

CODE OF ETHICS

Ethical
Decision-Making





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At KRUK Group, being ethical is not just about complying with regulations or acting in line with our mission. These are real actions that affect our entire organization, regardless of location, and are undertaken by each person based on our values and with our common good in mind. It is also a commitment to continuous development and motivation to build a better future. The future of the organization, as well as the future of our employees, business partners, suppliers, customers, and society.


**Ethics is with us every day, in every action.
Thanks to it, we strengthen our organizational culture,
build a positive image, and care for the good reputation
of the KRUK Group.**

We also pursue our strategic goals in a sustainable manner. Our strength lies in our awareness of our impact on the lives of many

people, which is why it is important for us to have the trust of our stakeholders and to cooperate with entities that share our values and believe that the need for progress does not disappear under any circumstances.

We feel responsible for setting good practices not only within the KRUK Group, but we also want to inspire the entire financial industry to be positively perceived by the public and all its stakeholders. Our consistent actions in this area counteract financial exclusion, aim to raise public awareness, and guarantee the stability of business relationships.

We consistently set ambitious goals and focus on innovative solutions to develop our business and set industry trends. We believe that the ethical standards we create are valuable to all our stakeholders.

Piotr Krupa 
President of the Management Board of KRUK S.A.
CEO of the KRUK Group

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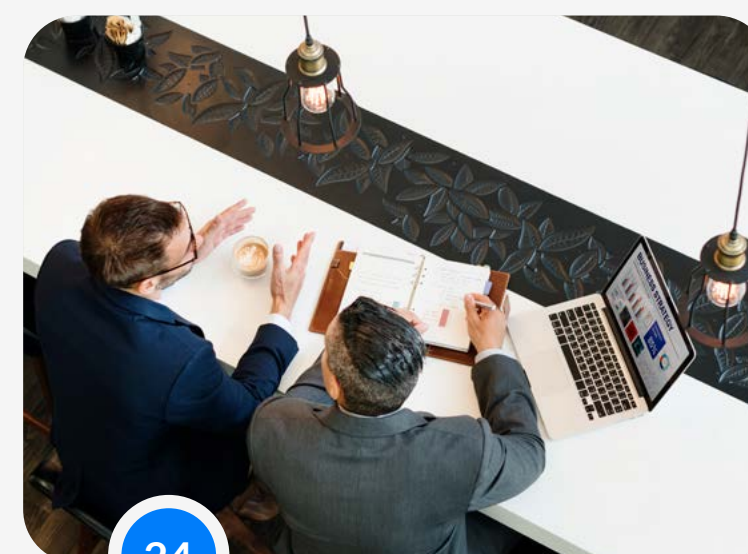


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**Let's get to know
each other**



Who are we?

We are a debt management company operating in several European countries since 1998. We have experience in comprehensive debt management. Our core business line is the management of debt acquired on our own account, mainly retail unsecured debt.

- We also offer debt management services on request. As part of the process of acquiring and servicing debt portfolios, we cooperate with the largest financial institutions. We also grant consumer loans in Poland and Romania.



Our mission, vision, and values

The success of the KRUK Group is based on our mission, vision, and values. Our mission is to provide effective and ethical support to our customers and familiarize them with the available options for getting out of debt, while also improving their financial literacy. Our vision is a world where finances are based on mutual trust and responsibility, financial stability is the norm, and a given word has a real value and must be kept. Our values connect us all and are the pillar of our organizational culture, regardless of position held in the organization. What matters for us is not only what we do, but also how we achieve our goals. We are fully aware that by acting in accordance with our values, we contribute to the implementation of our adopted business strategy.

MISSION

We guide customers on the path to getting out of debt. Being ethical and effective while educating the public about responsible finances.

VISION

We are building a world of financial balance based on mutual trust, where promises and commitments are fully honored.

Values



Respect

Mutual respect is the foundation of our business. We treat everyone as we would like to be treated.



Cooperation

Together we achieve more. We build partner relationships based on transparent rules. We call things by their name.



Responsibility

Everyone is responsible for one's decisions, actions, or negligence, and their consequences.



Development

We constantly grow. Our inner need to progress goes under any circumstances, even when we achieve success.

Simplicity

Simple is beautiful. We simplify our processes and eliminate waste. Done is better than perfect.

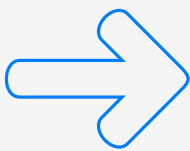




Ethics and human rights
are our foundation

We build and continuously improve our organization based on them. This foundation is also reflected in our mission, vision, and values. We view ethics from a HUMAN perspective. We believe that through daily, conscious choices, we can build ethical relationships. We are guided by ethics in all our activities and relationships with employees, customers, suppliers, business partners, and society, including affected communities.

We are ethical and respect human rights



For us, being ethical means that:

- we cooperate with mutual respect and trust,
 - we assume good intentions on the other side,
 - we strive for understanding and remember that our actions affect others,
 - we support each other, listen to each other’s needs, and learn from each other,
 - we draw on our diversity, care for equal opportunities and an inclusive organizational culture,
 - we appreciate each other and openly provide each other with feedback in accordance with the rules we have adopted,
 - we use technology with a “human-centric” approach.
- Through our actions, we reinforce the KRUK Group’s positive contribution to protecting human rights in our relations with stakeholders. At the same time, we identify actual and potential risks of human rights violations in our operations and take steps to mitigate them.

