most important sustainability-related topics for our business. We received a strong response reflecting their commitment and high engagement in our shared sustainability goals.

We are actively expanding our focus on ESG risks and opportunities as well as on operational resilience, and broadening the scope of risk assessments in our supply chain. To support this, we are updating all our supplier management policies and Group Procurement Standards to enhance our understanding of how companies are addressing their ESG responsibilities, reinforce IT security resilience and refine the criteria for defining strategic and critical suppliers.

To meet these goals for 2025 we are in the process of amending our existing Group Procurement Standards:

- Supplier Segmentation Group Procurement Standard: widening the critical supplier definition increasing this key supplier group which is covered by extended risk management and risk monitoring procedures;
- Sourcing Group Procurement Standard: including our due diligence procedure as an additional mandatory step in the selection process for all suppliers supporting critical and important functions and processes. All sourcing processes will also be executed in accordance with an amended list of internal Group policies including Anti-bribery and Corruption Policy, Conflict of Interest Policy, Data Protection Policy, Gifts and Hospitality Policy, Human Rights Policy, ICT Third-Party Risk Management Policy, Information Security Policy, Modern Slavery Policy, and the Whistleblowing Policy;
- Supplier Relationship Management Standard: additional obligations of continuous performance monitoring for all critical and strategic suppliers; and
- Supplier Risk Management Group Procurement Standard: including additional risks assessment criteria to our Supplier Evaluation Process including conflict of interests, concentration risk, strength of exit strategy, ICT resilience risk and business continuity.

In addition, a new ICT third-party risk management policy and ICT third-party risk assessment procedure will be introduced to increase our operational resilience and ICT security, increasing the level of supplier risk assessment, risk monitoring and ensuring operational continuity.



## Our communities



We are committed to contributing to the social and economic development of the communities in which we operate. Our primary focus is on supporting groups facing challenges with financial inclusion by ensuring their stories are heard and advancing financial education initiatives directly through our own programmes and in partnership with NGOs. Through our focus on financial inclusivity and social equity, we strive to build more sustainable and resilient communities.

Our community strategy is built around three core pillars:

- our *Invisibles* programme;
- financial education initiatives; and
- volunteer opportunities for our colleagues.

In 2024, we continued our investment in a wide range of community initiatives which are important to both our colleagues and communities. We support our communities through a variety of means, including financial contributions, in-kind support, and active employee involvement. In 2024, our total community investment amounted to £920,270 and 4,011 days of volunteering.

### Our Invisibles programme

We recognise that financial vulnerability, stemming primarily from economic disparities, poses a significant challenge and that we have an important role to play in addressing this issue.



Our Invisibles programme was created to ensure those segments of society that currently struggle to access financial services become visible to stakeholders and are also provided with practical help. The programme has four elements:

1. **Identify:** Studies commissioned by independent third parties to identify the underbanked groups in each of our markets provided meaningful insights concerning the specific challenges they face.
2. **Highlight:** Publish the results of the study to highlight the insights we have gathered and what it means for that market.
3. **Engage:** Initiate dialogue with relevant stakeholders on what practical steps would improve the situation of the identified invisible groups.
4. **Help:** Identify a relevant NGO partner to enable joint working to offer help to one or more selected invisible groups.

Building on the foundations laid in 2022 and 2023 in our home credit markets, we expanded this flagship community initiative in 2024 into Estonia, Lithuania and Latvia where IPF Digital operates. During the first phase, we identified the most excluded groups in these countries and hosted events to raise awareness of their challenges. This included the "People in the Shadow of Social Exclusion" conference in Riga, attended by NGOs, politicians, academics and businesses who came together to discuss and debate the issues of exclusion. In Estonia and Lithuania, we also launched a podcast series to shed light on the difficulties faced by these marginalised groups, amplifying their voices and fostering greater understanding.

In our home credit markets, where the Invisibles programme is well established, we partnered with new NGOs to broaden our reach and support more groups facing barriers to financial visibility. In the Czech Republic, we collaborated to assist young adults leaving the state childcare system, and developed a programme to support social workers. We also launched a financial education initiative for senior citizens.

In Romania, we partnered with six NGOs, each focusing on a specific invisible group, with particular emphasis on employability workshops and senior citizens. In Mexico, we began collaborating with UN Women to support women in isolated areas facing extreme poverty, and worked with Save the Children to assist migrant families by providing education and tools to navigate life changes.

In Hungary, we renewed our strategic partnership with Hungarian Interchurch Aid, committing to support its anti-poverty efforts for the next three years. In Poland, our focus shifted from aiding Ukrainian refugees to supporting children transitioning out of state childcare.

In 2025, we plan to extend our efforts to reach new invisible groups and make a lasting, positive impact on financially vulnerable people.

### Building empowerment through financial education

Alongside our Invisibles programme we invested in delivering financial education initiatives to empower individuals. Financial literacy plays an essential role in the lives of excluded consumers because it equips them with the knowledge and skills to manage money with confidence, access financial services, make informed financial decisions and improve their resilience and wellbeing. Our research into financial wellbeing suggests many people in our markets do not receive a formal financial education and would value the opportunity to learn more about financial management.

We have implemented comprehensive financial literacy programmes targeting financially vulnerable individuals. These initiatives include workshops, webinars and educational materials aimed at improving financial knowledge, developing budgeting skills and supporting long-term financial planning. They also provide volunteering opportunities for our colleagues to impart their knowledge and expertise on these topics for the benefit of financially vulnerable individuals.



### Empowering seniors through financial education

In 2024, we launched the Senior Academy in Hungary to provide financial education for retirees in small towns. The three-session programme covers managing finances, avoiding financial fraud and understanding credit. Partnering with Semmelweis Medical University, we hosted three events attended by around 60 seniors each, offering financial tips from colleague volunteers and healthy living advice from university experts. Following its success, we plan to expand the Academy in 2025, helping more elderly people navigate their finances with confidence.



### Supporting young adults transitioning from state care

In 2024, we extended our Invisibles programme in the Czech Republic to support young adults leaving state childcare by offering financial support to an NGO responsible for supporting them. We also selected three talented individuals who had recently left the state childcare system and gave them direct financial support to help them live independently.

### Supporting communities through volunteering

Thousands of our colleagues make a difference in their communities through volunteering in both company time and their own.

In 2024, they supported a range of community projects from financial education to environmental causes. Our volunteering programme also helps improve teamwork, engagement and motivation.

Our focus for volunteering is brought together with our annual Volunteer and Financial Inclusion Month, which we organise each May. Colleagues got involved in a range of activities including painting community hubs that host Invisibles-supported projects, visiting people in assisted-living homes and tree planting. In this one month alone, our team of nearly 2,500 volunteers supported 85 projects benefiting 250,000 people and raised more than €100,000.

In September 2024, some of the worst floods in a decade hit our Central European markets, sadly claiming many lives and destroying thousands of homes. Faced with this serious challenge, our teams set about helping the communities most badly affected by fundraising and volunteering to help build flood barriers and clean homes.



4,011

days of volunteering undertaken by colleagues

£920,270

invested in our communities



# IPF in Society

Here we provide additional sustainability disclosures beyond the requirements of the Corporate Sustainability Reporting Directive (CSRD), offering a more comprehensive view of our ESG initiatives.



## Our Code of Ethics

Our Code of Ethics is designed to ensure everyone working for the Group understands how we deliver on our purpose and how to act ethically and with integrity at all times. The Code can be viewed on the policies section of our website at [www.ipfin.co.uk](http://www.ipfin.co.uk). The Chief Legal Officer has responsibility for the implementation and effectiveness of the Code of Ethics and reports annually to the Board on this. The Group Ethics Committee, membership of which comprises the Chief Executive Officer, Chief Financial Officer, Chief Legal Officer and Chief HR Officer, has oversight of all ethical issues and meets quarterly to review progress and discuss any concerns.

The Code communicates the minimum standards which we expect from all colleagues. We take breaches of our Code of Ethics very seriously and they could result in disciplinary action. If our colleagues have any concerns about the provisions of the Code not being followed, we encourage them to report this at the earliest opportunity. Whistleblowing processes are available if for any reason reporting to line management is not appropriate or preferred.

In early 2024, the Board approved our updated Code of Ethics which was then translated into local languages and cascaded throughout the business globally. To ensure high awareness and understanding of the updated Code, a communication campaign targeting all employees and customer representatives in all our markets was launched. During the course of the year colleagues received a range of communications including emails, posters, screen savers, videos and presentations on the three pillars of the Code: Doing the Right Thing as a responsible business, as a responsible employer and as individuals. In September 2024, we held our tenth annual global Ethics Week which is a series of events, training and communications for all full and part-time employees and customer representatives on topics relating to ethics. The week focused on our revised Code, how it sets our standards and how it should be used to guide behaviour. 97% of all employees and customer representatives globally completed our online annual ethics training in 2024.

