

# CSRD Statement for International Personal Finance plc for the year ended 31 December 2024

## Introduction

The Corporate Sustainability Reporting Directive (CSRD) is an EU regulatory framework designed to improve the consistency and transparency of sustainability reporting, which came into effect for IPF plc from the 2024 financial year. Under the CSRD, we disclose sustainability information in alignment with defined standards that cover a broad spectrum of sustainability-related topics. These standards ensure consistency and comparability across industries and companies. A fundamental aspect of the CSRD is the Double Materiality Assessment (DMA), which requires us to evaluate sustainability matters that are significant both to our business and across our value chain.

Our CSRD Statement aligns with the CSRD and the requirements set out in the European Sustainability Reporting Standards (ESRS).

Looking ahead, the scope of CSRD disclosure requirements are expected to change given the EU's announcements in Q4 2024 that it is reviewing the scope of key sustainability laws including the CSRD, the EU Taxonomy and the Corporate Sustainability Due Diligence Directive (CSDDD). We will continue to work to review and comply with these evolving reporting requirements.

### i. General disclosures

This CSRD Statement for IPF plc has been prepared on a consolidated basis with the same scope as the financial statements. They cover the parent company, IPF plc and subsidiaries controlled directly or indirectly by IPF plc. The CSRD Statement covers the main value chain of IPF plc, including the impacts, risks and opportunities (IROs) in our upstream, downstream and own operations.

The Group confirms that, during the reporting period, no information has been omitted from the CSRD Statement due to concerns regarding intellectual property, know-how, or the results of innovation. The Group confirms it has not utilised the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in Article 29a(3) of Directive 2013/34/EU.

We report on disclosures in relation to specific circumstances alongside the relevant disclosures. None of the metrics and monetary amounts disclosed in this CSRD Statement are subject to a high level of estimation uncertainty.

The disclosures in this CSRD Statement have been expanded significantly to comply with the requirements of the CSRD.

### ii. Governance disclosures

The Group Board – The Board of Directors comprises seven directors, made up of two executive directors and five non-executive directors, who are elected annually at the Annual General Meeting by the Group's shareholders, in line with the Company's Articles of Association. Four of the five non-executive directors (57% of the Board in total) are considered independent, according to the provisions of the UK Corporate Governance Code. The Chair was assessed as independent on appointment. The Group Board holds the highest level of responsibility for overseeing the Group's sustainability strategy and our management of material IROs. The Board provides strategic direction on sustainability matters, including

reviewing and approving the annual plan for this area, approving various sustainability-related policies and reviewing public disclosures made by the Group concerning sustainability. The Group confirms that, during the current reporting period, there are no employees or other workers serving as representatives on the Board of Directors. As at 31 December 2024, the Board's gender diversity calculated as an average ratio of female to male Board members equated to 0.75.

Committees of the Board support the Board of Directors by overseeing specific areas in line with corporate governance requirements. The responsibilities of each Committee are formalised in separate Committee Terms of Reference documents, which are reviewed and, if deemed necessary, updated and approved by the Board of Directors annually. The Terms of Reference for each Committee are available on our website at [www.ipfin.co.uk](http://www.ipfin.co.uk). Members of the Board Committees, including the Chair, are appointed by the Board of Directors from its own members. Specific Board Committees which operated in 2024 were:

**Audit and Risk Committee:** Responsible for the oversight of financial, sustainability, and statutory audit matters, internal control and risk management, including business conduct and probity, whistleblowing procedures, and related matters. Tasks include supervision of the external auditor's independence and the procedure for the election of an external auditor and overseeing sustainability related disclosures. The Committee ensures that sustainability risks, including those related to climate change and regulatory compliance, are managed and effectively reported.

**Remuneration Committee:** Responsible for determining executive remuneration, reviewing the Remuneration Policy and ensuring compliance with it, overseeing incentive programmes including alignment with sustainability commitments when relevant; overseeing pension retirement schemes for the Executive Management and preparation of the Directors' Remuneration Report.

**Nominations and Governance Committee:** Responsible for effective Board governance arrangements, the composition of the Board of Directors and Executive Management.

Details of the membership of each of these Committees are set out on pages 80 to 81 of the Annual Report.

The members of the Board possess substantial experience in financial services, governance, and risk management. For more detailed information on the expertise of Group Board members, please refer to pages 80 and 81 of the Corporate Governance Report. Specific sustainability-related knowledge includes:

**Stuart Sinclair, Chair** – Previously a member of Lloyd's Banking Group's Responsible Business Committee which oversaw sustainability and responsible business practices at this UK bank. As chair of Willis Ltd Stuart participated in its cross-functional Climate Resilience Hub, which helped clients assess and mitigate the risks they face from climate change.

**Katrina Cliffe, Senior Independent Director** – As a non-executive director of DCC PLC, Katrina oversees a range of sustainability related matters relating to this company's clean energy activities.

**Aileen Wallace, Non-Executive Director** – Experience of chairing Board Committees where a wide range of external environmental, colleague and wellbeing matters are covered. Extensive experience in executive and non-executive roles on enabling green financing options.

**Gerard Ryan, Chief Executive Officer** – Overseen the launch of programmes aimed at improving employee health, safety and career development and driving a purpose-led business.

**Gary Thompson, Chief Financial Officer** – Overseen supplier sustainability programmes and enhanced the quality and frequency of ESG-related financial disclosures, aligning reporting with recognised frameworks and standards.

**Deborah Davis, Non-Executive Director** – As a non-executive director of Lloyds Banking Group/Scottish Widows and member of the Investment Committee her role includes oversight of the Responsible Investment Strategy of the insurance activities of the Group.

**Richard Holmes, Non-Executive Director** – Richard's role as chair of the Audit & Risk Committee of the Group means he oversees the development and reporting of sustainability and climate related matters on behalf of the Board.

The Nominations and Governance Committee assists the Board of Directors in determining if appropriate strategic, sector-specific, sustainability and other necessary skills and expertise are available within the Board of Directors and the Executive Management. The Committee must ensure that all candidates for membership of the Board of Directors fulfil stakeholder expectations and have the right skills, including relevant sustainability and business conduct expertise. The Board of Directors evaluates the competencies, diversity, knowledge, and experience of the individual members of the Board of Directors and the Executive Management annually, which is a key input to recruitment decisions. The Board also undertakes periodic training, which includes sustainability-related matters. In 2024 the Board and its Committees reviewed a number of items relevant to its material IROs including the HR strategy and a customer update from the Chief Marketing Officer.

While our Board members bring diverse professional experience, including areas such as finance and risk management, specific sustainability expertise has not been an explicit consideration in recruitment. Our current focus areas align with our identified material IROs – access to financial services and our workforce, and the required support on sustainability-related matters is provided to the Board as required. We will continue to assess our needs and make adjustments as appropriate.

The Executive Management is made up of 15 individuals reporting to the Chief Executive Officer. 86.7% of these individuals are male and 13.3% are female. Their purpose is to undertake day-to-day management in a way which aligns with the overall strategic direction set by the Board of Directors. Their tasks include ensuring compliance with various Board-approved policies and applicable regulatory requirements, decision-making on resource allocation, and ensuring sustainability and business conduct align with our long-term plans. The division of responsibility between the Executive Management and the Board of Directors is set out in the Matters Reserved to the Board document, which is approved by the Board annually.

Responsibility for the oversight of IROs is embedded within the roles of the Board and the Board Committees,

particularly the Audit and Risk Committee. Business conduct policies, including our Code of Ethics, are reviewed and approved annually by the Board of Directors. The following depicts management's role in the control and management of IROs by outlining their reporting lines to the administrative, management, and supervisory bodies, and their integration with other internal functions.

**Group Sustainability** – The primary function within management responsible for the identification, management, and communication of our IROs. They ensure compliance through the establishment of appropriate procedures for sustainability data collection. They ensure legal compliance with all sustainability matters from a reporting perspective, relevant sustainability standards and regulatory requirements. Disclosures on environmental matters, upstream and downstream value chain social matters, and overarching sustainability topics are anchored within this area.

**Group Legal** – Provides counsel for the legal compliance of disclosures on sustainability matters from both a reporting perspective and in terms of relevant sustainability standards and legal requirements for specific matters. Disclosures of governance matters are the responsibility of Group Legal, which provides information on governance structures, policies, and procedures to Group Sustainability.

**Group HR** – Disclosures on social matters concerning our own workforce are anchored within Group HR, which reports data about our employees and social activities to Group Sustainability for DMA and reporting purposes.

#### Executive Management

The Chief Legal Officer is the individual within the Executive Management responsible for the disclosure and reporting of non-financial matters. Executive Management participates in discussions and use their knowledge and expertise to guide the Board of Directors and enable them to make informed decisions on sustainability matters. Final decisions on IROs are made by the Board of Directors.

The Board of Directors uses the results of the DMA to guide the setting of targets in relation to our material IROs whenever relevant. When targets are set, these are to be tracked using appropriate qualitative and quantitative indicators. Currently, we have not set Group-level targets other than emissions-related targets. The setting of emissions-related targets has been driven by UK regulation (i.e. TCFD), and targets relevant to material sustainability matters will be developed in time. We are considering how and where we will set strategic targets to accelerate both business strategy and sustainability performance further.

#### iii. Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Board of Directors and Board Committees are informed of sustainability matters by the Chief Legal Officer as required. In 2024, this meant the Board of Directors approved the Company's Sustainability Plan for 2024/2025 and received an interim update on progress. In relation to IROs, the DMA process was briefed to the Board of Directors in Q2 2024 and the results reviewed by Executive Management and the Board of Directors as part of strategic planning activities in Q4 2024. The Board of Directors considered matters relevant to material IROs during 2024, namely those in relation to Access to Financial Services and Working Conditions and Workers Rights.

#### iv. Integration of sustainability-related performance in incentive schemes

The incentive schemes provided to the Group's Executive Directors included sustainability-related matters in 2024. No other member of any administrative or management bodies at the Group are remunerated on the basis of incentive schemes linked to sustainability matters.

Full details of the Group Executive Directors' incentive schemes are detailed in the 2023 Remuneration Policy. Part of their remuneration includes an annual bonus scheme. For the Chief Executive Officer, the objectives in the annual bonus scheme are agreed by the Chair of the Board of Directors with input from the Remuneration Committee. The Chief Financial Officer's objectives are determined by the Chief Executive Officer. Performance is measured over the financial year and is assessed using the following criteria:

- typically 80% of total bonus opportunity is subject to achievement of financial measures; and
- typically 20% of the bonus opportunity is subject to achievement of personal objectives linked to achievement of Group strategy.

The personal objectives agreed for Group Executive Directors included a sustainability-related objective in 2024. This objective was not assessed against specific sustainability-related targets and/or impacts and sustainability-related performance metrics were not considered as performance benchmarks or included in the Group's Remuneration Policy. All decisions on performance outcomes for the Group Executive Directors are made by the Group Remuneration Committee.

#### v. Statement on Sustainability Due Diligence

The table below provides a mapping of the paragraphs that contain disclosures about our current sustainability due diligence performance.

Due diligence step	Description	Relevant section in CSRD Statement
Identification of sustainability risks and impacts	We assess actual and potential adverse sustainability impacts across our operations and value chain.	Materiality Assessment and Risk Management (ESRS 2 GOV-5, SBM-3) pages 133 to 134
Integration into policies and procedures	Sustainability risks and due diligence are embedded in company policies, including human rights, sustainability, and Code of Conduct policies.	Sustainability Governance and Policies (ESRS 2 GOV-1, GOV-2, GOV-3) pages 123 to 124 and 141 to 143
Stakeholder engagement	We engage with stakeholders, including employees, suppliers, communities, and investors, to identify and address sustainability concerns.	Stakeholder Engagement (ESRS 2 SBM-2, SBM-3) pages 129 to 131
Grievance and remediation mechanisms	We provide reporting channels for sustainability-related concerns and have mechanisms to address grievances.	Whistleblowing and Remediation (ESRS S1-3) pages 144 to 145
Reporting and transparency	We disclose sustainability-related risks, impacts, and mitigation strategies in alignment with regulatory requirements.	Sustainability Reporting and Assurance (ESRS 2 BP-2, BP-3) pages 131 to 133

#### vi. Risk management and internal controls over sustainability reporting

The Group's risk management and internal control system in relation to the sustainability reporting process can be summarised as follows:

##### Board and Committee oversight

- The Group Audit and Risk Committee's responsibilities include oversight of the Group's sustainability reporting.
- The Chief Legal Officer, who attends Board meetings and Group Audit and Risk Committee, is accountable for sustainability reporting.
- The oversight of this process is managed by the Responsible Business Framework Steering Group, which is composed of key functions including Investor Relations, Sustainability, Risk, Legal, Procurement and HR.