How do we develop our organizational culture?

Our culture is shaped by people who, in their daily work, are guided by the law, internal regulations, ethical standards, and the values we uphold as an organization. Thanks to the attitudes of our employees, we develop an ethical organizational culture and strengthen our relationships and mutual commitment. We believe that cooperation is not just about jointly accomplishing tasks. For us, it is primarily about open and straightforward communication and the regular exchange of information.

Cooperation also means a willingness to support and build relationships based on mutual respect and trust

We share our knowledge and experience, and we value diverse perspectives. This allows us to create an environment where everyone feels part of the team and has a real impact on our collective success. We encourage our employees to actively shape the organizational culture in all KRUK Group companies.



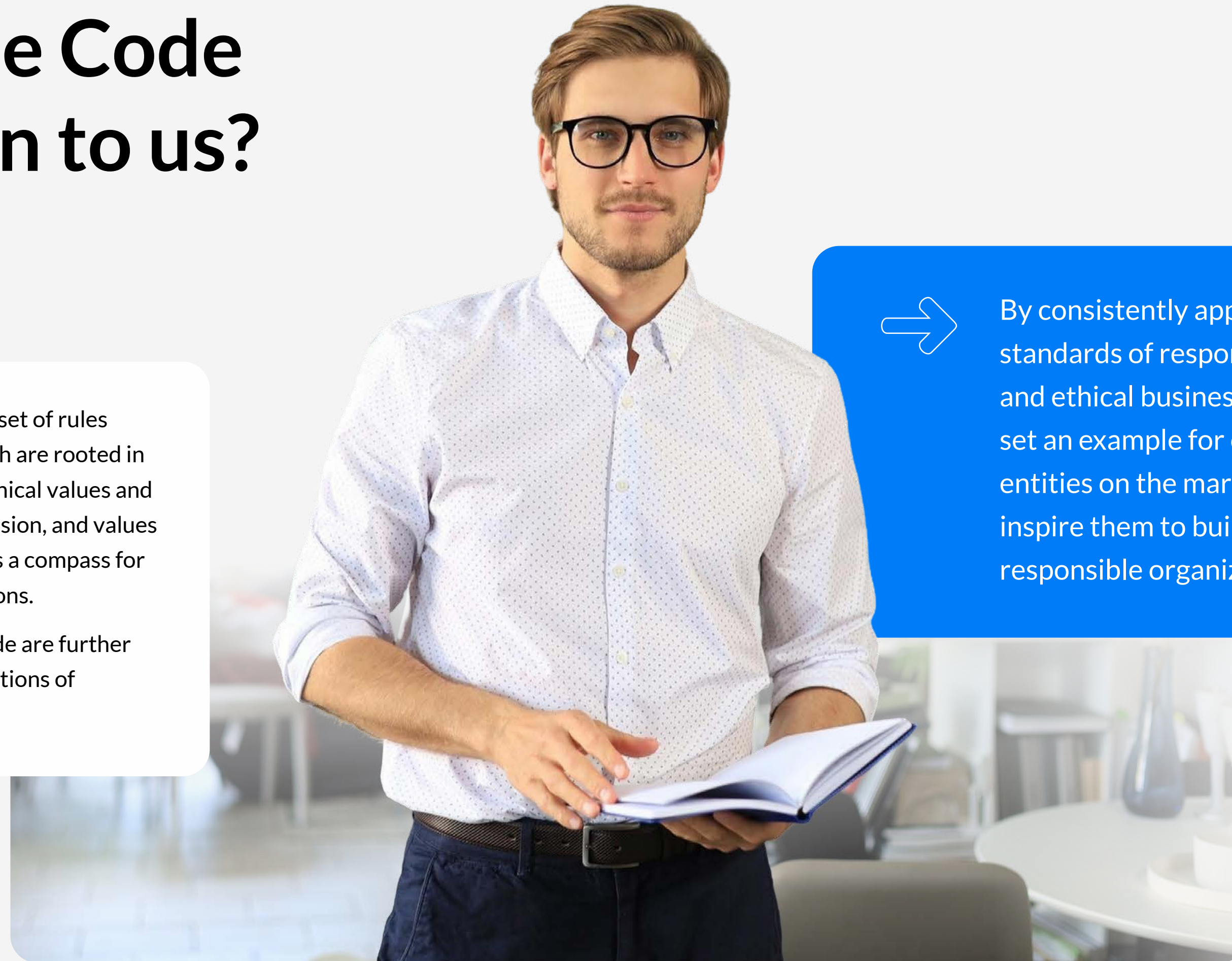
What does the Code of Ethics mean to us?

The Code of Ethics is not only a set of rules and guidelines for conduct which are rooted in legal regulations, a system of ethical values and social norms, and the mission, vision, and values of the KRUK Group. The Code is a compass for our everyday attitudes and actions.

The principles set out in the Code are further developed in the internal regulations of KRUK Group companies.



By consistently applying the standards of responsible and ethical business, we set an example for other entities on the market and inspire them to build socially responsible organizations.



Who is the Code addressed to?