## Human rights

The Group is a member of the UN Global Compact. Our commitment to this initiative, together with the standards of the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights, is set out in our Corporate Sustainability Policy, and our specific approach to human rights is set out in our Human Rights Policy. Both policies can be accessed on the policies section of our website and are approved by our Board. Our Human Rights Policy sets out our commitment to respecting internationally recognised human rights standards and our responsibility to take appropriate steps to identify, prevent and mitigate human rights risks across the Group, and to take action to remedy any adverse impacts we identify. This Policy sets out our risk assessment procedures and controls to detect and mitigate human rights risks in our business and supply chain together with our approach to raise awareness of these absolute and fundamental rights.

In 2024 we undertook additional targeted due diligence on suppliers we assessed to be as high risk for potential modern slavery and human rights violations. In 2025, we will perform a risk assessment and stakeholder engagement exercise to identify issues and review effectiveness of our Human Rights policy and report on this to the Board.

## Combatting financial crime

We are committed to protecting our customers and the business by combating fraud, bribery, extortion, collusion, money laundering, tax evasion, terrorist financing and all forms of financial crime and corruption, and have a zero-tolerance approach to these matters.

The Group Fraud and Anti-Money Laundering (AML) frameworks define minimum standards and controls for all markets on fraud, AML, counter-terrorism financing (CTF) and financial crime. The Group Fraud Risk and AML Manager has overall responsibility for the definition and development of the controls and standards defined within the frameworks. Each market has a Loss Prevention function which is responsible for ensuring the implementation of the required standards and assuring the operation of controls. Management information is monitored to track trends and patterns of behaviour relating to fraud, AML and CTF risks. Suspected frauds and instances of money laundering and terrorism financing are investigated by the Loss Prevention function and, where identified, remediating actions are taken.

To ensure that the Group is not used to launder the proceeds of criminal activity and/or facilitate the financing of terrorist organisations, a variety of methods utilising external data sources are used to ensure compliance with legislative requirements. We apply a risk-based approach to our customers and transactions, with systematic assessments made at the point of a credit application and regularly during the lifetime of the customer relationship. Additionally, checks are conducted to identify Politically Exposed Persons (PEPs) and, where identified, processes compliant with local legislation, are in place to conduct enhanced customer due diligence and obtain sign off by managers with appropriate levels of authority before commencing any business relationship. Independent assessments and audits by national regulators and/or external auditors assure our compliance with AML regulations.

Compliance with the fraud, AML and CTF frameworks is overseen on a market basis by local Loss Prevention Committees, comprising senior management in each market, which review management information to track trends and patterns of fraud and monitor the local risk landscape. The output of this activity is then monitored at Group level by the Group Credit Committee. The Group Fraud Risk and AML Manager carries out independent reviews of each market's systems and controls to ensure compliance with the minimum standards detailed in the Group Fraud and AML Frameworks as well as reporting quarterly to the Group Risk Advisory Group as risk owner of the fraud and AML risk category. The Group's Audit and Risk Committee has oversight of these systems and controls and receives bi-annual updates on this topic.

Technological developments have been leveraged to better identify potential instances of fraud and improve AML/CTF controls including improvements in the speed of delivering fraud alerts, expanded use of biometric identity checking and geolocation ringfencing.

In 2024, incidents of fraud remained low and within risk appetite. There were no confirmed cases of money laundering, terrorism financing or insider trading. A small number of suspicious activity reports were submitted to AML regulators across the markets.

## Bribery and corruption

Our commitment to countering bribery and corruption is detailed in our Anti-Bribery and Corruption Policy, which is approved by our Board and available on the policies section of our website. This Policy seeks to ensure the Group complies with anti-bribery and corruption laws in all markets where we do business as well as complying with the requirements of the UK Bribery Act. To ensure compliance with the policy, we conduct market-level anti-bribery risk assessments annually. Corruption risks are managed by an established framework including first-line functional controls, second-line oversight and specialised risk management with control assurance and investigations conducted by subject matter experts and third-line independent assurance provided by the Group's internal audit function.

Our Anti-Bribery and Corruption Policy sets out the Group's zero-tolerance approach to corruption together with details of our mechanisms and controls to combat bribery and corruption including anti-bribery risk assessments and annual compliance checks, along with our processes for recording and assessing conflicts of interest and gifts and hospitality. Training on this topic was provided to all employees and customer representatives in 2024 as part of our annual ethics e-learning and relevant functions received additional targeted training. There were no substantiated material incidents of bribery or corruption in 2024 across the Group. In 2025, we intend to review risk assessment options and mechanisms and complete a holistic risk assessment procedure proportionate and appropriate to the Group's corruption risk.

## Whistleblowing

The Group has mechanisms to enable individuals to raise concerns about wrongdoing or breaches of the law in the Group's operations or business relationships. These internal and external mechanisms for seeking advice and reporting concerns about unethical or unlawful behaviour and organisational integrity are formalised in the Group Whistleblowing Policy which is approved annually by the Board and available on the policies section of our website. This Policy, which is implemented in local language in all the markets in which we operate, states that there should be no retaliation against whistleblowers, sets out how to raise a concern and details processes for ensuring reports are handled properly.

Anyone, including all employees, customer representatives, customers and suppliers, can raise concerns through the whistleblowing processes which the Group has in place. Reports can be made to independent services which are available at any time and enable concerns to be raised in a variety of languages, and anonymously if preferred. All whistleblowing matters, however reported, come under the governance processes set out in the Group's Whistleblowing Policy.

The Whistleblowing Policy and related processes are owned by the Chief Legal Officer and maintained by the Group legal function. These whistleblowing systems and investigation processes are overseen by the Group Ethics Committee, which comprises the Chief Executive Officer, Chief Financial

Officer, Chief HR Officer and Chief Legal Officer. The Committee meets quarterly and receives updates on the operation of the whistleblowing systems together with statistical data reports and detail on outstanding whistleblowing cases. All significant cases are escalated immediately to the Committee which oversees their investigation and meets as required to review and agree actions and outcomes in relation to these cases. The Group's Audit and Risk Committee receives bi-annual reports from the Chief Legal Officer covering statistical data on whistleblowing reports, a summary of notable cases and key follow-up activity from the previous reporting period.

Our whistleblowing processes comply with all requirements of the EU Whistleblowing Directive and local implementing legislation. The Group legal function performs compliance checks to ensure that whistleblowing policies and processes are embedded in all our markets and that governance is in place for escalation, investigation and reporting of cases. Our Legal Directors champion the importance of speaking up and the value that this transparency brings to local businesses and ensure that local boards are engaged in the importance of whistleblowing.

In 2024, we documented our investigation processes in a Group-wide Investigations and Reporting Protocol which ensures that cases are properly responded to and escalated, thoroughly investigated and that outcomes are appropriately decided on and actioned. The Protocol includes steps to ensure that confidentiality, discretion and independence are maintained at all stages of an investigation. All investigators received interactive training on the Protocol and how to apply it in practice.

In 2024, 471 whistleblowing reports were received. All of these concerns were, or are being, investigated and resolved. 112 of the reports made (24%) were found to be unsubstantiated. We continue to embed processes and raise awareness through regular internal communications to our employees and customer representatives and our annual ethics week which highlights the importance of this issue. Our whistleblowing services are publicly communicated and available to suppliers, customers and other third parties and all reports and insights into our business are of great value to us.

## Managing conflicts of interest

Our Conflicts of Interest Policy provides colleagues in every market with the guidance necessary to know how to identify and declare potential conflicts as well as setting out requirements to manage any such conflicts ethically and in line with best practice. Our Responsible Procurement Policy and Group Procurement Standards include processes to ensure conflicts in our supplier relationships are managed appropriately.

In 2024 we focused on ensuring the Group's policies and processes for managing conflicts of interest were effective and reflected best practice. We implemented processes for recording and managing potential conflicts across the Group, reporting material conflicts and gifts and hospitality registers to the Group Ethics Committee and escalating any material perceived or potential issues to the Chief Legal Officer for appropriate consideration and management. Our Legal Directors emphasised the importance of effective management of conflicts of interest with local boards. In 2025, we will provide training on managing conflicts of interest to those areas of our business where this is a particularly relevant issue.