##### Defined responsibilities

- The Sustainability Function oversees the collation of information from different business units.
- Each business unit which is required to provide sustainability-related information must nominate a Sustainability Reporting Officer to ensure consistent data collection.

##### Integration into reporting and decision making

- Sustainability performance is reported quarterly to the Board of Directors through the provision of a dedicated ESG management information pack.

## Stakeholder engagement

- Formal stakeholder consultation (customers, colleagues, suppliers, investors, NGOs) to identify sustainability risks and opportunities.
- Sustainability risks and opportunities are an input to the strategic planning process undertaken by Executive Management and the Board of Directors.

There is no specific risk prioritisation methodology used by the Group. The following risks have been identified as relevant to the Group's sustainability reporting following internal discussions:

- Data quality and accuracy: Ensuring that sustainability metrics and disclosures are accurate, reliable, and based on verifiable data.
- Regulatory compliance: Monitoring compliance with evolving sustainability regulations and standards, such as ESRS requirements, to avoid legal and financial penalties.

The potential for creating specific mitigation plans for these risks will be assessed in 2025 but currently there are no such plans in place to address these matters. The Group does not integrate the findings of its risk assessment and internal controls for the sustainability reporting process into its internal functions and processes, and there are no plans to implement such integration. Our sustainability reporting and risk management processes remain distinct.

## vii. Strategy, business model and value chain

### a. Products and services offered

Our products and services are tailored to meet our customers' needs and different credit profiles and preferences. In 2024 we offered the following products:

Product	Estonia	Latvia	Lithuania	Mexico	Australia	Poland	Romania	Hungary	Czech Republic
<b>Home credit instalment loans:</b> Small-sum loans with weekly personal service and an increasingly digital touch, provided in customers' homes by our customer representatives.				●		●	●	●	●
<b>Hybrid loans:</b> A unique blend of customer representative and digital channels for those who do not have a strong enough credit profile to get a fully digital offer.						●	●		
<b>Credit card:</b> A convenient way for customers to make in-store purchases, shop online, or access cash through their customer representative or ATMs.						●			
<b>Retail credit:</b> Partnering with retailers to provide instalment loans to customers, both in-store and online.					●		●		
<b>Value-added services:</b> A range of value-added products beyond credit including health and life insurance.	●	●	●	●		●	●	●	●
<b>Digital instalment loans:</b> Affordable, end-to-end digital service with terms from one month to three years and monthly repayments.			●			●	●		
<b>Revolving credit line:</b> Flexible access to money up to a preset limit and when customers pay down, more credit becomes available.	●	●	●	●	●			●	
<b>Mobile wallet:</b> Account management and value-added services in the pocket of our customers.	●	●	●	●	●				

Our products are designed for millions of underserved consumers in a responsible way.

There were no significant changes to the Group's product, service offerings or customer groups served during the reporting period.

### b. Employee headcount

Employees as at 31 December 2024 by geographic area:

Market	Number of Employees
<b>Mexico</b>	2,569
<b>Poland</b>	1,040
<b>Hungary</b>	2,150
<b>Czech Republic</b>	302
<b>Romania</b>	1,960
<b>United Kingdom</b>	126
<b>Estonia</b>	120
<b>Lithuania</b>	30
<b>Latvia</b>	34
<b>Australia</b>	20

### c. Sustainability-related goals

The Group confirms that, at present, there are no specific sustainability-related goals in place for the following areas: significant groups of products and services, customer categories, geographical areas, or relationships with stakeholders. Our current strategy prioritises core business themes like profitable growth and customer satisfaction, with sustainability considerations such as our workforce and responsible lending integrated into our operations. While sustainability is not a primary driver, we monitor emerging trends and regulations, exploring training and data analysis to inform future strategic development. We regularly review our approach and will adapt as needed.

### d. Disclosure of business model and value chain

Our business model is aimed at assisting underserved consumers access financial services and creating long-term value for the communities we serve. We have built a suite of products described above which are tailored to our customers' financial circumstances, needs and preferences, and we deliver them in a responsible way. In doing so we are increasing financial inclusion for millions of people. Our approach is built on sustainable funding, multi-channel distribution, and strong regulatory compliance.

We raise funds through diversified wholesale financing instruments, including Eurobonds, bilateral financing arrangements, and other capital market sources. These funds enable us to provide the range of tailored financial products we offer to consumers.

Our products are delivered through multiple channels to ensure accessibility and convenience. We are committed to responsible lending, ensuring that all credit is extended based on a customer's ability to repay. Our affordability assessments, transparent pricing, and ethical collection practices are designed to support long-term financial wellbeing. We operate within the legal and regulatory frameworks of each market, ensuring adherence to consumer protection laws, fair lending standards, and financial regulations.

We have identified the following inputs required by our business model and describe below how these are gathered, developed and secured:

#### 1. Financial Capital:

- **Description:** Funds used to make loans and operate our business.
- **Sources:** Wholesale debt funding, equity investments.
- **Approach to gathering:** Maintain relationships with banks and investors, develop compelling investment narratives, diversify funding sources.
- **Approach to developing:** N/A (capital is not developed, but its availability is managed).
- **Approach to securing:** Maintain strong financial performance, manage risk effectively, comply with regulations, build investor confidence.

#### 2. Technology and data Infrastructure:

- **Description:** Software, hardware, and data platforms used for loan origination, servicing, risk management, reporting and customer interactions.
- **Sources:** Third-party vendors, in-house development.
- **Approach to gathering:** Careful supplier selection, competitive bidding, staying up to date with technology trends.
- **Approach to developing:** Invest in research and development, partner with technology companies, build internal expertise, prioritise cybersecurity.
- **Approach to securing:** Implement robust cybersecurity measures, data encryption, access controls, regular security audits, compliance with data privacy regulations.

#### 3. Human capital:

- **Description:** Employees with expertise in lending, finance, technology, customer service, and risk management.
- **Sources:** Recruitment, internal training.
- **Approach to gathering:** Targeted recruitment strategies, competitive compensation and benefits, employer branding.
- **Approach to developing:** Training programmes, leadership development, performance management systems.
- **Approach to securing:** Positive work environment, competitive salaries, opportunities for growth, strong company culture, employee retention programs.

#### 4. Customer data:

- **Description:** Information about borrowers used for credit scoring, loan underwriting, and customer relationship management.
- **Sources:** Loan applications, credit bureaus, third-party data providers (if applicable).
- **Approach to gathering:** Transparent data collection practices, informed consent from borrowers, compliance with data privacy regulations.
- **Approach to developing:** Data analytics and modelling to improve credit scoring and risk assessment.
- **Approach to securing:** Strict data security measures, access controls, encryption, compliance with privacy regulations (e.g., GDPR).

## 5. Credit information:

- **Description:** Credit reports and scores from credit bureaus.
- **Sources:** Various credit bureaux.
- **Approach to gathering:** Establish relationships with credit bureaus, subscribe to their services.
- **Approach to developing:** N/A (credit information is not developed by lenders).
- **Approach to securing:** Secure data transmission and storage, compliance with credit reporting regulations.

## 6. Regulatory and legal expertise:

- **Description:** Knowledge and expertise in lending regulations, consumer protection laws, and other legal requirements.
- **Sources:** Internal legal team, external legal counsel, industry associations.
- **Approach to gathering:** Stay up to date with regulatory changes, engage with legal experts, participate in industry events.
- **Approach to developing:** Build internal compliance expertise, develop robust compliance programs.
- **Approach to securing:** Maintain strong compliance culture, regular audits, legal reviews of policies and procedures.

## 7. Brand and reputation:

- **Description:** The Group's image and reputation in the market.
- **Sources:** Customer reviews, media coverage, industry recognition.
- **Approach to gathering:** Monitor customer feedback, engage with media, participate in industry events.
- **Approach to developing:** Provide excellent customer service, build trust and transparency, engage in responsible lending practices.
- **Approach to securing:** Maintain ethical business practices, handle customer complaints effectively, communicate transparently.

We have identified the following outputs from our business, which we define as the direct products and services that we provided in 2024:

- **Loans disbursed:** The total value and volume of loans issued.
- **Number of customers served:** The number of borrowers the Group has provided loans to.
- **Loan portfolio size:** The total outstanding balance of all loans.

## 1. Customers:

### Current benefits:

- **Access to credit:** Provide access to finance for various needs, principally to a customer segment which is not well served by other traditional lenders.
- **Convenient application and disbursement process:** Our customer representative model and online processes are designed to meet customer needs for convenience.
- **Flexible loan terms:** We offer a range of loan amounts, repayment schedules, and interest rate options to meet diverse needs.
- **Transparent pricing:** We clearly disclose all fees and interest rates upfront, ensuring no hidden costs.

### Expected benefits:

- **Building credit history:** Responsible loan repayments can help customers build or improve their credit scores.
- **Achieving financial goals:** Our products enable customers to achieve their aspirations.

### 2. Investors:

#### Current benefits:

- **Financial returns:** The Group's financial performance, including dividends.
- **Portfolio diversification:** We provide investors with exposure to a range of diverse geographic markets.
- **Social impact:** Our focus on financial inclusion provides a positive social impact of any investment in the Group.

#### Expected Benefits:

- **Sustainable growth:** Project future growth and profitability, demonstrating the long-term value of their investment.
- **Strong risk management:** Highlight our risk assessment and mitigation strategies to assure investors of the safety of their investments.

## 3. Other Stakeholders

### Employees:

- **Current benefits:** Job creation, competitive salaries and benefits, opportunities for professional development.
- **Expected benefits:** Career growth, a positive and inclusive work environment.

### Communities:

- **Current benefits:** Increased economic activity, community development.
- **Expected benefits:** Increased access to financial services in underserved communities.

### Regulators:

- **Current benefits:** Adherence to all applicable laws and regulations, transparent reporting.
- **Expected benefits:** Contribution to a stable and well-functioning financial system.

## Our value chain

### 1. Upstream value chain

Our upstream value chain encompasses the resources and services we rely on to create and deliver our lending products. Key actors include:

- **Capital markets:** We secure funding through a range of wholesale funding arrangements. These relationships are crucial for ensuring the availability of capital for lending.
- **Technology providers:** We rely on third-party IT service providers, cloud infrastructure partners, and cybersecurity companies to maintain secure and scalable digital lending platforms.
- **Credit bureaus:** We subscribe to credit reporting services. Access to accurate credit information is fundamental to our underwriting process and responsible lending practices.
- **Third-party service providers:** We engage a range of suppliers for various services including collection of customer repayments, legal support, and marketing. These relationships allow us to scale our operations and access specialised expertise.
- **Insurance providers:** We contract with third-party insurers to provide value-added services, with the insurer underwriting the policy, managing claims and assuming risk.
- **Physical locations:** Our business operations are supported by a network of owned and leased physical locations, including corporate offices, branches and call centres, which are integral to delivering our financial products and services, with leasing arrangements managed through agreements with landlords and property management firms.

### 2. Our Operations

Our core operations involve:

- **Loan origination and underwriting:** We evaluate loan applications based on creditworthiness, income, and other factors, adhering to regulatory requirements and our internal risk appetite. This process includes automated scoring models and manual review.

### e. Interests and views of stakeholders

Detailed below is information on stakeholder engagement in 2024. More information can be found in the stakeholder engagement section of this Annual Report and Financial Statements on pages 46 to 47.