The Code applies to all members of the statutory bodies of KRUK Group companies and all persons performing work under an employment contract or providing services on the basis of another legal relationship for the Group, regardless of their position, type of contract and place of work (hereinafter: employees). Employees are required to familiarize themselves with the Code and comply with its provisions. They are also required to participate in all training activities related to ethical standards and our values.

- We also expect suppliers and business partners with whom we cooperate and establish business relationships to respect the standards and principles described in the Code.



Employees who have questions about the content of the Code may send their inquiries to: hq_compliance@kruksa.pl.



Principles of responsible conduct

- Every day we follow ethical principles and make responsible decisions in line with our mission, vision, and values. Our corporate governance includes transparent internal oversight rules, cooperation between statutory bodies, and a risk management and internal control system that is actively supported by the internal audit function. We ensure that our conduct complies with applicable regulations. Our communication and activity in the public sphere are conscious and transparent.

We comply with regulations

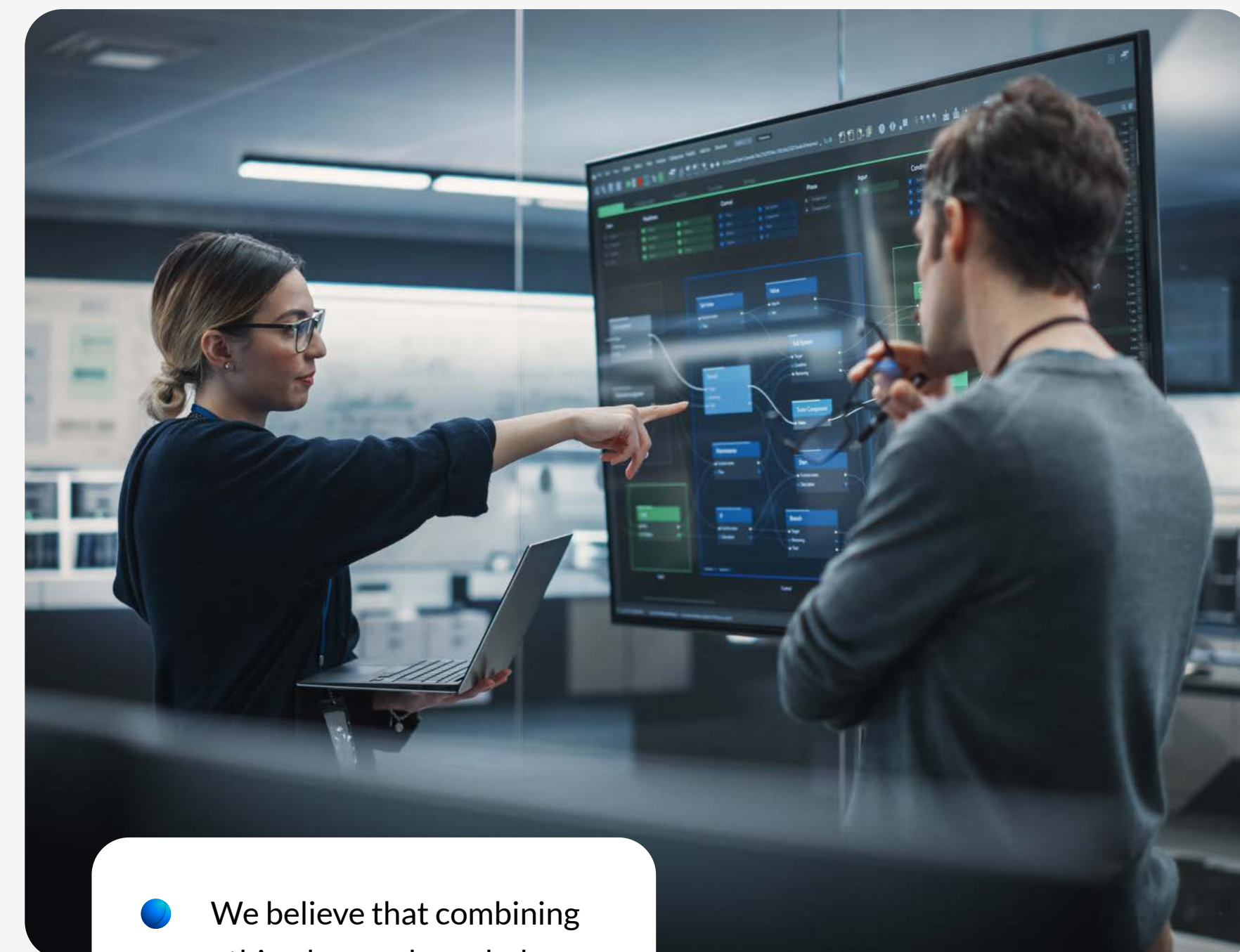
We comply with applicable national and international laws, as well as internal regulations. We constantly analyse new legal regulations to ensure that our actions are compliant in a dynamically changing regulatory environment. We also apply industry codes in force in the countries where we operate. We pay particular attention to consumer rights and fair competition rules. We are aware that non-compliance with regulations may have a negative impact on our stakeholders and the reputation of the KRUK Group.



