



Human Rights Policy

General provisions

Respect for Human Rights is the foundation on which the KRUK Group builds its processes and conducts its business. It is also reflected in its mission, vision and values, as well as in its principles of conducting business in accordance with applicable law, while complying with ethical, market and social standards in its dealings with Employees, , Business Partners, Suppliers, Customers, Shareholders, and the Affected Community (social groups at risk of falling into debt and having their rights violated due to exclusion, discrimination or lack of financial knowledge).

Human rights are a set of fundamental rights and freedoms that every person is entitled to by virtue of being human, regardless of their personal characteristics, lifestyle or affiliation, and which form the foundation of individual freedom, security and development. Human dignity is the source of these rights and freedoms, and their observance should be ensured and protected by appropriate mechanisms. Human Rights are:

- **universal** – they apply to all people,
- **innate** – they exist independently of law and authority,
- **inalienable** – they cannot be waived or taken away,
- **inviolable** – they cannot be arbitrarily restricted by authority.

Policy objectives

The main objective of the Policy is to prevent and minimise the negative impact of the InvestCapital activities on Human Rights and to strengthen its positive impact, as well as to increase the awareness of Employees about Human Rights and the protection of Human Rights within the organisation and in external relations.

Human rights due diligence

The Human Rights due diligence process includes both internal activities and those undertaken within the value chain.

It consists of five key stages: 1) identifying areas of risk of Human Rights violations by analysing the actual and potential negative impact (effect) of our activities on Human Rights, 2) determining ways to prevent negative impact, 3) implementing corrective measures, 4) monitoring their effectiveness, and 5) communicating the initiatives taken.

These measures are aimed at protecting Human Rights in business relations and in our daily activities. The process also defined a list of key stakeholders for whom specific mechanisms and initiatives supporting the realisation of their rights are directed. These include Employees, Customers, Suppliers and Business Partners, Social Groups – Affected Communities.

Human rights in the workplace

Human Rights are of fundamental importance to us, as they form the basis of an ethical and responsible workplace. Every Employee has the right to dignity and respect, as well as ethical treatment, regardless of their position or function. We ensure safe and hygienic working conditions, while supporting the professional and personal development of our Employees through access to training, promotion opportunities and equal chances.

We promote a culture of openness and social dialogue, recognising the right to associate and engage in constructive cooperation with representatives of Employees. We do not tolerate and counteract all forms of discrimination, mobbing, harassment and create a work environment free from prejudice and violence, where everyone can feel safe and be themselves. In accordance with the Diversity and Inclusion Policy adopted by InvestCapital, we respect and value the diversity of our Employees, recognising it as a source of measurable benefits, as well as potential for innovative ideas and inspiration for development and continuous improvement.

Human rights in customer relations

In our customer relations, we are guided by the principles of respect for Human Rights, ensuring that every person is treated with dignity, respect and empathy. We strive for social justice. We provide access to reliable, transparent and understandable information, enabling customers to ask questions, express opinions and raise objections and complaints in a safe and effective manner.

As a KRUK Group, we provide financial education to help customers make informed decisions. We protect the privacy and personal data of our customers in accordance with the highest security standards and applicable laws.

The implementation of these rights is supported by an ethical debt collection process and assistance to customers in effectively overcoming financial problems in order to avoid a spiral of excessive debt. Employees are required to apply the principles set out in the Code of Ethics, in particular in the process of ethical and responsible decision-making.

Human rights in business relations

In business relations, we are guided by the principles of ethics, honesty and responsibility. Every Business Partner and Supplier has the right to be treated fair, based on mutual trust and professionalism. By building cooperation on the basis of mutual respect, we comply with the terms of contracts and use transparent communication at every stage of cooperation.

We operate in accordance with the principles of fair competition, promoting transparent purchasing processes and equal opportunities for all business partners and suppliers. We comply with standards against unfair commercial practices, ensuring that our activities comply with applicable law and ethical standards. We counteract all forms of corruption, extortion, abuse and conflicts of interest in our relations with business partners and suppliers.

We strongly oppose child labour, forced labour and human trafficking, as well as all forms of discrimination, unequal treatment and mobbing, particularly on the grounds of gender, age, orientation or nationality, by our business partners and suppliers, as well as in their value chains.

Human rights in relations with communities

In relations with communities, in particular affected communities and those with special cultural sensitivities, KRUK Group adheres to the principles of respect, responsibility and integrity. We recognise the right of every person to education, support and a dignified life, regardless of their social or economic situation.

We support people who find themselves in difficult financial situations, giving them the opportunity to get out of debt and actively participate in social life – without feeling excluded. We undertake educational and informational initiatives, as well as activities aimed at building a positive image and emphasising the important role of debt management entities in the financial market.

We respect the community's right to live in a clean and healthy natural environment by taking measures to minimise the negative impact of our activities on the environment.

Our approach is based on dialogue, understanding local needs and taking into account cultural diversity, with full respect for the identity and values of the communities we work with.

Reporting and investigating irregularities

We have implemented mechanisms to enable the safe and effective reporting of violations and irregularities, supporting the protection of human rights, including:

- A whistleblowing **channel**, available to Employees, job candidates, members of the Companies' statutory bodies, Business Partners and Suppliers: whistleblowing@investcapital.com.mt, which is used to report not only actual violations, but also cases of reasonable suspicion of potential breach/abuse, including an incident of a corrupt nature.
- The **Mediation Team** considers reports from Employees concerning conflict, bullying, harassment, discrimination and unequal treatment, in accordance with the applicable policy.
- The **complaint handling process** is carried out through transparent procedures and, where applicable, are forwarded to the appropriate service provider or supplier responsible for the relevant activity (e.g., specialized debt collection agencies), in accordance with the principles of ethical service, individual approach and respect for dignity, in a manner that ensures an effective, high-quality and timely response to the complaint in accordance with applicable laws and standards.

The role of Compliance

The Board of Directors in InvestCapital LTD designates the Compliance Area as the unit responsible for performing the tasks arising from the Human Rights Policy, i.e.:

1. supervising the implementation of the due diligence process in the area of Human Rights;
2. advising on the application and interpretation of the provisions of this Policy;
3. undertaking and promoting initiatives to build and strengthen awareness of human rights protection, including the development of training courses or educational materials on this subject;
4. developing detailed guidelines for the implementation of measures to protect human rights in the processes operating within the Companies.

Final provisions

1. Every Employee, regardless of the form of employment, position held or function performed, is obliged to familiarise themselves with the Policy, comply with its principles and report any violations, as well as participate in all training courses on topics related to the implementation of human rights in the Company.
2. The Board of Directors monitors abiding for the provisions of the Policy, including the effectiveness of preventive and corrective measures in this area, using in particular incident and complaint management process, monitoring the application of control mechanisms and compliance guidelines, contract supervision, analysis of whistleblowing reports, tracking changes in the law, and regular review of internal regulations with an impact on human rights.
3. The policy is part of efforts to achieve the Sustainable Development Goals (Goals 4, 5, 8, 10, 16, 17) to promote stable, sustainable and inclusive economic growth and a peaceful and inclusive society that ensures access to decent work, high-quality education, equality (including gender equality) and justice, as well as the development of effective and accountable institutions at all levels that promote social inclusion.

This material is an abridged version of the Human Rights Policy adopted by resolution of the Board of Directors and constituting the implementation of the compliance standard for companies in the KRUK Group.