Stakeholder Group	Colleagues
Who are they?	Our colleagues working in full-time roles or as self-employed customer representatives.
How does engagement occur and how is it organised?	The HR Function has multiple touchpoints with colleagues throughout the entire employment life cycle, from recruitment and onboarding, to development, reward and recognition, performance management and exit. We also conduct specific engagement exercises regularly including our Global People Survey and pulse surveys, as well as more qualitative focus groups. We also conducted a DMA to understand their perspective on key sustainability topics.
What is the purpose of engagement?	To foster a motivated and productive workforce, gain insights into operational challenges, enhance workplace culture and ensure alignment between colleague needs and business objectives, ultimately driving long-term success.
How are the outcomes taken into account?	- Outputs from feedback mechanisms are reviewed by the HR Function at Group and market level. The results of surveys are reviewed by the Group Board of Directors and individual markets. - Feedback helps inform the People Strategy as well as decisions on remuneration and organisational design.
What are their views on the Group's strategy?	The DMA process involved engagement with employees and customer representatives in every market. The results of this exercise indicated the following five topics were of most interest (in descending order): Working conditions and workers' rights, health and safety, customer privacy, corporate culture and access to financial services.

- **Servicing:** We manage repayments, provide customer support, and handle enquiries. We strive to offer convenient payment options and clear communication throughout the loan lifecycle.

- **Risk management and compliance:** We continuously monitor loan performance, assess credit risk, and ensure compliance with all applicable laws and regulations.

- **Technology and data analytics:** We invest in technology to streamline processes, improve decision making, and enhance the customer experience. Data analytics plays a vital role in credit scoring, fraud detection, and portfolio management.

### 3. Downstream value chain

Our downstream value chain focuses on the delivery of our lending products to customers and the subsequent management of those loans. Key actors include:

- **Customers:** We provide financial products to a broad consumer base, supporting financial inclusion through responsible credit access.

- **Debt collection agencies (if applicable):** We partner with dedicated debt collection agencies to recover outstanding balances on delinquent accounts. We adhere to ethical and compliant collection practices.

- **Credit reporting agencies:** We report borrowers' payment history to credit bureaus, contributing to the credit ecosystem.

- **Customer representatives:** Our customer representatives originate and service personal loans directly with customers. They also provide an in-person service at the customer's home, ensuring accessibility and convenience.

- **Retail partners:** Our products include point-of-sale financing in both physical locations and online, provided in conjunction with retail partners, integrating financial solutions into everyday consumer transactions.

Stakeholder Group	Customers	
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<b>Who are they?</b>	The individuals we provide finance, insurance and other value-added services to in each of our markets.
<b>How does engagement occur and how is it organised?</b>	Review of customer engagement and experience metrics, complaints and feedback from customer representatives. We also conduct a materiality assessment involving customers to understand their perspective on key sustainability topics.
<b>What is the purpose of engagement?</b>	To understand their needs, preferences, and challenges, ensuring that our products and services remain relevant, competitive, and aligned with market demands. This engagement also helps to build trust, enhance customer satisfaction, and drive long-term loyalty, ultimately contributing to business growth and brand reputation.
<b>How are the outcomes taken into account?</b>	Customer feedback is analysed to identify trends, improve products and services, and refine customer experience strategies, ensuring alignment with market expectations. These insights are then integrated into business decisions, product development, and service enhancements, driving customer satisfaction, retention, and long-term growth.
<b>What are their views on the Group's strategy?</b>	The DMA process involved engagement with customers in every market. The results of this exercise indicated the following five topics were of most interest (in descending order): Customer privacy, working conditions and workers' rights; health and safety; corruption, bribery and whistleblowers; and ethical marketing.

Stakeholder Group	Investors	
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<b>Who are they?</b>	The entities that fund IPF (equity and debt).
<b>How does engagement occur and how is it organised?</b>	The Head of Investor Relations and Group Treasurer coordinate an extensive programme of engagement with investors. The Chief Executive Officer and Chief Financial Officer have regular discussions, including formal presentations for the full and half-year results, where feedback from this group is provided. The Group's joint brokers and their sales teams together with our equity and debt advisors also engage with investors on behalf of IPF and provide insights into investor sentiment.
<b>What is the purpose of engagement?</b>	To build investor confidence and align business strategy with shareholder and other investor expectations. Regular engagement helps to secure long-term investment support and communicate financial performance, as well as address any concerns. We also conducted a materiality assessment process to understand their perspective on key sustainability topics.
<b>How are the outcomes taken into account?</b>	Feedback influences corporate governance, ESG initiatives, and long-term growth strategies, helping to balance shareholder expectations with sustainable business performance.
<b>What are their views on the Group's strategy?</b>	The DMA process involved engagement with a range of debt and equity investors. The results of this exercise indicated the following five topics were of most interest (in descending order): Access to financial services; working conditions and workers rights; corporate culture; customer privacy and health and safety.

Stakeholder Group	Suppliers	
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<b>Who are they?</b>	The organisations we do business with to help us deliver our products to our customers and support our colleagues.
<b>How does engagement occur and how is it organised?</b>	IPF runs regular supplier meetings and surveys, reviews specific supplier complaints when they arise, and works with key suppliers using supplier relationship management processes. These activities are led by the Procurement Function. In the event of a major disagreement, legal actions being threatened/commenced would be apparent. We also conducted a DMA in 2024 inviting suppliers representing all markets we operate in to contribute so as to understand their perspective on key sustainability topics.
<b>What is the purpose of engagement?</b>	We engage with our suppliers to ensure the reliability, quality, and sustainability of our supply chain. This engagement also helps to assess and mitigate risks, improve operational efficiency, assure data protection and increase ICT resilience and align procurement practices with ethical, regulatory, and sustainability standards.
<b>How are the outcomes taken into account?</b>	We use supplier engagement outcomes to adjust procurement strategies and ensuring compliance with quality, ethical, and sustainability standards. Insights from suppliers may lead to process improvements, contract adjustments, or collaborative initiatives that drive efficiency, innovation, and long-term partnership success.

<b>What are their views on the Group's strategy?</b>	The DMA process involved engagement with over 50 suppliers across all our markets. The results of this exercise indicated the following five topics were of most interest (in descending order): Working conditions and workers' rights; health and safety; customer privacy; managing suppliers effectively; and access to financial services.
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Stakeholder Group	Community groups	
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<b>Who are they?</b>	The communities we impact through our operations, including the specific activities we undertake to enhance those communities we are part of.
<b>How does engagement occur and how is it organised?</b>	The Director of Corporate Affairs coordinates with market Corporate Affairs Directors to understand the perspective of community groups. Initiatives like the annual reputation tracker survey and financial wellbeing research provide a broader insight into this group. Local networks of NGOs and other social partners are a valuable source of information on issues impacting our customers and we also conduct a materiality assessment process to understand their perspective on key sustainability topics.
<b>What is the purpose of engagement?</b>	To understand local needs, foster positive social impact, and ensure our work with such groups is meaningful and effective.
<b>How are the outcomes taken into account?</b>	We use the outcomes of community engagement to assess the impact of community investment initiatives and adjusting programmes to better align with community needs. This may lead to refinements in funding allocation, new partnerships, or the expansion of successful initiatives.

Stakeholder Group	Regulators	
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<b>Who are they?</b>	The regulatory bodies or agencies that oversee and enforce rules and standards within the sector we operate to protect consumers, maintain market integrity, and ensure fair competition.
<b>How does engagement occur and how is it organised?</b>	The Director of Corporate Affairs coordinates with market Corporate Affairs Directors to understand the perspective of regulatory bodies.
<b>What is the purpose of engagement?</b>	To ensure compliance, build trust, contribute to informed policymaking, and foster a stable and predictable operating environment.
<b>How are the outcomes taken into account?</b>	The outcomes of ethical engagement with regulators is integrated into the Group's decision-making processes, including strategy, operations, and compliance programmes, to ensure alignment with regulatory expectations and promote responsible business practices.

<b>What are their views on the Group's strategy?</b>	This stakeholder group provides its views via a range of mechanisms to the Group. Overall, such feedback indicates that the Group is regarded as a reliable and important participant in its sector, recognising its adherence to established rules designed to protect consumers and maintain a healthy financial system.
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<b>Current and anticipated effects of its material impacts, risks and opportunities on its business model, value chain, strategy and decision-making</b>
<b>Working conditions and workers' rights</b>

<b>Material impacts:</b> The protection of workers' rights and the maintenance of favourable working conditions contribute to broader social well-being by promoting fair employment practices and economic stability. Ensuring ethical labour standards supports community development, reduces inequality, and strengthens industry-wide commitments to responsible business conduct.
<b>Material risks:</b> Poor working conditions or violations of workers' rights could result in legal consequences, labour disputes and reputational damage. This may also lead to reduced workforce efficiency and increased colleague turnover.
<b>Material opportunities:</b> By offering fair wages, and fostering a safe and inclusive workplace, the Group can enhance employee engagement and operational performance. Upholding high labour standards strengthens the Group's reputation as an employer of choice, thereby attracting and retaining talent.

- **Concentration assessment:** These material impacts are most concentrated within the Group's internal operations.
- **Current effects:** The prioritisation of workers' rights and working conditions has confirmed the Group's existing understanding of the importance of its approach to human resources.
- **Anticipated effects:** The Group anticipates that evolving its HR strategy will continue to drive talent attraction and retention, thereby improving productivity.
- **Impact on business model and value chain:** This topic impacts the internal operations of the Group directly and managing this effectively is crucial for the long-term success of the business.
- **Impact on strategy and decision making:** The Group has a Group-wide HR strategy in place which covers topics such as employee development and operational policies, and this will continue.
- **Response and planned actions:** No specific additional actions are planned as a result of this assessment.
- **Changes to strategy and business model:** No specific changes are envisaged.
- **Time horizon:** This topic impacts the Group in the short, medium and long term.
- **Potential negative impacts on people:** These could include poor working conditions, such as unsafe environments, unfair wages, or excessive working hours which can lead to physical and mental harm for colleagues. Our colleagues also include customer representatives who visit customers' homes to disburse loans and collect repayments. This activity raises specific health and safety risks for these colleagues, such as exposure to potentially unsafe environments or travel-related hazards. These risks are managed through appropriate safety protocols, training, and support mechanisms to ensure the wellbeing of those involved.
- **Potential positive impacts on people:** Ensuring favourable working conditions and upholding workers' rights supports colleague wellbeing, promotes a positive work environment, and enhances productivity.
- **Potential positive impacts on the environment:** There are no material positive impacts identified from this topic.
- **Potential negative impacts on the environment:** There are no material impacts identified from this topic.
- **Basis for involvement:** The Group is involved in this topic through its direct activities.

## Access to financial services

- **Material impacts:** Ensuring access to financial services is crucial for promoting financial inclusion, particularly in underserved markets. As a provider of financial services, the Group plays an important role in bridging gaps in financial accessibility.
- **Material risks:** Limited access to financial services for certain populations can widen economic disparities and affect the Group's social license to operate negatively.
- **Material opportunities:** Expanding access to financial services offers significant growth opportunities by opening up new customer segments. This can also position the Group as a leader in promoting financial inclusion, improving both social outcomes and business sustainability.
- **Concentration assessment:** The impacts of financial inclusion efforts are concentrated predominantly in downstream operations, where the Group engages with customers.

- **Current effects:** The Group’s purpose and strategy is aimed at improving access to financial services, particularly in underserved markets.
- **Anticipated effects:** The Group anticipates continuing to develop its approach to offering new products and channels mean greater demand for these services.
- **Impact on business model and value chain:** Expanding access to financial services impacts the Group’s downstream operations, requiring adjustments to distribution channels. Additionally, upstream impacts will likely occur, given the Group will likely require greater engagement with various suppliers, particularly in the technology area.
- **Impact on strategy and decision making:** The Group’s purpose has made financial inclusion a strategic priority, influencing decisions around product development, partnerships, and market expansion.
- **Response and planned actions:** No specific additional actions are planned as a result of this assessment.
- **Changes to strategy and business model:** No specific changes are envisaged.
- **Time horizon:** This topic impacts the Group in the short, medium and long term.
- **Potential negative impacts on people:** A lack of access to financial services affects low-income and underserved consumers disproportionately, limiting their ability to save, invest, or manage financial risks. This can perpetuate economic inequality and exclude certain populations from economic participation.
- **Potential positive impacts on people:** Expanding access to financial services empowers individuals, particularly in underserved communities, by providing them with the tools to manage their finances, and build financial resilience.
- **Potential positive impact on the environment:** Financial exclusion has a limited direct impact on the environment.
- **Potential negative impact on the environment:** Consumer loans may have indirect environmental impacts by enabling purchases that contribute to carbon emissions, resource depletion, and waste generation. However, as the Group does not track how customers use their loans, it cannot assess or measure the specific environmental effects of its lending activities. The process of originating, processing, and managing loans relies on digital infrastructure, data centres, and office energy use and customer representatives use motor vehicles to meet with customers in the Group’s home credit businesses, which are all activities that contribute to emissions in the financial sector.
- **Basis of involvement:** The Group is involved in this topic through its direct activities.