We care about information security and cybersecurity

We apply an information security policy that ensures the confidentiality, integrity, and availability of all information resources. We prevent the unlawful disclosure or use of information. We protect our systems, network resources, and data against cyberattacks. Employees are required to protect physical and electronic resources, maintain the confidentiality of information related to the KRUK Group and its stakeholders, and care for the positive image of our organization. It is unacceptable to disclose or disseminate any data that constitutes confidential information or trade secrets. It is the responsibility of every employee to report any identified security incidents.

We develop modern technologies, including solutions based on artificial intelligence that support our daily work and improve the efficiency of our processes. We create solutions in accordance with the law and standards for their safe and ethical use. We understand that a responsible approach to technology requires not only investment in education and development of employee competencies, but also special attention to potential threats. We are aware of the risks associated in particular with cybersecurity, inappropriate use of technology, and unethical use of data.



We believe that combining ethics, human knowledge, and technology, used responsibly and in accordance with the values of the KRUK Group, is the best way to grow.



We protect personal data

We process personal data in accordance with the law, ensuring the confidentiality, integrity, and availability of such data, and respecting the rights of the individuals whose data is being processed. We have implemented rules for the secure processing of personal data in our processes. Employees are obliged to exercise due diligence in this regard and to complete training. We undertake a number of initiatives to raise awareness of personal data protection among our employees. We investigate reported irregularities that could result in a breach of personal data protection and act in accordance with the standards set by law.

We implement the anti-corruption program

We apply a zero-tolerance policy towards corruption

Every employee is obliged to report any actual or potential corruption incident, both when they participate in it and when they become aware of it. We have implemented rules for giving and receiving gifts, therefore we do not accept or give benefits that could be perceived by an objective observer as an attempt to exert influence. We agree to accept and give gifts that are consistent with generally accepted business practices. We have also introduced rules for our employees' participation in events organized by business partners, suppliers, and other cooperating entities.



We apply conflict of interest management standards, in accordance with which we have defined, among others, rules for identifying, managing, and disclosing conflicts. We avoid situations in which our private interests could influence the impartiality of our business decisions. All situations that constitute or may constitute a conflict of interest, in particular conducting additional activities or performing functions in the bodies of other entities, should be reported to the Compliance Officer.

We raise awareness among our employees by providing trainings that enables them to identify and prevent corruption and conflicts of interest.

We communicate responsibly

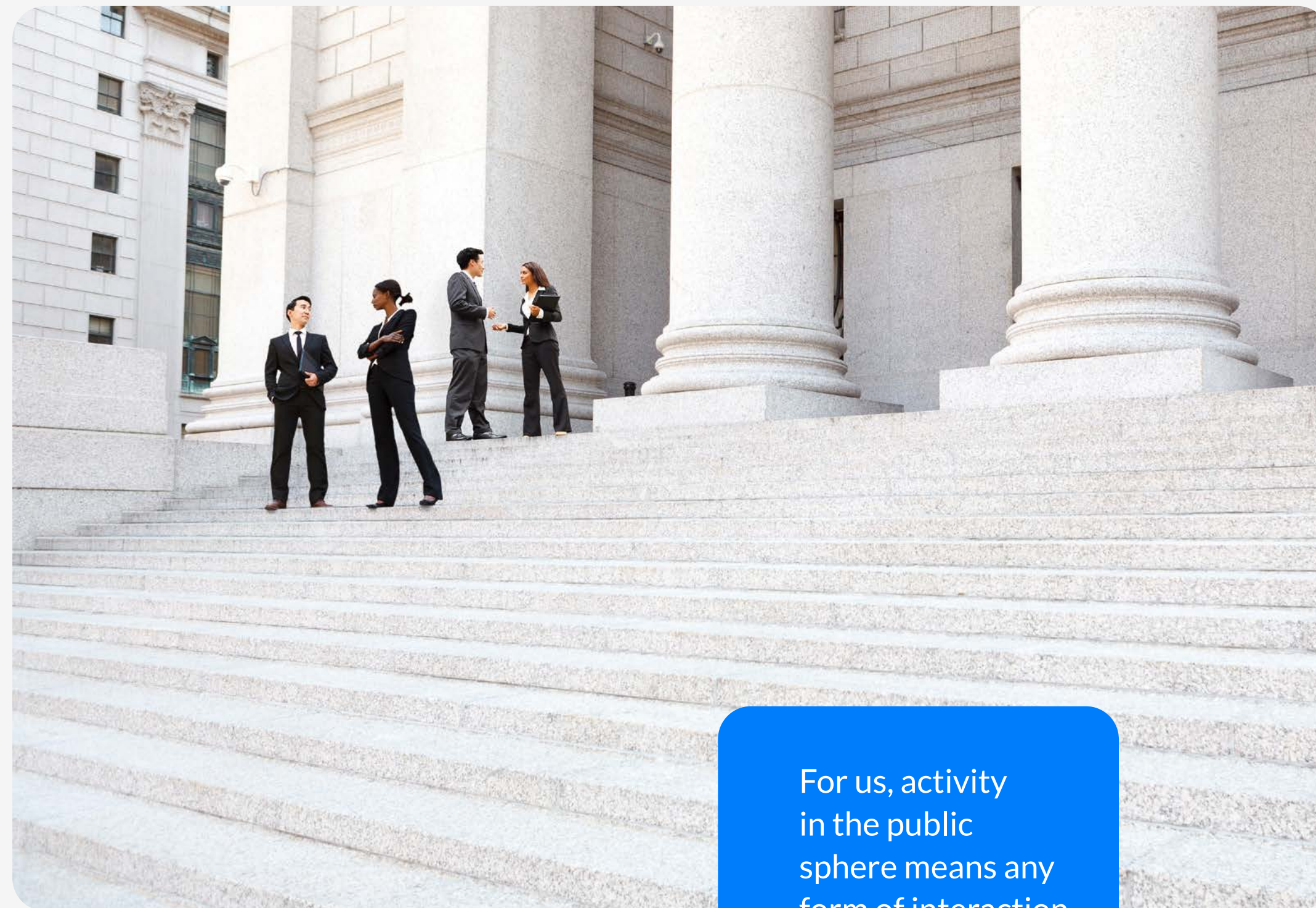
Transparent communication – both internal and external – is the foundation for building lasting relationships, mutual trust, and a better understanding of the needs and expectations of our stakeholders. Our approach is based on several key principles, such as:



- reliability and clarity of communication – we ensure that the information we provide is complete and presented in an objective and understandable manner to the recipient,
- tailoring communication to the recipient – we take into account the diversity of stakeholder groups, their knowledge, needs, and context to ensure that the communication is relevant and clear, which is why we use plain, understandable language,
- openness and dialogue – we focus on active listening, encourage to ask questions, and provide feedback,
- avoiding ambiguity – we eliminate phrases that may be misleading or exclude recipients,
- use of modern tools – we invest in and implement solutions that improve the flow of information and increase the effectiveness of communication.



- We operate in an international environment, which is why open and effective communication that takes cultural differences into account is important to us. It allows our employees to exchange experiences, access relevant information, and better understand the decisions and processes taking place within the KRUK Group. We believe that our communication strengthens cooperation and consistency of action among all units of the Group.



For us, activity in the public sphere means any form of interaction with society.

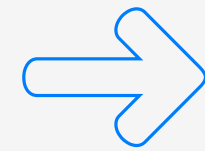
We act in the public sphere

Our activity in the public sphere is based on ethical values, legal provisions, and internal regulations. We strive to ensure that every statement and action strengthens trust in the KRUK Group and builds positive relations with our stakeholders. We participate in public debate and cooperate with local industry organizations and the media. Speaking on behalf of the KRUK Group without prior authorization is unacceptable. We respect local customs and business practices.

- We are politically neutral – we do not engage in political activities, we do not finance political parties or donate funds for political purposes. At the same time, we respect our employees' right to engage in political and public activities outside of working hours as individuals.

We cooperate with industry organizations

We belong to various industry associations in the countries where we operate. As part of industry organizations:



- we promote responsible and sustainable business conduct,
- we co-create consistent rules and good practices for companies in the debt management industry,
- we undertake initiatives that contribute to the application of ethical practices in the financial industry,
- we lobby for legal regulations in accordance with applicable regulations in this area,
- we carry out educational activities in the field of financial education, aimed at, among others, supporting people at risk of financial exclusion.





Relations with employees

- People are the foundation of our organization. We clearly communicate our principles, goals, and tasks so that our employees know how they contribute to achieving our strategic goals. We encourage openness and dialogue - our employees can openly express their opinions, ask questions, and influence decisions. They have the opportunity to use their knowledge, participate in trainings, improve their skills, and gain experience. We create an inspiring, inclusive, and friendly workplace so that everyone can feel comfortable. We are constantly strengthening our brand as an attractive employer that cares about dialogue, development, belonging, and the well-being of all employees.



The diverse competencies and perspectives of our teams foster innovation and creativity in our activities. We have implemented DEI (Diversity, Equity & Inclusion) principles that support the creation of a work environment in which everyone can feel part of the community and in which equal opportunities for access to resources are ensured, regardless of naturally occurring differences.

We care about diversity, equity and inclusion

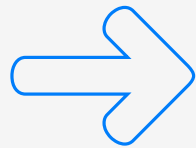
We promote gender equality, support people with special needs, and provide equal opportunities for people from marginalized groups. We strive to eliminate barriers, encourage the use of inclusive language, and counteract all forms of exclusion in order to create a strong and committed organization. We nurture an inclusive culture and draw on the diversity of our employees, who enrich our team with their experiences, perspectives, and talents.

- We ensure that recruitment, hiring, promotion, and employee benefit policies are based on clear criteria, using objective evaluation methods that take into account competence, experience, and work performance.

We undertake educational activities to raise awareness of diversity, inclusion, and equal opportunities in the workplace.