## Modern slavery

We take appropriate steps to ensure that no forms of modern slavery including forced labour, child labour, human trafficking or any practices detrimental to employment rights, are taking place in our business or supply chain.

The Group's position on modern slavery is set out in our Modern Slavery Policy, which is approved by our Board and available on the policies section of our website. It includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and states that the Group expects the same high standards from all of its contractors, suppliers and business partners. The Group publishes an annual Modern Slavery Statement which is registered with the UK Government's modern slavery registry and available on our website. Oversight of compliance with the policy is managed by the legal function, which works closely with the human resources function and procurement function. The Board approves the Policy and the Group's Modern Slavery Statement annually, and receives an update on performance of processes to combat this risk.

To address the risk of modern slavery in our own workforce, the Group's Human Resources Control Framework and relevant human resources policies are designed to ensure a safe, fair and inclusive workplace for all our employees and customer representatives. All employees are provided with a written contract of employment and steps taken to ensure that anyone employed has a right to work. The Group does not employ children and has processes in place to ensure that there are no incidents of withholding wages, confiscating documents or similar.

Our Group Procurement Standards include requirements for an annual risk assessment process across all our suppliers to identify those in a location and/or industry with a high prevalence of modern slavery risk and do further due diligence on any potential coercive or exploitative practices.

Our annual ethics training includes modern slavery to ensure our colleagues are aware of the issues involved, understand how to identify signs of modern slavery and what to do in response. There were no suspected cases of modern slavery reported in 2024. The Group is committed to continuous improvement in our approach to combatting modern slavery.

## Anti-competition

We are committed to the principles and spirit of competition law and similar laws in all markets in which we operate.

Our Competition Law Policy sets out our processes to ensure employees understand these principles and do not engage in anti-competitive behaviour. A copy of our policy is available to view on the policies section of the website.

The Group was not subject to any regulatory findings or legal action relating to anti-competitive behaviour or breach of anti-trust or monopoly legislation in 2024.

## Compliance with law and regulation

We comply with all relevant laws and regulations in all markets in which we operate. We support regulation which protects consumers and ensures that only responsible businesses are permitted to provide financial products. The Group's Consumer Protection Regulatory Compliance Management Framework sets out the policies, procedures, structures and responsibilities required to be implemented in all markets to identify and manage compliance obligations across the Group. The focus of the framework is to provide assurance that the Group's consumer credit products and services are transparent and ethical as well as compliant with applicable regulatory standards and legislation. The Group oversees the effectiveness of management of the risk of non-compliance and provides guidance on necessary mitigation measures including adjustment to monitoring and controls appropriate for increased regulation. The assurance activities performed in 2024 did not identify any significant instances of non-compliance.

We maintain good relationships with regulators, legislators and governments who play a key role in shaping the consumer finance sector. We respond constructively to all regulatory audits and investigations to address any findings, and continuously improve our business practices in line with changing regulation. There have been no material adverse regulatory findings, sanctions or fines against the Group in 2024.

## Data privacy

The security and privacy of our customers, colleagues and partners are top priorities for us. We process large amounts of personal information every day and uphold rigorous data protection standards to safeguard privacy and protection of data. We are committed to protecting the privacy of our stakeholders.

Our data protection approach is anchored in the following principles:

- We only collect data that is relevant, use it solely for its intended purpose, and apply further data minimisation practices.
- We maintain transparency regarding our use of personal data.
- We process data lawfully, including by obtaining consent from individuals and in alignment with applicable local laws.
- We ensure accuracy of personal data upon request and uphold individual rights under data protection and privacy laws.
- We keep personal data confidential and secure.

Compliance with data protection and privacy legislation is achieved through our Group Data Protection and Privacy Policy which is reviewed annually to address emerging risks, enforce control standards, ensure all personal information is protected, and individuals' data protection rights are observed. Breaches of this policy can result in disciplinary action, including contract termination. This policy aligns not only to our purpose, but also with applicable data protection legislation, reflecting its significance within our Code of Ethics and reinforcing employee responsibility in this area.

Our Group Data Protection Standards supplement the policy with further operational guidance. Oversight is led by the Group Data Protection Officer (GDPO) and the Chief Legal Officer, who maintain accountability to the Board. The GDPO is supported by a team of Data Protection Officers in each market, responsible for advising and ensuring compliance across the business. They also liaise with data protection authorities and respond to individuals' requests for information on data processing activities.

A compliance monitoring programme ensures that our controls are effective, with corrective actions taken when necessary. Each year, under the GDPO's leadership, we develop a Group-wide data privacy plan. Data Protection Officers provide regular updates to both the GDPO and local market boards on progress, while the Group Audit and Risk Committee oversees the plan's global implementation.

All employees and customer representatives complete annual data protection training, with tailored sessions provided for specific roles where necessary. We also require our suppliers to follow data protection principles, implemented through our due diligence and contracting processes.

Management of data breaches is governed through a Data Breach Policy which outlines the plan to action together with roles and responsibilities. Data breaches can occur in the form of a malicious attack or accidental error and can be widespread or impact one individual. We operate a robust process to ensure data breaches are identified, reported and resolved appropriately.

Errors occur from time to time, caused mostly by human error or process flaws for which we undertake appropriate follow-up actions to resolve. In 2024, we did not experience any significant personal data breach cases requiring notification to the competent data protection authority and the impacted data subjects.

In 2025, we will work to further enhance our privacy compliance monitoring. We will also focus on training and awareness relating to data protection and privacy, particularly in areas involving the interplay with advanced technologies. Our work will expand to cover emerging domains such as AI and cloud computing, ensuring that we are well prepared to manage evolving regulatory expectations and protect stakeholder data in this dynamic landscape.

## Cybersecurity

Our Cybersecurity Governance Framework is designed to ensure accountability, oversight and protection of the Group against cyber risks. This framework is embedded in our Group Information Security Framework and Cybersecurity Standards and outlines the mandatory requirements across all our markets. The Group Chief Information Officer (CIO) is responsible for oversight of the framework. Recognising the growing complexity of the cybersecurity landscape, we appointed a Group Chief Information Security Officer (CISO) in 2024 to strengthen our security position in response to evolving technologies and innovations. The CISO reports to the CIO and is responsible for overseeing the Group's cybersecurity programme and providing regular updates to the Board on cybersecurity initiatives, risks, and progress.

The Group Audit and Risk Committee further oversees the cybersecurity strategy's global implementation, ensuring alignment with strategic security objectives.

This governance structure reinforces accountability and supports continuous improvement in our cybersecurity position across the organisation. Our commitment to cybersecurity is reinforced by this expanded leadership structure, as we adapt to the demands of emerging technologies and the need for continual innovation in safeguarding our information assets.

Each market has a dedicated cybersecurity team responsible for implementing and enforcing our Group Standards, conducting regular risk assessments, and ensuring compliance with both Group policies and local regulatory requirements. Our security monitoring systems are further supported by a 24/7 Security Operations Centre (SOC), which plays a crucial role in early breach detection and incident management.

Employee awareness remains essential to our cybersecurity strategy. Mandatory training programmes and regular awareness campaigns are conducted to ensure that employees are familiar with cybersecurity principles. Each employee receives mandatory training before accessing the Group's information and later undergoes refresher training on an annual basis. Targeted phishing campaigns are also conducted to assess and enhance awareness levels across the organisation.

Our commitment to cybersecurity includes policies and standards designed to ensure all employees understand and adhere to best practices in information security. We have established Group Information Security End User Standards, which are accessible to all employees and outline fundamental cybersecurity responsibilities. For our IT function, we maintain specialised Group IT Security Standards that provide detailed requirements specific to technical roles. Both sets of standards are cascaded and implemented across our business, ensuring alignment and consistent adherence to security protocols at both the Group and market levels. This structured approach enhances our ability to safeguard information across the organisation and reinforces our cybersecurity resilience.

To mitigate risks, we perform vulnerability assessments and penetration testing, and strive to implement security controls aligned with best practices in managing information security, for example, ISO 27001 specifications and the National Institute of Standards and Technology (NIST) framework.

Particular areas of focus in 2024 included improving security monitoring capabilities and strengthening security controls in relation to cloud processing. We also aligned our ICT risk management and resilience practices with the Digital Operational Resilience Act (DORA). In 2025, we will continue to enhance our breach detection and protection controls, as well as our incident management protocols.