The current financial effects of the identified material IROs are limited. The Group does not consider that the current financial effects of the material IROs identified above would impact its financial position, performance, or cash flows materially. Additionally, there are no significant risks that would require a material adjustment to the carrying amounts of assets and liabilities within the next annual reporting period.

The anticipated financial effects of the Group's material risks and opportunities will continue to be an important consideration in relation to its financial position, financial performance, or cash flows in the short, medium, or long term. These matters will remain a key focus for management and the Group Board of Directors, and will be assessed regularly through the strategic planning process to ensure appropriate risk mitigation and opportunity management. The Group does

not anticipate any significant changes to its investment, disposal plans, or funding sources as a result of these impacts and will continue to evaluate their development as part of its ongoing business planning and governance framework.

As our material IROs are related to our core business activities, our initiatives to improve opportunities and mitigate impacts and risks are embedded in already established governance structures. As a result, our resilience is deemed high within the time horizons applied in the CSRD. The resilience analysis is based on qualitative input by internal subject-matter experts, including an overall assessment of the mitigating factors in place across all IROs.

#### **g. Disclosures on the materiality assessment process**

## Processes to identify and assess material impacts, risks and opportunities



In 2023, we undertook a materiality assessment process for the first time and reported on this in our 2023 Annual Report and Financial Statements. In 2024, we undertook a DMA to map and gain a deeper understanding of our most material impacts in alignment with the requirements of ESRS 1 and 2. A DMA is a strategic and comprehensive approach to evaluate the IROs related to sustainability. The DMA determined one topic stemming from the ESRS (Working Conditions and Workers' Rights) and one self-identified topic (Access to Financial Services) to be material.

We sought to use methodologies and assumptions to ensure a comprehensive understanding of how sustainability issues affect both the Group and our broader stakeholders. When preparing our first disclosures under ESRS requirements, we looked to comprehensively assess all requirements on a datapoint-by-datapoint basis, considering the identified IROs, and mapping and preparing all material disclosure requirements. We also assessed data points that are not

The Group has assessed the resilience of its strategy and business model regarding its capacity to address material IROs. Based on the current analysis, no material sustainability-related risks or opportunities have been identified that require strategic adjustments. The Group continues to monitor potential sustainability-related developments as part of its risk management and business planning processes, applying the different time horizons in accordance with ESRs 1.

For the current reporting period, as this is the first time the Group is disclosing in line with ESRS, there are no prior reporting cycles for comparison. The Group remains committed to ongoing assessment and will update its disclosures in future reporting periods should material IROs change.

material, considering carefully the intent and contents of the requirement, the relevance to our business, and potential usefulness for users of our annual reporting.

The Group utilised a DMA process as the key methodology to identify material IROs. This method sought to evaluate both impact materiality (the effects of our business activities on the environment, society, and stakeholders) and financial materiality (the potential financial implications of sustainability factors on our business performance and value creation). We used a scoring system for the DMA process. For the impact assessment, we used a scoring system to evaluate the scale, scope, irremediability and likelihood of all sustainability matters. For financial materiality, the scoring system assessed the likelihood and potential magnitude of financial effects caused by a sustainability matter. In our DMA we considered the topics prescribed in ESRS 1 (Article 16) and other relevant topics when assessing IROs.

Thresholds were applied for both the financial and impact assessments. The financial thresholds were applied in the DMA process to assess financial risks and opportunities to ensure alignment with how risks are evaluated generally in relation to financial performance. For the impact assessment, internally-developed thresholds were applied, based on internal discussions. These thresholds helped evaluate and identify impacts to satisfy the needs of our stakeholders, including the readers of our CSD Statement.

The development of the DMA methodology and the management of the DMA process was centralised to ensure consistency in the application of scores and thresholds, and also involved the use of external subject-matter experts. The process was overseen by the Responsible Business Framework Steering Group with the results reported to the Board of Directors.

The process described enabled appropriate focus on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts on the environment or people given the choice of topics. Through consulting with customers, suppliers, NGOs and investors the process sought to include consideration of the impacts which the Group is involved with through business relationships. Through consultation with colleagues the process sought to identify impacts arising from its own operations. The process included consultation with impacted stakeholders but not with external experts. The process sought to prioritise negative impacts based on severity and likelihood through questions asked of stakeholders.

Following our sustainability governance process, the Group Sustainability Function managed the DMA process in collaboration with internal subject-matter experts. The results of the DMA were discussed with the Responsible Business Framework Steering Group and the Responsible Business Framework Executive Steering Group before being reviewed by the Board of Directors.

The Group considers sustainability-related risks within its Enterprise Risk Management (ERM) framework, alongside other business risks. These risks are assessed using the Group's existing risk assessment tools and processes, alongside financial, operational, and regulatory risks, to support overall risk management. For more information on how the Group manages and assesses risks, including climate risk and other sustainability-related risks, see the Principal Risks and Uncertainties section of the Group's 2024 Annual Report and Financial Statements on pages 38 to 43.

The Group identifies, assesses, prioritises, and monitors risks and opportunities that may have financial effects through separate processes.

#### Risk identification and assessment:

Sustainability-related risks are considered as part of the Group's broader ERM framework, alongside financial, operational, and regulatory risks. The likelihood, magnitude, and nature of these risks are assessed using a qualitative approach, considering potential financial effects and business implications. The Group does not prioritise sustainability-related risks over other risk types; instead, it applies a common risk review process across all categories to ensure consistency in risk management.

#### Opportunity identification and assessment:

Opportunities are assessed through the strategic planning and budgeting process, which identifies areas for prioritisation based on business objectives and market conditions. This process does not include an explicit assessment of the connections between the Group's impacts and dependencies and the opportunities that may arise from them. The assessment of financial effects related to opportunities follows a qualitative approach, with decisions guided by broader strategic considerations.

The Group continues to monitor sustainability-related risks and opportunities as part of its existing governance and planning frameworks.

For our DMA, we used inputs provided by our stakeholders and covered all markets in which we operate. The assessment relied on both qualitative and quantitative data, including stakeholder feedback and internal discussions. No significant deviations or extraordinary assumptions were made beyond what is supported by the available data.

As noted above, the Group undertook its first materiality assessment process in 2023 and in 2024 it was further refined to reflect the requirements detailed in the ESRS for materiality assessments.

#### Processes to identify and assess material impacts, risks and opportunities – environmental topics

The Group has assessed its potential environmental IROs in accordance with ESRS E1–E5. These were assessed for materiality in the DMA process in the same way as for other topics as described above. This meant that a wide variety of potential topics relating to climate and the environment were on the initial "long list" of topics. Following discussions, the "Climate Change" and "Waste" topics were included on the shortlist of topics which were the subject of stakeholder consultation. In undertaking this assessment, the consideration was not only for the Group's own operations but also those of the Group's upstream and downstream value chain for these topics.

Based on this assessment, none of these topics have been identified as material to the Group's operations. Below are specific disclosures against each standard:

#### ESRS E1: Climate Change

The Group reviewed its potential contributions to and risks from climate change. This process included consideration of climate hazards and physical risks, consideration of transition risks and use of climate-related scenario analysis. The Group does not have direct operations with significant carbon emissions, energy consumption, or climate-related risks. As a service-based financial institution, its environmental impact is limited, and climate-related risks are not considered material at this time. The Group will continue to monitor regulatory developments and industry trends.

#### ESRS E2: Pollution

The Group does not engage in manufacturing, industrial processes, or other activities that generate air, water, or soil pollution. As a financial services provider, pollution-related risks and opportunities have not been identified as material. The Group's primary environmental footprint relates to office operations and digital infrastructure, which are not considered significant sources of pollution.

#### ESRS E3: Water and Marine Resources

The Group's business activities do not involve high water consumption, discharge of pollutants into water bodies, or dependency on marine resources. As such, the Group does not consider water and marine resource management to be a material issue.

#### ESRS E4: Biodiversity and Ecosystems

The Group has a limited geographic footprint and is focussed in urban areas. It does not operate in industries that directly impact biodiversity, land use, deforestation, or ecosystem degradation. Given that its primary activities involve financial services, biodiversity-related risks and opportunities are not considered material.

#### ESRS E5: Resource Use and Circular Economy

The Group operations do not involve significant material resource consumption, waste generation, or circular economy initiatives. As a financial institution, resource use is primarily related to digital services, office equipment, and IT infrastructure, which are not considered material in the context of circular economy principles.

#### h. Disclosure requirements in ESRS covered by the undertaking's CSD Statement

The Group's DMA process included assessment of climate change related IROs. The feedback from all stakeholder groups involved in the process, both internal and external regarding climate change, indicated that this area was not considered to be a material IRO for our business. This assessment considered both our direct impacts and those arising potentially from our value chain.

Internal assessment of these results concurred with this conclusion based on the following factors:

- Limited direct emissions:** Our operational footprint, primarily related to vehicle emissions, office premises and data centres, generates limited greenhouse gas emissions. We do not engage in manufacturing, transportation, or other activities typically associated with significant direct emissions.

- Limited exposure to financed emissions:** Our core business involves providing consumer loans and credit cards. While we acknowledge the broader societal impact of consumer spending, our financing activities do not involve large-scale projects directly or industries with high carbon footprints (e.g., fossil fuel extraction, heavy industry). Furthermore, currently accepted methodologies do not allow for a reliable and meaningful allocation of Scope 3 financed emissions to the type of lending we undertake. We are monitoring the development of such methodologies and will reassess this aspect of our DMA as they evolve.

- Physical risk assessment:** We commissioned an independent, specialist modelling company to conduct a comprehensive assessment of physical climate change risks to our global premises over different time horizons. This assessment considered various climate change scenarios and potential impacts, including extreme weather events. The results of this assessment indicated that, based on current projections, we do not face significant physical climate-related risks to our operations in the short and medium term.

#### Forward-looking analysis:

While climate change is not currently considered material, we recognise that the situation may evolve. We will continue to monitor the following factors, which could lead us to reassess the materiality of climate change in the future:

- Development of Scope 3 methodologies:** As methodologies for measuring financed emissions related to consumer lending improve, we will re-evaluate the feasibility and relevance of including such emissions in our assessment.
- Changes in regulatory landscape:** Evolving regulations related to climate change reporting and financial disclosures could necessitate a reassessment of materiality.
- Shifts in consumer behaviour:** Significant changes in consumer preferences towards more sustainable products and services could impact our business and require us to adapt our lending practices.
- Advances in climate science:** Updated climate projections and risk assessments could reveal greater physical risks to our operations or the broader economy, thereby impacting our business environment.

We are committed to reviewing our materiality assessment for climate change regularly. These reviews will ensure that our assessments remain aligned with the latest scientific understanding, regulatory requirements, and best practices in climate-related risk management. We will disclose any changes to our materiality assessment and related disclosures accordingly. We remain committed to reducing our emissions and more details on our approach to this topic are set out in our TCFD Disclosures on pages 68 to 75.

#### Materiality of information disclosed

In determining the material information to be disclosed in this CSD Statement, the Group has applied the guidance set out in ESRS 1 section 3.2, which defines material information as that which is necessary for stakeholders to understand material IROs and how they are managed. The Group has sought to take a prudent approach, ensuring that all relevant information related to its material IROs are disclosed. This approach aims to provide transparency and alignment with ESRS requirements, ensuring stakeholders have a clear and complete view of the Group's sustainability-related disclosures.

## EU legislation data points

The table below outlines the data points derived from other EU legislation as listed in ESRS 2 Appendix B.

It indicates where these data points can be found in our 2024 Annual Report and Financial Statements and identifies which data points are assessed as 'Not material' (the information is not material to our reporting) or "Not relevant" (the information is not relevant to our operations).