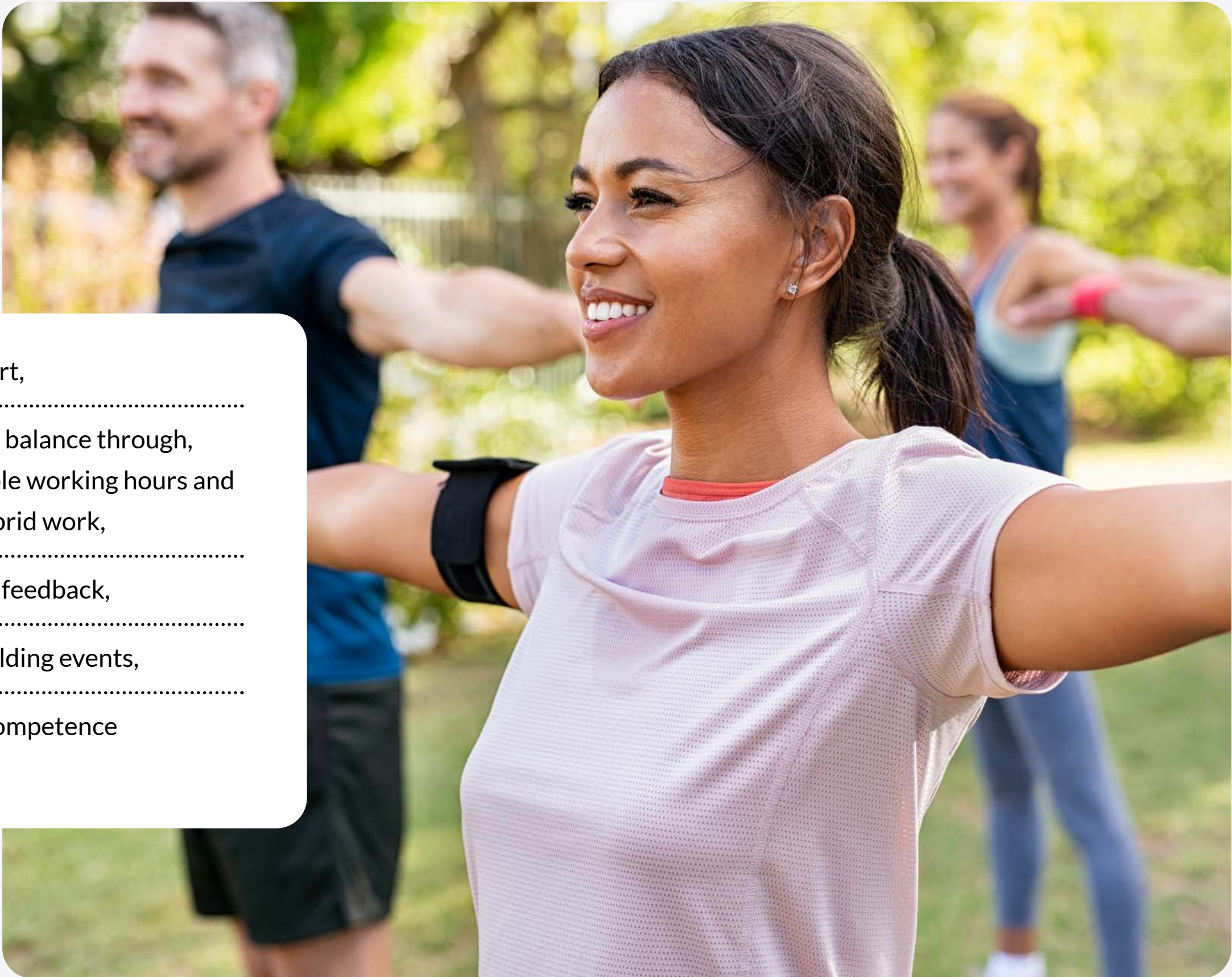
We support well-being

Employees well-being is an important part of building an engaged and supportive work environment that is open to the needs of our employees. We understand it as a sense of vitality and health that gives energy to act both at work and in personal life. We apply a holistic approach to well-being, which is why we implement solutions that support our employees in five key areas: physical health, mental health, interpersonal relationships, a sense of fulfillment, and financial stability, understood as education in personal finance management and conscious consumer choices.



Our activities include mainly:

- psychological support,
- promoting work-life balance through, among others, flexible working hours and the possibility of hybrid work,
- building a culture of feedback,
- organizing team-building events,
- creating space for competence development.



We do not tolerate mobbing, discrimination and harassment



We treat human dignity as a supreme good, which is why a work environment based on respect for the dignity of each employee is a priority for us.

Mobbing, discrimination, harassment, including sexual harassment, unequal treatment, intimidation, stalking, and disrespect, as well as all forms of physical or verbal violence, are unacceptable. Every employee should prevent such behaviour and react whenever they notice it.



Every employee is required to participate in anti-mobbing training.

Identified cases should be reported via the provided channel. If they occur, we respond quickly and effectively to minimize their negative consequences and prevent similar behaviour in the future. We thoroughly investigate the circumstances of reported incidents based on objective criteria.



We create a safe workplace

We care about the health and safety of our employees, which is why we provide a working environment that complies with applicable health and safety standards and internal procedures regarding occupational safety. We constantly improve the level of protection and reducing the risk of injuries or health hazards. We implement initiatives that ensure work safety and improve comfort - from ergonomic workstations, through education on health and safety regulations, to programs that support healthy habits and work hygiene.

- We also take into account the specific nature of hybrid and remote work by developing detailed guidelines for performing duties outside the office, with an emphasis on ergonomics and compliance with law.

We respect collective rights

We respect the right of employees to form and join trade unions, employee groups, and other organizations that protect their rights and interests. We engage in open and constructive dialogue with employees and their representatives with the aim of mutual understanding of needs and creating socially acceptable solutions.