### Enhancing lone worker safety

To ensure the safety of Customer Representatives working independently in customers' homes, we launched a field risk assessment survey across our home credit businesses. The survey evaluated understanding of risks, including physical assault, road safety and psychosocial challenges, while ensuring compliance with safety protocols. With an 89% response rate, the survey highlighted strong adherence to safety protocols and the effectiveness of our training. It also identified opportunities to enhance support for managing psychological risks, aligning with ISO 45003 standards for psychological safety and colleague feedback offered valuable insights into hazards and controls, helping us refine safety practices. This initiative reinforced ISO 45001 compliance and strengthened our Global Care Programme, furthering our commitment to team wellbeing.

**89%**

response rate to our field risk assessment survey in 2024

### Health and safety

We are fully committed to the health, safety, and wellbeing of our colleagues. The Board maintains overall responsibility for health and safety, reviewing and approving the Health and Safety Policy at least annually, while receiving an annual report on safety performance. The Group Credit and Risk Director is the executive responsible for health and safety with the Group Safety Manager providing oversight and leading a global team of health and safety professionals across each of our markets. This team is responsible for implementing our Global Health and Safety Framework, ensuring consistent adherence to our standards. Oversight, governance and assurance are upheld through Quarterly Safety Management Review Committees at market board level in each home credit business. Additionally, the Group Safety Manager performs annual safety reviews of each market to ensure the Safety Management System operates effectively in line with the Group's standard framework. Annual self-assessments of compliance with safety management system protocols are also conducted by the second-line control function, the members of which are trained specifically to undertake these reviews. Further assurance is provided through periodic reviews conducted by the Group's internal audit function.

Our approach to safety includes a comprehensive training programme, supplemented with regular communication and safety campaigns to keep colleagues informed and reminded of essential safety practices. In 2024, all our home credit businesses successfully retained ISO 45001 accreditation following an independent surveillance audit. This ongoing accreditation underscores our commitment to best practice in occupational health and safety management, promoting continual improvement across our global operations. While our IPF Digital operations are not required to pursue ISO 45001 accreditation due to their 'low-risk' office environment, they continue to follow the standard principles of ISO 45001 for best practice safety management.

The importance of reporting all health and safety-related events is crucial and colleagues are reminded continually of this requirement within their training and safety communications. All events are recorded and investigated systematically by trained personnel to determine root causes, lessons to be learned, and corrective and preventative actions to minimise the risk of reoccurrence. The table below captures the total number of workers who experienced a work-related safety event during 2024 and the harm caused by this event.

Work-related safety events and harm caused 2024

		% of colleagues
Total work-related safety events	774	3.5%
<b>Worker Injury Type</b>		
No injury	482	2.2%
Minor injury	158	0.7%
Moderate injury	99	0.4%
Serious injury (requiring hospital treatment)	35	0.2%
Life-threatening injury	0	0.0%
Fatalities	0	0.0%

The majority of work-related safety events (62%) resulted in "No Injury," including 20% car accidents, 30% verbal threats and 40% theft from street crime. This performance highlights robust reporting processes and the effectiveness of safety training in preventing escalation and physical harm.

In 2024, we made significant strides in advancing the Group's Global Framework for the Management of Psychological Health, Safety, and Wellbeing, developed in alignment with ISO 45003—the world's first global standard for workplace mental health. We have fully defined all necessary processes and procedures, created comprehensive training materials to build awareness and drive application across the organisation, and engaged external experts to guide the psychological risk assessment phase. This phase will deliver valuable insights and enable us to prioritise key psychological risk management issues effectively.

Implementation of the framework is progressing on schedule, with each business unit achieving milestones as planned. We are firmly on track to secure ISO 45003 accreditation across all markets by 2025, reinforcing our unwavering commitment to best practices in psychological health and creating a supportive, mentally healthy environment for all employees and customer representatives.

### Engagement with government, trade bodies and regulators

We actively contribute to policy developments relevant to the provision of lending products for underserved communities, in particular to drive policy change that enables our purpose of building a better world through financial inclusion. We advocate for change on the issues that matter most to our customers with governments, non-governmental organisations and regulatory bodies. We are a member of the following trade associations:

- **Poland:** Foundation for Financial Development; Confederation Lewiatan, Employers of Poland; Association of Employers and Entrepreneurs; Federation of Polish Employers; British-Polish Chamber of Commerce in Poland.
- **Hungary:** Association of Non-Banking Financial Institutions; Hungarian Business Leaders Forum; Association of Hungarian Manufacturers; Association of Hungarian Executives.
- **Romania:** Association of Financial Enterprises; American Chamber of Commerce in Romania; British-Romanian Chamber of Commerce; Foreign Investors Council; Association of Credit and Leasing Employers; Aspen Institute Romania; National Association of Treasurers.
- **Czech Republic:** Association of Non-Banking Financial Institutions.
- **Mexico:** Employers Confederation of the Mexican Republic; Prodesarrollo; Fintech Mexico.
- **Estonia:** Estonian Credit Providers' Association; Finance Estonia; Estonian Chamber of Commerce.
- **Lithuania:** FINCO.
- **Australia:** Fintech Australia.

All of our public policy engagements and lobbying are aligned with the Paris Agreement for direct activities, and none of the trade associations of which we are a member, as far as we are aware, has taken a position not aligned to the Paris Agreement on climate. In 2024, we did not undertake any public policy advocacy activity concerning climate change.

### Provident Polska at the Economic Forum in Karpacz

In September 2024, Provident Polska participated in the Economic Forum, Central and Eastern Europe's largest business gathering, strengthening relationships with key stakeholders and showcasing our leadership on financial sector issues. A key highlight was Botond Szirmak, head of our European home credit division, joining the opening debate on Europe's economic future and the private sector's response to geopolitical challenges, highlighting our proactive role in shaping business agendas. Polish management board members also contributed to panels on financial market development and regulatory frameworks, reinforcing our commitment to responsible business practices and driving positive industry change.

The Group is a politically neutral organisation. This approach is formalised in our Political Lobbying Policy, which is overseen by the Group Nominations and Governance Committee. We comply with legal requirements on disclosing political donations and we do not provide financial support to political parties. In 2024 and consistent with this policy, the Group made no political contributions directly or indirectly, including in-kind contributions. No governmental body has any ownership stake in the Group.

In 2024, our key areas of focus with governmental and regulatory bodies comprised responsible lending, financial inclusion, our Invisibles programme and the regulation of consumer loans to consumers. A particular focus for our advocacy efforts is our annual Financial Wellbeing Report which surveys around 4,500 consumers in nine markets. This exercise provides extensive insights on the views of consumers on a range of important financial and economic issues including savings and borrowing habits, and knowledge about personal finances. We use this research to advocate for the needs of consumers to key groups of decision makers. Beyond this, we operate our Group-wide Invisibles programme, the objective of which is to work with professional organisations to map groups in society which do not have access to the regulated financial market. See page 58 for more information.

In 2025, our focus will be on continuing to collaborate with key stakeholders to ensure legislation and regulation takes account of the need for responsible lending for all groups of customers, with a special focus on regulation emerging from the European Union. We will also engage with NGOs and our communities to deliver our Invisibles and financial education programmes.



## Tax management

We are a responsible taxpayer, committed to ensuring compliance with tax law and practice in all of the territories in which we operate, including the UK, and to operating in a straightforward and transparent manner in our dealings with tax authorities while recognising our responsibility to protect shareholder value.

The Group has a publicly available tax strategy which is available in the policies section of our website. This strategy is approved by the Board annually and the Chief Financial Officer has Board responsibility for this area. Our tax strategy focuses on ensuring that we pay the right amount of tax, in the right place, at the right time. Transactions between Group companies are effected for tax purposes in accordance with the arm's length principle as enshrined in the OECD's Transfer Pricing Guidelines. The Group does not seek to reduce its effective tax rate through cross-border profit shifting or similar artificial arrangements and we do not seek to transfer value to, or otherwise undertake transactions with, tax havens. In the absence of a globally recognised definition of tax havens, the Group has adopted the EU's list of non-cooperative tax jurisdictions for this purpose.

Our tax affairs are managed by a global team of experienced, qualified tax professionals supplemented, where necessary, by advice from external specialist tax advisers. Where there are uncertainties regarding the treatment of the Group's activities, transactions or products, we seek to engage in an open, transparent and constructive dialogue with the relevant tax authority where this is available and seek to obtain rulings in advance where appropriate.

In order to give effect to the principles contained in the tax strategy there is a Group-wide tax policy and control framework which is implemented in all operating entities. Tax risk is one of the principal risks in the enterprise risk management methodology and is therefore reported and reviewed regularly by the Risk Advisory Group and the Audit and Risk Committee.