### Key

- Sustainable Finance Disclosure Regulation: SFDR
- EBA Pillar 3 disclosure requirements: P3
- Climate Benchmark Standards Regulation: BRR
- EU Climate Law: EUCL

Disclosure Requirement	Data Point	Legislation	Page/relevance
ESRS 2 GOV-1	21 (d)	Board's gender diversity	SFDR/BRR
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent	BRR
ESRS 2 GOV-4	30	Statement on due diligence	SFDR
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	SFDR/P3/BRR
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	SFDR/BRR
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	SFDR/BRR
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco	BRR
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050	EUCL
ESRS E1-1	16 (g)	Undertakings excluded from Paris aligned benchmarks	P3/BRR
ESRS E1-4	34	GHG emission reduction targets	SFDR/P3/BRR
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources	SFDR
ESRS E1-5	37	Energy consumption and mix	SFDR
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	SFDR
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	SFDR/P3/BRR
ESRS E1-6	53-55	Gross GHG emissions intensity	SFDR/P3/BRR
ESRS E1-7	56	GHG removals and carbon credits	EUCL
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks	BRR
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk	P3
ESRS E1-9	66 (c)	Location of significant assets at material physical risk	P3
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes	P3
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities	BBR
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil	SFDR
ESRS E3-1	9	Water and marine resources	SFDR
ESRS E3-1	13	Dedicated policy	SFDR
ESRS E3-1	14	Sustainable oceans and seas	SFDR

Disclosure Requirement	Data Point	Legislation	Page/relevance
ESRS E3-4	28 (c)	Total water recycled and reused	SFDR
ESRS E3-4	29	Total water consumption in m <sup>3</sup> per net revenue on own operations	SFDR
ESRS 2 SBM-3 - E4	16 (a) i	Biodiversity sensitive areas	SFDR
ESRS 2 SBM-3 - E4	16 (b)	Sustainable land / agriculture practices or policies	SFDR
ESRS 2 SBM-3 - E4	16 (c)	Threatened species	SFDR
ESRS E4-2	24 (b)	Sustainable land/agriculture practices or policies	SFDR
ESRS E4-2	24 (c)	Sustainable oceans/seas practices or policies	SFDR
ESRS E4-2	24 (d)	Policies to address deforestation	SFDR
ESRS E5-5	37 (d)	Non-recycled waste	SFDR
ESRS E5-5	39	Hazardous waste and radioactive waste	SFDR
ESRS 2 SBM-3 - S1	14 (f)	Risk of incidents of forced labour	SFDR
ESRS 2 SBM-3 - S1	14 (g)	Risk of incidents of child labour	SFDR
ESRS S1-1	20	Human rights policy commitments	SFDR
ESRS S1-1	21	Sustainability due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8	BRR
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	SFDR
ESRS S1-1	23	Workplace accident prevention policy or management system	SFDR
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	SFDR
ESRS S1-14	88 (b), (c)	Number of fatalities and number and rate of work-related accidents	SFDR/BRR
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	SFDR
ESRS S1-16	97 (a)	Unadjusted gender pay gap	SFDR /BRR
ESRS S1-16	97 (b)	Excessive CEO pay ratio	SFDR
ESRS S1-17	103 (a)	Incidents of discrimination	SFDR
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	SFDR/BRR
ESRS 2 SBM-3 - S2	11 (b)	Significant risk of child labour or forced labour in the value chain	SFDR
ESRS S2-1	17	Human rights policy commitments	SFDR
ESRS S2-1	18	Policies related to value chain workers	SFDR
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	SFDR/BRR
ESRS S2-1	19	Sustainability due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 paragraph 19	BRR
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	SFDR
ESRS S3-1	16	Human rights policy commitments	SFDR
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	SFDR/BRR

Disclosure Requirement	Data Point	Legislation	Page/relevance
<b>ESRS S3-4</b>	36	Human rights issues and incidents	SFDR
<b>ESRS S4-1</b>	16	Policies related to consumers and end-users	SFDR
<b>ESRS S4-1</b>	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	SFDR/BRR
<b>ESRS S4-4</b>	35	Human rights issues and incidents	SFDR
<b>ESRS G1-1</b>	10 (b)	United Nations Convention against Corruption	SFDR
<b>ESRS G1-1</b>	10 (d)	Protection of whistleblowers	SFDR
<b>ESRS G1-4</b>	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	SFDR/BRR
<b>ESRS G1-4</b>	24 (b)	Standards of anti-corruption and anti-bribery	SFDR

**Table: ESRS Disclosure Requirements Compliance Overview in accordance with ESRS 2 Paragraph 56**

ESRS Disclosure Requirement	Included in CSDR Statement	Reference / Explanation
ESRS 2 SBM-1 Business Model and Strategy	Yes	Strategy, Business Model and value chain, pages 126 to 128
ESRS 2 SBM-2 Interests and Views of Stakeholders	Yes	Interests and Views of Stakeholders, pages 129 to 131
ESRS 2 SBM-3 Material Impacts, Risks and Opportunities	Yes	Material Impacts, Risks and Opportunities, pages 131 to 133
ESRS 2 GOV-1 Governance of Sustainability Matters	Yes	Governance disclosures, pages 123 to 125
ESRS 2 GOV-2 Information Provided by Administrative, Management, and Supervisory Bodies	Yes	Governance disclosures, pages 123 to 124
ESRS 2 GOV-3 Integration of Sustainability-related Performance in Incentive Schemes	Yes	Integration of Sustainability-related Performance in Incentive Schemes, page 125
ESRS 2 GOV-4 Statement on due diligence	Yes	Statement on Sustainability due diligence, page 125
ESRS 2 GOV-5 Risk management and internal controls over sustainability reporting	Yes	Risk management and internal controls over Sustainability Reporting, page 125
ESRS 2 IRO-1 Description of Processes to Identify and Assess Material IROs	Yes	Disclosures on the materiality assessment process, pages 133 to 135
ESRS IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Yes	Disclosure requirements in ESRS covered by the undertaking's CSDR Statement, page 135
ESRS S1 Own Workforce	Yes	Own Workforce, pages 140 to 150
S1-1 Policies related to own workforce	Yes	Policies, pages 140 to 144
S1-2 Processes for engaging with own workforce and workers' representatives about impacts	Yes	Processes for engaging with own workforce and workers' representatives about impacts, page 144
S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns	Yes	Processes to remediate negative impacts and channels for own workforce to raise concerns, pages 144 to 145
S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Yes	Targets related to managing material impacts, advancing positive impacts and managing material risks and opportunities, page 146
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Yes	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities, page 146
S1-6 Characteristics of the undertaking's employees	Yes	Characteristics of the undertaking's employees, page 147
S1-7 Characteristics of non-employees in the undertaking's own workforce	Yes	Characteristics of non-employees in the undertaking's own workforce, page 148
S1-8 Collective bargaining coverage and social dialogue	Yes	Collective bargaining coverage and social dialogue, page 148
S1-9 Diversity metrics	Yes	Diversity metrics, page 148
S1-10 Adequate Wages	Yes	Adequate Wages, page 148
S1-11 Social Protection	Yes	Social Protection, page 148
S1-12 Persons with disabilities	Yes	Persons with disabilities, page 148
S1-13 Training and skills development metrics	Yes	Training and skills development metrics, page 149
S1-14 Health and safety metrics	Yes	Health and safety metrics, page 149
S1-15 Work-life balance metrics	Yes	Work-life balance metrics, page 149
S1-16 Remuneration metrics (pay gap and total remuneration)	Yes	Remuneration metrics (pay gap and total remuneration), page 149
S1-17 Incidents, complaints and severe human rights impacts	Yes	Incidents, complaints and severe human rights impacts, pages 149 to 150

# Social information

## ESRS S1 Own Workforce

Our people are the core of our business. We are committed to their personal and professional growth and strive to create an inclusive culture where every individual feels valued and supported. We look to provide career opportunities for all colleagues, regardless of their gender, age, or location. This section of the CSD Statement provides more details on our workforce in line with ESRS S1 "Own Workforce".

### a. Employees and our strategy

The Group recognises that actual and potential impacts on its own workforce, as well as risks and opportunities related to its own workforce, are linked to its strategy and business model, particularly in areas such as wellbeing, health and safety and skills development. While these factors are considered as part of ongoing workforce management, no material risks or impacts have been identified that necessitate significant adjustments to the Group's strategy or business model. However, the Group continues to monitor workforce-related developments to ensure alignment with long-term business objectives and operational needs.

All our permanent employees, customer representatives and contractors may be exposed to material impacts due to our operations and all are covered within this disclosure. The Group, therefore, includes all individuals in its own workforce within the scope of this disclosure. This covers:

- **Full-time and part-time employees:** These colleagues across all operational sites are impacted directly by the Group's policies on working conditions, health and safety, compensation, and career development.
- **Customer representatives:** Customer representatives, who visit customers' homes to disburse loans and collect repayments, are included due to their exposure to specific health and safety risks. The Group seeks to ensure that safety measures are in place to mitigate these risks.
- **Temporary and contract workers:** These workers are also within the scope of this disclosure as they are subject to the Group's fair labour practices and safety standards during their engagement.

Our workforce includes customer-facing roles and back-office functions. All are subject to our operational impacts. Our customer-facing roles, specifically those who work as customer representatives and whose role requires them to interact directly with borrowers, are exposed to specific risks related to customer interactions, which we mitigate through extensive training and safety protocols. We have not identified any material negative impacts that are either widespread/systemic or related to individual incidents concerning our workforce.

The Group has identified positive impacts on its own workforce through initiatives aimed at colleague development, well-being, and engagement. These include training programs to support career growth, flexible work arrangements to enhance work-life balance, and support initiatives that contribute to job satisfaction and retention. These benefits are accessible across the workforce. Ongoing evaluation ensures that these initiatives continue to align with business objectives and workforce needs.

We recognise that our workforce is essential to our success and that our operations can create both risks and opportunities related to our workforce. While we manage a range of workforce-related factors, we have not currently identified any specific risks or opportunities arising from our impacts on our workforce that we deem to be individually material in the context of this specific disclosure requirement. The Group has identified dependencies on its workforce as material, given its reliance on employees to deliver core business activities and maintain service quality. The availability, engagement, and skill levels of the workforce are critical to operational success. However, these risks and opportunities are well managed through existing processes, including workforce planning, employee engagement initiatives, training and development programs, and risk management frameworks. The Group continues to monitor workforce-related dependencies to ensure business continuity and adaptability to changing workforce dynamics. We will reassess this determination annually.

The Group has not identified any material impacts on its own workforce related to efforts to reduce environmental impacts or achieve its sustainability goals. As a financial services provider with limited direct environmental impact, there are no significant workforce changes, such as restructuring, job losses, or reskilling, associated with such initiatives.

The Group has assessed its operations and determined that there are no significant risks of forced or compulsory labour or child labour, either based on the nature of its business activities or the geographic areas in which it operates. As a provider of consumer financial services, the Group does not engage in high-risk sectors typically associated with such risks.

The Group has identified customer representatives as being a particular group within its workforce who may be at greater risk of negative impacts due to health and safety considerations. A suite of policies and processes, described in more detail below, are in place to address this risk. Beyond this area workforce-related risks are managed through general policies and procedures applicable to all employees.

### b. Policies

The Group has a comprehensive set of policies governing how issues related to our entire workforce are handled in a structured manner. Our policies related to our workforce regulate those actions where our key impacts and potential risks are present and support us in reaching our social sustainability targets and ambitions. If publicly available, policies can be found on our website at [www.ipfin.co.uk](http://www.ipfin.co.uk).