Business relations



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- Our decisions matter – not only for the KRUK Group, but also for the people and entities we work with and for the entire financial sector. That is why we act responsibly and are aware of our social role in the economic system. We are committed to building solid and long-lasting business relationships based primarily on mutual respect, trust, openness, and partnership. We believe that relationships based on these values bring long-term benefits to all parties. We are professionals in our business relationships, which is reflected in our compliance with the law, industry best practices, and internal regulations. We keep our word and do not make empty promises.

We responsibly select our portfolios and business partners, verify the compliance of transactions, and work exclusively with business partners, service providers and customers who comply with the law and ethical standards. We analyse potential partners not only from a financial perspective, but also in terms of ethics and reputation, paying particular attention to respecting consumer rights. This approach helps us prevent the risk of working with entities that may be involved in illegal activities and protect the reputation, trust, and credibility of the KRUK Group among customers, partners, and investors.

Relations with customers

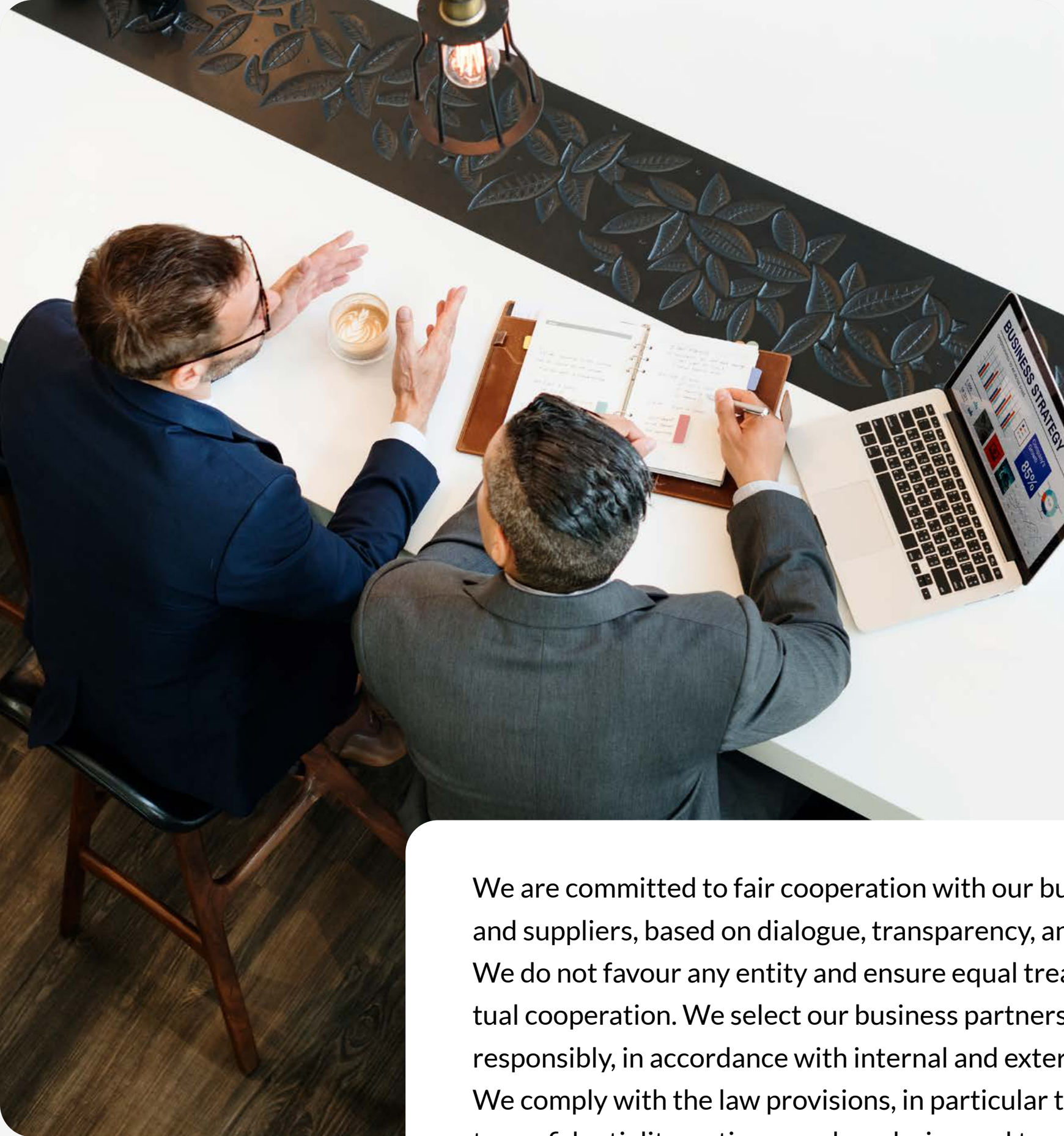
In our relations with each customer, we are guided by responsibility, diligence, and concern for their well-being. We treat all customers individually and fairly. We provide them with equal access to our services. We build lasting and trust-based relationships. We listen to our customers' needs in order to create products and services that meet their expectations. We advise customers on solutions tailored to their situation. We provide them with information about the effects of concluding a contract with us, including possible costs. We make sure that at every stage of the process, we provide information in a transparent manner and using plain language. We build positive customer experiences based on respect. We also collect customer feedback to develop our tools and simplify, and eliminate inefficient processes. We handle complaints in a timely manner and with respect for customer rights. Their analysis allows us to respond promptly and improve the quality of our service. We also promote financial education on debt and responsible borrowing.