Our overall approach to tax is included in our Code of Ethics and reinforced in the global ethics training which is undertaken annually by all colleagues. Specific anti-facilitation of tax evasion training is provided to colleagues identified as working in roles where there is a relevant consideration.

# £168m

Total tax contribution in 2024\*, supporting the wider economy.

\* The total tax contribution in 2024 comprised £73m taxes paid representing a cost to the Group (including profit taxes, employer payroll taxes and irrecoverable VAT/sales taxes) and £95m taxes collected from employees and customers on behalf of governments (including taxes collected on employee salaries and net VAT collected).

## Environment

Addressing the environmental challenges of our time is urgent and complex, but also an opportunity, as we fundamentally transform our global economy to meet the need for a sustainable future. At IPF, we are determined to play our part, consistent with our purpose and relevant business and risk considerations.

### Our approach to addressing the climate change challenge

In 2023, the Board agreed an ambition to be net zero by 2050, across all our operations and supply chain.

Currently, the lending we undertake, consisting of originating unsecured consumer loans, is not covered by any global methodology dealing with the measurement of financed emissions. This reflects the fact that, as a lender, we cannot know what our customers use the funds we lend to them for. We will continue to monitor guidance on this topic from credible international bodies to determine if our approach to financed emissions should change, and will provide further updates on this point in future Annual Reports.

In respect of contributing to the financing of the transition to a low-carbon economy, our assessment is that the Group's current products are unlikely to be suitable for helping finance transition efforts for our customers in a way which would be aligned to our purpose or customer needs. This is due to the requirements of the customers we serve, and the amount lent on average to each customer. We will continue to review this periodically to understand if this position changes across our markets.

In 2024, we have focused work on reducing our environmental footprint by addressing Scope 1 and 2 emissions.

### Managing our operations

Our Environment Policy drives our environmental strategy, and is overseen by the Chief Executive Officer and the Board. Following this policy, we will continue to reduce our environmental impacts through:

- replacing diesel and petrol cars with lower emission fuel vehicles;
- moving our offices to renewable electricity and energy-efficient technology, such as LED bulbs and sensor lighting where possible;
- ensuring core data infrastructure activities include deployment of cloud-based services, using less energy than conventional data storage;
- recycling materials, collecting used paper, mixed recycling including plastic bottles and cans, and food waste; and
- reducing paper use and using printed materials more sparingly.

## Greenhouse gas emissions (GHG)

IPF reports Scope 1 and Scope 2 emissions in line with current regulations detailed below, comprising electricity, district heating, gas and fuel for cars. Of this, transport by car is our most material GHG emission.

We report annually on our material carbon emission sources required under the Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013 – Scope 1 and 2 GHG emissions and energy consumption data. We have applied the GHG Protocol Corporate Accounting and Reporting Standard to calculate our emissions data and have used emission factors from the UK Government's latest GHG conversion factors and the current edition of the IEA emission factors for non-UK electricity.

The emission data covers all our offices across the globe. These sources fall within our Consolidated Financial Statements. Where data was incomplete, we have extrapolated data in line with this methodology.

In 2024, the Group's GHG emissions for Scope 1 and 2 reduced by 8% year on year. We are also pleased to report that overall emissions have reduced by 35% since 2019. This positive trend is due primarily to the gradual replacement of diesel and petrol cars with lower emission LPG vehicles in the Company's fleet, plus a reduction in reliance on carbon intensive district heating.

In 2024, in accordance with the Large and Medium-sized Companies and Groups (Accounts and Reports) Regulations 2008:

- the Group's Scope 1 and 2 emissions in the UK represent 0.3% of the Group's total (2023: 0.2%);
- the Group used 3.0 MWh of electricity (2023: 3.9 MWh) with the UK representing approximately 5.4% of the Group's total (2023: 3.1%); and
- no actions were taken during the year with the express purpose of increasing the Company's energy efficiency.

For Scopes 1 and 2, transport by car will remain our priority in 2025, and we plan to continue replacing our petrol and diesel car fleet with LPG and hybrid cars, where possible. Scope 3 (indirect emissions) have not been included in our 2024 reporting. However, we intend to assess how best to measure indirect emissions (Scope 3) in 2025. In line with best practice, we have restated our Scope 1 and 2 emissions for 2023 in the table below, where some of the data was based on estimates.

Our GHG emissions report has been reviewed and verified by Be Sustainable Limited and the statement of verification can be found in the sustainability section of our website at [www.ipfin.co.uk](http://www.ipfin.co.uk).

		Tonnes CO <sub>2</sub> e							
GHG emission sources	Travel and utilities	2019	2020	2021	2022	2023*	2024	Difference vs 2023	2024 difference vs 2019
Scope 1	Gas	927	1,008	476	468	721	617	(14%)	(34%)
	Business travel by car	24,274	16,304	18,277	19,012	17,826	16,816	(6%)	(31%)
Scope 2	Purchased electricity and district heating	3,236	2,664	2,494	1,944	1,713	1,193	(30%)	(63%)
Scope 1 and 2		28,437	19,976	21,247	21,424	20,260	18,626	(8%)	(35%)
CO <sub>2</sub> e emissions per customer		0.013	0.011	0.013	0.013	0.013	0.011		

\* 2023 data restated where based on estimates

We do not believe that as a Group we pose particularly significant risks to the environment through our business activities. As detailed above, our greatest source of emissions relates to the transport by car undertaken by our customer representatives. Given the nature of our supply chain and the types of goods and services we purchase, we have not identified any specific material risks arising from our supply chain other than the need to work with suppliers to reduce emissions in order for us to achieve our net zero target by 2050.

## Looking ahead

Our focus in 2025 will be to understand how we establish Scope 3 base year data for our supply chain, and develop a credible strategy for how we will meet our targets. We will continue to track progress against our targets, monitor relevant scientific trends, and regularly review and adjust our strategy and targets as needed. We intend to report our progress against our environmental plans in future Annual Reports.

We are still at an early stage in our journey. We recognise there is a huge amount of progress still to be made. Over the coming years, we aim to increase our momentum as well as continuing to be transparent about our progress and developing appropriate metrics to track our progress to net zero by 2050.



# TCFD Report

## Introduction

This Task Force on Climate-related Financial Disclosures (TCFD) report serves as the Group’s 2024 disclosure of the climate-related risks and opportunities to our business. It describes how climate change scenarios may impact the Group, and outlines our strategy to mitigate these potential impacts to ensure our resilience as a business.

The report is structured in accordance with the TCFD recommendations. As such, it covers our governance structures, strategy, risk management, and targets and metrics. We recognise that the global financial system is connected to the health of the planet and that a changing climate has implications for business and society. Therefore, our approach concerns not only mitigating the transition and physical risks of climate change to our business, but also our actions to tackle climate change at source, to help the successful transition to a low-carbon economy. While we recognise that climate change poses risks to our business model, we believe there may also be opportunities arising from this trend which also require regular evaluation.

## Governance

Sustainability considerations are embedded in the way we run our business, with the objective of ensuring we align our business priorities with society’s expectations. Our commitment is outlined in the Group’s Corporate Sustainability Policy which is available in the policies section of our website. This sets out our commitment, in particular, what is expected from the Group and those it does business with in terms of responsible business conduct and sustainable development. This commitment supports our business decision making at all levels, and provides a frame of reference for how we want to deal with business opportunities and risks in the context of direct and indirect sustainability impacts.

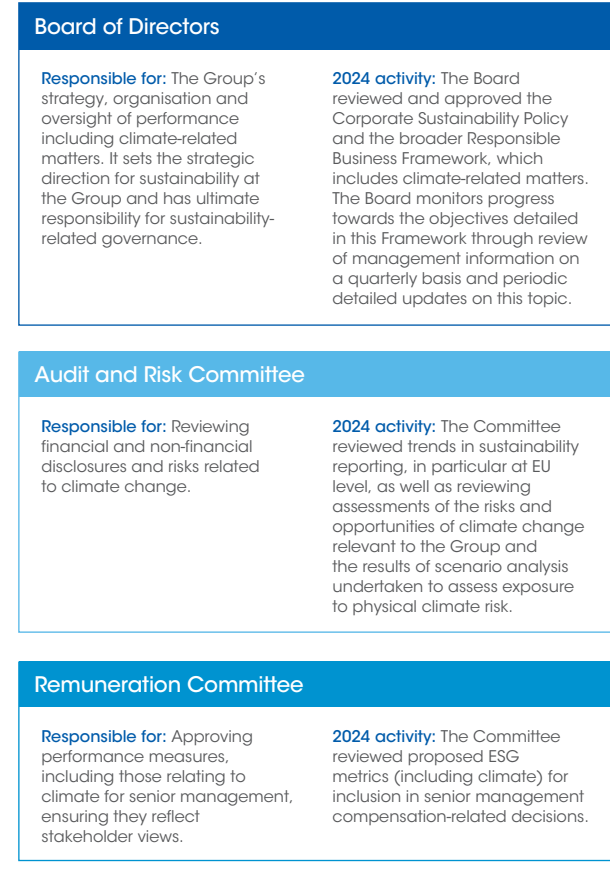
Our Board and management-level governance structures and oversight bodies incorporate climate considerations as part of their responsibilities. We seek to ensure that oversight of sustainability and climate-related risks and opportunities are embedded across the Group.