## Code of Ethics

Description of the key contents of the policy, including its general objectives	The Code of Ethics sets out the principles and standards for ethical business conduct, ensuring integrity, transparency, and compliance with legal and regulatory requirements. It covers key areas such as anti-corruption, fair treatment of employees, data protection, conflicts of interest, and responsible business practices, reinforcing the Group's commitment to ethical decision-making and accountability.
Description of the material IROs the policy relates to	The Code of Ethics relates to material IROs associated with workforce-related impacts, including fair treatment, diversity, and non-discrimination. The Code also supports opportunities to enhance stakeholder trust, strengthen governance, and uphold responsible business practices across the Group's operations.
Description of the process for monitoring	The Group monitors compliance with the Code through regular training, senior oversight and reporting mechanisms, including a whistleblowing channel for confidential concerns. Oversight is provided ultimately by the Board of Directors, which approves the Code. Executive oversight is provided by the Group Ethics Committee, which comprises the Chief Executive Officer, Chief Financial Officer, Chief HR Officer and Chief Legal Officer. Day to day oversight and management of the Code is undertaken by the Group Legal Function, which reviews adherence to the Code and ensures any breaches are addressed in line with established procedures.
Description of the scope of the policy	The Code of Ethics applies across the Group's operations, covering all employees, Executive Management, and Board members, as well as contractors, suppliers, and business partners where relevant. It governs ethical conduct in all geographies where the Group operates and applies to activities across the value chain, including customer interactions and third-party relationships. There are no specific exclusions.
Body with accountability for the implementation of the Policy	The Board of Directors.
Reference to relevant third-party standards	The Code is based on the 10 principles of the UN Global Compact, the UN initiative to promote ethical business practices. Further, the principles set out in the UN Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises are reflected in the Code.
Stakeholder considerations	While no formal stakeholder consultation was conducted, the policy reflects established expectations for ethical conduct, compliance, and responsible business practices across the Group's operations.
How the Policy is made available	The Code of Ethics is made available to all potentially affected stakeholders through being published on the Group's website and its intranet sites. It is translated into every language relevant to the Group's markets to ensure accessibility across all operating regions. The Group holds an annual Ethics Week, where the principles of the Code are explained through various engagement activities. Additionally, all colleagues are required to complete annual ethics training, reinforcing awareness and understanding of the Code. Other events and communications are held throughout the year to publicise its contents and support its effective implementation.

## Human Rights Policy

Description of the key contents of the policy, including its general objectives	The Policy outlines its commitment to respecting and upholding fundamental human rights across its operations and value chain. Its key objectives are to ensure fair and ethical treatment of employees, prevent discrimination and harassment, promote safe working conditions, and uphold labour rights in line with international standards. The Policy also reinforces the Group's stance against modern slavery, child labour, and forced labour.
Description of the material IROs the policy relates to	The Policy relates to material IROs associated with workforce-related considerations, including fair treatment, non-discrimination, and safe working conditions. It addresses risks such as labour rights violations, workplace harassment, and inadequate health and safety measures, ensuring alignment with relevant legal and ethical standards. The Policy also supports opportunities to enhance employee well-being, improve workplace culture, and strengthen engagement by fostering an inclusive and responsible working environment across the Group's operations.
Description of the process for monitoring	The Group monitors compliance with the Policy through a combination of internal reviews, employee feedback mechanisms, and risk assessments. Regular training is provided to employees to ensure awareness and understanding of human rights principles. Concerns can be raised through established reporting channels, including a confidential whistleblowing mechanism. The Policy is reviewed periodically to assess its effectiveness, and any identified issues are addressed through corrective actions as part of the Group's broader governance and compliance framework.
Description of the scope of the policy	The Policy applies to all aspects of the Group's operations, covering its employees, workplaces, and business activities. It sets expectations for how the Group upholds human rights in its employment practices, working conditions, and interactions with stakeholders. The Policy guides the Group's approach to fair treatment, non-discrimination, and workplace safety, ensuring alignment with applicable laws and international human rights standards.
Body with accountability for the implementation of the Policy	The Board of Directors.
Reference to relevant third-party standards	The Policy aligns to align with UN Guiding Principles on Business and Human Rights and other relevant frameworks.
Stakeholder considerations	While no formal stakeholder consultation was conducted, the Policy reflects established expectations for human rights across the Group's operations.
How the Policy is made available	The Code of Ethics incorporates the key elements of the Policy, which is publicly available on the Group website, ensuring accessibility to employees, stakeholders, and other interested parties.

## Diversity Policy

Description of the key contents of the policy, including its general objectives	The Policy outlines the Group's commitment to fostering an inclusive and equitable workplace where all employees are valued and treated with respect. It promotes equal opportunities in recruitment, career development, and workplace culture while preventing discrimination based on gender, ethnicity, age, disability, sexual orientation, or other protected characteristics. The Policy supports a diverse workforce by ensuring fair treatment and encouraging a culture of inclusion and belonging.
Description of the material IROs the policy relates to	The Policy addresses workforce-related impacts, including representation, workplace inclusion, and career progression. It mitigates risks such as discrimination, bias in decision-making, and barriers to equal opportunities. The Policy also creates opportunities to enhance employee engagement, attract diverse talent, and strengthen innovation and collaboration across the Group's operations.
Description of the process for monitoring	The Group monitors the implementation of the Policy through regular workforce assessments, employee feedback, and inclusion surveys. Diversity metrics are reviewed periodically to track progress in representation and career development. Employees receive training on diversity and inclusion principles, and any concerns can be raised through established reporting channels, including a confidential whistleblowing mechanism.
Description of the scope of the policy	The Policy applies to all aspects of the Group's employment practices, including recruitment, promotions, workplace conduct, and leadership development. It sets out expectations for maintaining an inclusive workplace and applies to all employees and business units across the Group. The Policy focuses on the Group's internal workforce and does not extend to external stakeholders or the broader value chain.
Body with accountability for the implementation of the Policy	Group Ethics Committee.
Reference to relevant third-party standards	The Policy does not align to any specific third-party standards.
Stakeholder considerations	The Policy was developed without a formal stakeholder consultation process but reflects established best practices and legal requirements. It aligns with recognised diversity and inclusion frameworks and incorporates insights from ongoing employee engagement and workforce assessments to ensure its relevance and effectiveness.
How the Policy is made available	The Policy is publicly accessible on the Group website and is communicated internally through announcements and training programs. Employees receive regular updates on diversity initiatives, and the policy is embedded in recruitment, performance management, and leadership development processes to ensure ongoing awareness and implementation. The Code of Ethics incorporates the key elements of the Policy.

## Health and Safety Policy

Description of the key contents of the policy, including its general objectives	The Policy outlines its commitment to maintaining a safe and healthy working environment for all employees. It sets out guidelines for risk prevention, workplace safety procedures, and employee well-being. The policy aims to reduce workplace hazards, promote compliance with safety regulations and foster a culture where health and safety are prioritised in daily operations.
Description of the material IROs the policy relates to	The Policy addresses workforce-related risks such as workplace accidents, occupational illnesses, and non-compliance with safety regulations. It mitigates potential legal and reputational risks while creating opportunities to improve employee well-being, reduce absenteeism, and enhance productivity through a safe and supportive work environment.
Description of the process for monitoring	The Group monitors compliance with the Policy through regular workplace inspections, risk assessments, and reporting mechanisms. Training is provided to employees to ensure awareness of health and safety procedures, and incidents are recorded and reviewed to identify areas for improvement. A confidential reporting system allows employees to raise safety concerns, which are investigated and addressed as part of the Group's risk management framework.
Description of the scope of the policy	The Policy applies across all the Group's operations and workplaces, covering employees, contractors, and other personnel working on-site. It outlines responsibilities for maintaining workplace safety at all levels of the organisation. While the Policy primarily focuses on internal operations, it also applies to third-party service providers where relevant.
Body with accountability for the implementation of the Policy	The Board of Directors.
Reference to relevant third party standards	The Policy aligns to ISO 45001 Occupational Health & Safety, the international standard that specifies requirements for an occupational health and safety management system.
Stakeholder considerations	The Policy was developed without a formal stakeholder consultation process but aligns with legal requirements, industry best practices, and internal risk management frameworks. It incorporates insights from employee feedback and workplace safety assessments to ensure continued relevance and effectiveness.
How the Policy is made available	The Policy is communicated internally through training programs, safety briefings, and group-wide announcements. Employees receive regular updates on safety procedures, and the policy is integrated into onboarding processes and operational guidelines to ensure consistent application across the Group.

### c. Processes for engaging with own workforce and workers' representatives about impacts

The Group considers workforce perspectives through general people engagement initiatives, such as surveys and feedback mechanisms, to inform decisions related to workplace policies and wellbeing. However, no formal process is in place to integrate these perspectives specifically into the management of actual and potential workforce impacts. The Group continues to monitor workforce-related considerations through its broader HR and operational frameworks.

The Group engages with its workforce both directly and through formal employee and customer representative forums. In 2024, both our established employee forums across all markets and customer representative forums in all home credit markets helped to ensure an open dialogue on significant workforce matters. Additionally, we conducted "Pulse Surveys" across all divisions, which returned very positive responses. The outputs of these surveys were reviewed by the HR Function, Executive Management and the Board of Directors, providing valuable insights that inform our strategy and decision making. These engagement mechanisms allow us to assess and respond to workforce perspectives regularly in a structured and inclusive manner.

The Group has not adopted a specific process to gain insight into the perspectives of workforce members who may be particularly vulnerable to impacts or marginalised. There are currently no plans to implement such a process. However, the Group remains committed to applying its broader policies on diversity, equity, and inclusion to ensure fair treatment and equal opportunities for all employees.

### d. Processes to remediate negative impacts and channels for own workforce to raise concerns

The Group is committed to identifying, addressing, and remediating any material negative impacts on its workforce related to working conditions, including employment security, wages, working time, social dialogue, freedom of association, collective bargaining, work-life balance, and health and safety. Our approach includes established HR mechanisms, grievance procedures, and an independent whistleblowing system that allows employees to report concerns confidentially and without fear of retaliation.

Where the Group identifies that it has caused or contributed to a material negative impact, we assess the appropriate remedy through internal investigations, direct engagement with affected colleagues, and corrective actions such as policy adjustments, process improvements, or targeted interventions. The effectiveness of remedies is evaluated through follow-up engagement, feedback from colleague

forums, and monitoring of key workforce indicators, ensuring that concerns are appropriately addressed and resolved.

The Group is committed to maintaining a transparent and supportive environment where all colleagues feel empowered to raise concerns, report issues, or communicate their needs. We recognise the importance of providing clear, accessible channels for our workforce to engage directly with the Group on matters affecting their wellbeing, working conditions, and rights. We have established robust mechanisms to ensure that all concerns raised by colleagues are addressed promptly and fairly. Channels for raising concerns:

- Independent whistleblowing service:** The Group provides an independent, confidential whistleblowing service available to all colleagues. This service allows colleagues to report any concerns related to misconduct, unethical behaviour, or any issues that may affect their wellbeing, including potential violations of Group policies or legal requirements.

- Accessibility and confidentiality:** The whistleblowing service is operated by third-party providers to ensure confidentiality and impartiality. Colleagues can raise concerns anonymously, without fear of retaliation, and are assured that all reports will be thoroughly investigated and addressed.

- Regular communication:** We regularly communicate the availability of this service to all employees, ensuring that they are aware of how to access it and understand the types of concerns they can raise through this channel. Information on how to use the whistleblowing service is included in onboarding materials, Group-wide emails, and posted on the employee intranet.

- Internal reporting mechanisms:** In addition to the independent whistleblowing service, the Group has established internal mechanisms for colleagues to raise concerns directly with management or the HR Function. These include:

- Human resources:** Employees can contact the HR Function via email, phone or face to face to raise concerns about working conditions, benefits, career development, or any other work-related issues.

- Manager engagement:** We encourage open communication between colleagues and their direct supervisors or managers. Colleagues are invited to raise concerns during regular check-ins, performance reviews, or on an ad-hoc basis, ensuring that issues are addressed promptly. These internal channels are overseen by the relevant departments, with clear procedures in place to ensure that concerns are addressed in a timely and effective manner.

- Employee feedback surveys and forums:** The Group conducts engagement surveys regularly to gather feedback on various aspects of the work environment, including wellbeing, job satisfaction, and areas for improvement. Colleagues can raise concerns or suggest improvements through these surveys, which are analysed and acted upon by Executive Management. We also hold periodic employee forums or town hall meetings, where colleagues are encouraged to ask questions and share their concerns directly with Group leadership.

These mechanisms ensure that all colleagues have access to appropriate channels to raise concerns or complaints related to their work environment, wellbeing, or any other employment-related issues. Colleagues can utilise our internal reporting

systems or the independent whistleblowing service, both of which are designed to handle complaints confidentially and fairly, without fear of retaliation.

The Group has established a comprehensive system for tracking and monitoring issues raised through our grievance and whistleblowing channels. The process is overseen by the Group Legal Function, ensuring confidentiality and compliance with our internal policies. To maintain transparency and accountability, the Group Ethics Committee reviews all whistleblowing matters, and updates are provided regularly to the Group Audit and Risk Committee.

- Group Ethics Committee:** The Group Ethics Committee plays a central role in reviewing whistleblowing reports and other issues raised by colleagues. This Committee is responsible for assessing the nature of the issues, ensuring appropriate investigations are conducted, and recommending actions or remedies where necessary.