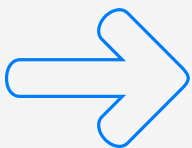
We support customers in the process of repaying their debts and regaining financial stability and credibility. We understand their difficult financial situation. We make them aware that they are responsible for their obligations. We inform them about further possible proceedings in the event of avoiding contact with us. We rely on, among others, good practices developed by national industry associations, which regulate the principles of responsible debt collection in a concrete manner and with respect for human rights.



The KRUK Group includes companies that offer consumer loan in accordance with the law, regulatory requirements, and good business practices.



Relations with business partners and suppliers



We are committed to fair cooperation with our business partners and suppliers, based on dialogue, transparency, and responsibility. We do not favour any entity and ensure equal treatment in mutual cooperation. We select our business partners and suppliers responsibly, in accordance with internal and external regulations. We comply with the law provisions, in particular those relating to confidentiality, anti-money laundering and terrorist financing, as well as international sanctions. We oppose any abuse of competitive advantage, price fixing and any agreements between businesses that aim to restrict competition. In our activities, we do not restrict the freedom of other entities on the market, and we do not engage in practices that could negatively affect the market or consumers. We comply with the agreements we have entered into, including the timely settlement of our financial obligations.

We expect our business partners and suppliers to familiarize themselves with the principles described in our Code and to follow them in their daily activities. It is particularly important to us that the entities we work with:

- act in accordance with the principles of fair competition and transparency,
- uphold human rights and employee rights,
- oppose discrimination, unequal treatment, and mobbing,
- counteract corruption and do not offer benefits that could affect our objectivity and impartiality,
- prevent conflicts of interest and if they identify a conflict in our cooperation, inform us immediately,
- minimize their negative impact on the environment and do not harm the communities in which they operate.

- We make investments with due diligence, following thorough analysis, and in compliance with applicable law and internal regulations. We only cooperate with entities that share the described principles and values in business relationships.

We avoid entering into business relations with entities whose business practices may damage the image and reputation of the KRUK Group or the financial sector.



Relations with society and approach to the natural environment

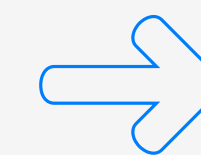


As a socially responsible organization, we are aware of the impact of our actions and the scale of their impact on various social groups. In implementing our business strategy and sustainable development strategy, we take into account the managerial, social, and environmental aspects of our operations. We share our knowledge and resources, and conduct our business in a way that combines economic goals with social good.



We are aware that there are social groups in society that may be particularly vulnerable to financial difficulties and the risk of their rights being violated. We define these groups as affected communities, which, due to limited access to information or low levels of economic literacy, may experience various forms of exclusion and discrimination. We raise awareness among these individuals about the role that professional debt collection companies play in economic transactions so that they can identify and respond to unethical debt collection practices. We work to combat financial exclusion and support these individuals in managing their finances more effectively.

Relations with society



We undertake a number of pro-social activities, i.a.:

- we support initiatives aimed at improving financial education,
- we cooperate with non-profit organizations,
- we conduct social dialogue and try to respond to the needs of society, including affected communities, to the best of our ability,
- we examine various social groups in terms of debt, financial education, and the financial condition of households,
- we educate and raise social awareness in the field of responsible finance,
- we undertake sponsorship and charitable activities in accordance with internal regulations,
- we encourage our employees to get involved in social initiatives.

Approach to the natural environment

We identify, analyse, and monitor our impact on the natural environment as part of fulfilling the commitments we have set out in our sustainable development strategy. We strive to minimize our negative impact by implementing measures to reduce our carbon footprint.




That is why:

- we optimize electricity consumption by introducing energy-saving technologies and processes,
- we are switching to renewable energy sources, supporting the energy transition, and reducing greenhouse gas emissions,
- we minimize emissions from transport, including by developing a low-emission fleet and promoting public transport.



- We are convinced that our actions contribute to mitigating the effects of climate change.



We report and respond

- Each of us may face legal consequences for breaking the law. Employees who violate the Code may be held liable.

Conduct that is inconsistent with the Code may damage our organizational culture, as well as the image and reputation of the KRUK Group.

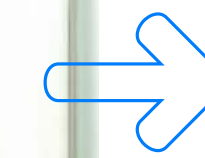


How to report violations?

Employees, business partners and suppliers may report (also anonymously) actual violations or reasonable suspicions of violations of the Code through the whistleblowing channel, which is available at:

<https://whistlekruksa.vco.ey.com/>.

- The KRUK Group companies may implement other channels to assist in the investigation of specific types of violations.



We protect individuals who report violations in good faith from retaliation and implement corrective measures to prevent similar incidents from occurring in the future. We undertake initiatives to raise employee awareness and build trust in the violation reporting process.



Final provisions



The role of the Management Board and Supervisory Board of KRUK S.A. is:

- to shape and promote an ethical culture within the organization,
- to incorporate ethical values and standards into its strategy,
- to implement supplementary regulations.



The role of the Compliance is:

- to support the interpretation of the provisions of the Code,
- to conduct annual reviews and update of the Code,
- to raise employee awareness of the Code.