During 2023, we embedded oversight of sustainability and climate-related risks and opportunities into management governance structures at multiple levels of the Group. In 2024, we continued to evolve our governance structures to establish effective and resilient governance for climate- and sustainability-related issues. In 2025, we will continue to embed climate considerations into the Group’s strategy and decision-making processes.

### Board oversight of climate risks

The Group Board oversees our sustainability-related activity including oversight of the risks and opportunities associated with climate change, while the Chief Executive Officer (CEO) has overall accountability for management of this area. This activity has been delegated by the CEO to the Chief Legal Officer (CLO), who has specific responsibility for the management and implementation of measures detailed in our Responsible Business Framework, including assessing risks and opportunities from climate change, and also ensuring these are identified and managed appropriately. We will continue to monitor the effectiveness of these arrangements in 2025.

## How our Board oversees climate



## Management oversight

The CLO oversees the work of analysing the potential future impact of climate change on the Group and submits the results of scenario assessments to the Audit and Risk Committee. The CLO is also responsible for the Responsible Business Strategy on a day-to-day basis including providing updates that include any climate-related issues of relevance to the Executive Oversight Group. Regular meetings of senior management in 2024 included detailed consideration of climate issues. The CLO reports directly on all these matters to the CEO.

A further means of management oversight is the incorporation of a specific climate-related section in the annual budget process as well as the creation of a dedicated climate resilience fund, which is held centrally and available to each market to help reduce climate impacts and enhance resilience.

The diagram above provides an overview of the Group’s management governance bodies with climate-related oversight responsibilities.

## Governance body



## Sustainability function

The Group’s sustainability function is led by the CLO, who is a member of the executive team and attends the Group Board meetings. The function works in collaboration with other functions and markets to implement the Group’s Responsible Business Framework on a day-to-day basis including climate-related activity. A new Group-level appointment is now in place to develop and take forward this strategy.

## Strategy

It is recommended that organisations disclose the nature and impact of their material climate-related risks and opportunities, as well as the resilience of their strategy under each chosen climate scenario. We recognise that both climate-related risks and opportunities have the potential to impact our business. We have therefore identified and assessed the potential materiality of these risks and the opportunities, so we can maximise the positive impacts and minimise the negative impacts on our business. We consider climate change alongside other factors when developing our overall strategy.

We recognise that assessing and quantifying the level of impact from climate change is an emerging practice. A greater level of estimation and assumption is required

to address the long-term and forward-looking nature of climate-related risks and opportunities, which causes limitations in assessing how such trends impact our strategy. In 2025, we will engage wider internal stakeholder groups to understand and assess climate risks and opportunities through consultation and workshops, and will enable individual countries to consider climate risks/opportunities specific to them in their business planning processes.

### IPF strategy time horizons

The time horizons to be used for assessing risks and opportunities arising from climate change are set out below:

Time period	Years	Rationale
Short term	0-3 years	Reflects the average term of our loans and the flexibility in both our credit strategies and field operations that allow us to adapt to rapidly changing scenarios.
Medium term	3-10 years	Reflects the strategic planning horizon used by the Group.
Long term	10+ years	Based on the useful economic life of the majority of Group assets.



A number of factors informed the selection of these periods, including changes in climate-related legislation, the volatility of energy prices and the need to align with the periods considered in the Group’s scenario analysis of climate-related risk. These typically consider scenarios that span thirty years or longer and are discussed in more detail below. The short-term time horizon aligns to our risk management framework, and the medium-term horizon is aligned to timeframes used internally for planning purposes. The long-term time horizon was chosen to capture the impact expected from countries in which the Group operates taking steps to meet their commitments as detailed in the 2015 Paris Agreement.

### Defining risks and opportunities

Details of how we define climate risks and opportunities are set out in the table opposite.

Following stakeholder feedback, it was noted that the attractiveness to employees of the Group’s approach to this area should be regarded as a risk as well as an opportunity. The opportunities arising from enhancing our ability to manage transition risk well and move to more remote working (with consequently lower costs and environmental impacts) was also highlighted. This process resulted in the following definitions being adopted by the GE and approved by the Board in terms of risks and opportunities which could be relevant to the Group.

### Principal risks

Risk type	Potential effects
<b>Physical risk</b> Physical risks are those related to the physical impacts of climate change.	<p><b>Acute</b> Increased frequency and severity of extreme weather events affecting customers, customer representatives and employees could impact the success of our business model.</p> <p><b>Chronic</b> Permanent changes to sea, river or lake levels could impact our ability to conduct our business in some areas.</p>
<b>Transition risk</b> Transition risks are those related to the impact arising from changes in climate policies, or changes in the underlying economy due to decarbonisation. These risks emerge from policy, legal, technology, and market changes as the economy shifts towards using less carbon.	<p><b>Policy and legal</b> (i) Exposure to litigation due to our inability to comply with new carbon-related requirements; and (ii) Increased operating costs due to the increased cost of transport or carbon pricing initiatives.</p> <p><b>Market</b> Uncertainty around the costs incurred in moving to a net zero economy.</p> <p><b>Reputation</b> (i) Increased stakeholder concern or negative stakeholder feedback relating to our ability to transition effectively to a lower-carbon economy; (ii) Increased shareholder concern or negative shareholder feedback relating to our strategy to address climate-related risks; and (iii) Employee concern or negative feedback relating to our strategy to address climate-related risks.</p>
Opportunity type	Potential effects
<b>Resource efficiency</b>	(i) Reduced operating costs through reduced air and other travel; (ii) Reduced operating costs through reduced paper consumption; and (iii) Potential for reducing costs and environmental impacts through remote working.
<b>Energy source</b>	(i) Use of lower-emission sources of energy; (ii) Use of supportive policy incentives; and (iii) Use of new technologies, which have the potential to reduce costs.
<b>Products and services</b>	Development of new products and services through innovation to address climate challenges.
<b>Markets</b>	Increased attractiveness of the Group to customers and employees by effective execution and communication of the Group’s climate strategy.
<b>Resilience</b>	Enhanced access to funding at attractive pricing for organisations which are making good progress on eliminating and reducing greenhouse gas emissions.

It is envisaged that this process of risk identification will be repeated in 2025.

### Assessing materiality

For the purposes of assessing climate-related risks and opportunities, the definition approved by the Board and GE was that for a climate-related risk or opportunity to be deemed material for strategic planning purposes, it would have a significant impact on the profitability of the Group (e.g. through delayed customer repayments), expenditures (e.g. increased costs), assets (e.g. closing branches), or financing (e.g. loss of investors due to legal breaches). “Significant” for these purposes means a material impact on the Group’s ability to meet the targets detailed in our 2025 budget.

### Determining climate risks and opportunities over different time periods

Risks and opportunities have been assessed by members of the GE and Audit and Risk Committee as to how likely it is that they would impact the Group materially over different time periods. Impacts were assessed as follows: (i) High impact indicated significant risk or opportunity on the Group; (ii) Medium impact indicated moderate influence on the Group; and (iii) Low impact indicated minimal effect on the Group. The process indicated material impacts from climate risks and opportunities are not assessed as likely over the short term.

Risk type	Risk	Short term			Medium term			Long term		
		Low impact	Medium impact	High impact	Low impact	Medium impact	High impact	Low impact	Medium impact	High impact
Physical	Acute-chronic									
	Policy and legal									
	Market									
Transition	Reputation									
Opportunity type		Short term			Medium term			Long term		
		Low impact	Medium impact	High impact	Low impact	Medium impact	High impact	Low impact	Medium impact	High impact
Impacts	Resource efficiency									
	Energy sources									
	Products and services									
	Markets									
	Resilience									

Over the longer term, there was a consensus that risks and opportunities were likely to be of much higher relevance. This reflected the assessment we made of physical climate risk through scenario planning, and our assessment of the broader market and regulatory trends evident in each market.