- Oversight by Group Legal Function:** To ensure the confidentiality and integrity of the process, the Group Legal Function oversees the tracking and management of all reported concerns. This function ensures that each case is handled in line with legal and regulatory requirements while protecting the identity of whistleblowers and other parties involved.

- Regular reporting:** Regular updates on the issues raised and their resolution are provided to the Group Audit and Risk Committee, ensuring that Executive Management and the Board of Directors are fully informed of key concerns and risks. This also ensures that the process is aligned with the Group's risk management framework.

The Group is committed to maintaining a safe, transparent, and ethical work environment where all employees and customer representatives can raise concerns without fear of retaliation. Our Whistleblowing Policy provides clear guidelines on how colleagues, contractors, and workers' representatives can raise concerns related to misconduct, unethical behaviour, legal violations, or other workplace issues. The policy explicitly prohibits any form of retaliation against individuals who use this channel to report concerns in good faith.

The Whistleblowing Policy applies to all individuals in our workforce, including full-time and part-time employees, contractors and self-employed customer representatives. The Whistleblowing Policy reflects a framework in place to support the management of workforce-related risks by providing employees with a confidential and secure channel to report concerns about misconduct, unethical behaviour, or policy violations. It guarantees that anyone raising a concern through the designated channels, including the independent whistleblowing service, will be protected from any adverse action or retaliation. The Group provides independent third-party whistleblowing services that allow colleagues to report concerns confidentially and, if desired, anonymously. This external service ensures that individuals feel secure when raising issues. To further protect those who report concerns, the whistleblowing service ensures strict confidentiality. No identifying details are shared without the consent of the individual raising the concern, except as required by law. The Group takes any allegation of retaliation seriously. Any report of retaliatory action is investigated immediately, and appropriate disciplinary measures are taken against individuals found to be engaging in retaliatory behaviour.

#### e. Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

The Group manages material workforce-related impacts through established HR policies, colleague engagement initiatives, and governance frameworks. To prevent or mitigate material negative impacts, we conduct regular colleague surveys, maintain formal employee and customer representative forums, and provide whistleblowing and grievance mechanisms to identify and address workplace concerns proactively. Where an actual material negative impact arises, the Group takes appropriate action through internal investigations, direct engagement with affected colleagues, and corrective measures, ensuring fair resolution and alignment with Group policies. These steps may include policy updates, training programmes, or adjustments to workplace conditions where necessary. Additionally, the Group implements initiatives aimed at delivering positive impacts, such as career development programmes, wellbeing support, and flexible work arrangements, to enhance engagement and retention. The effectiveness of these actions and initiatives is tracked through colleague feedback, survey results, retention rates, and workforce wellbeing indicators, allowing for continuous assessment and improvement in workforce management practices.

The Group looks to identify necessary actions in response to actual or potential negative impacts on its workforce through the mechanisms described above – namely regular colleague surveys, engagement forums, grievance mechanisms, and whistleblowing channels. Reported concerns are assessed by the HR Function and management, with appropriate actions determined based on internal policies, regulatory requirements and colleague feedback. The effectiveness of these actions is monitored through ongoing workforce engagement and review by the HR Function.

The Group manages its material IROs related to its own workforce as part of business-as-usual operations including governance frameworks, colleague engagement and HR policies, and workforce-related matters, including wellbeing, fair treatment, and workplace safety, are integrated into standard management practices and addressed through existing HR processes, training programmes, and internal reporting mechanisms. No separate action plans or additional resources have been allocated beyond these ongoing business operations.

The Group ensures that its practices do not cause or contribute to material negative impacts on its workforce through regular colleague surveys, engagement forums, and other touchpoints that provide insights into workforce wellbeing and workplace conditions. Workforce-related concerns are managed through established HR policies, grievance mechanisms, and whistleblowing channels to address potential issues proactively.

The management of material workforce-related impacts is handled as part of the HR Function's regular responsibilities and budgeting process, with no separate allocation of resources beyond standard HR operations. Workforce matters, including wellbeing, workplace policies, and compliance, are integrated into ongoing HR activities and managed within existing frameworks and budgets.

#### f. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The Group has not set any specific time-bound or outcome-oriented targets related to reducing negative impacts, advancing positive impacts, or managing material risks and opportunities for its workforce other than targets for workforce turnover which are disclosed on page 25 above, and there are no current plans to do so. The Group monitors the effectiveness of its policies and actions through regular governance and oversight processes. This includes periodic workforce reviews, employee feedback mechanisms and HR reporting to assess trends in engagement, well-being, and compliance with employment policies. While no specific level of ambition has been formally defined, qualitative assessments and internal reporting support continuous improvement in workforce-related matters.

Responsibility for setting workforce-related targets, if required, sits with the Chief HR Officer, who would determine them in agreement with the Chief Executive Officer and the Board of Directors. In such cases, the process would include consideration of workforce data, colleague engagement insights, and alignment with business priorities. While no specific targets have been set beyond those mentioned above, any future targets would be developed in consultation with relevant stakeholders and monitored through existing HR governance frameworks.

#### Methodology Statement for Disclosures S1-6 to S1-17

This methodology statement outlines the approach taken in compiling and reporting workforce-related data for Disclosures S1-6 to S1-17. It ensures consistency, accuracy, and compliance with applicable reporting standards across all entities within the Group. The methodologies applied provide a clear framework for classifying employees, contract types, working time, and gender to support comprehensive workforce analysis.

#### Scope and coverage:

- The data presented in Disclosures S1-6 to S1-17 covers all entities within the Group.
- Employee data is compiled as of the end of the reporting period, with additional reference to average workforce numbers over the period for comparative analysis.
- Data is reported as headcount rather than full-time equivalent (FTE).
- Workforce data is sourced from internal HR systems, payroll databases and employment records.

#### Methodologies applied:

##### 1. Employee headcount classification

- Permanent employees are counted based on their contract status at the reporting date.
- Temporary employees include fixed-term contracts and agency workers.

##### 2. Contract type classification

- Permanent contracts refer to indefinite employment agreements.
- Temporary contracts include fixed-duration agreements or agency employment.

#### 3. Working time classification

- Employees are categorised as full-time or part-time based on:
  - Contract terms.
  - Actual hours worked.

#### 4. Gender classification

- Based on Group HR records, which may be informed by:
  - Self-reported data, where available.
  - Local employment classifications, where applicable.

By adhering to these methodologies, the Group seeks to ensure that workforce data is accurately recorded and consistently applied across all reporting entities. This structured approach enhances transparency, comparability, and reliability, providing meaningful insights into the Group's workforce composition and employment practices.

#### g. Disclosure Requirement S1-6 – Characteristics of the undertaking's employees

Table 1 – information on employee head count by gender

Gender	Number of employees (headcount)
Male	2,946
Female	5,405
Other	0
Not reported	0
Total Employees	8,351

The data in this table covers all entities within the Group and includes employees on permanent and fixed-term contracts, as well as those working full-time and part-time. This dataset also includes customer representatives in Hungary and Romania, who are employed under the Group's workforce structure. There has been no significant changes in total employee numbers during the reporting period. A notable

Table 3 – information on employees by contract type, broken down by gender\*

Number of employees (head count)	Female	Male	Other(*)	Not disclosed	Total
Number of permanent employees (head count)	5,405	2,946			8,351
Number of temporary employees (head count)	5,287	2,918			8,205
Number of non-guaranteed hours employees (head count)	106	23			129
	12	5			17

\* Gender as specified by the employees themselves.

Most of our employees across the Group are employed on a permanent basis. Temporary employment represents a small proportion of our total workforce, as we primarily rely on long-term employment contracts to ensure stability and continuity in our operations. For the purposes of reporting in this CSD Statement, we have defined "temporary employees" as individuals who meet at least one of the following criteria:

- 1) They do not have a permanent contract with the Group;
- 2) They have a contract with a fixed duration (e.g. fixed-term

feature of the Group's workforce composition is that around 3,000 employees are customer representatives in Hungary and Romania. A very high proportion of these roles are held by female employees, contributing to the overall higher percentage of female employees within the Group. This trend reflects the local labour market demographics and the nature of these customer-facing roles in those markets. These figures are different to those included in note 9 of the financial statements to this report because the employee data above is as at 31 December 2024 compared with the average employee FTE data contained in the financial statements.

Table 2 – employee head count in countries where the undertaking has at least 50 employees representing at least 10% of its total number of employees

Country	Number of employees (headcount)
Czech Republic	302
Estonia	120
Hungary	2,150
Mexico	2,569
Poland	1,040
Romania	1,960
United Kingdom	126

The data in this table covers all entities within the Group in countries where the undertaking has at least 50 employees, representing at least 10% of its total number of employees. It includes employees on permanent and fixed-term contracts, as well as those working full-time and part-time. This dataset also includes customer representatives in Hungary and Romania, who are employed under the Group's workforce structure. The presence of a large number of customer representatives in these countries contributes to their relatively higher employee headcount, providing important context for workforce distribution across the Group. Mexico has the largest employee headcount within the Group, reflecting the scale of operations in this market.

Table 4 – information on employees by contract type, broken down by gender\*

Number of employees (head count)	Female	Male	Other(*)	Not disclosed	Total
Number of permanent employees (head count)	5,405	2,946			8,351
Number of temporary employees (head count)	5,287	2,918			8,205
Number of non-guaranteed hours employees (head count)	106	23			129
	12	5			17

employment contracts with a specified end date). This definition ensures that our reporting aligns with ESRS S1-6 requirements, while also reflecting the employment structures used across the jurisdictions in which we operate.

The total number of employees who left the Group in 2024 was 2,562 and the rate of employee turnover in the reporting period was 29.2%.

#### **h. Disclosure Requirement S1-7 – Characteristics of non-employees in the undertaking's own workforce**

Total number of non-employees in own workforce

Metric	Unit	Total
Total number of non-employees in own workforce	Head count	12,139

#### **Classification of non-employees**

- Czech Republic:** Customer representatives are classified as self-employed individuals.
- Poland:** Customer representatives operate as civil contractors.
- Mexico:** Customer representatives are engaged as commission agents.

This classification aligns with local legal and contractual frameworks, ensuring compliance with regional employment regulations while reflecting the diverse nature of workforce engagement across different markets.

#### **i. Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue**

0% of employees are covered by collective bargaining agreements globally.

In the European Economic Area (EEA), the Group has no collective bargaining agreements in place. Outside the EEA, 0% of employees are covered by collective bargaining agreements.

Country	% of employees covered by workers' representatives for each EEA country
Czech Republic	0%
Estonia	0%
Hungary	0%
Mexico	0%
Poland	0%
Romania	0%

The Group has no agreements in place for representation by a European Works Council, a Societas Europaea Works Council or a Societas Cooperativa Europaea Works Council.

#### **j. Disclosure Requirement S1-9 – Diversity metrics**

##### **Gender diversity at top management Level**

In preparing the disclosure on gender at top management, we have used the definition of top management as one and two levels below the administrative and supervisory level. The gender distribution within this group is as follows:

Metric	Unit	Total
Number and percentage at top management level by gender	Head count (%)	88 (100%)
Female	Head count (%)	29 (33%)
Male	Head count (%)	59 (67%)
Other gender	Head count (%)	0 (0%)
Not reported	Head count (%)	0 (0%)

#### **Age distribution of employees**

Our workforce is composed of employees across different age groups. The distribution is as follows:

Metric	Unit	Total
Distribution of colleagues by age groups	Head count (%)	8,351 (100%)
< 30 years	Head count (%)	1,038 (12.4%)
30-50 years	Head count (%)	5,443 (65.2%)
> 50 years	Head count (%)	1,870 (22.4%)

#### **k. Disclosure Requirement S1-10 – Adequate wages**

We confirm that no employee within the Group is paid below an adequate wage. This aligns with our commitment to fair and responsible employment practices, ensuring financial security and wellbeing for our workforce.