### Integration with our strategic planning process

The work undertaken confirmed that the actual or potential impacts of climate-related risks and opportunities on the Group over the short term are unlikely to significantly influence the Group’s approach in its markets or to its customers due to climate change. The results of the scenario analysis undertaken and discussed in more detail on page 72 provide further confirmation that climate change is not expected to have a material impact on the Group’s current strategy or financial viability in the short term under the most likely climate scenarios.

Completed assessments of risks and opportunities are incorporated into the strategic planning process, and conclusions provided to the Board as part of this process.

#### Next steps:

- identify the strategic impacts of creating a credible transition plan;
- review in more detail the potential impact of transition risks on the Group’s Next Gen strategy; and
- using updated scenario models, analyse the resilience of the Group’s business strategy to increasing climate risks and opportunities.



## Risk management

We have fully integrated climate-related risks into broader risk management practices and gained deeper insights into this risk category by using climate scenarios. We remain focused on identifying and measuring climate-related risks relevant to our business strategy, using our revised risk appetite statement and key risk indicators.

### Risk framework

The Group uses an enterprise risk management (ERM) methodology to identify, report and manage risks. This is defined centrally, and implemented in each of our markets. This approach allows risk management and reporting to balance the importance of having consistency of approach, measurement and risk categorisation across the Group, together with the value of having local expertise and risk action plans.

Risks are identified collectively across the Group and are classified against a taxonomy of 21 key risks including climate-related issues. Each category is assigned to a member of the Group's senior leadership team or one of their reports, who is accountable for managing the identified risk as first-line risk owner. For each risk, the ERM requires the first-line risk owner to ensure ongoing measurement/monitoring as well as improvement plans and training to enhance risk mitigation. Each first-line risk owner updates the Risk Advisory Group (RAG) on their respective risks for discussion and oversight. Each risk is assessed to determine probability and severity, and assigned a score accordingly. These risk scores allow the Group to determine the relative significance of each risk in relation to other risks. The RAG meets quarterly to consider these topics.

### Processes for identifying and assessing climate-related risks

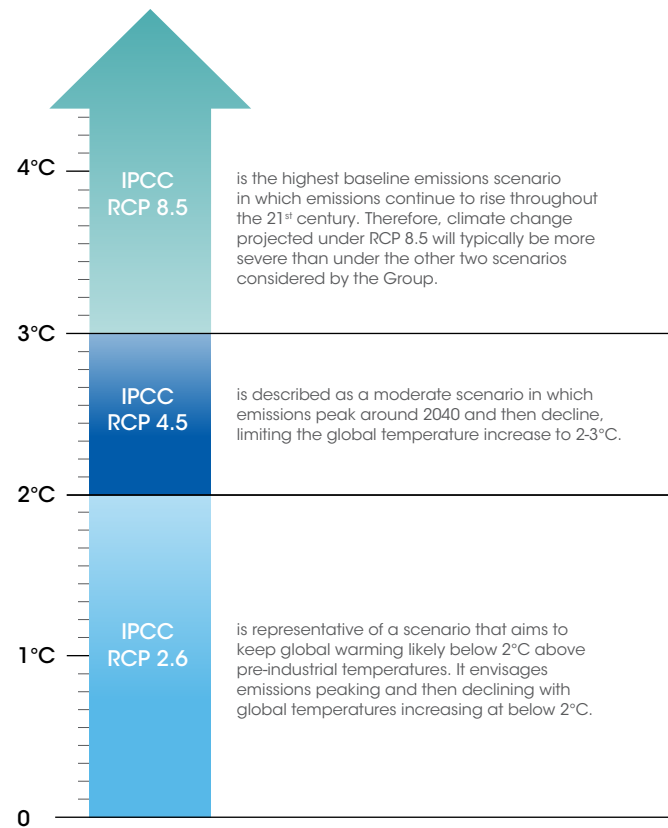
Our climate-related risk management approach aims to assess and manage the risks posed by climate change to our business, and seeks to integrate climate considerations into risk management practices.

The CLO is the first-line risk owner for climate risk, engaging with internal stakeholders to understand the level of importance and potential climate-related impacts on the Group which are reported as a series of KPIs to the RAG to provide insight on this topic. These KPIs include assessment of whether there have been changes to policy and legal issues, market trends and reputational matters, as well as physical risks.

### Scenario analysis

We have conducted scenario analysis, using the three climate scenarios described opposite to explore and assess the resilience of our Next Gen strategy to the physical risks arising from climate change. This helped us understand which physical risks could potentially have the largest impact on the Group across different time horizons, and informed our efforts to better manage and monitor these risks. We used external datasets on climate trends and internal datasets on the locations of our premises worldwide to model the potential impact of such risks.

The following scenarios have been used:



We used the outputs of the high-level impact analysis for all material climate-related risks identified under three different Representative Concentration Pathways (RCP) over different time horizons to better understand the potential impact of climate-related risks and opportunities on our business. These three scenarios were chosen as they represented a diverse range of pathways to be able to understand the impact of physical climate risk.

The outcomes of these assessments were considered by the Audit and Risk Committee. The output of this modelling showed that in the short term, there were no immediate material risks and exposures that would impact strategy, performance or liquidity.

The scenario analysis allowed us to be more targeted in understanding the current resilience we have against climate-related risks, and will enable focus on developing further mitigation strategies across the Group where necessary.

The Group's overall assessment was that our business model and strategy are resilient to climate risks and opportunities in the short term. The Group does not envisage material impacts on financial performance or financial position in the short term and will continue to review through the regular strategy process the potential for this position to change.

## Mitigation and resilience measures

The Group has sought to implement credible mitigation and resilience measures, including establishing targets for energy efficiency measures, scenario analysis and reporting transparency.

### Next steps

- include broader ESG risks into risk management, which will impact the Group's indirect greenhouse gas emissions;
- engagement with senior management to ensure input on climate related considerations; and
- explore extending analysis of exposure to physical climate risks to areas where our customers live and work.

## Metrics and targets

### Greenhouse gas emissions (GHG)

We are committed to reducing GHG emissions in line with the Paris Agreement. We make disclosures on the Group's direct Scope 1 and 2 emissions in line with the GHG Protocol methodology on page 67.

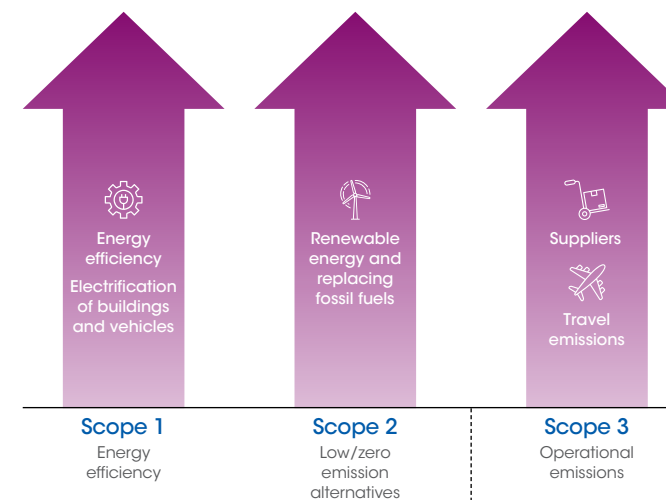
### Emissions targets and metrics

Our overall target is to be net zero across our operations and supply chain by 2050. This commitment means a public undertaking by the Group to achieve progress in three areas:

1. the carbon emissions of our own operations – our offices, branches and data centres;
2. the emissions resulting from the energy we purchase to operate our business; and
3. the emissions of our value chain, such as our suppliers' emissions and our business travel emissions.

We are working to eliminate and reduce emissions in line with the net zero standard set by the Science Based Targets initiative.

Achieving our net zero target will require the following actions:



**Reduce our Scope 1 and 2** emissions through energy efficiency, electrification of our buildings and vehicles, renewable energy sourcing and replacing fossil fuels with low emission alternatives.

**Reduce Scope 3** operational emissions by engaging with our key stakeholders, including suppliers, to track, manage and reduce their GHG emissions. Plus include Scope 3 travel emissions for example from air travel.

## Other environmental metrics and targets

The Group is committed to wider environmental improvements as well as reducing its emissions.

The Board has agreed targets for the Group using 2025 as a baseline to:

- divert 90% of waste from landfill by 2034;
- source 100% of paper from sustainable sources; and
- reduce paper use by 50%.

### Focus on our supply chain

Our target to be net zero in our operations by 2050 will be a catalyst, influencing our supply chain to deliver better services and products. Our initial assessment is that our supply chain emissions are concentrated in a small number of large suppliers. We will focus on engaging these key suppliers to adopt credible reduction targets and develop decarbonisation pathways to achieve this goal. In the medium term, our goal is to integrate carbon pricing into sourcing and procurement decisions, alongside net zero clauses into our tender processes.

### Next steps

- measure and report Scope 3 business travel GHG emissions;
- assess how to measure and report supply chain GHG emissions;
- measure and report waste to landfill and paper use;
- commit to set science-based targets, and commit to seek verification of these by the Science Based Targets initiative;
- work to eliminate and reduce emissions in line with the net zero standard set by the Science Based Targets initiative; and
- move to external verification of GHG data to the ISO14064 standard.

### Interim targets

Our Board has approved the following interim targets to be delivered by 2034

**100%** renewable energy in our head office locations globally

**Transition 90%** of our global fleet to EV or ULEV models where EVs are not viable

**50%** of our vendors by addressable spend to set their own 1.5°C aligned climate targets

**Identify and pursue opportunities** to reduce the distances travelled by our customer representatives, thereby reducing this source of emissions



## TCFD compliance statement

The Group has complied with the requirements of LR 9.8.6(8)R by including climate-related financial disclosures consistent with the TCFD recommendations and recommended disclosures.

The climate-related financial disclosures made by the Group also comply with the requirements of the Companies Act 2006 as amended by the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022. Details of how the Group complies with these requirements are set out in the table on page 76.

### Governance

	Summary	Alignment	Action in 2025	Reference
a.	Describe the board's oversight of climate-related risks and opportunities.	Aligned	Embed climate considerations into the Group's strategy and decision-making processes.	Page 68
b.	Describe management's role in assessing and managing climate-related risks and opportunities.	Aligned	Up-skill senior management regarding climate risks, impacts and mitigating actions – enabling strategy and decision-making to include climate considerations. Engagement with senior management to ensure input on climate related considerations.	Page 68

### Strategy

	Summary	Alignment	Action in 2025	Reference
a.	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	Aligned	Engage wider internal stakeholder group in understanding/assessing climate risks/opportunities. Enable individual countries to consider climate risks/opportunities specific to them in their business planning processes.	Page 70
b.	Describe the impact of climate-related risks and opportunities on the organisation's business, strategy, and financial planning.	Aligned	Identify the strategic impacts of creating a credible transition plan. Review in more detail the potential impact of transition risks on the Group's Next Gen strategy.	Page 71
c.	Describe the resilience of the organisation's strategy, taking into consideration different climate related scenarios, including a 2°C or lower scenario.	Aligned	Using updated scenario models, complete analysis of the resilience of the Group's business strategy to increasing climate risks and opportunities.	Page 72

### Risk management

	Summary	Alignment	Action in 2025	Reference
a.	Describe the organisation's processes for identifying and assessing climate-related risks.	Aligned	The Enterprise Risk Management methodology defines climate risk as a key risk. Include broader ESG risks into risk management, which impact the group's indirect GHG emissions. Continue to refine our scenario analysis.	Page 72
b.	Describe the organisation's processes for managing climate-related risks.	Aligned	The Group has an Enterprise Risk Management methodology of which climate risk is a part. Explore extending analysis of exposure to physical climate risks to areas where our customers live and work.	Page 72
c.	Describe how processes for identifying, assessing and managing climate-related risk are integrated into the organisation's overall risk management.	Aligned	The Enterprise Risk Management methodology provides structure to ensure consistency of approach, alignment to the risk appetite and monitoring of our risk exposure across the Group.	Page 72

### Metrics and targets

	Summary	Alignment	Action in 2025	Reference
a.	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	Aligned	Metrics used to assess our climate-related risks and opportunities include Scope 1, 2 emissions. We are committed to measuring and reducing GHG emissions in line with the Paris Agreement. Measure and report waste to landfill and paper use. Move to external verification of GHG data. Work to eliminate and reduce emissions in line with the net zero standard set by the Science Based Targets initiative. Consider committing to verification to the ISO14064 standard for Greenhouse Gasses.	Page 73
b.	Disclose Scope 1, Scope 2 and if appropriate, Scope 3 GHG emissions and the related risk.	Aligned	Details of our GHG emissions in 2024 (Scope 1, Scope 2) have been provided. Extend GHG data collection to include Scope 3 travel emissions Assess how to measure IPF supply chain GHG emissions.	Page 67
c.	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	Aligned	Target set to be net zero across operations and supply chain by 2050. Targets for climate related risks agreed – divert 90% of waste from landfill by 2034, source 100% of paper from sustainable sources; and reduce paper use by 50%. Commit to set science-based targets, and commit to seek verification of these by the Science Based Targets initiative.	Page 73



## Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022

Disclosures to meet mandatory climate-related financial disclosure requirements under the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022 are set out below.

Requirement	Summary	Page
a. A description of the governance arrangements of the company in relation to assessing and managing climate-related risks and opportunities.	Governance arrangements for management of climate-related risks and opportunities are detailed in the Governance section of the TCFD Report.	Page 68
b. A description of how the company identifies, assesses, and manages climate related risks and opportunities.	The process for identifying, assessing and managing climate-related risks is detailed in the Strategy section of the TCFD Report.	Page 70
c. A description of how processes for identifying, assessing, and managing climate-related risks are integrated into the overall risk management process in the company.	A description of how climate-related risks are integrated into the overall risk management process is set out in the Risk Management section of the TCFD Report.	Page 72
d. A description of: <ul style="list-style-type: none"> <li>i. the principal climate-related risks and opportunities arising in connection with the operations of the company; and</li> <li>ii. the time periods by reference to which those risks and opportunities are assessed.</li> </ul>	A description of the principal risks and opportunities and time periods is set out in the Strategy section of the TCFD Report.	Page 71
e. A description of the actual and potential impacts of the principal climate-related risks and opportunities on the business model and strategy of the company.	A description of these impacts is detailed in the Strategy section of the TCFD Report.	Page 70
f. An analysis of the resilience of the business model and strategy of the company or LLP, taking into consideration different climate-related scenarios.	A description of these impacts is detailed in the Strategy section of the TCFD Report.	Page 72
g. A description of the targets used by the company or LLP to manage climate-related risks and to realise climate-related opportunities and of performance against those targets.	A summary of the approach to targets is set out in the Metrics and Targets section of the TCFD Report.	Page 73
h. The key performance indicators used to assess progress against targets used to manage climate-related risks and realise climate-related opportunities, and a description of the calculations on which those key performance indicators are based.	There are currently no KPIs used to assess progress against targets.	N/A

# Non-financial and Sustainability Information Statement

In line with the non-financial reporting requirements contained in sections 414CA and 414CB of the Companies Act 2006, the table below contains references to non-financial and sustainability information intended to help our stakeholders understand the impact of our policies and activities.

Reporting requirement	Relevant policies	Relevant section of our report
Description of the business model	Corporate Sustainability Policy Enterprise Risk Management Policy	Our business model – pages 18 to 19 Our Customers and financial inclusion – pages 14 to 15 Key performance indicators – pages 24 to 25 Responsible business – pages 44 to 76
Employees	Code of Ethics Group Health and Safety Policy Wellbeing Policy Diversity Policy	Our colleagues – pages 53 to 56 Principal risks and uncertainties: People risk – page 42 CSRD Statement – pages 123 to 150
Human rights	Code of Ethics Human Rights and Modern Slavery Policy	Responsible business – pages 60 to 61 CSRD Sustainability Statement – pages 123 to 150
Social matters	Code of Ethics Tax strategy	Our business model – pages 18 to 19 Our customers – pages 50 to 52 Our communities – pages 58 to 59 Principal risks: Reputation risk – page 41 Responsible business – pages 44 to 76
Anti-corruption and bribery	Anti-bribery and Corruption Policy Gifts and Hospitality Policy Anti-facilitation of Tax Evasion Policy Know Your Customer and Anti-money Laundering Policy	Responsible business – pages 44 to 76
Environmental matters	Corporate Sustainability Policy Environment Policy	TCFD – pages 68 to 76 Climate-related Financial Disclosure – page 76 Environment – pages 66 to 67
Principal risks		Principal risks and uncertainties – pages 38 to 43
Non-financial KPIs		Non-financial key performance indicators – page 25

### Approval of the Strategic Report

The Strategic Report has been approved by the Board of Directors and signed on its behalf by:

**Gerard Ryan**  
Chief Executive Officer

26 February 2025