#### **l. Disclosure Requirement S1-11 – Social protection**

In the markets where we operate, Group employees are entitled to social protection measures mandated by national laws. These include:

- Sickness benefits:** All employees in our markets (Mexico, UK, Czech Republic, Poland, Hungary, Romania, Australia, Latvia, Lithuania, and Estonia) are entitled to income support during periods of illness, provided through national health insurance schemes or equivalent programmes.
- Unemployment benefits:** Employees are covered by statutory unemployment insurance programmes in all markets, ensuring income support during periods of job loss.
- Parental leave:** All markets offer statutory parental leave programmes, providing income support during maternity, paternity, or parental leave periods.
- Employment injury and acquired disability benefits:** Employees are protected through mandatory workers' compensation schemes or equivalent programmes that cover workplace injuries or disabilities.
- Retirement benefits:** Employees are enrolled in government-provided pension schemes in all markets.

#### **m. Disclosure Requirement S1-12 – Persons with disabilities**

Metric	Unit	Total
Percentage of persons with disabilities amongst employees	Head count (%)	124 (1.5%)

We are committed to fostering an inclusive workplace that supports diversity and equal opportunities for all employees, including persons with disabilities.

- As part of our reporting under Disclosure Requirement S1-12, we disclose the percentage of employees with disabilities, subject to legal restrictions on data collection in different jurisdictions.
- We ensure compliance with national laws and definitions of disability across the markets in which we operate, recognising that legal definitions may vary.
- Where possible, we monitor and track disability representation in our workforce to inform policies and initiatives aimed at enhancing accessibility, inclusion, and workplace support.

#### **n. Disclosure Requirement S1-13 – Training and skills development metrics**

The Group does not collate data on the average number of training hours per employee and by gender.

Metric	Unit	Total
Employees that participated in regular performance and career development reviews by gender	%	52%
Female	%	45.5%
Male	%	63.9%
Other gender	%	0%
Not reported	%	0%

#### **o. Disclosure Requirement S1-14 – Health and safety metrics**

Metric	Unit	Total
Percentage of employees in own workforce covered by a health and safety management system based on legal requirements and/or recognised standards or guidelines	%	100%

All IPF home credit businesses (Poland, the Czech Republic, Hungary, Romania, and Mexico) are accredited with the ISO 45001 Occupational Health and Safety Management Standard. All IPF Digital businesses adhere to local health and safety legal requirements. All markets undergo safety management system assessments to monitor compliance with the Group's health and safety protocols.

Metric	Unit	Total
Number of fatalities as a result of work-related injuries and work-related ill health	Fatalities	0

Metric	Unit	Total
Rate of recordable work-related accidents	Number of injuries/hours worked	1.1
Number of recordable work-related injuries	Number	302

This was calculated using industry standard:

Total recordable incident rate = Number of incidents x 200,000 / total number of employee/customer representative hours worked in a year.

Metric	Unit	Total
Number of cases of recordable work-related ill health among employees in own workforce	Number	0

Based on the nature of our operations, which involve office-based work and home visits to provide financial services without exposure to hazardous substances or conditions, we have not recorded any cases of reportable work-related ill health in the reporting period.

Metric	Unit	Total
Number of days lost to work-related injuries and fatalities among colleagues in own workforce	Days	1,529

Metric
Number of fatalities as a result of work-related injuries and work-related ill health of other workers working on undertaking's sites is zero.

#### **p. Disclosure Requirement S1-15 – Work-life balance**

Below are our family-related leave metrics for 2024:

Metric	Unit	Total
Number of employees entitled to take family-related leave	%	98%

Metric	Unit	Total
Percentage of entitled employees that took family-related leave by gender	%	21%
Female	%	26%
Male	%	14%
Other gender	%	0%
Not reported	%	0%

These figures demonstrate our commitment to supporting employees with family-related responsibilities through accessible and inclusive leave policies.

#### **q. Disclosure Requirement S1-16 – Remuneration metrics (pay gap and total compensation)**

Metric	Unit	Total
Annual total remuneration for the undertaking's highest paid individual	GBP	2,349,609
Median annual total remuneration	GBP	11,198
Annual total remuneration ratio	Ratio	209.82
Gender pay gap percentage	%	37.98%

#### **r. Disclosure Requirement S1-17 – Human rights impacts**

##### **Discrimination and complaints**

Metric	Total
Total number of incidents of discrimination and harassment reported in 2024	3

In 2024, the Group received and addressed three reported incidents of discrimination. We are committed to fostering a culture of inclusion, respect and fairness, and ensure that all reported incidents are thoroughly investigated and addressed appropriately.

#### Details of reported incidents

##### 1. Gender discrimination complaint:

- A customer representative stated that she felt discriminated against by a customer who complained about her breastfeeding during a home visit. The customer representative viewed this as gender discrimination.

- Outcome: Discussions were facilitated between the customer representative and the customer to acknowledge their respective concerns and mediate the situation. Management received guidance on handling feedback related to such situations and were advised to consult HR before taking any action in similar cases.

##### 2. Inappropriate remarks by a manager:

- A manager referred to women in a negative manner. Following an investigation, the manager received a written disciplinary warning in accordance with Group policy.

##### 3. Sexual harassment allegation:

- A claim of sexual harassment was investigated. However, due to insufficient evidence, the claim could not proceed, and no sanctions were imposed.

We take all allegations of discrimination seriously and are committed to addressing such issues through appropriate measures, including investigations, disciplinary actions, and employee support.

Metric	Total
Number of complaints filed through channels for own workforce to raise concerns	165

Metric	Unit	Total
Total amount of fines, penalties, and compensation for damages as result of reported incidents and complaints	GBP	0

#### Severe human rights incidents

Metric	Total
Number of severe human rights incidents connected to the undertaking's workforce	0

Metric	Unit	Total
Total amount of fines, penalties and compensation for damages severe human rights incidents connected to the undertaking's workforce	GBP	0

#### Entity-specific disclosure: Access to financial services

Through the DMA process, the Group has identified access to financial services as a material sustainability topic. This pertains to our role in providing financial products to underserved communities that are often overlooked by traditional banking institutions. Our commitment to offering personalised services and maintaining high ethical standards aligns with our strategy to promote financial inclusion.

In accordance with ESRS, particularly ESRS 2 on General Disclosures, we recognise the importance of reporting on material sustainability matters, including those self-identified through our DMA. Our approach to addressing access to financial services includes:

- Strategy and business model: Integrating financial inclusion into our core business strategy to reach underserved populations.
- Products and channels: Establishing products and policies that guide our efforts in extending financial services to marginalised communities.
- Performance measurement: Monitoring and assessing the effectiveness of our initiatives regularly through key performance indicators related to customer outreach and satisfaction among underserved groups.

By focusing on access to financial services, we aim to create positive social impacts while identifying opportunities for business growth, thereby fulfilling our sustainability commitments.

We have taken advantage of the transitional provision in ESRS 1 relating to entity-specific disclosures. Accordingly, we have prepared disclosures that are consistent with those reported in the prior year. These can be found in the customer section of this report on pages 50 to 52. Over the coming years, we will evolve our disclosures relating to access to financial services.

# Independent Limited Assurance Report to the Directors of International Personal Finance Plc

We were engaged by International Personal Finance Plc (the 'Company') to perform a limited assurance engagement in respect of the Corporate Sustainability Reporting Directive ('CSRD') Statement for the year ending 31 December 2024 as presented on pages 123 to 150 of the Annual Report and Financial Statements, hereafter referred to as the "CSRD Information".

#### Directors' responsibilities

The Directors of Company are responsible for:

- developing, implementing and reporting the double materiality assessment process to identify the information reported in the CSRD Statement in accordance with the European Sustainability Reporting Standards (the 'ESRS') and for disclosing this process in the CSRD Statement;
- preparing, measuring, fairly presenting and reporting the CSRD information included in the CSRD Statement in accordance with the applicable criteria of the EU Directive 2022/2464 which includes complying with the ESRS;
- designing, implementing, and maintaining systems, processes and internal controls necessary for the preparation and presentation of the CSRD Information that is free from material misstatement, whether due to fraud or error;
- maintaining adequate records for preparing and to support the CSRD Information;
- the contents and disclosures contained within the CSRD Information.

#### Our independence and quality management

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We apply the International Standard on Quality Management (UK) 1 *Quality Management for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements*. This requires us to design, implement and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the CSRD Information is free from material misstatement, whether due to fraud or error;
- evaluating whether the overall presentation, structure and content of the CSRD Statement achieves fair presentation in accordance with ESRS and the double materiality assessment carried out by the Company to identify the information reported is in accordance with the description set out in the CSRD Statement; and
- forming and reporting an independent conclusion, based on the procedures we have performed and the evidence we have obtained.

We conducted our limited assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (Revised) *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ISAE 3000') issued by the International Auditing and Assurance Standards Board ('IAASB').

#### Summary of work performed

The procedures we performed, and our determination of the nature, timing and extent of these procedures, was based on our professional judgement, including the assessment of the risks of material misstatement of the CSRD Information, whether due from fraud or error. Our procedures did not extend to any elements outside of the CSRD Information. The procedures included, but were not limited to:

- performing risk assessment procedures to understand the Company and its environment, the relevant internal controls, the underlying CSRD Information and other engagement circumstances, including the Company's reporting boundary and its value chain;
- obtaining an understanding of the Company's double materiality assessment process by performing inquiries to understand the source of information used by management; inspecting the Company's internal documentation of this process; and evaluating whether the evidence obtained from our procedures about the Company's process is consistent with the description of the process set out in the CSRD Statement;
- inquiring of management and others within the Company to understand the CSRD Information and the criteria used for measurement and evaluation;
- performing limited substantive testing of the CSRD Information including agreeing arithmetical accuracy of calculations and agreeing data points and disclosures to underlying records to check that the CSRD Information had been appropriately evaluated or measured, recorded, collated and reporting; and
- evaluating the overall presentation, structure and content of the CSRD Statement.

The procedures we perform in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we do not express a reasonable assurance opinion about whether the CSDR Information has been prepared, in all material respects, in accordance with the applicable criteria.

Our engagement was planned and performed to obtain limited assurance, but not absolute assurance, regarding whether the CSDR Statement is free from material misstatement, whether due from fraud or error. Therefore, there is an unavoidable risk that some material misstatements may not be detected by this engagement even though it is properly planned and performed. Furthermore, such a limited assurance engagement is not designed to detect matters that are immaterial to the CSDR Information.

For the avoidance of doubt, our work did not involve an audit of the CSDR Information. Consequently, our conclusion is not expressed as an audit opinion.

## Subject matter information

The subject matter information within the scope of this engagement comprises the CSDR Information. The CSDR Information does not include comparative information in respect of prior periods.

## Applicable criteria

The criteria applied in the preparation of the CSDR Information is the ESRS which are publicly available on the EFRAG website. The CSDR Information should be read together with the criteria.

## Inherent limitations

Non-financial information is subject to more inherent limitations than financial information given the absence of a significant body of established practice on which to draw, the characteristics of the underlying subject matter and the methods and precision used for measuring or evaluating it.

## Other information

We have not performed any assurance work nor express any conclusion on any other information accompanying the CSDR Information, or elsewhere disclosed directly or indirectly by the Company. We have read other information that accompanies or contains the CSDR Information to identify material inconsistencies, if any, with the CSDR Information or our limited assurance report. For the avoidance of doubt, the other information that accompanies the CSDR Information prepared by the Company may include comparative information which is not the subject of this engagement and/or additional sustainability disclosures not made in accordance with reporting obligations under the CSDR. We do not express a conclusion or other form of assurance on other information presented with the CSDR Information that is not subject to our limited assurance engagement.

## Limited assurance conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Company's CSDR Information for the year ending 31 December 2024 has not been prepared, in all material respects, in accordance with the applicable criteria, including:

- the double materiality assessment process to identify the information reported is in accordance with the description set out in the "disclosures on the materiality assessment process" section on pages 133 to 135 of the CSDR Statement; and
- the CSDR Information included in the CSDR Statement is fairly presented in compliance with the disclosure requirements of the ESRS.

## Use of our report

This report is made solely to International Personal Finance Plc, as a body, in accordance with the terms of our engagement letter dated 19 December 2024. Our limited assurance engagement has been undertaken so that we might state to International Personal Finance Plc those matters we are required to state to them in an independent limited assurance report and for no other purpose. The assurance report has been issued on the basis that it must not be recited or referred to or disclosed, in whole or in part, in any other document or to any other party without our express written permission.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than International Personal Finance Plc for our work, for the limited assurance report, or for the conclusion we have formed.

PKF Littlejohn LLP  
Chartered Accountants

London

26 February 2025